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Functional Foods Examined

The health claims being made for food products
and the need for regulation

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Functional Foods Examined

Summary

This report examines food products which claim, or imply, that they possess a health or nutritional benefit to the consumer. These include the recently-promoted ‘functional’ foods — such as those with added bacterial cultures, fish oils or soluble polysaccharides supposedly of benefit to the eater — as well as foods which have for some time been promoting themselves as having the benefit of added nutrients or being a rich source of certain nutrients.

That a food product should claim, or imply a claim, to be of specific health or nutritional benefit is of concern to consumer and public health organisations for several reasons. Firstly, the claim may be misleading in that the supposed benefit may not easily be obtained from the product in practical use: the present survey found that most products did not appear to have been tested to ensure that they actually imparted any health benefits to the consumer. Adding fish oil to white bread, for example, was only justified by reference to evidence about the benefits of eating diets that included oily fish, while the addition of soluble fibre to a soft drink was justified by reference to reports which, when examined, urged that dietary fibre be consumed in its original food and not in extracted forms.

Secondly, the supposed health benefit may lead to confusing messages about the nature of a healthy diet. Using the same two examples, when white bread contains fish oil or soft drinks contain dietary fibre, the attempts by health educators to encourage more oily fish consumption, or wholegrain cereal consumption can be undermined. The problem of ‘junk with added nutrients’ is that the nutritional messages about the value of foods become confused, and attempts to improve diet substantially undermined. The problem is further exacerbated if the nutritional profiles of similar foods differ: for example the vitamin levels added to breakfast cereals may vary from zero to double or treble the commonest levels. In other cases foods were claiming to be a ‘good source’ of nutrients which were not intrinsically present in the food but had been added, creating further confusion about the nature of a healthy, balanced diet.

Thirdly, the foods making the claim may be embedding their supposed beneficial element in a product of poor nutritional quality — a product high in fat and saturated fat, sugar or salt may be

promoted as beneficial to health when in fact such foods should be restricted to only a small part of the diet if eaten at all. The survey found examples of fatty snack foods being promoted as ‘a source of fibre’, a sugar-rich spread for bread bearing a claim that it was a source of calcium, and squashes and sweetened drinks being promoted as containing ‘essential’ vitamins.

Fourthly, there are potential safety concerns when nutrients that are hazardous to sections of the population if consumed at high levels are being added and/or promoted as beneficial without concurrent warnings. An example of this is found with vitamin A, which is added to some products and promoted in several others, encouraging consumption at levels that, if consumed by a pregnant woman, may increase the risk of birth defects.

In Japan, manufacturers wishing to make specific health claims for their food products must submit the product to extensive testing, as medicines must be tested here. In the USA a restricted list of claims is permitted, for use only with a restricted list of foods. In the UK neither type of restrictive control system prevails and there is some concern that health claims being made for foods are getting out of hand. When the UK Ministry of Agriculture, Fisheries and Food’s advisory body, the Food Advisory Committee (the FAC), last considered the issue of health claims on food labels in 1990 they made a series of recommendations. These were reviewed in 1992 and an official government response published that year. The government rejected two key recommendations, and only accepted the remainder subject to expected European legislation on the issue. European legislation has not been forthcoming and the government has now requested the FAC to reconsider its recommendations.

In the light of the evidence found in the present survey, this report urges the FAC to re-affirm the principles that lay behind its earlier recommendations. To ensure the best consumer protection, only those health claims which assist the public in choosing a healthy diet — such as the diets promoted by the Health Education Authority, reflecting the consensus view of healthy eating — can be considered to serve a useful purpose. Any other health claims — such as the cholesterol-lowering and immune system boosting claims made for bacterial cultures — should be considered to be medicinal claims and should require the same quality of evidence as a medicinal product must provide. The fortification of food products should be the subject of a Department of Health expert review and any claims and promotions on the basis of fortification should be strictly limited.

Introduction

The term functional food has no legal definition in the UK and is in fact a marketing term which won out against competition from such terms as ‘pharma food’ and ‘neutraceutical’. It is a

marketing device which offers 'exciting opportunities to food manufacturers and retailers to add value and differentiate their products'¹.

Japan is credited with introducing the concept of functional foods with the launch of Fibe Mini (a fibre enriched soft drink) from Otsuka Pharmaceutical in 1988². Products claiming to be functional foods are now appearing on the supermarket shelves in the UK, both home-grown and imported. As yet there is no consensus on a definition for what constitutes a functional food. Some definitions include:

- *'...foods that perform a specific role in the body. They are not pills or supplements, but everyday food'* (*Supermarketing*, 21 February 1992).
- *'Functional foods are similar in appearance to conventional foods and are intended to be consumed as part of a normal diet, but have been modified to subserve physiological roles beyond the provision of simple nutrient requirements'* (National Food Authority, Australia, 1994).

Food with added nutrients — fortified foods — have been with us for many years. Indeed, it is compulsory to fortify flour and margarine to compensate for the loss of nutrients during processing. Recently however there has been a rash of products adding other, relatively novel ingredients to food not used as a vehicle before, such as fibre added to soft drinks, fish oil added to bread and human gut bacterial cultures added to dairy foods.

Range of foods

'Functional' foods may have bacterial cultures, fibre (soluble and insoluble), fish oil, added vitamins and minerals or herbal extracts. What differentiates them from other products, or foods, is that these ingredients are used to make, or imply, a health claim. Claims can vary from a stated direct physiological effect — tantamount to a medicinal claim — to an indirect, implied claim which may simply be contained in the name of the product (for example Rio Amazon Guarana Breeze Energy Drink) or may be implied by the declaration of added nutrients (for example 'with vitamins ACE').

Adding vitamins and minerals, particularly to breakfast cereals, is a familiar concept. However, the range of foods to which vitamins and minerals are added has been growing, with a vitamin and iron mix being added to tinned pasta and dairy products, and the addition of one or more of the natural anti-oxidants, vitamins A, C, E and beta-carotene, to other products such as soft drinks.

The government has advised that we increase our fibre intake and the food industry has responded by making a 'high fibre' claim for products which are naturally high in dietary fibre, but also by adding fibre to soft drinks, yoghurts, breakfast cereals and white bread.

A reported possible link between consumption of oily fish and reduced rates of coronary heart disease was followed by fish oils, which are rich in omega 3, being added to margarine/spreads, bread, biscuits and cakes. The implied or stated claim is made that by eating these products you can reduce your risk of coronary heart disease (CHD).

Bio yoghurts, first introduced into the UK in the late 80s, usually contain *Bifidobacterium bifidum* and/or *Lactobacillus acidophilus* which are said to 'aid digestion'. With the overall UK market for yoghurt static, but with an increase of 22% in the 'bio' sector in the last twelve months, there is clearly an incentive for manufacturers to come up with new bio products³. Within the last 12 months we have seen the introduction in the UK of Gaio, LC1 and Yakult all claiming to be using specially developed bacterial cultures.

Functional foods, according to John Young of Leatherhead Food RA, are the third generation of 'health' foods to hit the European market. He believes that the food industry responded to consumer concerns about healthy eating by firstly removing ingredients such as fat, sugar and salt, which were perceived as unhealthy. Then the consumer demand for additive-free food led to the removal of certain ingredients, such as preservatives, which were perceived as unnatural. The development of functional foods was the 'next logical step to satisfying the consumer's growing desire for a healthier diet'⁴.

Sales of this latest wave of foods with added 'functionality' are estimated at \$3 billion in Japan and \$3 billion in Europe and North America. A conservative prediction is that sales could reach 5% of total food expenditure, a global market of \$100 billion, with Western Europe accounting for \$30 billion of that⁴. The main health risks thought to be influenced by diet are cardiovascular disease, obesity, diabetes and cancer. Symptomatic and predisposed individuals represent a

large proportion of the population, and are thus seen by manufacturers as a large potential market for functional foods⁴.

As a result of earlier concerns about health claims, the Food Advisory Committee (FAC) made recommendations in 1990 for tighter control over food labelling. None of these have been acted upon, and instead the government has urged the FAC to review its recommendations, particularly in the light of the government's policy of deregulating industry. The present report has been undertaken to examine how many products are now making claims, what those claims are, and to which sorts of products they are being attached. The survey was carried out in supermarkets, not specialist shops, and reflects what was available to the average consumer between January and April.

Legislation on claims

Legislation in the UK

At present there are no specific controls on functional foods. Unless they are medicinal products within the meaning of the Medicines Act with a medicinal product licence, they come under the same legislation that covers other foods. The Food Safety Act 1990 makes it an offence to render food injurious to health, and an offence to sell, or keep for eventual sale, food that *inter alia*: is falsely described or misleadingly presented, advertised or labelled. The Food Labelling Regulations 1984 set out the labelling requirements which apply to most prepacked food. They also cover certain claims made, either on the label or in advertisements, which extend the general provisions in the Food Safety Act and Trade Descriptions Act on misleading descriptions, the general rule being that label information, and claims, must be true and not misleading.

In addition there are specific requirements in respect of health claims. The Food Labelling Regulations prohibit an express or implied claim, in labelling or advertising, that a food is 'capable of preventing, treating or curing human disease'. Disease is interpreted as 'any injury, ailment or adverse condition, whether of body or mind'. A claim of this nature would be a medicinal claim and to carry such a claim, the food must have a product licence issued under the Medicines Act. In practice, licences are not usually issued for products which are mainly foods. The borderline between health claim and medicinal claim is unclear because the Food Labelling Regulations are not explicit: they ban only absolute medicinal claims. If a qualification is inserted, for example: 'this food may help reduce the risk of heart disease', a view must be formed whether an implied medicinal claim, covered by the Regulations, has been made. In practice, manufacturers and advertisers distance themselves still further by not mentioning a specific disease, for example 'helps reduce cholesterol levels when eaten as part of a low fat diet'. Whether this type of claim breaches the Regulations is a matter of opinion as the dividing line between implied medicinal claims and health claims is unclear⁵.

The Medicines Control Agency issued an updated *A Guide to what is a Medicinal Product*⁶ in December 1995, which sought to update their advice on whether a product is medicinal or not. Their criteria for what might constitute a medicinal claim are discussed on pages 26-29, but it is clear from these guidelines that the examples such as 'may help to reduce cholesterol' or 'boosts the immune system' would appear to fall within the guidelines for a medicinal claim. Besides the regulations on claims, the functional ingredient itself must be safe. If the functional food is a novel food or contains a novel ingredient, the company may apply for safety clearance by submitting a dossier of evidence to the Advisory Committee on Novel Foods and Processes.

This is currently voluntary, although a similar approval procedure will become mandatory once the draft European Council Regulation on Novel Foods and Novel Food Ingredients is adopted⁷.

FAC Review of Food Labelling

In 1989, a comprehensive review of food labelling was announced by the then Parliamentary Secretary at MAFF, David Maclean. It was to be carried out by the Food Advisory Committee (FAC), and would, in the words of David Maclean 'provide industry and consumers...with an independent assessment of our current food labelling legislation and practices and how these can best be developed to give consumers what they need and want to know'⁸. The FAC were asked to look particularly at eight issues including, 'whether and, if so, what controls should be introduced for claims beyond those already in place'.

The FAC looked at the general principles that they thought should apply to all claims and gave detailed consideration particularly to the area of medicinal and health claims. They felt that the borderline between the two was unclear leading to concerns that some manufacturers might be exploiting the public's interest in health, while the public themselves were unsure of the validity of the claims being made⁵. The FAC's report was published in 1990 and the Government's initial response published in April 1991. The report was sent out for further consultation and the Government published its final response along with the amended FAC recommendations in August 1992²³. The recommendations and responses applicable to claims is set out in table 1. Text underlined in the second column is additional advice from the FAC following the government's consultation on the 1990 report.

Table 1 FAC recommendations and government response

FAC Recommendations	Government's Final Response August 1992
Claims - General Principles	
21. a) a food must be able to fulfil the claim being made for it and adequate labelling information must be given to show consumers that the claim is justified	<p><u>The FAC also decided to recommend, without reversing the burden of proof, that manufacturers should be required to be able to produce for enforcement purposes information substantiating any claims, and that such information as is appropriate should also be available to any interested parties, including consumers.</u></p> <p>The Government accepts these recommendations and will urge the European Commission to propose legislation along these lines.</p>
Medicinal and Health Claims	
Medicinal Claims	
22. We recommend that the present law regarding direct medicinal claims should be maintained	Accepts recommendation
23. We recommend that claims relating to a deficiency disease which is virtually non-existent in the European Community should be prohibited	Accepts recommendation
Health Claims	
We believe that health claims should only be permitted if they can be justified in relation to any recommendations that have been made of supported by the Chief Medical Officer	<p><u>The FAC's additional advice took account of the view of some consumer groups that health claims should be banned, and indicated that the Committee was minded to recommend an even greater limitation on these types of claims. It suggested that more stringent controls, or a ban, might be considered.</u> The Government has considered carefully the Committee's advise. Whilst it shares the Committee's concerns about the potentially misleading nature of some health claims, it also believes that others may help consumers to choose healthier diets. Additional controls are therefore considered to be the way forward at this stage rather than a ban, which would in any case need to be agreed within the EC. The Government also believes that there would be considerable practical difficulties in operating the FAC's original recommendation. It has therefore decided that health claims should be permitted subject to the existing law on misleading labelling and advertising and to the Committee's additional principles for the control of general claims (Recommendation 21), including the requirement to be able to produce supporting information, together with the additional principles for health claims (Recommendation 25). These proposed new controls will be taken forward as appropriate with the European Commission</p>
25. In addition we considered what principles might be used to control permitted health claims and recommend that:	
a) the claim must relate to the food as eaten rather than to the general properties of any of the ingredients	Accepts recommendation
b) a food when consumed in normal dietary quantities, must be able to fulfil the claim being made for it and adequate labelling information must be given to show consumers that the claim is justified	Accepts recommendation

c) the label should give a full description of the food to ensure that selective claims, even if true, do not mislead and any claim should trigger full nutritional labelling (at least the group of eight nutrients in the EC Nutritional Labelling Rules Directive)	Accepts recommendation
d) the role of the specific food should be explained in relation to the overall diet and other factors	Accepts recommendation
Health Endorsement of Food	
26. i. We recommend that health endorsement schemes should not be permitted and that the Government consider other ways to achieve dietary change by improving basic nutrition education and explaining its relationship with health	In the light of the decision that health claims should continue to be permitted, the Government has decided that endorsement schemes should not be banned but that the operation of such schemes should be kept under review
26. ii. We recommend that all health endorsements by individuals (testimonials) making reference to possible disease risk factors or more generally to what a food can do to improve or maintain health should be banned	The Government accepts this recommendation. Any prohibition can however only apply to testimonials that are contained in the labelling or advertising of a specific foodstuff. Such action will however need to be agreed at EC level

Source: MAFF 1992²²

What happened to the FAC recommendations?

