

# Calories on menus in Ireland

REPORT ON A NATIONAL CONSULTATION  
JUNE 2012

<p><i>saucy. Served with chips or a jacket potato, side salad and coleslaw.</i> €8.99 <b>Chips 1,248 calories</b> <b>Jacket 1,145 calories</b></p> <p><b>Chicken Tikka Masala</b> Tender pieces of chicken breast marinated in a creamy tikka masala sauce, served with basmati rice, a nano bread, mango and mango chutney. €7.95 <b>883 calories</b></p> <p><b>Rump Steak</b> A cut of rump steak, grilled. €9.99 <b>792 calories</b></p>	<p><b>Steak &amp; Ale Pie</b> 100% Prime Irish beef encased in a shortcrust pastry pie slow cooked in ale. Served with chips, peas and gravy. €18.99 <b>1,336 calories</b></p> <p><b>Shepherd's Pie</b> Made from 100% Prime Irish, topped with mashed potatoes and Cheddar cheese. Served with gravy and peas. €9.95 <b>572 calories</b></p> <p><b>Roast Vegetable Pasta</b> Tomatoes, courgettes and peppers in a rich tomato sauce coating penne pasta, finished with Cheddar cheese and served with a slice of garlic bread. €6.99 <b>747 calories</b></p>
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## I am pleased to present to the Minister for Health, Dr James Reilly, T.D. the Food Safety Authority of Ireland's (FSAI) report of our consultation on placing calories on menus in Ireland.

In preparing this report, we have taken into consideration the views of over 3,000 interested parties. Most of the submissions we received were from consumers, the vast majority of whom want to see calories on menus. Consumers want this information so that they can make informed choices when purchasing foods from the food service sector. The food sector was less enthusiastic about placing calories on menus, citing the lack of expertise and limited resources to implement and sustain a calorie labelling scheme.

There is plenty of evidence from countries where calorie posting at the point of purchase has been implemented to suggest that when consumers are informed, they choose the healthier options. This has the effect of driving a demand for lower calorie products, with increasing profit margins.

The food service sector in Ireland has already begun to provide consumers with more information about the food they are eating, with some of the major chains already providing calorie information for their customers. Delivery methods vary in how the information is provided and the adoption of a consistent approach by the food industry should increase the usefulness of the information provided.

There is an opportunity to collaborate with colleagues in Northern Ireland, who have just introduced a pilot scheme for placing calories on menus. There are a number of major catering companies that operate in both jurisdictions and, harmonising our approach to placing calories on menus will result in cost benefits for the industry, whilst also facilitating a better understanding for consumers.

The FSAI is pleased to carry this initiative forward.



**Prof. Alan Reilly**

Chief Executive

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# Executive Summary

## Background

When calorie menu labelling is properly applied in restaurant chains, it can help combat obesity even where only modest changes occur in consumer behaviour. Best practice in calorie menu labelling involves four principles:

- **Principle 1** – displaying calorie information on ALL standard food and drink items sold
- **Principle 2** – displaying calorie information clearly at the 'point of choice' (wherever the food or drinks are described and placed beside the price in the same prominence)
- **Principle 3** – displaying calorie information in terms of the amount of calories in a portion or a meal
- **Principle 4** – displaying information about how many calories average people need in a day so that people can make sense of the calorie menu labelling values

Consumers who report using calorie information (15%) tend to make lower calorie food choices. In addition, there is evidence that calorie menu labelling creates a demand for healthier options – including smaller portion sizes. For these reasons, calorie menu labelling has potential to improve population health in Ireland where obesity rates have been rising dramatically among all age and gender groups over recent years.

The primary concern of food service businesses is to provide customers with what they want and to develop their business. Currently, most food service businesses in Ireland are not equipped to calculate the calorie content of the items on their menus. In addition to concerns about how to technically implement calorie menu labelling, a further worry for food service businesses is that calorie menu labelling may have a negative impact on their profit margins. However, there is evidence from other countries that calorie menu labelling can positively affect consumer food choice without negatively impacting business profitability.

To seek opinions on the best way of putting calorie information on menus in Ireland, the Food Safety Authority of Ireland (FSAI) held a national consultation to determine consumers' and stakeholder's (food service businesses and health professionals) views on calorie menu labelling in Ireland.

## Approaches Used to Determine Views of Consumers and Stakeholders

Two booklets were developed by the FSAI. The first informed people about the extent of the obesity epidemic in Ireland, calorie menu labelling in other countries and what people could expect should this be implemented in Ireland. The second booklet targeted food service businesses and health professionals and set out the technical aspects of implementing calorie menu labelling according to best practice (see four principles). Both booklets were made available in hard copy and on the FSAI website. Submissions were invited from both the public, via a short online consumer survey and from stakeholders (food businesses and health professionals) via a short online technical survey. Both surveys were open for four weeks (2nd to 29th February, 2012) and were launched formally by the Minister for Health, Dr James Reilly, T.D.

The consumer survey collected information on submitters' backgrounds, their views on calorie menu labelling – whether this should be implemented and in which food outlets – and whether this should be mandatory for large food businesses (defined by number of outlets). Submitters were asked if they would trust the calorie information. The technical survey collected information from stakeholders (food businesses and health professionals) who were invited to submit their views on the four principles and how these should best be implemented. Also, during the consultation, attendees at a food service trade exhibition in the RDS, Dublin were surveyed using an interviewer-assisted questionnaire. Data on gender, age, and whether calorie menu labelling should be implemented, and in which food outlets, were collected. In addition, those working in food service businesses were asked if calorie menu labelling was initiated in Ireland, would they implement it? Differences in views were analysed according to submitters' backgrounds (online survey data) and age or gender (exhibition data).

## Main Findings and Recommendations from the National Consultation

### **RECOMMENDATION 1: IMPLEMENT A CALORIE MENU LABELLING SCHEME IN IRISH FOOD SERVICE BUSINESSES**

A total of 3,130 submissions (2,666 consumers, 322 health professionals, 73 food businesses and 69 others) were received via the consumer survey. Ninety six percent of submitters want calorie menu labelling in all, or some, food outlets. Eighty three percent want calorie labelling in all food service businesses. Of the 13% who preferred calorie labelling in some outlets, their order of priority was: fast food outlets (95%), coffee shops and delis (63%), cinemas (58%), vending machines (57%), pubs (26%) and restaurants (18%). The main reasons given for wanting vs. not wanting calorie menu labelling was 'empowerment to make informed food choice decisions' vs. 'calorie labelling is unnecessary and ineffective' (46% vs. 3% of the total group respectively). Significantly more submissions from food businesses, compared to submissions from any other background, did not want calorie menu labelling in any food outlet. Significantly more submissions from consumers, healthcare professionals and others, compared with those from food businesses, wanted mandatory calorie menu labelling in large food businesses (92%, 88%, 84% vs. 58% respectively) and would trust calorie information (62%, 51%, 59% vs. 36% respectively).

Of over 2,000 attendees at a food service industry trade exhibition in the RDS, Dublin, 287 (53% female; aged 18 to 55+ years) were interviewed. The majority (73%) wanted calorie menu labelling in all or some food outlets, with significantly more females compared with males (79% vs. 66%, respectively) in support of this. Most of those in favour of calorie menu labelling in some outlets wanted it in: fast food outlets (78%), followed by cafes (43%), coffee shops (41%), vending machines (41%), delis (39%), cinemas (33%), bakeries (32%), pubs (29%) and restaurants (25%). Among those working in food service directly, more females than males would voluntarily implement calorie menu labelling (70% vs. 59% respectively) if this was initiated in Ireland.

### **RECOMMENDATION 2: FOOD SERVICE BUSINESSES SHOULD BE PROVIDED WITH INITIAL SUPPORT TO HELP THEM IMPLEMENT CALORIE MENU LABELLING**

A total of 260 submissions from stakeholders (200 food businesses and 60 health professionals) were received via the technical survey. Overall, responses to the technical survey on the four principles of calorie menu labelling and the draft technical guidance for implementing these in Ireland were positive by a narrow margin. Examination of the total group of submissions in terms of the submitters' background show that there is far less support among food businesses for the principles and the draft guidance, compared with the strong support for these from health professionals. This strong support for calorie menu labelling from the health professionals tips the balance towards the majority of the total group responses being in favour of calories on menus.

A concern that was repeatedly raised in submissions to the technical survey was the cost that would be incurred by food businesses implementing calorie menu labelling. The qualitative data on rationale for responses to questions on technical aspects of calorie menu labelling repeatedly demonstrate that food businesses currently do not have the expertise or resources to implement and sustain a calorie menu labelling scheme. In addition to this, the challenges of standardising serving sizes and ensuring food prepared consistently in line with the recipes used to calculate the calorie values were raised. The main theme of submissions from food businesses highlighted the fact that providing and sustaining a scheme for calculating calorie content of food sold is the biggest challenge to the implementation of calorie menu labelling in Ireland.

The national consultation indicates that there is strong consumer demand for calorie menu labelling and that as long as adequate support is provided this will be welcomed by all stakeholders in Ireland.

**RECOMMENDATION 3:  
A BEST PRACTICE CALORIE MENU LABELLING SYSTEM WITH APPROPRIATE GUIDANCE SHOULD BE ADOPTED, CENTRED ON THE FOUR PRINCIPLES AND BASED ON THE TECHNICAL GUIDANCE PROVIDED FOR CONSULTATION**

In response to the technical survey, respondents (77% food businesses and 23% health professionals) support for the proposed principles on which to base calorie menu labelling was largely positive.

Sixty four percent of respondents supported all or part of Principle 1: displaying calorie information on ALL standard food and drink items sold. Sixty four percent supported all or part of Principle 2: displaying calorie information clearly at the 'point of choice' (wherever the food or drinks are described and placed beside the price in the same prominence). Fifty seven percent of people supported all or part of Principle 3: displaying calorie information in terms of the amount of calories in a portion or a meal. Whilst fifty four percent supported all or part of Principle 4: displaying information about how many calories average people need in a day so that people can make sense of the calorie menu labelling values.

It should be noted that a significant proportion of food business respondents did not support Principles 1 to 4 and the majority of these didn't agree with Principles 3 and 4 (53% and 51% respectively). However, these principles found strong support with health professional group where 95% and 89% agreed with all or part of Principles 3 and 4 respectively.

**RECOMMENDATION 4:  
INTRODUCE CALORIE MENU LABELLING ON A VOLUNTARY BASIS AND EVALUATE ITS IMPLEMENTATION AFTER A SUITABLE PERIOD OF TIME. USE THIS INFORMATION AS A BASIS TO MAKE DECISIONS AS TO THE APPROPRIATENESS AND SCOPE OF A MANDATORY SCHEME**

Significantly more consumers (92%), health professionals (88%) and others (84%), compared with food businesses (58%), want calorie menu labelling to be mandatory for large food businesses.

Nevertheless, this desire should be tempered by the responses to the technical survey which clearly indicate that there are many difficulties for food service businesses in implementing calorie menu labelling. Key problems relate to the lack of training and skills in the food service community to facilitate accurate calorie menu labelling. Cost and time considerations in the current economic climate cannot be ignored and it is clear that initial support is required to defray potential expense for food businesses. By and large, food businesses would only make limited use of technical facilities located at the FSAI offices although more would potentially access a technical expert through the FSAI. The full details of what works best for every food service business situation in Ireland are not yet known well enough to develop the clear and appropriate rules that would be needed for the legislative route.

For these reasons, the calorie menu labelling scheme should be introduced on a voluntary basis for an initial period. During this introductory phase, detailed procedures that are flexible enough to accommodate the diversity of food service outlets in Ireland should be developed. A second advantage of having the introductory phase of calorie menu labelling on a voluntary basis is that it gives food businesses time to put this in place. During the introductory phase, the calorie menu labelling scheme should be fully evaluated. This evaluation could include assessment of compliance with best practice guidance on calorie menu labelling and accuracy of information on the calorific value of foods and beverages on sale in food service outlets in Ireland amongst other important considerations.

## Further Recommendations from the Food Safety Authority of Ireland

The following recommendations stem from work that the FSAI has undertaken whilst the national consultation was underway, to further explore ways to facilitate the implementation of calorie menu labelling in Ireland. They are direct recommendations from the FSAI and were not part of the national consultation questions.

**RECOMMENDATION 5:  
THE FSAI AND THE FOOD STANDARDS AGENCY  
NORTHERN IRELAND (FSANI) SHOULD CONTINUE  
THEIR COLLABORATION WITH A VIEW TO  
INTRODUCING A HARMONISED CALORIE MENU  
LABELLING SCHEME ACROSS THE WHOLE ISLAND OF  
IRELAND**

In Northern Ireland, voluntary calorie menu labelling was introduced in May 2012. A six-month pilot scheme involving eight large food businesses is currently under way. This pilot scheme will be evaluated after the six-month period and the findings will inform potential further roll out of the scheme in Northern Ireland. In addition, the evaluation will identify the need for further work to aid consumer understanding of calorie information. During the consultation period, the FSAI took the opportunity of discussing the initiative with the FSANI. It is clear that there is a significant opportunity to collaborate to develop a harmonised calorie menu labelling scheme across the two jurisdictions.

An all-island approach would provide significant advantages for both food businesses, consumers and the Government. For food businesses operating in both jurisdictions, there are cost and time savings to be realised in a harmonised system. For consumers, particularly those in border areas, a harmonised system would facilitate better understanding and use of the calorie information provided. For the Government, there may be cost saving synergies that can be exploited in the development of training support and provision of technical support for food service businesses.

**RECOMMENDATION 6:  
A BUSINESS SUPPORT PLAN NEEDS TO BE PREPARED  
BY THE FSAI AND AGREED AND RESOURCED BY THE  
GOVERNMENT TO ENSURE THE SUSTAINABILITY OF  
THE CALORIE MENU LABELLING SCHEME**

Discussions with food businesses in the service sector reveal that there is a significant technical skills gap which needs to be addressed to enable them to implement calorie menu labelling in a sustainable way. Training modules need to be developed to train food service business staff in calorie menu labelling. Such training will need to be short-term in the case of the immediate need but also long term in addition to the curricula of catering colleges. This is necessary to provide an element of sustainability. It would be desirable to explore ways to provide an online software package for use by food service business staff for the purposes of calculating the calorie content of food and beverages served. These initiatives will require resources to implement. However, without them, food service businesses will have to find their own resources to engage expert help on an ongoing basis and this could prove unsustainable from a business perspective.

# CHAPTER 1: BACKGROUND TO CALORIE MENU LABELLING

## 1.1 Approaches Needed to Curb the Obesity Crisis

Diet and nutrition are major determinants of population health. Poor diet, physical inactivity, and obesity are three major risk factors for the development of heart disease and type 2 diabetes. Since 1990, obesity has doubled amongst Irish women and tripled amongst Irish men resulting in Ireland having the second-highest rate of obesity in Europe. With 26% of Irish men (SLÁN, 2006), 21% of Irish women (SLÁN, 2006), 7% of 9-year-olds ([www.growingup.ie](http://www.growingup.ie)), and 6% of 3-year olds in Ireland ([www.growingup.ie](http://www.growingup.ie)) now classified as obese, this situation is a crisis which needs to be urgently tackled.

There are many factors which increase the likelihood of children, teenagers, adults and older adults becoming overweight and obese. Diet, physical activity, social and cultural practices, the physical environment in which a person lives, and genes, can all contribute to the development of obesity. The current food environment is represented by excesses of energy-dense foods. Such foods strongly appeal to people's innate preferences for sweet, salty and high-fat tastes. Such taste preferences, combined with the human tendency to eat when food is available and to eat more when more food is available, increase the risk of overweight and obesity (Brug, 2008). This food environment, combined with less physical activity, is recognised as the driving force behind many of the less healthy habits endemic to developing countries (see Flynn, 2006 for review). Therefore, approaches to change this 'obesogenic' environment are needed to protect the population against foods and eating patterns that contribute to overweight and obesity (Flynn, 2006).

There is no single approach which can successfully address the obesity epidemic – a varied approach involving all levels of society is required (Flynn, 2006). Recent data show that 18-64 year olds consume 24% of their total energy from food and drink outside the home (IUNA, 2011). As such, the food service sector can play a very positive role in promoting public health. Calorie menu labelling is one approach to addressing the obesity crisis which does benefit consumers who use the calorie information provided.

## 1.2 Calorie Menu Labelling – Where in the World?

### UNITED STATES OF AMERICA

Calorie menu labelling was first introduced on a voluntary basis in 2003 in the United States – the country with the highest rate of obesity worldwide. It really took off when New York City introduced legislation for calorie menu labelling in 2008 and more than 30 U.S. cities and States have since followed. The legislation introduced requires all food establishments with a minimum number of outlets to provide calorie information. Later in 2012, a federal menu labelling law (passed in 2010) is due to come into effect making calorie menu labelling mandatory across the U.S. This law provides a national standard for calorie menu labelling, with all restaurant chains with 20 outlets or more obligated to provide this information.