As can be seen from the table above, two of the main recommendations were rejected by the government in favour of making no changes to previous legislation. The remaining recommendations were accepted subject to a European Directive covering labelling — a Directive which has failed to materialise and is unlikely now to do so. As a result, none of the FAC's recommendations have been implemented. The law on health claims remains the same as it was before the FAC undertook its original review.

Aware of the increase in the number and range of foods making health claims, the Ministry of Agriculture, Fisheries and Food (MAFF) entered into talks with industry about what, if anything, needed to be done in the way of controlling these claims. This consultation was extended to encompass representatives from consumer groups, Trading Standards Officers, and the Leatherhead Food Research Association, and the consultation exercise was generally understood to have led to an agreement that controls were needed, although manufacturers would prefer that these were voluntary rather than statutory. The paper that MAFF produced as result of their consultations, and which was presented to the FAC for their consideration on 8 February 1996, concluded that in the 'absence of a strong case for new regulation' they suggested that the FAC should examine the possibility of an informal mechanism for assessing claims⁹. The FAC 'broadly accepted the paper, while emphasising that it would keep an open

mind as to the action needed' ¹⁰. MAFF have now circulated the paper they presented to the FAC for further comment, and the Food Commission is making comments on the basis of this report in response.

Legislation in the USA

In response to the increasing use of health claims on food the USA Congress enacted the Nutrition Labelling and Education Act (NLEA) in 1990 which directed the Food and Drug Administration (FDA) to set pre-market approval standards for health and nutrition claims for foods. In January 1993, the FDA issued in the Federal Register their rules for implementing NLEA which included permission for the use of health claims on food labels providing they are supported by valid and substantial scientific evidence, and are only those claims that FDA has specifically provided for by regulation.

The new regulations define a health claim as including: 'any claim made on the label or in labelling....that expressly or by implication....characterizes the relationship of any substance to a disease- or health-related condition' ¹¹. These claims link the presence of a specific food component rather than an individual food. Seven model claims were approved at the time¹²:

1. Regular exercise and a healthy diet with enough calcium helps teens and young adult white and Asian women maintain good bone health and may reduce their high risk of osteoporosis later in life.

To carry this claim, a food must contain 20% or more of the Daily Value for calcium per serving, have a calcium content that equals or exceeds the food's content of phosphorous, and contain a form that can be readily absorbed and used by the body. A product that contains 40% or more of the Daily Value must state on the label that total intake of greater than 200% of the Daily Value (2,000 mg) has no known benefit.

2. Diets low in saturated fat and cholesterol and rich in fruits, vegetables, and grain products that contain some types of dietary fibre may reduce the risk of heart disease, a disease associated with many factors

The food must contain, without fortification, at least 0.6g soluble fibre per serving.

3. Low fat diets rich in fiber-containing grain products, fruits, and vegetables may reduce the risk of some types of cancer, a disease associated with many factors.

4. Development of cancer depends on many factors. A diet low in total fat may reduce the risk of some cancers.

To carry this claim, a food must meet the descriptor requirements for 'low-fat' or, if fish and game meats, for 'extra lean'.

5. While many factors affect heart disease, diets low in total fat and cholesterol may reduce the risk of this disease.

The food must meet the definition 'low saturated fat', 'low-cholesterol', and 'low fat', or, if fish and game meats, for 'extra lean' to carry this claim.

6. Low fat diets rich in fruits and vegetables (foods that are low in fat and contain dietary fiber, vitamin A, or vitamin C) may reduce the risk of some types of cancer, a disease associated with many factors.

7. Diets low in sodium may reduce the risk of high blood pressure, a disease associated with many factors.

More recently, a claim about the relationship between intake of folic acid and the risk of neural tube defects has been authorised.

The claims are only allowed on foods which meet strict nutritional standards established by the FDA, and are intended by their wording to help educate the public about the relationship between diet and disease.

Parts of the food industry are unhappy with the new rules on health claims. According to Bruce Silverglade of the Washington based Center for Science in the Public Interest they 'had hoped that the FDA would authorise product-specific claims that could provide companies with a unique market advantage'¹³. They are claiming that the NLEA pre-market authorisation process violates the First Amendment of the Constitution because it interferes with rights on free speech. The first of five lawsuits attempting to challenge the constitutionality of the NLEA failed in August 1995.

Legislation in Japan

In July 1991 a new category of foods, Foods for Specified Health Use (FOSHU) was introduced under the Nutritional Improvement Law, in an attempt to regulate the rapidly expanding market for functional foods. FOSHU products are defined as ‘foods which are, based on the knowledge concerning the relationship between foods or food components and health, expected to have certain health benefits, and has been licensed to bear a label claiming that a person who uses them for specified health use may expect to obtain the said health benefits through the consumption thereof’¹⁴. To obtain a licence as a FOSHU food from the Ministry of Health and Welfare, the product in question is subjected to a comprehensive examination and must meet strict criteria:

- Contribution to the improvement of dietary life and the maintenance and enhancement of health can be expected.
- The health benefits of the food or relevant components of the food should be substantiated with medical and nutritional evidence.
- Appropriate amount of consumption should be definable for the food or relevant components based on medical and nutritional knowledge.
- The food or relevant components should be safe as judged from experience
- The relevant components should be well-defined in terms of:
 - a) physiochemical properties and analysis methods, and
 - b) methods of qualitative and quantitative analysis.
- The composition of the product should not be notably defective in comparison with the composition of nutritive components which are normally contained in similar types of foods.
- The product should be of a kind of foods that are consumed in ordinary dietary patterns, rather than those consumed only occasionally
- the product should be in a form of ordinary foods, other than pills, capsules, etc.
- The food and relevant components should not be those exclusively used as medical drugs. Food manufacturers are not permitted to make health claims unless their product is certified as FOSHU. The evaluation process is expensive and time-consuming and the new system was initially viewed with scepticism by the industry. However, the increase in sales that results from

approval has led to an increase in the numbers of products seeking certification, with 58 products licensed to carry the official logo and a health claim by October 1995.

Food Commission Survey

For the purposes of this survey, we included all health claims whether stated or implied, and whether the claim referred to an added ingredient or one which was naturally present. An attempt was made to look at all products in one branch each of Sainsbury, Tesco, Safeway, Marks & Spencer, Kwiksave, CO-OP, Gateway, Boots, and Holland & Barret. The survey was carried out over a three month period, from 10 January 1996 to 10 April 1996. Details were noted of the brand name, product name, the claim, the ingredient(s) added about which the claim was made, and the quantity present in the product (see the Appendix to this report). All products were noted down which made a claim about:

- vitamin and mineral content (intrinsic or added)
- bacterial cultures
- fibre (intrinsic or added)
- fish oils or omega 3 (intrinsic or added)
- fat composition (saturates, polyunsaturates, monounsaturates, hydrogenated fats, *trans* fats and cholesterol)
- herbal extracts
- suitability for use during exercise

The range of products for which claims were made was wide, encompassing virtually every type of food. Claims were made most often for breakfast cereals, followed by baby foods. A surprisingly large number were for meat and fish products. A summary of the product categories and numbers of products found making or implying a health claim is given in Table 2 overleaf.

Table 2 Categories of products and numbers making a health claim

Type of product	No. claiming functionality
Oats, muesli, cereals (sweet + regular)	149
Baby foods	66
Meat and poultry	56
Fatty spreads	49
Snacks, crisps, biscuits	41
Bread and cake products	37
Oils	35
Fruit juices	34
Frozen vegetables	32
Tinned fish	32
Yoghurt and yoghurt drinks	31
Dried fruit and pulses	30
Milk: fresh, UHT, evaporated, dried	22
Soft drinks: squashes	22
Soft drinks: carbonates	21
Baby drinks	20
Tinned vegetables	18
Soya foods and drinks	18
Frozen and marinated fish	16
Fruit juice drinks	14
Hot drinks	13
Sweet and savoury spreads	10
Tinned pasta	10
Flour	8
Cheese	4
Mayonnaise	4
Powder potato	4
Tinned soups	3

Source: Food Commission market research 1996

The types of claim being made or implied in the products surveyed are shown in the next table (Table 3). The majority of claims in this extensive survey were for the presence or addition of some nutritional feature, which was considered to be a health claim by implication rather than by direct association. For example, claims for the presence of vitamins or minerals, such as 'Rich in vitamin C', have been included in this survey because they imply a health benefit: although not stating that the vitamin C will benefit an individual consumer, the manufacturer is relying on consumer knowledge that vitamin C is necessary in the diet to promote a particular product. In

some cases the ingredient may be present naturally — as in fruit juice — and in others it may have been added — as in carbonated lemonade — leading to confusion as to what constitutes a well-balanced diet of foods genuinely and naturally rich in essential nutrients.

Despite the large number of foods promoting their functional advantages, only twelve products referred on their pack to scientific evidence that could underpin the benefits being claimed or implied — in seven cases no scientific reference was given, in three cases there was a reference to COMA and in two to the company's own sponsored research, and only in those two cases did the manufacturer refer to evidence showing the benefits of the product itself (evidence of the benefits of the product as sold) rather than the ingredient in general (e.g. dietary fibre or fish oil in general).

Table 3 Types of dietary benefit or claim made on products

<i>Claim</i>	<i>Number of Products</i>
Contains fish oil / High in omega 3	18
Emphasises other fats or oils	93
Low in cholesterol	22
Can lower cholesterol	6
Contains bacterial culture which improves digestion	10
Contains bacterial culture which has another physiological benefit (metabolism, dietary balance, immune system, lower cholesterol)	7
High / Added / Source of Fibre	232
Vitamin, mineral, vitamin & mineral claim	300
High / Rich in protein	92
Other claims & implied claims / isotonic / restorative	36
Total	815

Source: Food Commission market research 1996

We shall now look in more detail at some of the products and their health claims.

Omega 3

Of the 18 products we found to be making a claim regarding Omega 3 or fish oil, 15 of these contained naturally occurring omega 3 (i.e., fish and fish products). There were three products which had added fish oil:

Table 4 Added omega 3 products

<i>Product</i>	<i>Claim</i>
Pact	Enriched with essential Omega 3. For healthy hearts and minds / A pact between heart and mind (pack is heart-shaped)
Life — reduced vegetable fat spread	With added fish oil which may help maintain a healthy heart
Omega Bread	Fortified with omega 3... Healthier for the heart... Studies have shown that the special nutrients present in oil-rich fish may help maintain normal blood pressure and influence the fats in the blood in a way that is healthier for the heart. The evidence is conclusive enough for doctors and nutritionists to recommend that everyone should eat oil-rich fish regularly. Countries with a high consumption enjoy some of the lowest rates of coronary heart disease. If you can't eat enough oil-rich fish (the recommendation is a minimum of about 15g per day) you can still meet the needs of your family by choosing Heartwatch Omega Bread

Source: Food Commission market research 1996

Fibre

The vast majority of products which made a claim to be high in, or a source of, fibre were naturally so. Foods for which a fibre claim was made included bread, breakfast cereals, dried pulses and vegetables. However, we also found some high fat, high salt products which were using a fibre claim to improve the image of foods which would not necessarily be thought of as healthy, for example salted nuts, crisps and corn snacks (see Appendix).

Our survey also identified 22 products with added fibre, both soluble and insoluble forms. These are listed with the specific claim and fibre source in table 5. It should be remembered that the encouragement to eat extra dietary fibre is largely underpinned by the reports of the Committee on Medical Aspects of Food Policy (COMA) Dietary Reference Values¹⁵ and Cardiovascular

Disease²⁰, which emphasise the need to eat foods which naturally contain dietary fibre, rather than eat foods with little natural fibre but with added sources of fibre.

Table 5 Added fibre products

<i>Product</i>	<i>Claim</i>	<i>Fibre Source</i>
Ribena Juice & Fibre	Insoluble fibre helps keep your digestive system regular while soluble fibre, taken as part of a well balanced, low-fat diet can help reduce excess blood cholesterol, one of the risk factors for heart disease. Each serving contains 3 grams of fibre, two thirds of which is soluble	Fibrous extracts (from fruits, vegetables and cereals)
MD Foods Fybor orange juice with added fibre	'...we need to increase the level of fibre in our diet and Fybor provides the most convenient and refreshing way of achieving such an increase. Just one serving will ensure that 50% of your Recommended Daily Quantity of fibre is achieved. All of the fibre in Fybor is soluble fibre, which research has shown can ease digestion and be beneficial in reducing blood cholesterol levels when taken as part of a cholesterol controlled diet.'	'Natural fibre'
Sainsbury's Fruit and Fibre	Fortified with fibre.....offering the benefits of fibre	Oligofructose (soluble fibre)
Pro-fibre Fibre Hi	Enriched with soluble fibre, nature's way to reduce cholesterol	Oatflour
Müller Breakfast Bio	With fibre...	Cereal grains plus oligosaccharide
Sainsbury's Scottish porridge oats with bran	High fibre	Bran
Ryvita High Fibre Bran Enriched Cornflakes	Over twice the dietary fibre of ordinary cornflakes	Bran
Marks & Spencer Reduced Fat Crunchy Cereal	With added fibre	Split pea fibre Sugar beet fibre
Sainsbury's Wheaten Sliced Wholemeal Bread with Oats and Kibbled Grain	Twice the soluble fibre of ordinary wholemeal bread	Oatmeal, Oatbran, Oatgerm
Sainsbury's Soft Grain bread	33% more fibre than standard white bread	Kibbled rye and wheat
Marks and Spencer Vitamin Enriched Soft Grain bread	Increased fibre 30% more fibre than standard white bread	Cracked wheat and rye grains
Mighty White	Has 30% more fibre than ordinary white bread	Kibbled wheat and rye
Nimble Light White Bread	50% higher fibre	Oat bran
Tesco Healthy Eating Sliced White bread	Higher in fibre	Pea bran

Tesco Healthy Eating Sliced Wholemeal bread	Higher in fibre	Wheat bran
Heinz Weight Watchers White sliced bread	Source of fibre	Pea fibre
Heinz Weight Watchers Brown sliced bread	Source of fibre	Pea fibre
Sainsbury's Wholemeal Bran Biscuits	High fibre	Wheat bran
Granny Ann High Fibre Biscuits	High fibre	Cooked soya fibre
The Health & Diet Co. Ltd. Wholemeal Symbred	Added fibre	Wheat bran
GG Scandinavian Bran Crispbread	High Fibre	Wheat bran
Marks & Spencer Higher Fibre Reduced Sugar Digestive Biscuits	Higher fibre	Pea fibre

Source: Food Commission market research 1996

Lowering cholesterol

Our survey found seven products which claimed to be able to lower cholesterol. This type of claim might, as we discuss later in this report, be viewed under the recent Medicines Control Agency guidelines as a medicinal claim.