### AUSTRALIA

Calorie menu labelling could in fact be 'joule menu labelling' (kilocalories or kilojoules). So far, Australia is the only place to recognise that joule is the more correct term for calories. Now in certain territories in Australia, it is mandatory for the number of kilojoules in a dish to be provided in certain food service outlets. Food service outlets with 20 or more units are obligated to provide this information.

### GREAT BRITAIN

In Britain, the approach to calorie menu labelling was introduced on a voluntary basis and a voluntary system remains in place today. In January 2009, the Food Standards Agency (FSA) announced that it was starting a programme of work to develop a voluntary calorie labelling scheme for the catering industry. A pilot scheme involving 21 participating UK companies followed. An evaluation of this scheme revealed that businesses were able to implement calorie information and that challenging issues encountered while setting up the initiative, can be overcome. This work has been continued by the UK Department of Health, following the transfer of nutrition policy from the FSA in England. As part of the "UK Public Health Responsibility Deal", 'Out of Home Calorie Labelling' was launched in 2011. Thirty eight food companies signed the pledge with up to 5,000 outlets displaying calories in the UK by the end of 2011 (<http://responsibilitydeal.dh.gov.uk/f1-calorie-labelling/>). All of the 38 companies signed up to this deal have head offices with technical expertise and a large number of outlets.



## NORTHERN IRELAND

In Northern Ireland, voluntary calorie menu labelling was introduced in May, 2012. A six-month pilot scheme involving eight large food businesses is currently under way. During this time, calorie information for these food service businesses is calculated with assistance from the University of Ulster funded by the FSA(NI). The calorie information will be displayed on menus in one or more outlets of the participating food businesses, following best practice principles. Catering businesses that want to apply voluntary calorie labelling but who are not involved in the pilot, can access a technical guidance document which offers practical advice. This technical guidance follows the same principles as the UK Department of Health technical guidance on best practice for calorie menu labelling. A guidance document has also been developed for consumers in Northern Ireland.

This pilot scheme will be evaluated after the six-month period and the findings will inform potential further roll out of the scheme in Northern Ireland. In addition, the evaluation will identify the need for further work to aid consumer understanding of calorie information.

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# 24%

of calories are eaten outside the home. Recent data show that 18-64 year olds consume 24% of their total energy from food and drink outside the home.

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# -106 CALORIES

A large study by (Dumanovsky, 2011) reported that of the 15% of consumers who reported using the calorie information provided, purchased 106 fewer calories on average compared with those who reported not using the information.

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# 15%

of consumers use calorie information on menus.

## 1.3 Calorie Menu Labelling has an Impact

Calorie menu labelling is a relatively new concept, and as such, evidence is still emerging about the impact this approach has on eating behaviour. Like all interventions, calorie menu labelling has the most impact on those who engage in the process. Studies show that individuals who use calorie menu labelling purchase fewer calories. A large study by (Dumanovsky, 2011) reported that of the 15% of consumers who reported using the calorie information provided, purchased 106 fewer calories on average compared with those who reported not using the information. Another study showed that, on average, 6% fewer calories were purchased by consumers in a coffee chain, though a reduction of up to 26% less calories was reported for some consumers (Bollinger, 2010). Very importantly, this reduction was sustained over the 10-month period of this particular study.

There is no single approach which can successfully address the obesity crisis. It is essential to recognise that a small but sustained positive change in the eating behaviour of a large number of individuals can have a major effect on the obesity crisis – calorie menu labelling offers this potential. Apart from the minority of consumers who use the calorie menu information with immediate effect on their food purchases, there are other positive effects, which can be expected to increase the health benefits of food sold. These effects include consumer demand for smaller and more appropriate portion sizes for meals and snacks; and for healthier foods and beverages. Without the drive of consumer demand, food service businesses could not initiate these changes without risking a loss of revenue.

# CHAPTER 2: CONSUMER VIEWS ON CALORIE MENU LABELLING

## 2.1 Introduction

Recent Irish data show that 18-64 year olds consume 24% of their total energy from food and drink outside the home (IUNA, 2011). Adults more than 65 years of age in Ireland consume 9% of their total energy from food and drink outside the home (IUNA, 2011). Therefore, food service outlets provide a significant number of calories consumed daily in Ireland. As such, the food service sector can potentially play a very positive role in promoting more health-conscious and informed food choices amongst consumers. Through consumer demand for smaller and more appropriate portion sizes and for healthier foods and beverages, calorie menu labelling may help combat obesity even where only modest changes occur in consumer behaviour.

In light of these factors, a national consultation was held to determine the views of stakeholders on calorie menu labelling with the Consumer Survey assessing the views of consumers.

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## 3,130 RESPONSES

Of the 3,130 responses to the Consumer Survey, 85% were made by consumers, 10% were made by health professionals, 2% were made by food business operators, and 2% were made by those in the 'other' category.

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## 95%

of survey respondents want calorie menu labelling in all or some food outlets

## 2.2 Approach to Determine Consumer's Views on Calorie Menu Labelling

A user-friendly booklet developed by the FSAI, *What People Need to Know about Putting Calories on Menus in Ireland*, FSAI, 2012 provided background information on the obesity epidemic in Ireland, calorie menu labelling in other countries and what consumers could expect regarding calorie menu labelling. This was made available on the FSAI website (<http://www.fsai.ie/WorkArea/DownloadAsset.aspx?id=11235>) and in hard copy.

A survey with 12 questions was used to receive consumer responses over a four-week period (2nd to 29th February, 2012). This survey was available online, but responses received by phone and post were also considered. Information was collected on: submitters' background, where calorie menu labelling should be implemented, how calories should be presented on a menu, whether consumers felt that calorie menu labelling would be trustworthy, whether calories should be put on all alcoholic drinks, and whether calorie menu labelling should be mandatory for large food businesses. For each question asked, consumers had the opportunity to give reasons for their answer (see Appendix 1 for transcript of questions included in the Consumer Survey).

The National Consultation on Calories on Menus in Ireland was formally launched by the Minister for Health, Dr James Reilly, T.D. Stakeholders from the Department of Health, the Health Service Executive, and the food service industry also attended. Consumer responses were formally invited by press release. The survey was further highlighted through various media, i.e. 11 radio interviews, 3 television interviews, 21 newspaper articles and multiple Facebook activities.

Data from the consumer survey were analysed using SPSS (PASW Statistics 18). Submissions to the consumer survey were explored for differences in response according to background (consumer vs. health professionals [health care and food inspectorate] vs. food business vs. other) using  $\chi^2$  statistical test.

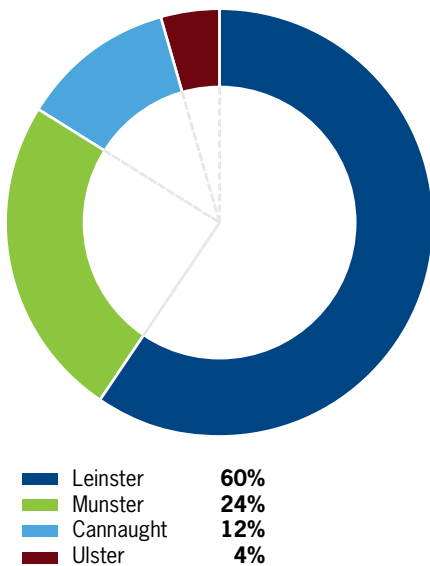
## 2.3 Results on Consumer’s Views on Calorie Menu Labelling

### 2.3.1 CONSUMER DETAILS

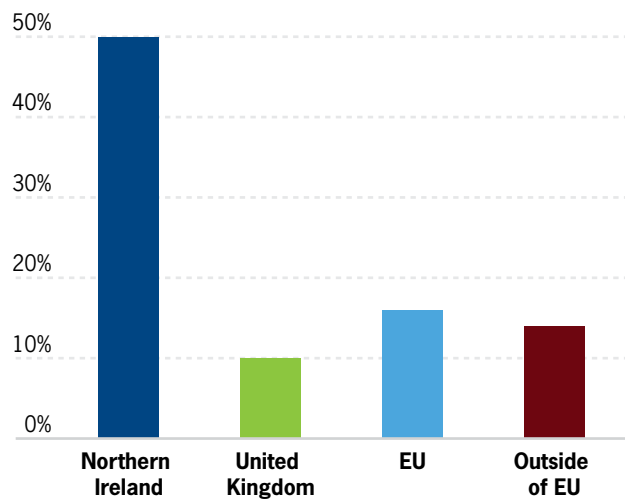
Of the 3,130 responses to the Consumer Survey, 85% were made by consumers, 10% were made by health professionals, 2% were made by food business operators, and 2% were made by those in the ‘other’ category.