Table 6 Products claiming cholesterol-lowering functions

Product	Claim
MD Foods Gaio	When eaten regularly as part of a balanced, low fat diet, the Causido culture used to make Gaio can actively help to reduce blood cholesterol levels
Pro-fibe Fibre Hi	Enriched with fruit and soluble fibre, nature's way to reduce cholesterol
Quaker Oats	Can help reduce cholesterol as part of a low fat diet
Mornflake Pure Oatbran	Oatbran can help reduce cholesterol as part of a low fat diet
CO OP Goodlife Oat Bran Flakes with Raisins and Apple	Valuable source of oat bran, containing soluble fibre which can play an important role in reducing the harmful effects of excess cholesterol in the body when used as part of a low fat diet
M D Foods Fybor orange juice with fibre	All of the fibre in Fybor is soluble fibre, which research has shown can ease digestion and be beneficial in reducing blood cholesterol levels when taken as part of a cholesterol controlled diet.
Ribena Juice & Fibre	Soluble fibre, when taken as part of a well balanced, low-fat diet can help to reduce excess blood cholesterol, one of the risk factors for heart disease. Each serving ... contains 3 grams of fibre, two thirds of which is soluble

Source: Food Commission market research 1996

High in protein

Although there is no evidence that protein deficiency is a problem in the UK, our survey discovered 94 products claiming to be high in protein. According to the Committee on Medical Aspects of Food Policy (COMA) when setting Dietary Reference Values (DRVs) for protein in 1991, it was important that the Reference Nutrient Intakes (RNIs) were not overestimated as adult protein intake was on average higher than when DRVs were last set in 1979¹⁵. It was considered important because some concerns have been raised that excessive intakes of protein may be associated with health risks, including demineralisation of bone, and contribution to deterioration of renal function in patients with renal disease.

Whilst it may be possible to make a case for labelling vegetable sources of protein in order to help vegetarians ensure that they consume adequate quantities, and quality, of protein, the vast majority of protein claims (83 out of 94) were for fish and meat products (see Appendix).

Vitamin and Mineral Claims

The most common type of claim found was about vitamins and minerals — 300 products made such claims. Not all of these products contained added vitamins and minerals: some products naturally contained certain vitamins and/or minerals and promoted this fact on the packaging. However, the Food Commission found 195 products with added vitamins and/or minerals. Many of these products were designed to appeal to children, exploiting a parent's concern that their children might not be getting all the vitamins and minerals they need unless they purchase the fortified version. Some examples of such food aimed at children are shown in table 7 overleaf.

The types of claim varied from a statement drawing attention to the fact that the product in question contained specific vitamins or minerals, to supporting statements which detailed the substance's effect on the body's structure and function. For example, Del Monte Extra, a fruit juice with seven added vitamins, made a supporting statement for each vitamin: 'vitamin E helps maintain a healthy immune system, vitamin B6 helps the body use protein from the diet, vitamin B12 essential for a healthy nervous system...' etc.

In some cases, the source of the vitamin/mineral was unclear. Phrases such as 'rich in' and 'a good source of' imply that the food in question naturally contains a substantial quantity of the nutrient. It is not until the ingredient list is examined that it becomes apparent that rather than occurring naturally in the foodstuff, the vitamin/mineral has been added.

Table 7 Sweet, fatty or salty children's food promoting their added vitamins and minerals

<i>Product</i>	<i>Vitamins and Minerals Added</i>
Sainsbury's Mr Men Fromage Frais (sweetened)	Vitamins A & C
Ribena Fromage Frais, Yoghurt, Drinking Yoghurt (sweetened)	Vitamins A, D, E, C, B6
Petit Danone Super Fromage Frais (sweetened)	Iron
Bread Busters spread (sweetened)	Vitamin C
Batchelors Pastamania tinned pasta	Thiamin, riboflavin, niacin, vitamin B6, folic acid, vitamin B12, iron
HP Pasta Shapes dried pasta mix	Thiamin, riboflavin, niacin, vitamin B12, iron, iodine
Heinz Pasta Shapes tinned pasta	Niacin, iron, riboflavin, thiamin, vitamin B12
Transform-A-Snack (corn snack)	Vitamins A, B12, C, thiamin, riboflavin, niacin, folic acid
Breakfast cereals (20-40% sugars): Nestlé Kellogg's Sainsbury's Tesco Somerfield Co-op	Most add thiamin, riboflavin, niacin, vitamins B12, folic acid, iron Also vitamins B5, B6, C Also vitamins B6, C, D Also vitamins B5, B6, A, C, calcium Also vitamins B6, C, D Also vitamins B6, D Also vitamin D
Fruit flavoured sweetened squashes, e.g. Tesco, Safeway, Kids Stuff Some Ribena drinks	Vitamin C Vitamins B6, B12, C, folic and pantothenic acid
Ready to Drink sweetened fruit drinks, e.g. Robinsons, Um Bongo, Ribena	Vitamin C

Source: Food Commission market research 1996

With the exception of dried milk, the vitamins and/or minerals added to the foods were in such quantities, or of such a nature, that their inclusion could not be justified on the grounds of replacing nutrients lost during processing. Vitamin B12 is present only in foods of animal origin (with the exception of certain algae, and some bacteria which can synthesise it), and yet the survey found products with exclusively vegetable source ingredients that contained vitamin B12 in the ingredient list, including products as diverse as orange squash and tinned pasta (see table 8 overleaf). Almost all animal products are a natural source of vitamin B12 and diet-related vitamin B12 deficiency is only likely to be a problem for a small number of very strict vegetarians and vegans. What is the justification for adding vitamin B12 to so many products, many of them

aimed at children, if not to foster the impression that it is not possible to obtain sufficient nutrients without buying products with added ones?

Table 8 Vegetable products containing added vitamin B12

<p>Kellogg's All-Bran, Bran Buds, Sultana Bran, Special K, Sustain, Multi-grain Start, Crunchy Nut Cornflakes Sainsbury's Bran Flakes, Sultana Bran, Nestlé Fibre 1 Heinz Weight Watchers Perfect Balance Allinson Tropical Break Wholeflakes Safeway Fibre Bran, Fruit and Fibre, Bran Flakes, Honey and Nut Cornflakes, Cornflakes, Rice Crunchies, Coco Crunchies, Frosted Flakes Tesco The Flintstones Breakfast Boulders, Frosted Flakes, Crisp Puffed Rice, Scotch Pops, Chocolate Smilers, Cocoa Puffs, Cocoa Crunchies, Wild Ones, Cocoa flakes, cookie Crisp, Golden Puffs, cornflakes, Honey and Nut Cornflakes, Fruit & Fibre, Healthy Eating Bran Flakes, Healthy Eating Sultana Bran Somerfield Cornflakes, Basic Cornflakes, Bran Flakes Co-op Choc & Nut Cornflakes, Cornflakes, Honey Nut Cornflakes</p>
<p>Red Bull Energy Drink Purdey's Elixir Vitae, Gold High Energy Ribena Spring and No Added Sugar Spring Ame regular and Red Novacrest Celeste Pro'Elixir</p>
<p>Plamil Concentrated Soya Milk</p>
<p>Red Mill Transform-A-Snack corn snacks</p>
<p>Marks & Spencer Vitamin Enriched Soft Grain Bread Mighty White white bread Tesco Healthy Eating Sliced White and Wholemeal Bread</p>
<p>Wells No Added Sugar MultiVit Orange Juice Drink Del Monte Extra orange juice</p>
<p>Matthew's Foods Pure dairy-free margarine</p>

Source: Food Commission market research 1996

Problems for consumers

Safety

We found several hundred products with added vitamins and minerals, many of them foods for children. The quantity of added vitamins varied, with some containing an entire day's Recommended Daily Amount (RDA) in one serving. This is particularly important if the RDA used is that for adults, and the product is one which is likely to be consumed by children, such as Ribena Juice Drinks which contained the adult RDA for vitamin C (60mg / day) in one 250ml carton, or Libby's Um Bongo fruit juice drink with 60mg in a smaller 200ml carton.

Excess intake of vitamin C may pose little threat, but this is not the case for some other nutrients. The adult RDA for vitamin A is 800mcg (micrograms) per day. Intakes of over 3,000mcg per day among women in the pre-conception period or during early pregnancy have been associated with an increased risk of birth defects. And yet all the products claiming to be a source of vitamin A or with added vitamin A failed to warn women who were or might become pregnant that they should be careful about their intake. Indeed, we found Sainsbury's and Tesco promoting vitamin A as a feature of chicken liver containing 1,480 % RDA, pig's liver with 2,346 % RDA and lamb's liver with 2,650 % RDA of vitamin A per 100g portion.

The antioxidant vitamins A, C, E and beta-carotene (the precursor of vitamin A) are also being promoted, with such claims as that made by SmithKline Beecham on Horlicks: 'now with ACE vitamins... to protect your body from some of the harmful effects of today's stressful lifestyles.' This appears to be in response to growing evidence that people who consume more fruit and vegetables which contain these vitamins have lower risks of some cancers and coronary heart disease. However, concerns have been raised recently about the safety of consuming these vitamins as extracts rather than as part of the whole vegetable or fruit: a four-year clinical trial published in 1994 found no reduction in the rate of colorectal adenoma in a group which took supplements containing beta-carotene, vitamin C and vitamin E¹⁶, while a Finnish study which looked at the effect of vitamin E and beta carotene on the incidence of lung cancer and other cancers in male smokers found the supplements to lead to an 18% increase in lung cancer incidence, and had little or no effect on the incidence of other cancers¹⁷. Researchers had hoped that this result was some sort of statistical fluke, but a large trial in the US involving 18,000 participants was stopped two years early in January 1996 after it was found that after four years there had been a 28% increase in the cases of lung cancer, and 17 % more deaths among the group taking vitamin A and beta carotene as opposed to those taking a placebo¹⁸.

Efficacy

As already mentioned, there is a question mark over the efficacy of adding beta-carotene to foods to reduce the risk of some cancers. Similar questions hang over other products. Nestlé state that they can back up their claims for the effectiveness of LC1 — a yoghurt with added bacterial cultures — with extensive research, but many of the so called bio yoghurts offer no evidence to back up their claims that consumption could be beneficial for health. The Food Commission, in a survey of bio yoghurts in 1991, found that of the eight yoghurts tested for the presence of *Lactobacillus* cultures, four fell below the lowest levels that the tests could detect (a count of under 5,000/g) and only three contained levels above 10^7 . The report also queried whether a sufficient number of bacteria would survive the journey through the digestive tract, and be able to colonise the intestine, in order to have the claimed beneficial impact on the composition of the microflora¹⁹.

Many products contain added fibre and yet the government's advisory body on diet and health, the Committee on Medical Aspects of Food Policy (COMA) have said that the present evidence suggests that it is diets characterised by higher intakes of food naturally rich in dietary fibre that are beneficial to health, rather than the extracted fibre itself¹⁵. Whilst high intakes of soluble fibre might have a beneficial role to play in reducing serum cholesterol levels, evidence needs to be produced that when soluble fibre is extracted from one food source and added to another, such as a soft drink, the modified product (the functional food) is itself capable of reducing excess cholesterol in everyday use.

Even in the few cases where the foods themselves appear to have been tested for their direct beneficial effects (e.g. Nestlé's LC1 and M D Food's Gaio) the evidence shows that it is necessary to consume the product repeatedly, over a period of weeks, before the benefit begins to show, and the benefit disappears when the product is not consumed. The widely-advertised Japanese drink Yakult, although implying that it is recognised in Japan as having a health benefit has not, we understand, have not applied to be listed as a FOSHU (Food for Specific Health Use) product under Japanese law.

Compromising the ability to choose a balanced diet

Considerable money and effort is expended by government departments, the Health Education Authority and health workers to educate the general public on the need to eat a well-balanced

diet, containing a good balance of essential nutrients. Guidance on overall balance and on the best sources of particular nutrients are given. Yet this whole enterprise can be undone by manufacturers selling products which distort the consumer's ideas of the 'natural' origins of nutrients.

We found many examples of products with added nutrients in such quantities, or of such a type, that their inclusion could not be justified on the grounds of replacing naturally occurring nutrients lost through processing. This is particularly well illustrated by the inclusion of the vitamin B12, a vitamin that is almost exclusively of animal origin, in at least 59 products of vegetable or cereal origin. The problem of identifying naturally good sources of various nutrients is further compounded by the wording of added vitamin claims, such as 'a good source of vitamin C and folic acid' (Kellogg's Bran Flakes), 'rich in vitamins' (Nestlé corn flakes), 'rich in vitamin C' (Ribena fromage frais and yoghurt drink), 'a good source of B vitamins and iron' (Batchelors Pastamania). Phrases such as these imply that the product is naturally a good source rather than by virtue of having had vitamins and/or minerals added. In the consumer's mind this could lead to the impression that other, non-fortified, products of the same food type are also good sources of the same nutrients.

The foods themselves chosen to have health claims made about them may also have an adverse impact on diet. COMA has issued advise on the need to reduce the average quantities of fat, sugar and salt we eat. Yet many of the foods identified in the present survey as making health claims were high in one or more of these nutrients. For example, Sainsbury's crisps and Cornitos corn snacks are labelled as 'a source of fibre' despite the fact that such foods are high fat, high salt foods.

Omega Heartwatch bread promotes its added omega 3 oils, but to obtain the recommended daily intake of omega 3 from this product (a white bread made with hydrogenated fat) it would be necessary to eat half a large loaf, an amount that contains six grams of salt which is the recommended maximum for adults¹⁵. The packaging for this bread cites the COMA cardiovascular report as suggesting that we should all eat about 15g of oil- rich fish per day, but that 'if you can't eat enough oil-rich fish you can still meet the needs of your family by choosing Heartwatch Omega Bread.' To suggest that a daily intake of oily fish is necessary is a distortion of the COMA report which actually recommended that 'people eat at least two portions of fish, of which one should be oily fish, weekly'²⁰. The impression is created that it is difficult to meet healthy diet recommendations by eating a normal diet, and that to protect oneself from heart disease it is necessary to eat a 'functionalised' food.

Similar problems are found in the case of added dietary fibre. According to the packaging of Ribena Juice & Fibre ‘government health experts recommend that we consume, on average, an extra 6 grams of fibre each day’, as this can help to lower blood cholesterol levels, and the packaging continues with the statement that with each serving containing three grams of fibre, Ribena Juice & Fibre is ‘a delicious way to top up your fibre’. They cite a COMA report as their source. What the COMA report actually says is that NSP (non-starch polysaccharides, dietary fibre) ‘is not the major dietary determinant of blood lipid patterns and may be acting as a marker of particular dietary habits’, and that evidence suggested that the benefits are from ‘diets characterised by high NSP rather than only from NSP itself.’ COMA recommended that NSP should be derived ‘from a variety of foods whose constituents contain it as a naturally integrated component, rather than as isolated supplements or as products enriched with NSP’¹⁵. Not only is the labelling misleading as to COMA's recommendations, the product itself is actually one which would be ruled out by COMA as a recommended source of fibre.

Health and medicinal claims

Our survey found a disturbing number of health claims which appear to border on medicinal claims. No clear guidelines exist as to the difference between the two. As the Food Advisory Body commented in their review of health claims in 1991 ‘it is at present uncertain which health claims are permitted because the Food Labelling Regulations are not explicit as they directly ban only absolute medicinal claims’⁵.

Since the FAC report there has been a significant attempt to clarify the situation. In a Medicines Act Leaflet⁶ issued in 1995 by the Medicines Control Agency — the agency which issues product licences to medicinal products under the Medicines Act — a set of guidelines are given on what constitutes a medicinal claim.

The guidance is as follows:

Medicines Control Agency guidelines on medicinal claims

- Claims to treat or prevent disease, or to interfere with the normal operation of a physiological function of the human body are regarded as medicinal. Claims of relief from symptoms, or to cure, remedy or heal a specific disease or adverse condition are similarly regarded as medicinal. In some contexts, 'protect' or 'avoid' may have the same meaning as prevent. Stress, anxiety and nervous tension are all adverse conditions, and claims to cope with or manage them are regarded as medicinal
- 'Maintenance' claims are likely to be regarded as medicinal when made for a product targeted at a vulnerable section of the population if there is an implication that it will restore, or help to restore, a specific bodily function or organ to a normal healthy state.
- On a case by case basis and considering each product on its merits, particular words which the MCA may regard as indicating or implying a medicinal claim include the following examples:

restores; repairs; eliminates; controls; counteracts; combats; alleviates; clears; stops; removes; heals; cures; remedies; treats; avoids; protects; prevents.

- Particularly if they are used in connection with, or in the context of, a disease, illness or specific adverse condition, words and phrases which are generally regarded as indicating or implying a medicinal claim include the following examples:

help with/ may help with / is said to help with; traditionally used for; is said to benefit those who suffer from; can lower cholesterol; strengthens or boosts the immune system; fights gum disease; stops craving for; burns fat; increases metabolic rate; helps body to adjust after crossing time zones (jet lag is an adverse condition); strips off sun-damaged pre-cancerous cells; at the first sign of a spot, use...; calms; calming; detoxifies; helps maintain normal water balance; stimulates the nervous system.

The Food Commission survey found examples of claims for a product, or for an ingredient in a product, which would appear to fall within the MCA guidelines, and hence would seem to constitute medicinal claims. Examples of such claims are listed in table 9:

Table 9 Claims which might be considered medicinal

Omega white bread with fish oil	'Healthier for the heart ... oil-rich fish may help maintain normal blood pressure and influence the fats in the blood in a way that is healthier for the heart ... If you can't get enough oil-rich fish you can still meet the needs of your family by choosing Heartwatch Omega Bread'
Del Monte Extra juice	'... with the reassurance of seven extra vitamins all essential for healthy living'; 'Vitamin E helps maintain a healthy immune system', 'Vitamin B12 essential for a healthy nervous system', etc.
Vegemince, non-animal savoury mince	'Keep your heart healthy'
Co-op Fruit & Fibre cereal with added vitamins	With vitamins which 'help to promote a healthy nervous system and maintain a healthy blood system'
Halo skimmed milk with added non-milk fat	The reduced saturated fat intake 'can have a very significant impact on your health'
Danone Bio yoghurt with live bacterial cultures	'Medical evidence shows that Danone Bio also helps to maintain the balance of your digestive system' and the '...cultures also help to maintain the balance of the digestive system'
Mornflake pure oatbran	'...can actively help to reduce blood cholesterol levels...'
Losley yoghurt with live culture	'...with beneficial (bacteria which) have long been associated with good health, as they ... promote natural healthy digestion and metabolism'
Sainsbury's bio-yoghurts	'Prepared with special live cultures... believed to aid digestion and dietary balance'
Nestle LC1 yoghurt with live culture	The culture 'boosts your natural defences against harmful bacteria and helps your body cope with the stresses and strains of everyday life. Daily consumption of LC1 helps your body to protect itself'
Ski Bio+ yoghurt with live culture	'Medical evidence suggests that these cultures when eaten regularly, can actively improve your digestion'
Pro-fibe Fibre Hi yoghurt with added fibre	'Enriched with fruit and soluble fibre, nature's way to reduce cholesterol'
Gaio yoghurt-style food with live culture	The culture 'can actively help to reduce cholesterol levels'
Ribena Juice & Fibre with added soluble and insoluble fibre	'Insoluble fibre helps keep your digestive system regular while soluble fibre ... can help reduce excess blood cholesterol, one of the risk factors for heart disease'
Quaker Oats	'Can help reduce cholesterol as part of a low fat diet'
Horlicks malted food drink	With A, C and E vitamins which 'have a special role, helping to protect your body from some of the harmful effects of today's stressful lifestyles'
Princes tinned mackerel	Contains fatty acids which 'may have a role in helping to prevent coronary heart disease'

We also found products claiming that ‘medical evidence’ or ‘scientific studies’ supported their claim, without any indication of what that evidence actually was. The consumer is led to believe that the product has been proved to be effective, although no research evidence is actually offered to support this view.

The implication that by consuming one particular food the consumer can protect him/herself from cancer or heart disease is a dangerous one. Diet itself is but one factor in what are multi-factorial diseases. Inflated claims could mislead the consumer into thinking that, by consuming certain ‘functional’ foods, it is not necessary to look at the rest of the diet, let alone other risk factors such as smoking, exercise or, obesity, thus leading to a false sense of security.

Price

Some functional foods appear to be little more than a marketing gimmick. They represent a way to differentiate one manufacturer's product from another and thus increase market share, and ‘add value’ to justify an increase in price. A survey by the *Daily Telegraph* in February 1996²¹ compared the prices of some of the higher-profile functional foods and found that they were between up to three-quarters more expensive than the ‘non-functional’ version. The figures cited are shown in table 10 below:

Table 10 Price comparisons of functional and regular foods (note pack size variations)²²

<i>Product and pack size/weight</i>	<i>Price</i>
Fybor, (orange juice with added fibre) 1 litre	£ 1.29
Own brand orange juice, 1 litre	£ 1.05
LC1 (milk drink with special culture) 4 x 150ml pack	£ 1.99
Yoplait (yoghurt drink), 4 x 200ml pack	£ 1.89
Gaio (yoghurt type product with special culture) 4 x 125g	£ 1.29
Own brand low fat fruit yoghurt, 4 x 125g	£ 1.16
Pact (reduced fat spread with added fish oil) 250g	£ 0.59
Omega (reduced fat spread with added fish oil) 250g	£ 0.59
Own brand sunflower spread, 500g	£ 0.62

Source: C Hall, *Daily Telegraph* 9.2.96.

Misleading advertising

The promotion of functional foods extends beyond the claims being made on the label, and may include leaflets handed to the public (e.g. Nestle's Cheerios sweetened breakfast cereal being promoted with leaflets and free samples given to benefit claimants at post offices), or with television advertising, or advertising in newspapers and magazines.

Leaflets and press advertisements are adjudicated by the Advertising Standards Authority (ASA). The Food Commission is aware of several complaints being made to the ASA about the promotion of functional foods and similar products, including complaints it has made itself. The National Food Alliance has compiled a list of recent cases and the ASA's ruling on the case, shown in table 11 below.

Table 11: ASA rulings on recent 'functional' claims

<i>Product and claim</i>	<i>ASA decision</i>
Juice Plus+ 'the natural way of getting all the most essential nutrients in one swallow'	Benefits exaggerated
Meltdown Fat Burning Liquid 'attacks the body's unwanted fat cells'	Contravenes Advertising Code
Creatabolin C10 'increases strength, speed and endurance'	Claims not substantiated
Bee Natural Propolis 'effective against most infectious diseases'	Claims not substantiated
Thermogen-5 'fat antagonist'	Benefits not demonstrated
Phyto Products Asparagus Juice 'excretes cholesterol'	Claims not substantiated
Ribena Juice & Fibre 'helps lower cholesterol'	Exaggerated likely benefits
MD Foods Gaio 'lowers levels of cholesterol'	Exaggerated potential benefits
MaxiMuscle Creatine Monohydrate 'Cycle up hills easier, twice as fast'	Claims not substantiated

Source: ASA / National Food Alliance 1996

The ASA generally only makes a ruling when it receives a complaint, and this can only happen after a company has launched its promotion drive. The ASA's ruling usually comes some weeks or months after a marketing drive has finished, making it ineffective as a means of ensuring consumer protection from misleading claims. And although it might be expected that the ASA

decision would bind manufacturers to prevent them repeating their claims, the ASA has rather limited sanctions it can take against companies who ignore its rulings and does not undertake legal prosecutions against companies.

Consumer protection

The greatest protection for consumers requires the least possibility of misrepresentation of the qualities of a food, and the least confusion about the nature of a healthy diet. In effect this would be realised:

- (a) by instituting controls on commercial interests to prohibit all health claims, nutrient claims or implied health benefits on products or in their promotional material, and
- (b) by improving nutrition and healthy eating education of the public

It can be argued that, in terms of ensuring good consumer protection, the next best arrangement would be to allow restricted claims on products, based on full clinical trials of the specific product, shown to be effective for all sections of the population to whom the product is to be sold for use — i.e. a medicinal product licence or FOSHU licence. This might also help cope with the next generation of biotechnology-led foods with pharmacological effects.

Taking one step further down the ladder of consumer protection, it can be argued that a less effective but valuable control procedure would be a restricted list of claims (approved by, say, the government's Chief Medical Officer), which can be used on a restricted list of food types — which is the US model. It allows manufacturers to proceed without trials of their specific product although it inhibits the development of products with possible genuine functionality but which fall outside the government-approved list.

Least consumer protection is given under the present UK system which, as can be seen from the present survey, is capable of causing confusion about balanced diets, can encourage poor quality diets under the guise of health, and may even put consumers at risk of specific nutrient hazards. In the government's paper presented to the Food Advisory Committee it is argued that changing the present poorly-regulated situation to one that is more regulated would run counter to the current ideology of deregulation. This puts the needs of industry (to be free of burdensome regulations, to increase their markets and the prices of processed food products) above the needs for public protection and public health, and should be resisted.

Attempts by the Department of Health to encourage healthier eating patterns are all too often undermined by legislation (or lack of legislation) in other government departments. The Ministry of Agriculture, Food and Fisheries' advisory body, the Food Advisory Committee, has a record of working well with Department of Health advisory committees such as COMA. This can be

expected to continue: for example the issue of food fortification is expected to be the subject of a Department of Health expert review and the FAC may then want to consider limiting any claims and promotions of food products on the basis of the product's fortification in the light of the COMA panel's findings.

In terms of other health claims, the recommendations made by the Food Advisory Committee in 1990 and strengthened in 1992 were based on sound principles and should not be lightly relinquished. At a time when food standards are being abolished — in the name of deregulation — clear, reliable food labelling becomes one of the last remaining means of ensuring some protection for the consumer against commercial marketing interests and in support of better public health.

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Appendix: Product Summary Tables

Baby Foods

BRAND	PRODUCT	CLAIM
Sainsbury's	First Menu: ready to serve pure baby juice (pear & peach, carrot & orange)	With added vitamin C
Sainsbury's	First Menu: concentrated pure baby juice (apple & blackcurrant, apple & grapefruit)	With added vitamin C
Sainsbury's	Toddlers apple & blackcurrant juice, grape & orange juice	With added vitamin C
Sainsbury's	Toddler Teddy Bear Biscuits (chocolate & orange, honey & oats)	Added iron
Milupa	Junior drink powder (hibiscus, apple & raspberry)	With added vitamin C
Milupa	All packet food	Added vitamins and minerals
Cow & Gate	Diluted pure baby juice with added vitamin C (apple & orange, summer fruit)	With added vitamin C
Cow & Gate	Concentrated pure baby juice with added vit. C (pear & peach, apple & blackcurrant, apple & pear)	With added vitamin C
Cow & Gate	Pure Baby Rice	With added vitamin B1
Robinson's	Baby fruit concentrated juice (apple & blackcurrant, apple)	With added vitamin C
Robinson's	Baby & Toddler Apple & Orange, Apple & Blackcurrant Fruit Juice	With added vitamin C
Heinz	Ready to Drink Pure Juice (apple & cherry, pear, apple)	Vitamin C added
Farley's	Rusks (original reduced sugar)	Enriched with vitamins and minerals
Farley's	Breakfast Timers - Muesli	Containing essential vitamins and minerals
Farley's	Lunch Timers - Vegetable Provencal	With essential protein, vitamins and minerals
Farley's	Lunch Timers - Banana Custard	Enriched with vitamins and minerals
Farley's	Tea Timers - Macaroni Cheese	Containing essential protein, vitamins and minerals
Farley's	Tea Timers - Strawberry Yoghurt	Enriched with vitamins and minerals

Farley's	Junior Choice (Fruity Muesli, Apricot and Apple Crumble)	Plus essential vitamins and minerals
SmithKline Beecham	Baby Ribena	Rich in vitamin C

Beverages

Soft Drinks - Carbonates

BRAND	PRODUCT	CLAIM
Red Bull Co. Ltd.	Red Bull Energy Drink	With taurine revitalises body & mind
EnCo Products	Dunn's River Might Malt	Malt drink rich in Vit. B and with high energy-giving glucose syrup
SmithKline Beecham	Lucozade Sport, lemon & lime juice drink	...isotonic...helps fight dehydration & fatigue
SmithKline Beecham	Lucozade Sport, orange fruit drink	...isotonic for fast fluid replacement
SmithKline Beecham	Lucozade Sport, low calorie orange drink	Hypotonic
SmithKline Beecham	Ribena Spring No Added Sugar	Rich in vitamin C. Provides all the vitamin C you need in one day
SmithKline Beecham	Ribena Spring	Rich in vitamin C. Provides all the vitamin C you need in one day
SmithKline Beecham	Sparkling Ribena	With vitamin C
Wander Ltd.	Isostar	The fast-acting isotonic thirst quencher iso-optimal formula
Wells Soft Drinks Ltd.	Prolong sparkling isotonic cola	Satisfies thirst replaces vital minerals
Schweppes	Schizan	Refresh your senses
Schweppes	Diet Schizan	Refresh your senses
American Body Builder	Carbo force natural energy drink (orange, strawberry)	Lactic acid buffers, electrolytes, stacked carbohydrates, chromium picolinate
Callitheke (UK) Ltd	Purdey's Elixir Vitae	Herbal multivitamin drink. ..provides healthy & immediate way to feel enlivened & refreshed in today's busy times. If you are constantly on the go, you are using up vitamins.. perfect boost whether working or playing
Callitheke (UK) Ltd	Purdey's Gold High Energy	Herbal multivitamin drink. ..provides healthy & immediate way to feel enlivened & refreshed in today's busy times. If you are constantly on the go, you are using up vitamins.. perfect boost whether working or playing
Rio Trading Co.	Rio Amazon Guarana Breeze Energy Drink	
Gusto	Gusto sparkling herbal drink	A herbal beverage created to refresh & stimulate in place of tea or coffee