Of the 3,130 responses, 98% were from the Republic of Ireland (ROI). Two percent of responses came from outside of Ireland. Ten percent of respondents from outside of the ROI did not provide their location.

**Proportion (%) of submissions from Ireland in relation to province**



**Proportion (%) of people living outside of the Republic of Ireland**



The average response time to the survey was 29 minutes. All surveys were completed online.

### 2.3.2 WHERE CALORIE MENU LABELLING SHOULD BE IMPLEMENTED

As shown in Table 1, over 95% of survey respondents want calorie menu labelling in all or some food outlets. The main reasons given for wanting calorie menu labelling in all outlets were 'informed decision making' (46%), 'fairness and equality amongst all food outlets' (10%), and 'to encourage healthier eating' (3%). Those wanting calorie labelling in some outlets want it in: fast food outlets (95%), followed by coffee shops and delis (63%), cinemas (58%), vending machines (57%), pubs (26%), and fine-dining restaurants (18%). Significantly more submissions from food businesses, compared to submissions involving those with any other background, did not want calorie menu labelling in any food outlet. The main reasons given for not wanting calorie menu labelling in any outlet were 'calorie labelling is unnecessary and ineffective' (3%), and 'prefer to eat guilt-free' (0.3%).

**Table 1. Views on where calorie menu labelling should be implemented in Ireland**

	Total Group		Consumer		Health Professional		Food Business		Other	
	n	(n)	%	(n)	%	(n)	%	(n)	%	(n)
	<b>3,130</b>		<b>2,666</b>		<b>322</b>		<b>73</b>		<b>69</b>	
	%	(n)	%	(n)	%	(n)	%	(n)	%	(n)
<b>In all food outlets</b>	83	(2,585)	85	(2,269)	75	(241)	37	(27)	70	(48)
<b>In some food outlets</b>	13	(396)	11	(288)	20	(64)	36	(26)	26	(18)
<b>In no food outlets</b>	4	(131)	4*	(94)	5*	(16)	25*	(18)	4*	(3)
<b>Don't know</b>	1	(18)	1	(15)	1	(1)	3	(2)	0	(0)

\*Views from food businesses significantly different from views of consumers, health professionals and others

COMMENTS TO SUPPORT CALORIE MENU LABELLING IN ALL FOOD OUTLETS:

“We need to know what we’re eating in order to make healthy choices. It doesn’t make sense for some outlets to show calories and others not to.”

“Living a healthy lifestyle is not a part-time thing. You need to be aware of the calorific values of ALL the food you consume.”

“Some people are in a food fog and do not realise the amount of fat in certain things... knowledge is vital.”

“I think people should be informed and let each person make their own choices from there. I know it may be hard for some restaurants to do, but even a basic calorie range would be a help. The hidden calories are where people need to be more informed. It’s hard for the average person to realise a cappuccino coffee has more calories in it than a bar of chocolate.”

“I won’t have to second guess the content, or look it up after I’ve gone home and then regret my choice.”

“It would give me the tools to make an informed choice.”

“This empowers individuals with information. Some will choose to ignore it, but it may influence others to make healthier choices. If it even impacts on some of the population, it may have an impact on our overweight/obesity statistics.”

“In for a penny, in for a pound - it would not be practical to just ask only some outlets to apply calories to menus; why not all? It would be misleading to have certain outlets present the calorie information and not others. For unaware consumers it would give the impression that places exempt from showing this information are healthier in some way.”

“Good to have it there if you want it, you don’t have to look if you don’t want to!”

“People deserve to be informed - after all - it’s them who are eating it.”

### COMMENTS TO SUPPORT CALORIE MENU LABELLING IN **SOME** FOOD OUTLETS:

“I feel staff canteens, sandwich bars, etc., should display calories as people eat there on a daily basis so they would have a larger impact on a person’s overall calorie intake rather than a restaurant or pub where a person may frequent far less.”

“Calories are more useful for the frequently used venues/sources, i.e. places where people eat more than once or twice per week.”

“I think when people go out to restaurants/pubs for a meal, they are really there to enjoy themselves and generally the standard of what is being consumed is much higher than for example a fast food outlet or the high volume of sweets and salty food at the cinema.”

“These are the places [fast food outlets, cinemas and vending machines] that serve spudgy, fatty, unhealthy food.”

“Restaurants that change menus often would find it hard to work out calories of all food. Much easier for big chains with set menus... if I’m out for a nice meal I just don’t care how many calories there are in food.”

#### 2.3.3 HOW CALORIES SHOULD BE PRESENTED ON A MENU

The majority (87%) of respondents would prefer to have calories displayed beside the price of food and drink items on the menu. Significantly more submissions from consumers, health professionals and others, compared with those from food businesses (89%, 83%, 83% vs. 53% respectively), wanted calorie values to be displayed beside the price.

#### 2.3.4 TRUST IN CALORIE MENU LABELLING

In **Table 2**, significantly more submissions from food businesses, compared to submissions from any other background, reported that calorie menu labelling would not be trustworthy. The main reasons given for the lack of trustworthiness were ‘the natural variance in homemade meals would make it impossible to guarantee accuracy in calorie values’ (5%) and ‘the system will be abused due to the impracticalities of policing it’ (3%).

**Table 2. Would calorie information be trusted: views according to submitters' background**

	Total Group		Consumer		Health Professional		Food Business		Other	
	n	(n)	n	(n)	n	(n)	n	(n)	n	(n)
	n 3,130		n 2,666		n 322		n 73		n 69	
	%	(n)	%	(n)	%	(n)	%	(n)	%	(n)
<b>Yes</b>	60	(1,893)	62	(1,662)	51	(164)	36	(26)	59	(41)
<b>No</b>	12	(366)	10*	(263)	18*	(57)	49*	(36)	14*	(10)
<b>Don't know</b>	28	(871)	28	(741)	31	(101)	15	(11)	26	(18)

\*Views from food businesses significantly different from views of consumers, health professionals and others

COMMENTS ON WHY CALORIE MENU LABELLING WOULD NOT BE TRUSTWORTHY:

“They might just make up figures... restaurant owners might not reveal that a particular recipe contains an ingredient e.g. cream, and this would distort the calorie content/claim.”

“Good restaurants cook according to the request of the person - i.e. addition of cream to a curry to reduce how hot it is going to be - impossible for the restaurant to calculate this for each and every dish.”

“Because each ingredient will not be weighed on accurate weighing scales, chefs will squirt out a little of this and add handfuls of that. It's not an exact science like in a production factory.”

“I don't think that most places would want people knowing exact calorie content in their products for fear of people rejecting the product/service.”

“Having carried out some menu audits for canteens as well as having worked as a chef in kitchens, I can say that trying to obtain a correct, standard recipe or portion size that's actually in use is a challenge. The majority of kitchens do not use standard recipes with the exception of large franchise operations.”

### 2.3.5 MAKING CALORIE MENU LABELLING MANDATORY FOR LARGE FOOD BUSINESSES ('LARGE' FOOD BUSINESSES WILL BE DEFINED BY THE NUMBER OF OUTLETS THEY HAVE)

The majority (90%) of respondents from the total group stated that calorie menu labelling should be mandatory for large food businesses. The main reasons given for supporting the development of legislation for calorie menu labelling were: 'legislation needed to ensure consumers are properly informed' (18%), 'legislation is the best way to ensure compliance' (8%), and 'large food businesses can afford this initiative' (3%). Significantly more consumers, health professionals and others, compared with food businesses, wanted calorie menu labelling to be mandatory for large food businesses (92%, 88%, 84% vs. 58% respectively). The main reason given for not wanting the development of legislation for calorie menu labelling was 'Don't want calorie menu labelling at all' (7%).

### 2.3.6 CALORIE MENU LABELLING ON ALCOHOLIC DRINKS

In **Table 3**, the majority of survey respondents would prefer to see calorie menu labelling in all or some outlets serving alcoholic drinks (84%). The main reasons for wanting calorie menu labelling were to ensure 'more informed decision-making' (37%) and for fairness across all food service outlets (3%). Significantly more consumers, health professionals and others, compared with food businesses, wanted calorie menu labelling to include alcoholic drinks. The main reason given for not wanting calorie menu labelling to apply to alcoholic drinks were 'calories are not necessary on alcoholic drinks' (5%).

**Table 3. Should calorie labelling apply to alcoholic beverages: views according to submitters' background**

	Total Group		Consumer		Health Professional		Food Business		Other	
	n 3,130		n 2,666		n 322		n 73		n 69	
	%	(n)	%	(n)	%	(n)	%	(n)	%	(n)
<b>Yes, in all outlets</b>	74	(2,331)	75	(2,003)	77	(249)	44	(32)	68	(47)
<b>Yes, in some outlets</b>	10	(313)	10	(262)	11	(35)	7	(5)	16	(11)
<b>No, in no outlets</b>	11	(329)	10*	(259)	10*	(31)	42*	(31)	12*	(8)
<b>Don't know</b>	5	(157)	5	(142)	2	(7)	7	(5)	4	(3)

\*Views from food businesses significantly different from views of consumers, health professionals and others



## 2.4 Discussion and Conclusions

There was a huge response to this national consultation. The number of submissions to this consultation was unprecedented. A total of 3,130 responses to the consumer survey were received. Previously, the best response to a national consultation – which concerned the addition of folic acid to bread and was supported by commercial advertising – received 513 submissions.

Given the size of the response and that over 95% of submissions to the consumer survey were in favour of calorie menu labelling in all or some food service outlets, demonstrates an overwhelming demand for calorie menu labelling among consumers in Ireland. The qualitative data collected on reasons why consumers want this information mainly indicate a strong plea for information to make informed food choice decisions that foster healthier eating by consumers.

While a clear majority (90%) of submissions to the consumer survey were in favour of making calorie menu labelling mandatory for large food service businesses (those with several outlets), only just over half of those with a food service business background supported this. The qualitative data indicate that consumers believe mandatory implementation of calorie menu labelling by large food service outlets represents the best way of ensuring calorie menu labels 'happens' and 'happens properly'. Nevertheless, this desire should be tempered by the responses to the technical survey (Chapter 3) which clearly indicate that there are many difficulties for food service businesses in implementing calorie menu labelling. Key problems relate to the lack of training and skills in the food service community to facilitate accurate calorie menu labelling. Cost and time considerations in the current economic climate cannot be ignored and it is clear that initial support is required to defray potential expense for food businesses. At this point in time, the full details of what works best for every food service business situation in Ireland are not known well enough to develop the clear and appropriate rules that would be needed for the legislative route.

Some concerns were evident amongst consumers regarding the trustworthiness of calorie menu labelling. This was further demonstrated in responses from food service businesses that highlighted the greater variability in recipe ingredients in the context of catering service outlets compared to the strict control exerted in food factories. This highlights one of the areas that will have to be addressed to ensure an acceptable degree of accuracy exists in calorie labelling information both from the consumer's and food law enforcer's perspectives. Guidance on fidelity to the amounts and types of ingredients used in recipes and portion control will be as important as use of appropriate food composition tables/software. Evidence from American studies that have examined the accuracy of calorie menu labelling indicates that if standard recipes are followed without deviation and portion sizes are controlled to be consistent; the calorie information provided is reliable and accurate (Urban, 2011).

# CHAPTER 3: STAKEHOLDER VIEWS ON CALORIE MENU LABELLING

## 3.1 Introduction

Regardless of whether calorie menu labelling is required on a voluntary or mandatory basis, it should be implemented following best practice principles. Best practice principles for calorie menu labelling ensure that the information is relayed to the customer in a consistent and effective manner.

Four technical principles summarise best practice in calorie menu labelling:

- **Principle 1** – Calorie information is provided for all standard food and drink items sold
- **Principle 2** – Calorie information is displayed clearly and prominently at the ‘point of choice’ for the consumer
- **Principle 3** – Calorie information is provided per portion or per meal
- **Principle 4** – Information on how many calories an average person needs in a day is given to help consumers ‘make sense’ of calories on menus

These four technical principles underpin best practice in calorie menu labelling. Feedback from food businesses and health professionals on the technical aspects of implementing these four principles in Ireland was needed. This would serve to shape practical guidance developed for the implementation of calorie menu labelling in Ireland so that it would most suit Irish conditions in addition to being in line with best practice.

The aim of this national consultation was to determine the views of stakeholders in the food service sector on draft best practice guidance for calorie menu labelling in Ireland.

## 3.2 Approach to Determine Stakeholder’s Views on the Technical Aspects of Calorie Menu Labelling

*Putting calories on menus in Ireland – draft technical guidance for food businesses* was developed by the FSAI and made available on the FSAI website (<http://www.fsai.ie/WorkArea/DownloadAsset.aspx?id=11234>) and in hard copy. This draft guidance document outlined the four technical principles underpinning best practice in calorie menu labelling. In addition, this booklet included detailed practical guidance on how to implement the best practice principles. Stakeholders (food businesses and health professionals) were invited to submit their views on this draft technical guidance via an online technical survey.

A survey with 22 questions was used to receive stakeholder responses over a four-week period (2nd to 29th February, 2012). This survey was available online, but responses received by phone and post were also considered. Information was collected on: submitters’ background, their location, the number of outlets they had, and the number of items on their menus. The main questions focused on submitters’ views on the four best practice principles and the draft guidance on how these should be implemented in Ireland. For each question asked, stakeholders had the opportunity to give reasons for their answer (see Appendix 2 for transcript of questions included in the technical survey).

The national consultation on calories on menus in Ireland was formally launched by the Minister for Health, Dr James Reilly, T.D. Stakeholders from the Department of Health, the Health Service Executive, the food service industry and health professions also attended. Stakeholders in food service businesses and health professionals were formally invited by press release and emails (see list in Appendix 3) to submit their views on the draft technical guidance for food businesses survey. The survey was further highlighted through various media, i.e. 11 radio interviews, 3 television interviews, 21 newspaper articles and multiple Facebook activities.

Also during this four-week consultation period, attendees at a food service industry trade exhibition in the RDS, Dublin in February 2012 were surveyed using an interviewer-assisted questionnaire. Data on gender, age, and whether calorie menu labelling should be implemented and in which food outlets, and how many calories did they think they needed in a day, were collected. Of the survey respondents, those actively working in food service businesses were asked if they would implement calorie menu labelling when it is promoted in Ireland.

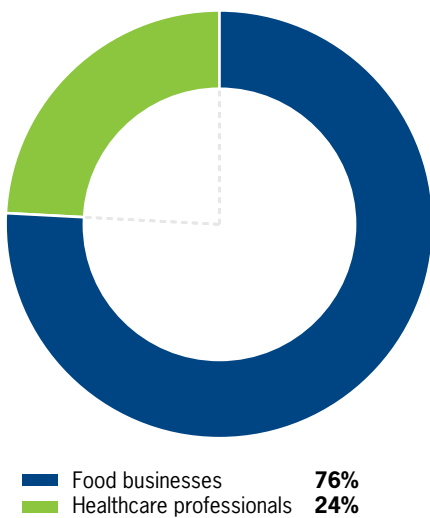
Data submitted to the technical survey were analysed using SPSS (PASW Statistics 18). Submissions to the technical survey were explored for differences in response according to background (health professional [health care and food inspectorate] vs. food business) using  $\chi^2$  statistical test. Data collected at industry trade exhibition were also analysed using SPSS, where views were explored for differences according to age category and gender using  $\chi^2$  statistical test.

### 3.3 Results on Stakeholders' Views on Calorie Menu Labelling

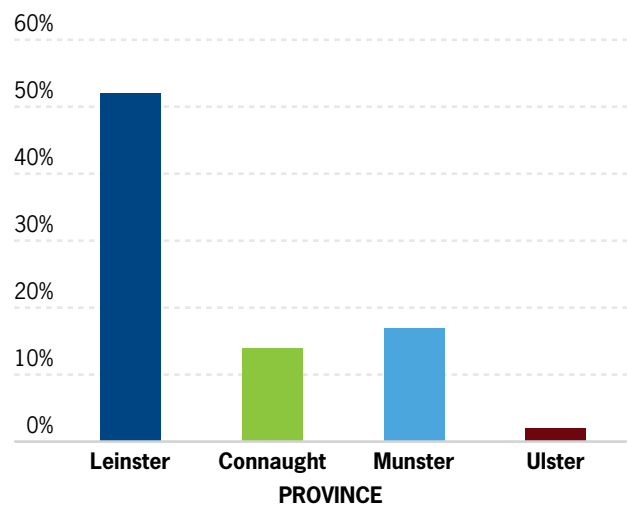
#### 3.3.1 DETAILS OF THE ONLINE SUBMISSIONS TO TECHNICAL SURVEY

Of the 262 submissions to the online Technical Survey, 76% were made by food businesses and 24% were made by health professionals. Fifty-two percent of submissions came from businesses located in Leinster, 14% from Connaught, 2% from Ulster, 17% from Munster, and 1% from the United Kingdom. Details on location were not provided on 14% of submissions.