Multipower Fitness & Nutrition (distrib.)	Red Kick Guarana Action drink	
	Ame / Ame Red	Contains a unique and revitalising blend of fruit juices, eastern herbs and vitamins
	Aqualibra	Infusions of digestive botanical extracts
Novacrest	Celeste	Lightly sparkling drink based on pure orange juice, and the unique revitalising potent PRO'ELIXER blend of selected synergistic herbal extracts, vitamins and minerals, thereby creating a powerful restorative which enlivens and fortifies for today's busy and challenging environment. Benefits accrue with daily intake

Soft Drinks - Dilutables

BRAND	PRODUCT	CLAIM
Tesco	Apple and Blackcurrant drink	With added vitamin C
Tesco	Whole Lemon drink	With added vitamin C
Tesco	Orange, Lemon and Pineapple drink	With added vitamin C
Tesco	Whole Orange drink	With added vitamin C
Tesco	Orange and Apricot drink	With added vitamin C
Tesco	Lime Juice Cordial	With added vitamin C
Tesco	Sugar Free Apple & Blackcurrant drink	With added vitamin C
Tesco	Sugar Free Apple drink	With added vitamin C
Tesco	Sugar Free Lemon drink	With added vitamin C
Tesco	Sugar Free Orange, Lemon and Pineapple drink	With added vitamin C
Tesco	Sugar Free Orange drink	With added vitamin C
Tesco	Sugar Free Tropical drink	With added vitamin C
Danish Black	Blackcurrant Juice drink	Rich in vitamin C
Safeway	High Juice Blackcurrant drink	Rich in vitamin C
Safeway	No Added Sugar Orange, Pineapple and Banana drink	With added vitamin C
Safeway	No Added Sugar Apple drink	With added vitamin C
Safeway	No Added Sugar Strawberry drink	With added vitamin C
Kids Stuff	Jack Tar	With added vitamin C
Kids Stuff	Rhubarb & Custard	With added vitamin C
CO OP	Vitamin C	With added calcium
Boots	Orange Barley Water	Vitamin C enriched
SmithKline Beecham	Ribena - Blackcurrant Juice Drink	Rich in vitamin C
SmithKline Beecham	Ribena Light	Rich in vitamin C
SmithKline Beecham	Ribena No Added Sugar	Rich in vitamin C

Hot Drinks

BRAND	PRODUCT	CLAIM
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Ovaltine	Ovaltine Malted Food Drink	100g Ovaltine provides at least 100% RDA of Fe & the following vitamins: A B1 B2 B6 B12 D folic acid .
Ovaltine	Instant Ovaltine light	with added vitamins and iron
Sainsbury's	Malted chocolate drink	With added vitamins
Nestle	Milo	with extra vitamins and minerals
SmithKline Beecham	Horlicks Malted Food Drink	Even more vitamins and minerals. Horlicks has always been nutritious, but has now been enriched further with vitamins C, B12, Folic acid and iron.
SmithKline Beecham	Instant low fat Horlicks - (malt, chocolate malt, hot chocolate flavours)	now with ACE vitamins. While you unwind, you'll be doing your body good too because...now fortified with the 'ACE' vitamins.. have a special role, helping to protect your body from some of the harmful effects of today's stressful lifestyles
SmithKline Beecham	Low Fat Horlicks Malt	now with ACE vitamins. While you unwind, you'll be doing your body good too because...now fortified with the 'ACE' vitamins.. have a special role, helping to protect your body from some of the harmful effects of today's stressful lifestyles
	Lift Instant Lemon Tea	2 heaped teaspoons (10g) of Lift supply 25% of the RDA if vitamin C

Fruit Juice Drinks

BRAND	PRODUCT	CLAIM
Robinson's	Orange juice drink	Rich in vitamin C
Robinson's	No added sugar juice drinks (special R orange, apple & blackcurrant, tropical fruit)	Rich in vitamin C
Del Monte	Orange, Five Fruit, Caribbean, Tropical Fruit Burst	Enriched with vitamin C

SmithKline Beecham	Ribena juice & fibre (orange & apricot, blackcurrant)	Rich in vitamin C With added fibre Most of us don't get nearly enough fibre. Government health experts recommend that we consume, on average, an extra 6 grams of fibre each day. There are two types of fibre. Insoluble fibre helps keep your digestive system regular while soluble fibre, taken as part of a will balanced, low-fat diet can help reduce excess blood cholesterol, one of the risk factors for heart disease. Each serving contains 3 grams of fibre, two thirds of which is soluble. So enjoy a delicious way to top up your fibre
SmithKline Beecham	Ribena no added sugar blackcurrant juice drink	Rich in vitamin C
SmithKline Beecham	Ribena juice drink (blackcurrant, raspberry, strawberry, apple)	Rich in vitamin C
SmithKline Beecham	Ribena juice drink (orange & apricot)	Rich in vitamins A and C
SmithKline Beecham	Ribena lower sugar blackcurrant juice drink	Rich in vitamin C
Libby's	Orange "C" juice drink (orange, apple)	Enriched with vitamin C
Libby's	Um Bongo	Enriched with vitamin C
Ocean Spray	Cranberry Classic juice drink	Rich in vitamin C
Ocean Spray	Cranberry & Raspberry juice drink	Rich in vitamin C
Ocean Spray	Cranberry & Blackcurrant juice drink	Rich in vitamin C
Wells	No Added Sugar MultiVit Orange Juice drink	Rich in vitamins C, niacin, B6 and B12

Fruit Juice (Fresh)

Sainsbury's	Freshly squeezed sweet grapefruit juice	Rich in vitamin C
Sainsbury's	Freshly squeezed orange & grapefruit juice	Rich in vitamin C
Sainsbury's	Florida squeezed orange juice	Rich in vitamin C
Sainsbury's	Pure jaffa orange juice	Rich in vitamin C
Sainsbury's	Pure Florida orange juice	Rich in vitamin C
Sainsbury's	Ruby red squeezed orange juice	Rich in vitamin C
Sainsbury's	English pressed apple juice	Rich in vitamin C

Sainsbury's	Pure orange & grapefruit juice	Rich in vitamin C
Sainsbury's	Pure grapefruit juice	Rich in vitamin C
Sainsbury's	Pure pink grapefruit juice	Rich in vitamin C
Sainsbury's	Florida squeezed pink grapefruit juice	Rich in vitamin C
Sainsbury's	Freshly squeezed orange juice	Rich in vitamin C
Sainsbury's	Pure orange juice	Rich in vitamin C
Sainsbury's	Pure orange & pineapple juice	Rich in vitamin C
Sainsbury's	Frozen pure Jaffa orange juice	Rich in vitamin C
MD Foods	Fybor	Orange juice with natural vitamin C and added fibre. It is generally accepted that we need to increase the level of fibre in our diet and Fybor provides the most convenient and refreshing way of achieving such an increase. Just 1x300ml serving will ensure that 50% of you recommended daily quantity of fibre* is achieved. All of the fibre in Fybor is soluble fibre, which research has shown can ease digestion and be beneficial in reducing blood cholesterol levels when taken as part of a cholesterol controlled diet. *Dietary intake of 18g per day as recommended for adults in the Report of the Panel on Dietary Reference Values of the Committee on Medical Aspects of Food Policy 1991

Fruit Juice (Long Life)

Sainsbury's	Long life premium orange juice	Rich in vitamin C
Sainsbury's	Long life pure orange juice	Rich in vitamin C
Sainsbury's	Long life pure jaffa orange juice	Rich in vitamin C
Sainsbury's	Long life pure jaffa grapefruit juice	Rich in vitamin C
Sainsbury's	Long life pure ruby red grapefruit juice	Rich in vitamin C
Sainsbury's	Jaffa orange juice	Rich in vitamin C
Sainsbury's	Jaffa grapefruit juice	Rich in vitamin C
Sainsbury's	Ruby red grapefruit juice	Source of vitamin C
Britvic	Pink grapefruit juice	Contains vitamin C

Britvic	Orange juice	Rich in vitamin C
Britvic	English apple juice	Rich in vitamin C
Copella	Farm pressed English apple juice	Rich in vitamin C
Martlet Natural Foods	PLJ	Rich in vitamin C
Eden	Organic carrot juice	Rich in Beta-carotene
Delmonte	Extra	"Extra" is the extra-healthy fruit juice - the goodness of pure orange and apple juice together with the reassurance of seven extra vitamins, all essential for healthy living. Vitamin E helps maintain a healthy immune system. Vitamin A good for healthy skin as well as night vision. Vitamin C important for healthy bones and teeth. Vitamin B6 helps the body use protein from the diet. Folic acid essential for the formation of all body cells. Vitamin B12 essential for a healthy nervous system. Niacin helps the body use food
St Ivel	Real - pure orange juice	Rich in vitamin C
Boots	Forest Fruit Juice	Vitamin C enriched
Boots	Tropical Fruit Juice	Vitamin C enriched

Bread

BRAND	PRODUCT	CLAIM
Sainsbury's	Economy brown rolls	Source of fibre
Sainsbury's	Wholemeal pittas	High in fibre
Sainsbury's	Wholemeal hoagies	Source of fibre
Sainsbury's	Home bake crusty wholemeal bread	High in fibre
Sainsbury's	Hovis wheatgerm ...sliced bread	Source of fibre
Sainsbury's	Stoneground wholemeal sandwich loaf	High in fibre
Sainsbury's	Granary malted wholemeal bread	High in fibre
Sainsbury's	Granary malted brown bread	Source of fibre
Sainsbury's	Wheaten sliced wholemeal bread with oats & kibbled grain	Twice the soluble fibre of ordinary wholemeal bread
Sainsbury's	Multigrain	High in fibre
Sainsbury's	Stoneground wholemeal bread	High in fibre
Sainsbury's	Soft grain	33% more fibre than standard white bread
Sainsbury's	Harvest grain sandwich loaf	Source of fibre
Sainsbury's	Wholemeal thick sliced bread	High in fibre
Sainsbury's	Nature's choice stoneground wholemeal - organic	High in fibre
Allinson's	Soft wholemeal medium cut	High in fibre
Allinson's	wholemeal thick cut	High in fibre
Allinson's	HiBran extra bran brown bread	High in fibre
Spiller Premier Products	Original Turkestan	High in fibre
Hovis	Wholemeal sliced	High in fibre
Marks & Spencer	Vitamin Enriched Soft Grain	Increased fibre. Vitamin enriched. 30% more fibre than standard white bread
Marks & Spencer	Hi - Bran	High in fibre
Marks & Spencer	Whole-wheat stoneground	High in fibre
Marks & Spencer	Stoneground sandwich loaf	High in fibre

Marks & Spencer	Stoneground cob	High in fibre
Allied Bakeries	Mighty White	Enriched with 4 vitamins. Has 30% more fibre than ordinary white bread
Nimble	Light white bread	50% higher fibre
Tesco	Healthy Eating (medium & thick) sliced white	Higher in fibre with added vitamins and calcium
Tesco	Wholemeal baps	High in fibre
Tesco	Oatmeal brown bread	High in fibre
Tesco	Multigrain	High in fibre
Tesco	Stoneground wholemeal	High in fibre
Tesco	Healthy Eating sliced wholemeal	Higher in fibre with added vitamins and calcium
Tesco	Wholemeal sliced	High in fibre
Heart Watch	Omega Bread	The evidence is conclusive enough for doctors and nutritionists to recommend that everyone should eat oil-rich fish regularly. Countries with a high consumption enjoy some of the lowest rates of coronary heart disease. If you can't eat enough oil-rich fish (the recommendation is a minimum of about 15g per day) you can still meet the needs of your family by choosing Heartwatch Omega Bread
Heinz	Weight Watchers White sliced bread	Source of fibre
Heinz	Weight Watchers Brown sliced bread	Source of fibre

Breakfast Cereals

BRAND	PRODUCT	CLAIM
Sainsbury's	Organically produced Scottish porridge oats	High fibre
Sainsbury's	Instant hot oat cereal	Fortified with 6 vitamins, calcium and iron
Sainsbury's	Scottish porridge oats with bran	High fibre
Sainsbury's	Scottish porridge oats	High fibre
Sainsbury's	Hot Krumbly tropical fruit	Fortified with vitamins and iron
Sainsbury's	Luxury muesli	High in fibre
Sainsbury's	Swiss style muesli	High in fibre
Sainsbury's	Deluxe muesli	High in fibre
Sainsbury's	Fruit & spice muesli	Source of fibre
Sainsbury's	Wholewheat muesli	High in fibre
Sainsbury's	Original muesli	High in fibre
Sainsbury's	Crunchy oat cereal with raisins, coconut, honey & hazelnuts	High in fibre
Sainsbury's	Crunchy oat cereal with bran, apple & hazelnuts	High in fibre
Sainsbury's	Bran Flakes	High in fibre Fortified with vitamins and iron
Sainsbury's	High Fibre Bran	Fortified with vitamins High in fibre
Sainsbury's	Fruit & Fibre Flakes	Fortified with vitamins and iron High in fibre
Sainsbury's	Natural Bran	High in fibre
Sainsbury's	Sultana Bran	Fortified with vitamins and iron High in fibre
Sainsbury's	Balance	Fortified with vitamins and iron
Sainsbury's	Oat bran flakes with raisins & apple	Fortified with vitamins and iron High in fibre
Sainsbury's	High fibre malties	Fortified with vitamins High in fibre
Sainsbury's	Wholewheat miniflakes	Fortified with vitamins and iron High in fibre
Sainsbury's	Wholewheat biscuits	Fortified with vitamins and iron High in fibre
Sainsbury's	Corn Flakes	Fortified with vitamins and iron

Sainsbury's	Economy Corn Flakes	With vitamins and iron
Sainsbury's	Chococurls	Fortified with vitamins and iron
Sainsbury's	Coco Snaps	Fortified with vitamins and iron
Sainsbury's	Rice Pops	Fortified with vitamins and iron
Sainsbury's	Mini Wheats	High in fibre
Sainsbury's	Honey Nut Cornflakes	Fortified with vitamins and iron
Sainsbury's	Banana Pops	Fortified with vitamins and iron
Sainsbury's	Frosted Flakes	Fortified with vitamins and iron
Sainsbury's	Golden Pops	Fortified with vitamins and iron
Sainsbury's	Golden Puffs	Fortified with vitamins
Weetabix	Ready Brek	High fibre Fortified with vitamins and minerals
Weetabix	Fruit & Nut Ready Brek	High fibre food with added vitamins and minerals
Weetabix	Ready Brek, contains real chocolate	Fortified with vitamins and minerals
Weetabix	Weeta Flakes	Fortified with vitamins and iron
Weetabix	Weetabix	A high fibre food
Weetabix	Weetos	Fortified with vitamins and iron
Weetabix	Frosted Chex	Fortified with vitamins and iron
Weetabix	Crunchy Nut Chex	Fortified with vitamins and iron
Weetabix	Honey Nut loops	Fortified with vitamins and iron
Quaker Oats	Quaker Oats	Can help reduce cholesterol as part of a low fat diet
Mornflake	Original pure oatbran	High fibre oat cereal Oatbran can help reduce cholesterol as part of a low fat diet
Mornflake	Toasted crunchy oatbran	High fibre
Prewetts	Oatbran & oatgerm	Source of fibre
Allinson's	Wheatgerm	Source of folic acid
Allinson	Tropical Break Wholeflakes	With added vitamins and iron
Kellogg's	All-Bran	Very high fibre cereal fortified with vitamins and iron
Kellogg's	Bran Buds	Very high fibre cereal fortified with vitamins and iron

Kellogg's	Bran Flakes	A good source of vitamin C and folic acid High in fibre
Kellogg's	Fruit & Fibre	Fortified with vitamins and iron
Kellogg's	Sultana Bran	Provides essential vitamins and iron
Kellogg's	Special K	Enriched with vitamins and iron Now with vitamin C
Kellogg's	Sustain	High in complex carbohydrates: which is the healthiest form of energy. A good source of fibre: to help ensure a healthy inner body. A unique combination of vitamins & minerals: two antioxidants in Beta Carotene and Vitamin E as well as Iron. Zinc and B vitamins can help maintain an athlete's performance. Designed by an athletic body for athletic bodies. Official Breakfast of the British Olympic Team
Kellogg's	Multi-grain Start	Fortified with vitamins and iron
Kellogg's	Raisin Splitz	Fortified with vitamins and iron
Kellogg's	Crunchy Nut Cornflakes	Fortified with vitamins and iron
Kellogg's	Corn Flakes	Fortified with vitamins and iron
Kellogg's	Coco Pops	Fortified with vitamins and iron
Kellogg's	Corn Pops	Fortified with vitamins and iron
Kellogg's	Banana Bubbles	Fortified with vitamins and iron
Kellogg's	Ricicles	Fortified with vitamins and iron
Kellogg's	Rice Krispies	Fortified with vitamins and iron
Kellogg's	Frosties	Fortified with vitamins and iron
Granny Ann	Cooked soya bran	High fibre
Heinz (Weight Watchers)	Perfect Balance	Fortified with vitamins and iron High in fibre
Nestlé	Fibre 1	High fibre
Nestlé	Frosted Shreddies	Natural fibre with 8 added vitamins and iron
Nestlé	Shredded Wheat bitesize	A good source of fibre
Nestlé	Shredded Wheat	A good source of fibre
Nestlé	Corn Flakes	Rich in vitamins
Nestlé	Honey Nut Cheerios	Fortified with 8 vitamins and iron
Nestlé	Nesquik	Fortified with 8 vitamins and iron

Nestlé	Lucky Charms	Fortified with 8 vitamins and iron
Nestlé	Golden Grahams	Fortified with 8 vitamins and iron
Jordans	Bran Hearts	High fibre
Jordans	Crispy muesli	High fibre
Jordans	Porridge Oats	High fibre
Safeway	Fibre Bran	A very high fibre low fat food Fortified with 6 vitamins and iron including the B vitamin folic acid
Safeway	Fruit and Fibre	High fibre food Fortified with 7 vitamins and iron including the B vitamin folic acid
Safeway	Bran Flakes	A very high fibre food Fortified with 8 vitamins and iron including the B vitamin folic acid
Safeway	Honey and Nut Cornflakes	Fortified with vitamins and iron Fortified with 8 vitamins and iron including the B vitamin folic acid
Safeway	Cornflakes	Fortified with 8 vitamins and iron including the B vitamin folic acid
Safeway	Wheat Bisks	A high fibre low fat food Fortified with 4 vitamins and iron including the B vitamin folic acid
Safeway	Rice Crunchies	Enriched with vitamins and iron
Safeway	Coco Crunchies	Enriched with vitamins and iron
Safeway	Frosted Flakes	Enriched with vitamins and iron
Safeway	Instant Hot Oat Cereal	A high fibre food fortified with vitamins and minerals
Safeway	Savers Cornflakes	No claim but contains 6 added vitamins and iron
Tesco	The Flintstones Breakfast Boulders	Vitamin fortified with 7 added vitamins and iron
Tesco	Frosted Flakes	Fortified with 8 vitamins and iron
Tesco	Crisp Puffed Rice	Fortified with 8 vitamins and iron
Tesco	Scotch Pops	Fortified with 8 vitamins and iron
Tesco	Chocolate Smilers	Fortified with 8 vitamins and iron
Tesco	Cocoa Puffs	Fortified with 8 vitamins and iron
Tesco	Cocoa Crunchies	Fortified with 8 vitamins and iron
Tesco	Wild Ones	Fortified with 6 vitamins and iron
Tesco	Cocoa Flakes	Fortified with 8 vitamins and iron
Tesco	Cookie Crisp	Fortified with 8 vitamins and iron

Tesco	Golden Puffs	Fortified with 5 vitamins
Tesco	Shredded Malt Flakes	With 3 added vitamins
Tesco	Cornflakes	Fortified with 7 B vitamins, vitamin D and iron. The B vitamins are needed every day to enable the body to convert food we eat into energy. Vitamin D helps the body to absorb calcium which is essential for strong bones and teeth. Iron forms a vital part of our red blood cells
Tesco	Honey and Nut Cornflakes	7 added vitamins and iron. The B vitamins are needed to enable the body to convert the food we eat into energy. Iron forms a vital part of our red blood cells and is needed to help carry oxygen around the body
Tesco	Whole-wheat Flakes	High fibre
Tesco	Whole-wheat Biscuits	High fibre
Tesco	Fruit & Fibre	Fortified with 7 B vitamins and iron
Tesco	Healthy Eating Bran Flakes	With 8 added vitamins and iron
Tesco	Bran Breakfast Cereal	With 5 added vitamins Useful source of fibre
Tesco	Healthy Eating Sultana Bran	High fibre
Tesco	Scottish Porridge Oats	High fibre
Tesco	Tropical Feast	High fibre
Tesco	Oat Cereal with Raisins, Honey and Flaked Almonds	A useful source of oatbran
Tesco	Deluxe Whole-wheat Muesli	High fibre
Tesco	Luxury Fruit Muesli	High fibre
Somerfield	Cornflakes	Fortified with vitamins and iron
Somerfield	Basics Cornflakes	Fortified with vitamins and iron
Somerfield	Wheat Biscuits	A high fibre food Fortified with vitamins and iron
Somerfield	Luxury Muesli	A high fibre food
Somerfield	Swiss Style Muesli	A valuable source of fibre
Somerfield	Bran Fibre Muesli	A high fibre food
Somerfield	Bran Flakes	A high fibre food Fortified with vitamins and iron
CO OP	Goodlife Oat Bran Flakes with Raisins and Apple	Valuable source of oat bran, containing soluble fibre which can play an important role in reducing the harmful effects of excess cholesterol in the body when used as part of a low fat diet. With added folic acid. High fibre

CO OP	Choc Chip Muesli	High fibre
CO OP	Swiss Style Muesli	High fibre
CO OP	Crunchy Oat Cereal	High in fibre
CO OP	Traditional Porridge Oats	High fibre
CO OP	Goodlife Fruit & Bran Muesli	High fibre
CO OP	Goodlife Muesli	High fibre
CO OP	Apricot and Yoghurt Cereal	High fibre
CO OP	Fruit with Fibre	High fibre. With added folic acid, recommended for women who are pregnant or planning a pregnancy. Fortified with vitamins thiamin, riboflavin, niacin, plus iron which together help to promote a healthy nervous system and maintain a healthy blood system
CO OP	Bran Flakes	High fibre. Fortified with vitamins thiamin, riboflavin and niacin. With added folic acid, recommended for women who are pregnant or planning a pregnancy.
CO OP	Choc & Nut Cornflakes	6 added vitamins and iron. With added folic acid, recommended for women who are pregnant or planning a pregnancy
CO OP	Corn Flakes	6 added vitamins and iron. With added folic acid, recommended for women who are pregnant or planning a pregnancy
CO OP	Honey Nut Flakes	6 added vitamins and iron. With added folic acid, recommended for women who are pregnant or planning a pregnancy
Marks & Spencer	Reduced Fat Crunchy Cereal	With added fibre
Marks & Spencer	Banana Flake Cereal	High fibre
Marks & Spencer	Multi Flake Cereal	High fibre
Marks & Spencer	Unsweetened Bran Muesli	High fibre
Marks & Spencer	Luxury Muesli	High fibre
Ryvita	High Fibre Bran Enriched Corn Flakes	Over twice the dietary fibre of ordinary cornflakes
Sunblest	Cornflakes	Fortified with vitamins and iron
Sunblest	Coconut Cornflakes	Fortified with vitamins and iron

Force	Whole Wheat Flakes	With 4 added vitamins and iron
Scott's	Old Fashioned porridge oats	Rich in soluble fibre

Dairy

BRAND	PRODUCT	CLAIM
Milk		
CO OP	Evaporated milk	Vitamin D enriched
Nestle	Carnation Light - evaporated milk	Rich in vitamin D
Tesco	Evaporated Milk	Vitamin D increased
CO OP	Instant Dried Skimmed Milk	With vitamins A and D
Safeway	Dried Skimmed Milk	With added vitamins A and D
Tesco	Healthy Eating Dried Skimmed Milk	With added vitamins A and D...contains calcium which is essential for strong bones and teeth, and vitamin A which is necessary for healthy skin
Tesco	Value Dried Skimmed Milk	With added vitamins A and D
Chivers	Marvel Dried Skimmed Milk	Naturally rich in calcium and contains vitamins A and D
Health Care Products Ltd	Slimmer Brand (dried, skimmed milk)	Rich in calcium
Tesco	Make (dried, skimmed milk)	Fortified with vitamins A, C and D
Somerfield	Dried Skimmed Milk	With vitamins A and D
Kwiksave	No Frills instant dried skimmed milk	With added vitamins A and D
St. Ivel	Milquik (dried, skimmed milk)	With added vitamins A and D
Marks & Spencer	Half Fat Milk	Enriched with vitamins A and D
Sainsbury's	Vitamin enriched half fat milk	With added vitamins A and D
Tesco	Virtually Fat Free Milk	High in calcium
Tesco	Half Fat Milk	High in calcium
Express Dairy	Halo - skimmed milk and non-milk fat	80% less saturated fat than semi skimmed, but all the taste. Over 98% fat free. A reduction in the intake of saturated fat can have a very significant impact on your health
MD Foods	Lactolite	Lactose reduced milk. Specially digestible. Lactolite is natural cows' milk with a natural lactase enzyme added, that has reduced over 95% of the lactose content to a more digestible form (glucose and galactose)

Tesco	UHT Virtually Fat Free Milk	High in calcium
Tesco	UHT Half Fat Milk	High in calcium
Tesco	Long Life Healthy Eating Virtually Fat Free Milk	High in calcium
Fromage frais		
Sainsbury's	Mr Men smooth fromage frais	Fortified with vitamins
Eden Vale	Ribena fruit fromage frais	Rich in vitamin C
Danone	Petit Danone super fromage frais	Provides for your child's daily needs: calcium 34%, phosphorous 31%, iron 20%, vitamin B2 22%, vitamin B12 22%, and also contains essential polyunsaturates. (DRVs for 4 - 10 years)
Nestle	Chambourcy Hippo Tots - smooth fromage frais	Source of iron, calcium and vitamin B2
Yoghurt		
Losely	Very Low Fat Natural Live Yoghurt	Culture: Lactobacillus bulgaricus, Streptococcus thermophilus
Danone	DanoneBio low fat natural yoghurt	...contains active bifidus. Medical evidence shows that DanoneBio also helps to maintain the balance of your digestive system
Onken	Biopot	..with Bio cultures. These cultures also help to maintain the balance of the digestive system.
MD Foods	Gaiocan actively help to reduce blood cholesterol levels
Woodlands Park	Live Sheep's Milk Yoghurt and strawberries	Live yoghurt culture
Losely	BA live low fat set yoghurt (strawberry, lemon, plain)	Be Alive with beneficial Bifidus and Acidophilus. Beneficial Bifidobacterium longum and Lactobacillus acidophilus have long been associated with good health, as they survive well in the digestive tract to promote natural healthy digestion and metabolism by maintaining the proper balance of microflora. Losely's new production techniques ensure BA Live remains live to the "use by" date if stored correctly.
Müller	Breakfast Bio	With fibre and added vitamins. Made using special bio cultures
Sainsbury's	Diet BIO yoghurt	Prepared with special live cultures...believed to aid digestion and dietary balance
Sainsbury's	Natural Bioyoghurt - low fat, set	Prepared with special live cultures...believed to aid digestion and dietary balance
Sainsbury's	Wholemilk Bioyoghurt - various flavours	Prepared with special live cultures...believed to aid digestion and dietary balance

Sainsbury's	Wholemilk set natural yoghurt	Prepared with special live cultures...believed to aid digestion and dietary balance
St Ivel	Shape Extra Fruit	BIO
Little Swallow	Biogarde live natural yoghurt	Contains original Biogarde special cultures Lactobacillus acidophillus and B bifidus forming lactic acid
Little Swallow	Biogarde yoghurt - strawberry	
Nestlé	LC1	Contains a culture called Lactobacillus acidophilus 1. The Nestle Research Centre selected this culture for its exceptional properties. Joint studies conducted with university teams have shown that Lactobacillus acidophillus works in two ways: it boosts your natural defences against harmful bacteria and helps your body cope with the stresses and strains of everyday life. Daily consumption of LC1 helps your body to protect itself.
Ski	Bio+	Made using special, natural Biocultures. Medical evidence suggests that these cultures when eaten regularly, can actively improve your digestion
Tesco	Virtually Fat Free Bio	Made with special bio cultures. Medical evidence suggests that these cultures can have a beneficial effect on the digestive system where they occur naturally
Pro-fibe	Fibre Hi yoghurt	Worlds first Hi-fibre yoghurt. At least 20 times the fibre content of ordinary yoghurt. Enriched with fruit and soluble fibre, natures way to reduce cholesterol
Rachel's Dairy	Pure and Natural Organic yoghurt	Made with Bio-active live cultures
Bio Green	Live & Mild Bio Green Drinking Yoghurt	...with Bifidus Acidophilus beneficial cultures.
SmithKline Beecham / Eden Vale	Ribena Yoghurt Fruit Drink	Rich in vitamin C
Yakult	Yakult	A healthy start to every day. A well balanced intestinal flora is important to help maintain health. Levels of the good bacteria can reduce as a result of bad eating habits, stress, the use of some antibiotics and age related changes. Yakult can help to maintain the all important balance. Yakult is a useful source of Lactobacillus and large numbers of these friendly bacteria help maintain both a favourable balance of beneficial intestinal flora and the natural rhythm of the bowel.
Cheese		
The Cheese Company	Bio - Reduced Fat Cheese	With active bio cultures believed to promote healthy digestion. Rich in calcium. Culture: Bifidus culture