**Proportion (%) of people who completed the industry survey based on background**

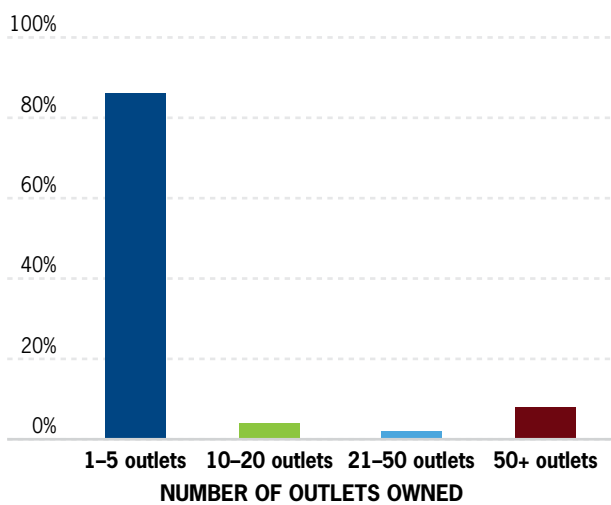


**Proportion (%) of people who completed the technical survey based on province**

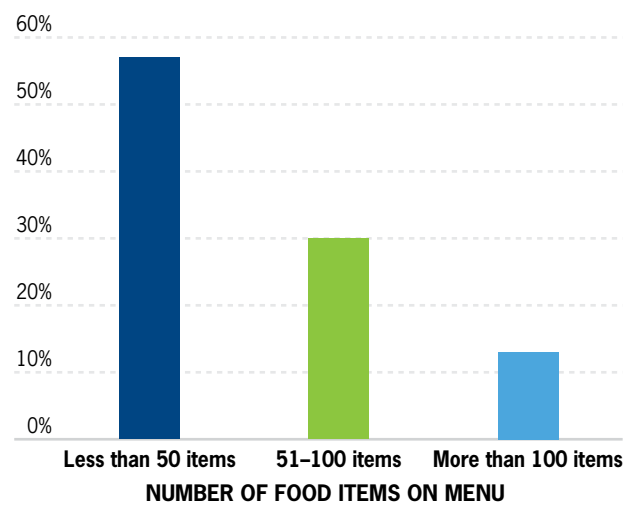


The majority (86%) of food businesses were responsible for 1-5 food outlets. Four percent of food businesses were responsible for 10-20 food outlets, 2% for 21-50 outlets, and 8% for more than 50 food outlets.

**Proportion (%) of food businesses responsible for multiple outlets**



**Proportion (%) of food businesses based on number menu items provided**



The majority (57%) of food business had 50 items or less on their menu. Thirty percent of food businesses had 51-100 menu items, and 13% had more than 100 menu items. The average response time to the survey was 32 minutes. The majority (93%) of submissions were received online, all remaining submissions were received by post.

### 3.3.2 VIEWS FROM THE TECHNICAL SURVEY ON PRINCIPLE 1 OF CALORIE MENU LABELLING

**PRINCIPLE 1: Calorie information is provided for all standard food and drink items sold.**

**A standard food or drink item is a product that is on sale for at least 30 days a year and remains the same each time it is made.**

**Providing calorie information on alcoholic drinks is at the discretion of the food business.**

As shown in **Table 4**, the majority of submissions received in the national consultation were in support of some or all of Principle 1 and its accompanying guidance (<http://www.fsai.ie/WorkArea/DownloadAsset.aspx?id=11234>) regardless of submitters' background. However, significantly fewer food businesses, compared with health professionals, agreed with both the content of, and guidance for, Principle 1.

**Table 4. Views on Principle 1 and the proposed guidance for Principle 1 according to submitters' background**

	Total Group		Food Business		Health Professional	
	n 262		n 199		n 63	
	%	(n)	%	(n)	%	(n)
<b>Agree with all of Principle 1</b>	42	(110)	33	(65)	72	(45)
<b>Agree with some of Principle 1</b>	22	(58)	24	(47)	17	(11)
<b>Disagree with all of Principle 1</b>	32	(85)	41*	(81)	6*	(4)

	Total Group		Food Business		Health Professional	
	n 241		n 181		n 60	
	%	(n)	%	(n)	%	(n)
<b>Agree with all of guidance</b>	37	(89)	27	(49)	67	(40)
<b>Agree with some of guidance</b>	23	(55)	23	(42)	22	(13)
<b>Disagree with all of guidance</b>	34	(82)	43*	(78)	7*	(4)

\*Views from food businesses were significantly different from views of health professionals

A number of concerns were raised amongst submissions which agreed with some of Principle 1. Only a few submissions cited reasons for their submissions. Of those submitted, the main concern cited by 3% of submitters for Principle 1 was that it is unfeasible and unrealistic to provide calorie information on every food and drink item which is on sale for a minimum of 30 days a year. Three submissions suggested an increased timeframe for providing calorie information on standard food and drink items, suggesting 60, 90 and 180 days respectively.

**“The issue is the cost of calculating calories for items on sale for only a short time. We want innovation, so perhaps it should be for items on sale for 3 months.”**

**“Increase time limit to 60 days to accommodate specific promotions.”**

Principle 1 also states that standard food items should remain the same each time they are made. A small number of submissions (8%) highlighted the much greater difficulty small food businesses would have in accurately meeting this part of the principle, compared with food which is mass-produced for chains of food outlets.

**“I would query how homemade products would be affected, which by their nature change with every batch.”**

**“There are simply too many variables to make this work. Restaurants are not like chains - our food is not standard - our chefs can make changes to dishes at will. Chef A may make curry one way, while Chef B adds more cream because they are free-pouring instead of using a jug. The calorie content will change every time.”**

**“I don’t agree that calorie information should be required for restaurants which adjust their menus seasonally and prepare fresh food “à la minute.”**

Feedback on the draft practical guidance associated with Principle 1 included providing specific guidance on ‘specials’, ‘extras’ and ‘self-service buffets’ (3%), on how staff should be trained to apply calorie menu labelling (2%), and on how alcohol should be included as a standard food item (1.5%). A further 4% of submitters made comments regarding the general burdensomeness of the guidance associated with the principle.

A number of concerns were raised amongst submissions which disagreed with all of Principle 1. The submitters who disagreed with all of Principle 1 (11%) expressed their aversion to the entire calorie menu labelling initiative.

**“We do NOT have the resources to continually analyse the calorie content of our dishes. We have different menus for lunch, pre-theatre, à la carte dinner, set dinner menu and Sunday brunch. We are a small 70-seater restaurant...what you are asking us to do is beyond crazy.”**

**“This would only suit fast food chains where the menu never changes - and being honest the food is mainly calories anyway. Restaurants however, change their menus every 3-4 weeks or seasonally. Plus specials daily - very cost prohibitive to be doing this all the time!”**

Similarly, submissions which provided feedback (10%) on why they disagreed with all of the guidance which accompanies Principle 1 all expressed an aversion to the entire calorie menu labelling initiative.

**“Because by the time you guys make this happen we’ll need two phone book size menus to hand the customers who will simply walk out because they can’t have their lunch right away...hot and how they like it. This is bureaucracy gone MAD.”**

**“I don’t believe that listing calories is a healthy informative way of teaching people food value.”**

**“ALL of the guidance is clearly directed towards fast food/cafe chains and their style of foodservice. Clarification is required that this will not apply to cook-to-order/gourmet/independent/single outlet restaurants.”**

**“Leave the task of health education to the health education specialists in the Department of Health.”**

### 3.3.3 VIEWS FROM THE TECHNICAL SURVEY ON PRINCIPLE 2 OF CALORIE MENU LABELLING

**PRINCIPLE 2:** Calorie information is displayed clearly and prominently at the ‘point of choice’ for the consumer.

The ‘point of choice’ is the place where consumers choose from the food and drink on offer. Typical ‘point of choice’ locations include printed menus, menu boards, counter display tags, internet web pages from which food can be purchased etc.

As shown in **Table 5**, the majority of submissions received in the national consultation were in support of some or all of Principle 2 and its accompanying guidance: (<http://www.fsai.ie/WorkArea/DownloadAsset.aspx?id=11234>), regardless of submitters’ background. However, significantly less food businesses, compared with health professionals, agreed with both the content of, and guidance for, Principle 2.