Flora	Medium Mature Cheddar	60% less fat than typical cheddar. Matured and made from skimmed and semi skimmed milk and sunflower oil. Ing: skimmed milk, semi skimmed milk, sunflower oil, hydrogenated vegetable oil
Kraft	Dairylea - individually wrapped cheese food slices	A good source of calcium
Kraft	Dairylea (light & original) cheese spread	A good source of calcium

Dried Pulses & Fruit

BRAND	PRODUCT	CLAIM
Sainsbury's	Puy lentils	Source of fibre
Sainsbury's	Blackeye beans	Source of fibre
Sainsbury's	Mung beans	Source of fibre
Sainsbury's	Aduki beans	Source of fibre
Sainsbury's	Marrowfat peas	Source of fibre
Sainsbury's	Bulgar wheat	Source of fibre
Sainsbury's	Chick peas	Source of fibre
Sainsbury's	Country bean mix	Source of fibre
Sainsbury's	Red lentils	Source of fibre
Sainsbury's	Yellow split peas	Source of fibre
Sainsbury's	Butter beans	Source of fibre
Sainsbury's	Cannellini beans	High fibre
Sainsbury's	Flageolet beans	High fibre
Sainsbury's	Pinto beans	High fibre
Sainsbury's	Black beans	High fibre
Sainsbury's	Haricot beans	High fibre
Sainsbury's	Country casserole mixture	High fibre
Sainsbury's	Country veg. mixture	High fibre
Sainsbury's	Country soup mixture	High fibre

Sainsbury's	Red kidney beans	High fibre
Whitworths	Blackeye peas	High fibre
Whitworths	Haricot beans	High fibre
Whitworths	Butter beans	High fibre
Whitworths	Continental lentils	High fibre
Whitworths	Yellow split peas	High fibre
Whitworths	Soup and broth mix	High fibre
Whitworths	Pearl barley	High fibre
Whitworths	Chickpeas	High fibre
Blue Ribbon	Mission figlets	Source of fibre
Sunsweet	Breakfast prunes	High fibre

Fish

BRAND	PRODUCT	CLAIM
John West	Sardines in vegetable oil	High in omega 3
John West	Sardines in tomato sauce	High in omega 3
John West	Wood smoked kippers in vegetable oil	High in omega 3
John West	Wood smoked kippers in tomato sauce	High in omega 3
Sainsbury's	Fillets of anchovies in pure olive oil	High in protein
Sainsbury's	Scottish mackerel in brine	High in protein
Sainsbury's	Scottish mackerel in tomato sauce	High in protein
Sainsbury's	Mackerel fillets in brine	High in protein
Sainsbury's	Mackerel fillets in tomato sauce	High in protein
Sainsbury's	Skipjack tuna chunks in brine	High in protein
Sainsbury's	Skipjack tuna chunks in soya oil	High in protein
Sainsbury's	Skipjack tuna steaks in soya oil	High in protein
Sainsbury's	Skipjack tuna steaks in brine	High in protein
Sainsbury's	Skipjack tuna steaks in water	High in protein
Sainsbury's	Skipjack tuna steaks in sunflower oil	High in protein
Sainsbury's	South Seas tuna steak in brine	High in protein
Sainsbury's	South Seas tuna steak in soya oil	High in protein
Sainsbury's	Portuguese sardines in brine	High in protein
Sainsbury's	Portuguese sardines in tomato sauce	High in protein
Sainsbury's	Portuguese sardines in pure olive oil	High in protein
Sainsbury's	Portuguese sardines in sunflower oil	High in protein
Sainsbury's	Portuguese skinless & boneless sardines in pure olive oil	High in protein
Sainsbury's	Shrimps in brine	High in protein
Sainsbury's	Soft herring roes in brine	High in protein
Sainsbury's	Pink salmon	High in protein

Sainsbury's	Skinless & boneless pink salmon	High in protein
Sainsbury's	Selected medium red salmon	High in protein
Sainsbury's	Frozen small haddock fillets	High in protein
Sainsbury's	Frozen cod fillets	High in protein
Sainsbury's	Frozen coley fillets	High in protein
Sainsbury's	Frozen smoked haddock fillets	High in protein
Sainsbury's	Frozen plaice fillets	High in protein
Sainsbury's	Frozen skinless chunky cod fillets	High in protein
Sainsbury's	Frozen cod portions	High in protein
Sainsbury's	Frozen coley portions	High in protein
Sainsbury's	Frozen Scottish boned kippers & butter	High in protein
Sainsbury's	Frozen Scottish whole kippers	High in protein
Sainsbury's	Frozen lemon sole fillets	High in protein
Sainsbury's	Frozen cooked & peeled prawns	High in protein
Sainsbury's	Frozen large prawns cooked & peeled	High in protein
Princes	Mackerel fillets in tomato sauce	High in omega 3. Oily fish such as mackerel contains useful quantities of particular fatty acids (called Omega 3) which medical evidence suggests may have a role in helping to prevent coronary heart disease
Princes	Mackerel fillets in vegetable oil	High in omega 3. Oily fish such as mackerel contains useful quantities of particular fatty acids (called Omega 3) which medical evidence suggests may have a role in helping to prevent coronary heart disease
Princes	Sardines in vegetable oil	High in omega 3. Oily fish such as mackerel contains useful quantities of particular fatty acids (called Omega 3) which medical evidence suggests may have a role in helping to prevent coronary heart disease
Princes	Sardines in tomato sauce	High in omega 3. Oily fish such as mackerel contains useful quantities of particular fatty acids (called Omega 3) which medical evidence suggests may have a role in helping to prevent coronary heart disease

Princes	Marinated Herring	High in omega 3. Oily fish such as mackerel contains useful quantities of particular fatty acids (called Omega 3) which medical evidence suggests may have a role in helping to prevent coronary heart disease
Glenryck	Pacific pilchards in brine	More calcium per 100g than milk Naturally rich in fish oils More protein than beefsteak
Glenryck	South Atlantic pilchards in tomato sauce	More calcium per 100g than milk Naturally rich in fish oils More protein than beefsteak

Margarine, Spreads, Oils & Mayonnaise

Margarine / Spread

BRAND	PRODUCT	CLAIM
St. Ivel	Utterly Butterly	Low in saturates, high in monounsaturates
St Ivel	Gold sunflower light	Rich source of vitamin E
St. Ivel	Mono	Low in saturates, high in monounsaturates
Van den Bergh	I can't believe it's not butter light	Low in saturates, no hydrogenated fats, virtually no trans fatty acids
Van den Bergh	I can't believe it's not butter	No hydrogenated fats, virtually no trans fatty acids
Van den Bergh	Olivio	High in monounsaturates, no hydrogenated fats, no trans fatty acids
Van den Bergh	Delight extra low	No hydrogenated fats
Van den Bergh	Delight	No hydrogenated fats
Van den Bergh	Blue band	Low in saturates, high in monounsaturates
Sainsbury's	Sunflower spread	Low in saturates, high in polyunsaturates, virtually no trans fatty acids, source of vitamin E
Sainsbury's	Spread with sunflower oil	Low in saturates, high in polyunsaturates
Sainsbury's	Olive gold	Low in saturates, high in monounsaturates, no trans fatty acids
Sainsbury's	Olive gold extra light	Low in saturates, high in monounsaturates, no trans fatty acids
Sainsbury's	Olive gold extra rich	Low in saturates, high in monounsaturates, no trans fatty acids
Sainsbury's	Sunflower light	Low in saturates, high in polyunsaturates, no trans fatty acids
Sainsbury's	Sunflower extra light	Low in saturates, high in polyunsaturates, no trans fatty acids
Flora Food Co.	Flora	Low in saturates, high in polyunsaturates, low in cholesterol, no hydrogenated fats
Flora Food Co.	Flora reduced salt	Low in saturates, high in polyunsaturates, low in cholesterol, no hydrogenated fats
Flora Food Co.	Flora extra rich	Low in saturates, high in polyunsaturates, low in cholesterol, no hydrogenated fats

Flora Food Co.	Flora extra light	Low in saturates, high in polyunsaturates, low in cholesterol, no hydrogenated fats
Flora Food Co.	White Flora	High in essential polyunsaturates, low in saturates, low in cholesterol
Heinz (Weight Watchers)	Olivite	Low in saturates, high in monounsaturates
MD Foods	Pact	Low in saturates, high in monounsaturates, no trans fatty acids. Enriched with essential omega 3
Kraft	Vitalite light	High in essential polyunsaturates, low in saturates, virtually cholesterol free
Kraft	Vitalite	High in essential polyunsaturates, low in saturates, virtually no trans fatty acids, virtually no cholesterol
Granose	Olive Grove	High in monounsaturates, low in cholesterol
Granose	Soya margarine	No hydrogenated fats
Granose	Vegetable margarine	No hydrogenated fats
Granose	Non-hydrogenated sunflower margarine	Low in saturates, high in polyunsaturates, low in cholesterol, no trans fatty acids
Granose	Diet half-fat spread	Low in saturates, high in polyunsaturates
Whole Earth	Superspread	Low in saturates, no hydrogenated fats
Matthews Foods	Pure - dairy free margarine	Low in saturates, high in polyunsaturates, low in cholesterol, source of vitamin E
Fauser Vitaquellwerk KG	Vitaquell Extra	Low in saturates, high in polyunsaturates, low in cholesterol, source of vitamin E, virtually no trans fatty acids
Tesco	Life	With added fish oil which may help maintain a healthy heart
Tesco	Soya spread	High in polyunsaturates, low in saturates
Tesco	Sunflower spread	Rich source of vitamin E, high in polyunsaturates, low in saturates
Tesco	Olive Gold	High in monounsaturates, low in saturates
Tesco	Healthy Eating extra light sunflower spread	Rich source of vitamin E
Tesco	Unbelievable	High in polyunsaturates, low in saturates
Tesco	Golden low fat spread	High in monounsaturates, low in saturates
Marks & Spencer	Reduced fat olive	High in monounsaturates, low in saturates

Marks & Spencer	Sunflower spread	High in polyunsaturates, low in saturates
Somerfield	Sunflower spread	High in polyunsaturates, low in saturates, low in trans fats
Somerfield	Low fat sunflower spread	High in polyunsaturates, low in saturates
Somerfield	Believe it or not spread	With added vitamin A and D
Somerfield	Soya margarine	High in polyunsaturates, low in saturates
Safeway	Olive	Low in saturates
Safeway	Low fat sunflower spread	Low in saturates, high in polyunsaturates
Safeway	Sunflower spread	Low in saturates, high in polyunsaturates, low in trans fats
Safeway	Soya margarine	Low in saturates, high in polyunsaturates

Oils

Spry	Crisp'n Dry	Low in saturates, high in monounsaturates
Sainsbury's	Pure sunflower oil	Low in saturates, high in monounsaturates
Sainsbury's	Pure corn oil	Low in saturates, high in polyunsaturates
Sainsbury's	Italian extra virgin olive oil	Low in saturates, high in monounsaturates
Sainsbury's	Greek extra virgin olive oil	Low in saturates, high in monounsaturates
Sainsbury's	Spanish extra virgin olive oil	Low in saturates, high in monounsaturates
Sainsbury's	Olive oil with hint of garlic	Low in saturates, high in monounsaturates
Sainsbury's	Pure vegetable oil	Low in saturates
Sainsbury's	Grapeseed oil	Low in saturates, high in polyunsaturates
Sainsbury's	Olive oil	Low in saturates, high in monounsaturates
Sainsbury's	Walnut oil	Low in saturates, high in polyunsaturates
Sainsbury's	Hazelnut oil	Low in saturates, high in monounsaturates
Sainsbury's	Olive oil - light & delicate	Low in saturates, high in monounsaturates

Sainsbury's	Olive oil - mild & fruity	Low in saturates, high in monounsaturates
Sainsbury's	Olive oil - extra virgin	Low in saturates, high in monounsaturates
Flora Food Co.	Sunflower oil	Low in saturates, high in polyunsaturates, low in cholesterol, source of vitamin E
Mazola	Pure sunflower oil	High in polyunsaturates, low in cholesterol
Mazola	Pure corn oil	High in polyunsaturates, low in saturates, low in cholesterol
East End	Pure corn oil	High in polyunsaturates
Napolina	Extra virgin olive oil	High in monounsaturates
Filippo Berio	Extra virgin olive oil	Low in saturates, high in monounsaturates
Filippo Berio	Olive oil	Low in saturates, high in monounsaturates
Mani (Greek organic products)	Extra virgin first cold pressed olive oil	Low in cholesterol
Goldenfields	Pure rapeseed oil	Low in saturates, high in monounsaturates
St. Giles Foods	Fry light sunflower spray	Low in saturates, high in polyunsaturates, low in cholesterol
St. Giles Foods	Fry light extra virgin olive oil spray	High in monounsaturates
Sunbee	Baking spray: emulsified soya oil	Low in saturates, high in polyunsaturates, low in cholesterol
Pura	Light touch	Low in cholesterol
Somerfield	Sunflower oil	High in polyunsaturates
CO OP	Goodlife sunflower oil	High in polyunsaturates, low in saturates, low in cholesterol
CO OP	Pure corn oil	High in polyunsaturates, low in saturates, low in cholesterol
Tesco	Extra virgin olive oil	Low in saturates, high in monounsaturates
Tesco	Olive oil	Low in saturates, high in monounsaturates
Tesco	Ground nut oil	Low in saturates, high in monounsaturates
Tesco	Sunflower oil	Low in saturates, high in polyunsaturates

Mayonnaise

Sainsbury's	Reduced calorie French mayonnaise	Low in saturates, high in polyunsaturates
Sainsbury's	French mayonnaise & garlic	Low in saturates, high in polyunsaturates
Sainsbury's	French mayonnaise & coarse ground mustard	Low in saturates, high in polyunsaturates
Sainsbury's	French mayonnaise	Low in saturates, high in polyunsaturates

Meat, Poultry & Offal

BRAND	PRODUCT	CLAIM
Sainsbury's	British turkey breast fillets	High in protein
Sainsbury's	Grade A chicken drumsticks	High in protein
Sainsbury's	Grade A chicken quarters	High in protein
Sainsbury's	Grade A part boned chicken breast portion	High in protein
Sainsbury's	Grade A chicken thighs	High in protein
Sainsbury's	Grade A boneless chicken breasts	High in protein
Sainsbury's	Grade A skinless boneless chicken breast fillets	High in protein
Sainsbury's	Grade A skinless & boneless chicken small prime breast fillets	High in protein
Sainsbury's	Grade A British self-basting chicken with sunflower oil	High in protein
Sainsbury's	Grade A chicken	High in protein
Sainsbury's	Grade A British chicken	High in protein
Sainsbury's	British turkey	High in protein
Sainsbury's	Free range turkey	High in protein
Sainsbury's	Game mallard	High in protein
Sainsbury's	Lean cubed rabbit	High in protein
Sainsbury's	Frozen chicken livers	Rich in vitamin A, vitamin B12 and iron
Sainsbury's	Frozen lamb's liver	Rich in vitamin A, vitamin B12 and iron
Sainsbury's	Frozen pig's liver	Rich in vitamin A, vitamin B12 and iron
Sainsbury's	Premium corned beef	High in protein
Sainsbury's	Chicken part boned breasts	High in protein
Sainsbury's	Chicken large skinless boneless thighs	High in protein
Sainsbury's	Chicken large leg portions	High in protein
Sainsbury's	Turkey breast steaks	High in protein
Sainsbury's	Chicken large drumsticks	High in protein