**Table 5. Views on Principle 2 and the proposed guidance for Principle 2 according to submitters’ background**

	Total Group		Food Business		Health Professional	
	n 263		n 200		n 63	
	%	(n)	%	(n)	%	(n)
<b>Agree with all of Principle 2</b>	45	(119)	34	(67)	83	(52)
<b>Agree with some of Principle 2</b>	19	(50)	22	(44)	10	(6)
<b>Disagree with all of Principle 3</b>	34	(89)	43*	(85)	6*	(4)

	Total Group		Food Business		Health Professional	
	n 241		n 179		n 62	
	%	(n)	%	(n)	%	(n)
<b>Agree with all of guidance</b>	40	(96)	23	(42)	87	(54)
<b>Agree with some of guidance</b>	21	(50)	25	(45)	8	(5)
<b>Disagree with all of guidance</b>	36	(86)	46*	(83)	5*	(3)

\*Views from food businesses were significantly different from views of health professionals

A number of concerns were raised amongst submissions which agreed with some of Principle 2. Principle 2 states that calorie information must be clearly and prominently displayed at the 'point of choice' for consumers – the 'point of choice' being the place where consumers choose food and drink items for purchase. The main concern regarding this principle is the definition of the 'point of choice' (4%).

**"For consistency I feel principle 2 has too many options and may not promote clarity. This would be best suited positioned with the price of the product on sale."**

**"The menu should state "... copy of menu with calorific values is available"."**

**"Calorie information could be displayed on menus only, not on specials boards or chalk boards, as this information would take up too much space on a chalk board/specials board."**

**"I may have a special on that day that is promoted through the use of a chalkboard or daily printed page. Calorific information in this circumstance isn't practical. This wouldn't be an issue on the printed menu itself."**

**"I would leave it on POS material only. Or have it available to review but not on every single item that promotes a dish/product."**

**"Our research suggests that when customers are making a decision about their meal choice at the point of purchase, information provided on the menu boards placed above the serving area in front of the counter – was more effective than other mechanisms, such as a counter mat or other signage."**

This was followed by concerns regarding the 'display of this additional information' (3%).

**"The price is important - the calories beside the price could cause lot of confusion."**

**"How do we define "prominent"? Do we state that it must be the same size font as the menu prices or how else is this defined?"**

**"Clear labelling is important so as to ensure that consumers are not confused between the calorie number and the price."**

**Feedback on the guidance associated with Principle 2 included providing calorie information at a single designated 'point of choice' (5%), not having the calorie information as prominent as the price (3%), and that calorie menu labelling should only apply to large food businesses (2%).**

**"Calorie information should be on a printed menu or a menu board in the absence of a menu in a centralised location. Multiple locations may overburden FBO's and decrease space which is badly needed for marketing/POS information."**

**"Point of choice is a very vast topic and information overload should be avoided. Literacy issues also need to be addressed here. Clear information on printed menus is appropriate in a seating style restaurant environment."**

**"Master file is more realistic, every point of sale poster is too onerous."**

**"In certain more high-end establishments where dining is more of an experience, then perhaps the calories could be displayed somewhere more discreet e.g. the back of the menu. Obviously this would have to be categorised carefully. Perhaps this could be confined to single food businesses/small food outlets."**



Feedback on the guidance associated with Principle 2 included providing calorie information at a single designated 'point of choice' (5%), not having the calorie information as prominent as the price (3%) and that calorie menu labelling should only apply to large food businesses (2%).

**"If the calories have to be displayed, then the calorie figure should be at the end of the description of the dish in the same font as the contents of the dish are listed."**

**"It should be readily available but not as clearly printed as price or any other information. This should not be an exercise in making everybody feel guilty about dining out. For many consumers the act of dining out is a treat or celebration. Menus cannot not be used to turn people off dining out."**

**"It does not make sense to require calories to be printed in the same size as the price. It would be enough to display them in a clearly legible fashion (e.g. minimum font size could be 10 point pica) and print the value close to the item it relates to."**

**"I think restaurants where menus change depending on availability of fresh produce should be given a general overall rating per year which could be checked by a health inspector."**

**"Unrealistic for small restaurants with already stretched resources and changing seasonal menus."**

**"Apply this to fast food operations only."**

A small number of concerns were raised amongst submissions which disagreed with all of Principle 2. The submitters who provided feedback (6%) on why they disagreed with all of Principle 2 expressed their aversion to the entire calorie menu labelling initiative.

**"Are you serious? Would you like us to hand you a book or a menu?"**

**"This is only an extra cost when the sector is already struggling - keep your great ideas to yourselves!"**

**"From the point of view of cost of consultants, training, software, etc., and most of all because of the TIME it would take up, it would be far too onerous and totally unworkable for our business to put this scheme in place."**

Similarly, submissions which disagreed with all of the guidance which accompanies Principle 2 (13%) all expressed an aversion to the calorie menu labelling initiative.

**“I think it just plain mad, to go to these extremes when people just won’t pay attention. Sure, the healthy ones will, but are they your target?”**

**“I feel that the proposals are completely unworkable.”**

**“Guidance should not be printed on menus but on a separate nutritional information document if a food business chooses.”**

**“It will turn restaurants into a guilt trip for the customer. Everywhere you look would be a reminder as to why you should not be eating there!”**

**“I don’t consider it important for my customers to know the calorific value of the food we serve. My customers are out to enjoy and relax, not to be bamboozled by numbers.”**

**“Not in my menu box - it’s a SALES point, NOT an education point.”**

**“DON’T implement it.”**

### 3.3.4 VIEWS FROM THE TECHNICAL SURVEY ON PRINCIPLE 3 OF CALORIE MENU LABELLING

**PRINCIPLE 3:** Calorie information is provided per portion or per meal.

The calorie information on foods to share can be provided in two ways, e.g. for a pizza, the calories for the whole pizza are shown along with the number of portions or the calories in a single portion are shown along with the number of portions in the whole pizza.

The calorie information on a 'multi portion' or 'combo' meals can be provided in two ways - provide the calories for each individual item or provide the maximum amount of calories from combining the meal items shown.

The calorie information on different sized portions of the same foods/drinks can be provided in three ways – provide all calorie values for each size or the range from lowest calories to highest, provide calories for the most popular choice size or default option or provide the maximum calorie value for the portion size.

As shown in **Table 6**, the majority of submissions received in the national consultation were in support of some or all of Principle 3 and its accompanying guidance (<http://www.fsai.ie/WorkArea/DownloadAsset.aspx?id=11234>), regardless of submitters' background. However, significantly fewer food businesses, compared with health professionals, agreed with both the content of, and guidance for, Principle 3.

**Table 6. Views on Principle 3 and the proposed guidance for Principle 3 according to submitters' background**

	Total Group		Food Business		Health Professional	
	n 261		n 198		n 63	
	%	(n)	%	(n)	%	(n)
<b>Agree with all of Principle 3</b>	39	(102)	28	(56)	73	(46)
<b>Agree with some of Principle 3</b>	18	(48)	17	(34)	22	(14)
<b>Disagree with all of Principle 3</b>	41	(107)	53*	(104)	5*	(3)

	Total Group		Food Business		Health Professional	
	n 242		n 180		n 62	
	%	(n)	%	(n)	%	(n)
<b>Agree with all of guidance</b>	34	(82)	23	(42)	65	(40)
<b>Agree with some of guidance</b>	24	(57)	21	(38)	31	(19)
<b>Disagree with all of guidance</b>	37	(90)	48*	(87)	5*	(3)

\*Views from food businesses were significantly different from views of health professionals

A number of concerns were raised amongst submissions which agreed with some of Principle 3. Principle 3 states that calorie information must be provided per portion or per meal. The main concern regarding this principle is the 'difficulty which will be encountered to achieve accuracy with the information provided' (8%).

**"There must be a facility to allow a disclaimer on individually made/cooked products that the information is average for an expected portion size and may vary slightly depending on the final portion served."**

**"This would be difficult to enforce/comply with where portion sizes are not standard, e.g. buffet/carvery."**

**"It would be useful, but what happens if somebody substitutes chips for potatoes, requests no dressing or sauces. The amount of information required is staggering."**

**"The individual item`s calorie content is hard to determine, especially with items what have various sizes, such as chicken wings, or a ham hock on the bone."**

**"Would it mean that every meal would need to be individually weighed and a calculation then carried out? Where the calories of individual components of the meal are given (as per the guidance note suggestions on 'How principle 3 can best be implemented'), calculators or notepaper and biros will need to be provided for the consumers!"**

Suggestions to only display calorie information per meal were also expressed (4%).

**"I think it should be per meal rather than per portion as several outlets run meal deals and only the most careful of consumers may take the time to calculate all the portions of each item in the meal they consume."**

**"It must reflect the amount served on the plate...then a guide as to how many portions this is recommended for."**

Suggestions to only display calorie information per portion were also expressed (1%).