Sainsbury's	Chicken large wings	High in protein
Sainsbury's	Chicken self-basting with sunflower oil	High in protein
Sainsbury's	Chicken quarters	High in protein
Sainsbury's	Chicken stir fry	High in protein
Sainsbury's	Chicken	High in protein
Sainsbury's	Chicken breast fillets	High in protein
Sainsbury's	Chicken boneless breast	High in protein
Sainsbury's	Chicken mince	High in protein
Sainsbury's	Free range chicken	High in protein
Sainsbury's	Corn fed chicken boneless breasts	High in protein
Sainsbury's	Chicken with olde English pork stuffing	High in protein
Sainsbury's	Fresh game pheasant	High in protein
Sainsbury's	Fresh game mallard	High in protein
Sainsbury's	Fresh game wood pigeon	High in protein
Sainsbury's	Fresh game wood pigeon breast fillets	High in protein
Sainsbury's	Boneless rabbit portions	High in protein
Sainsbury's	Fresh British quail	High in protein
Sainsbury's	Fresh game wild rabbit	High in protein
Sainsbury's	Turkey thigh joint	High in protein
Sainsbury's	Turkey breast joint	High in protein
Sainsbury's	Turkey extra lean mince	High in protein
Sainsbury's	Turkey lean diced thigh	High in protein
Sainsbury's	Turkey large prime breast fillet	High in protein
Sainsbury's	Turkey stir fry	High in protein
Tesco	Sliced lambs liver	High in vitamin A
Tesco	Sliced pigs liver	High in vitamin A
Tesco	Sliced calves liver	High in iron
Tesco	Whole pig kidney	High in iron
Tesco	Whole lamb kidney	High in iron

Tesco	Whole lambs heart	High in iron
Tesco	Frozen chicken livers	High in iron
Padleys	Frozen chicken livers	Ideal source of vitamin A and C. Chicken livers are an excellent source of vit. A & vitamin C required for healthy skin and bones

Miscellaneous

BRAND	PRODUCT	CLAIM
Batchelors	Pastamania: Dino-might chunky pasta shapes in cheese sauce	A good source of energy, B vitamins and iron
Batchelors	Pastamania: Freaky's friend chunky pasta shapes in tomato sauce	A good source of energy, B vitamins and iron
Batchelors	Pastamania: Pasta pigs chunky pasta shapes in pizza sauce	A good source of energy, B vitamins and iron
HP	Mr Blobby Pasta Shapes in Tomato Sauce (with / without burgers)	With added vitamins and minerals
HP	Pasta shapes - Batman forever	With added vitamins and minerals
Heinz	What The Noodle Doodle Pasta Shapes in Tomato Sauce	Fortified with vitamins and iron
Heinz	Noddy Pasta Shapes in Tomato Sauce	Fortified with vitamins and iron
Heinz	Where's Wally pasta shapes in tomato sauce	Fortified with vitamins and iron
Heinz	Spaghetti in tomato sauce	Fortified with vitamins and iron
Heinz	Spaghetti hoops in tomato sauce	Fortified with vitamins and iron
Pasta Foods Ltd.	Stoneground spirals	High fibre
Premier Biscuits	Smash	Rich in vitamin C
Premier Biscuits	Smash - fried onion flavour	With vitamin C
Premier Biscuits	Smash - cheese and onion flavour	With vitamin C
CO OP	Instant Mashed Potato	Rich in vitamin C
Sainsbury's	100% organically produced wholemeal flour	High fibre
Sainsbury's	Self Raising Wholemeal flour	High fibre
Sainsbury's	Stoneground Strong Wholemeal flour	High fibre
Sainsbury's	Plain Wholemeal flour	High fibre
Tesco	Strong Brown Flour	High fibre
Tesco	Strong Stoneground 100% Wholemeal Bread Flour	High fibre
Baxters	Healthy Choice Soup	A source of fibre

Heinz	Weight Watchers Soup	Low in saturates
High Five	Energy Bar	High carbohydrate. Contains LeanBurn Technology (nutrient mix): calcium carbonate, magnesium sulphate, glycine, inosine, vitamin C, arginine, L-carnitine, vitamin E, niacin, tetrasodium pyrophosphate, zinc oxide, ferrous gluconate, vitamin B6, vitamin A, riboflavin, thiamin, folacin, biotin, chromium polynicotinate, vitamin B12. ...incorporates a unique blend of long and short chain carbohydrates designed to optimise energy levels. With LeanBurn Technology, an exclusive formula of nutrients that independent research indicates can enhance athletic performance.
ams Ltd.	Maxim High Energy Bar	Packed with carbohydrates for sustained energy
Boots	Energy	High carbohydrate, low fat cereal bar for improved endurance. Formulated to provide simple carbohydrates for rapid energy release and complex carbohydrates for sustained energy release
Wander	Isostar Powder	Unique isotonic formula is designed to quench thirst by restoring lost fluid to the body. ...replaces lost energy through its balanced range of carbohydrate, essential minerals and vitamins. Scientific studies have shown that fluid loss of only 2% of body weight through sweating is enough to reduce performance by up to 20%
High Five	Hawaiin Tropical Energy Source	Advanced sports fuel containing HICOSE, a special type of highly concentrated carbohydrate designed to increase strength and endurance, plus LBT a complex formulation of micronutrients developed to help maintain peak physical condition

Sanatogen	Original High Protein Powder	Helps maintain a healthy nervous system and build up strength and energy. ..rich source of high quality protein called casein which has been combined with glycoposphate so that it can be easily absorbed by the body...Protein is essential for the body to: help maintain a healthy nervous system. Protein is essential for cell formation and replacement in all parts of the body, including the nervous and digestive systems. Some forms of protein cannot be made by the body so a regular supply is essential. Builds up strength and energy: helps provide the energy the body needs to cope with the stresses and strains of day to day living. It is particularly beneficial in helping to build up strength after illness or injury, for expectant and nursing mothers and growing children. Help maximise muscle performance: a regular protein supply can help athletes to maximise the bodies' performance and improve muscle structure
Boots	Children's Recovery Drink	Vitamin enriched. ..helps build up your child after loss of appetite or when they are listless or feeling down
Boots	Adult Recovery Drink	Vitamin enriched. ..helps you regain vitality after loss of appetite or when you feel tired, listless or rundown
Boots	Vita meal replacement drink	Vitamin enriched. High in fibre
Nestlé	Build Up meal replacement drink	With vitamins, minerals and more Built In
Nestlé	Build Up Fortified Soup	Fortified with vitamins and minerals. Rich in protein
Bemax	Toasted Wheatgerm	A source of vitamins B1, E, folic acid and iron
Boots	Second Nature Natural Unprocessed Bran	Provides essential dietary fibre

Snacks

BRAND	PRODUCT	CLAIM
Jordans	Honey recipe oat bran bars	High fibre
Sainsbury's	Salted nut selection	High fibre
Sainsbury's	Salted large peanuts	High fibre
Sainsbury's	Salted mixed nuts	High fibre
Sainsbury's	Salted peanuts	High fibre
Sainsbury's	Roasted peanuts in shell	High fibre
Sainsbury's	Honey roast cashews and peanuts	High fibre
Sainsbury's	Dry roasted peanuts	High fibre
Sainsbury's	Natural roasted peanuts	High fibre
Sainsbury's	Natural roasted cashews	High fibre
Sainsbury's	Unsalted peanuts	High fibre
Sainsbury's	Crisps, ready salted	Source of fibre
Sainsbury's	Crisps, salt and vinegar	Source of fibre
Sainsbury's	Crisps, cheese and onion	Source of fibre
Sainsbury's	Cornitos - sizzling bacon	Source of fibre
Sainsbury's	Cornitos - spicy tomato	Source of fibre
Sainsbury's	Cornitos - tangy cheese	Source of fibre
Sainsbury's	Highland oatcakes	High fibre
Sainsbury's	Wholemeal bran biscuits	High fibre
Sainsbury's	Light and crispy crackers	High fibre
Sainsbury's	Wholemeal rye crispbread	High fibre
Kernals	Pasta snacks	Half the fat of crisps, twice the protein
Tixana	Soya king multigrain crisps	High fibre
Tixana	Soya King multigrain crisps - sour cream & chives	High fibre
Tixana	Soya King multigrain crisps - taco flavour	High fibre

West Park Foods	HiLo crackers	High fibre
Nairn's	Rough oatcakes	High fibre
Vessen	Original oatcakes	High fibre
Granny Ann	High fibre biscuits	High fibre
The Health & Diet Co. Ltd	Wholemeal Slymbred	Added fibre. High protein
Health & Diet Co. Ltd.	Golden linseeds	Rich in essential fatty acids or omega 3 High fibre
Finn Crisp	Harvest wheat crispbread	High fibre
Finn Crisp	Original rye crispbread	High fibre
GG	Scandinavian Bran Crispbread	High fibre
Holland & Barrett	Organically grown golden linseeds	Rich in essential fatty acids or omega 3 High fibre
Granovita	Sunshine Linseed	Rich in essential fatty acids or omega-3
Granovita	Organically grown golden linseed	Rich in essential fatty acids or omega-3
Marks & Spencer	Higher Fibre Reduced Sugar Digestive Biscuits	Higher fibre
Red Mill	Transform-A-Snack - cheese & onion corn snack	Added vitamins
Sunblest	Toasted Cracked Wheat Crisp Rolls	High in fibre
Haldane (Protoveg)	Smokey Snaps	High fibre

Soya Products

BRAND	PRODUCT	CLAIM
Sojasun	"Yogurt", natural flavour	Contains live ferments...believed to have a beneficial effect on digestion and dietary balance. Culture: Bifidobacterium longum and acidophilus
Sojasun	Soya & Fruit	Rich in protein Contains/provides vitamins
Sojasun	Plaisir Cacao	Contains essential lipids, rich in / provides calcium, provides / contains vitamins
Provamel	Yofu Dessert	Rich in / provides calcium
Plamil	Concentrated soya milk	Provides / contains vitamins. Rich in / calcium
Sainsbury's	Longlife calcium enriched soya milk	Rich in / provides calcium
Soderasens	Fromsoya (with horseradish, with garlic, parsley, onion)	High in polyunsaturates, low in cholesterol
Cauldron	Tofu burgers (chilli, savoury)	Rich in protein
Cauldron	Original tofu	Rich in protein
Cauldron	Marinated tofu	Rich in protein
Cauldron	Marinated tofu pieces	Rich in protein
Cauldron	Smoked tofu	Rich in protein
Provamel	Soya milk	With added calcium
Granose	Soya cream	High in polyunsaturates, low in saturates, low in cholesterol

Spreads

BRAND	PRODUCT	CLAIM
Sainsbury's	Smooth peanut butter	High fibre
Sainsbury's	Crunchy peanut butter	High fibre
Sainsbury's	Wholenut peanut butter	High fibre
Whole Earth	Crunchy peanut butter	No trans fats
Granovita	Vegetable yeast pate - wild mushroom	With non-hydrogenated vegetable fats
Granovita	Vegetable yeast pate - herb Provencal	With non-hydrogenated vegetable fats
Granovita	Vegetable yeast pate - original	With non-hydrogenated vegetable fats
Kraft	Vegemite	Each 100g contains vitamin B1 11mg, vitamin B2 16mg, niacin 110mg
Robertsons	Toffee Treat	A source of calcium. A serving (25g) provides 58mg of calcium = 7% RDA
Chivers	Bread Busters	With vitamin C

Vegetables

BRAND	PRODUCT	CLAIM
Tinned		
Sainsbury's	Haricot vert	Source of fibre
Sainsbury's	Garden peas in water	Source of fibre
Sainsbury's	Garden peas in water with sugar & salt	Source of fibre
Sainsbury's	Pease pudding	Source of fibre
Sainsbury's	English spinach leaf	Source of fibre
Sainsbury's	Mixed bean salad	Source of fibre
Sainsbury's	Mixed beans in mild chilli sauce	Source of fibre
Sainsbury's	Cannellini beans	High in fibre
Sainsbury's	Pinto beans	High in fibre
Sainsbury's	Soya beans	High in fibre
Sainsbury's	Mixed pulses	Source of fibre
Sainsbury's	Yellow split peas	Source of fibre
Sainsbury's	Borlotti beans	High in fibre
Sainsbury's	Red kidney beans	High in fibre
Sainsbury's	Butter beans	High in fibre
Tesco	Chickpeas in brine	High in fibre
Tesco	Baked beans in tomato sauce	High in fibre
Tesco	Baked beans in tomato sauce 50% less salt 50% less added sugar	High in fibre
Frozen		
Sainsbury's	Brussel sprouts	Source of fibre
Sainsbury's	Button brussel sprouts	Source of fibre
Sainsbury's	Cauliflower, peas & carrots	Source of fibre
Sainsbury's	Broccoli florets	Source of fibre
Sainsbury's	Leaf spinach	Source of fibre
Sainsbury's	Special mixed vegetables	Source of fibre

Sainsbury's	Mixed vegetables	Source of fibre
Sainsbury's	Supersweet sweetcorn	Source of fibre
Sainsbury's	Sweetcorn	Source of fibre
Sainsbury's	Mini corncobs	Source of fibre
Sainsbury's	Broad beans	High in fibre
Sainsbury's	French whole green beans	Source of fibre
Sainsbury's	Extra fine whole French beans	Source of fibre
Sainsbury's	Sliced green beans	Source of fibre
Sainsbury's	Cut green beans	Source of fibre
Sainsbury's	Petits pois	Source of fibre
Sainsbury's	Mint flavoured garden peas	Source of fibre
Sainsbury's	Garden peas	Source of fibre
Sainsbury's	Economy peas	Source of fibre
Bird's Eye	Garden peas	Vitamins in peas
Tesco	Baby sweetcorn	High in vitamin C
Tesco	Sweetcorn	High in vitamin C
Tesco	Cauliflower florets	High in vitamin C
Tesco	Baby carrots	High in vitamin A
Tesco	Broccoli florets	High in vitamin C
Tesco	Broccoli & cauliflower floret mix	High in vitamin C
Tesco	Button sprouts	High in vitamin C
Tesco	Cut cabbage	High in vitamin C
Tesco	Spinach	High in vitamin A
Tesco	Straight cut oven chips	Made with sunflower oil. Sunflower oil is high in polyunsaturates and low in saturates
Ross	Garden peas	Source of fibre
Realeat	Vege Mince (100% meat free blend of vegetable proteins)	Keep your heart healthy