**"Per portion would be best to enable the customer to make an informed choice when ordering. Total calories for a meal to be shared could give the customer an unrealistic picture of the calories per portion and may encourage customers to believe that 1 pizza = 1 person, which is not the case."**

Principle 3 provided guidance on providing calorie information for (1) foods for sharing, (2) multi-portion or combo meals, and (3) different-sized portions of the same food or drink.

- (1) Of the submissions which provided feedback on the proposed guidance for 'foods for sharing', 7 submissions suggested that 'calorie information per portion with the number of portions' was preferred, 7 submissions suggested that 'calorie information per meal with the number of portions' was preferred, and 1 submission suggested that 'calorie information per meal and per portion along with the number of portions' should be provided.

- (2) Of the submissions which provided feedback on the proposed guidance for 'multi-portion or combo meals', 8 submissions wanted the option of providing the 'maximum amount of calories a meal could contain' removed and 1 submission wanted providing the 'maximum amount of calories a meal could contain' to be the only guidance on these meal types.
- (3) Of the submissions which provided feedback on the 'different-sized portions of food and drink', 4 submissions wanted calories on all beverage sizes to be specified, 1 submission wanted a calorie range from lowest to highest to be displayed, 1 submission wanted a calorie value for the medium-sized portion only, 1 submission wanted calorie information for the most popular size beverage only, and 1 submission wanted calorie information on the 'default' option provided to the consumer if size is not specified.

A number of concerns were raised amongst submissions which disagreed with *all* of Principle 3. The submitters who provided feedback (6%) on why they disagreed with all of Principle 3 highlighted the perceived difficulties with the implementation and resource costs of the calorie menu labelling initiative.

**"This will be impossible to quantify and far too difficult to monitor."**

**"Customers constantly ask for changes to their dishes. This is completely unworkable on a day to day basis."**

**"This calorie count is ridiculous - it just won't work...would be impossible to implement."**

**"Again, this is impractical and an extremely costly suggestion. To hire a nutritionist, which we have done for a limited number of 'healthy heart' dishes, was very expensive and took up a lot of our time."**

**"In our business it is almost impossible to standardise a portion - often customers ask for extra potatoes or vegetables and we are happy to oblige - how can we standardise this?"**

Similarly, submissions which provided feedback (11%) on why they disagreed with all of the guidance which accompanies Principle 3 expressed an aversion to the entire calorie menu labelling initiative.

**"I have been over this information with my calculator in hand...I can't make head nor tail of it...and I'm not even hungry or under time pressure. I don't have to get back to work in 30 minutes - at least 12 of which will be cooking time, about 10 minutes eating time, maybe 5 minutes to read this information and 5 more minutes to stress over it - no, as a customer I really don't need this nonsense."**

**"In my opinion the best option is to bin the whole project."**

**"I don't believe that calories should be evident on any menus. I believe that people have the option as to whether they would like to know the calorie content of each meal."**

**"Again this is entirely unworkable in restaurants. Chefs are humans, not robots."**

### 3.3.5 VIEWS FROM THE TECHNICAL SURVEY ON PRINCIPLE 4 OF CALORIE MENU LABELLING

**PRINCIPLE 4: Information on how many calories an average person needs in a day is given to help consumers make sense of calories on menus.**

**The average amount of calories women, men and children need every day will be displayed. The information must be the same in all food outlets.**

As shown in **Table 7**, the majority of submissions in the national consultation were in support of some or all of Principle 4 and its accompanying guidance (<http://www.fsai.ie/WorkArea/DownloadAsset.aspx?id=11234>).

**Table 7. Views on Principle 4 and the proposed guidance for Principle 4 according to submitters' background**

	Total Group		Food Business		Health Professional	
	n 262		n 198		n 64	
	%	(n)	%	(n)	%	(n)
<b>Agree with all of Principle 4</b>	37	(98)	28	(55)	67	(43)
<b>Agree with some of Principle 4</b>	17	(46)	16	(32)	22	(14)
<b>Disagree with all of Principle 4</b>	40	(106)	51	(100)	9	(6)
<b>Don't know</b>	5	(12)	6	(11)	2	(1)

	Total Group		Food Business		Health Professional	
	n 247		n 184		n 63	
	%	(n)	%	(n)	%	(n)
<b>Agree with all of guidance</b>	37	(91)	29	(53)	60	(38)
<b>Agree with some of guidance</b>	21	(52)	18	(34)	29	(18)
<b>Disagree with all of guidance</b>	39	(96)	48	(89)	11	(7)
<b>Don't know</b>	3	(8)	4	(8)	0	(0)

A number of concerns were raised amongst submissions which agreed with some of Principle 4. Principle 4 states that information on how many calories an average person needs in a day is given to help consumers 'make sense' of calories on menus. The main concern regarding this principle is that 'it is not the job of the food business operator to provide this information' (8%).

"The RDA should not be for the venue to display but should be as part of the national education/information process so that should the consumer choose to engage in calorie counting, they would know their own RDA. It is not the role of the venue to explain or police the RDA of calories."

"It may be better to do this as part of a public awareness drive."

"People should, and do know, what they should eat and not eat. To make small businesses responsible for their health is beyond me."

"We provide an eating experience not an education lesson. They don't get this at home when they open a food item."

Concern was also expressed that this information may be misleading to the customer if only information on the 'average' calories needs of an individual are displayed (3%).

"The average amount of calories for men, women and children may give consumers a false sense of how many calories they can have."

"As a guide it's fine however it can confuse some people."

"Provision of only partial information will result in misunderstanding of what is really needed for a balanced regime - 250 calories from a chocolate bar is not the same as from fruit & vegetables."

"This varies hugely from person to person, so while not ideal, is necessary to help people understand the choices they are making."

**8%**

expressed concern that 'it is not the job of the food business operator to provide this information'.

**17%**

of submitters who provided feedback expressed their aversion to the entire calorie menu labelling initiative.

A number of concerns were raised amongst submissions which disagreed with *all* of Principle 4. The submitters who provided feedback expressed their aversion to the entire calorie menu labelling initiative (17%), argued that it will involve providing too much information (2%) and that the information itself is meaningless to consumers and therefore irrelevant (2%).

**“To have this item displayed at every food outlet is quite excessive. A reminder every now and then is perhaps OK, but to have it in your face every time you see a food item is too much.”**

**“This information is provided on all purchased packed foods and has made no difference. The people who are monitoring their weight through calorie counting are aware of their specific needs.”**

**“We don’t believe that this information is necessary in a Restaurant as people can get this information through various other methods.”**

**“It is just a waste of time, people will not take any care, and will just skip all the information. Do you honestly think that they will even take notice?”**

Principle 4 provided guidance on providing information on how many calories people need in a day. The submissions which provided feedback agreeing with some of the guidance commented that this guidance is too vague and needs to be more specific (7%)

**“Should consideration of physical activity levels be indicated here? These are very broad guidelines and many people wishing to lose weight may need to be consuming less than these recommended calorie intakes to achieve a healthy weight. Where high fat high sugar foods are on the menu, should it be stated that these foods ‘should only be consumed in moderation as part of a healthy balanced diet.’”**

**“Most people do not fit into an average - these needs to be clear”**

Suggestions that calories may be provided elsewhere but not on the menu were also submitted (3%)

**“I believe that this should be available in each food outlet but not necessarily a requirement for the menu”**

**“Should be printed on separate document”**

The submissions that disagreed with all of the guidance which accompanies Principle 4 did not want to display/ see calories on menus (7%) and deemed calories on menus unnecessary (8%).

**“This has nothing to do with our restaurant - this is a personal thing for people if they want to know.”**



“People should educate themselves it shouldn’t be up to a restaurant to do it for you.”

“There is no point in putting this information on menus as it’s only relevant if the menu items are listed with their calorie content - a principle with which I wholeheartedly disagree.”

### 3.3.6 VIEWS ON SUPPORT FOR THE IMPLEMENTATION OF CALORIE MENU LABELLING

Respondents were asked a series of questions about support to help with the implementation of calorie menu labelling. Although both food businesses and health professional groups responded to these questions, it is really only the views of the food businesses, as the implementing group, that are of primary importance.

Forty seven percent of food business respondents said they would access the support of a technical expert through the FSAI, noting that the support was essential (35%) and low-cost or free (21%). However, 29% said they would not access such support because it was too costly (18%) or because they didn’t want calories on menus at all (18%). When asked if they would use technical tools if they were made available on site in the FSAI, only 35% of food businesses said they would and 39% said they would not. The main reason for not availing of such a service was because it was considered time and cost prohibitive (35%). However, 21% of yes respondents said they would access the service, provided there was additional free support and 13% would access the service if there was free calculator software made available. When asked about other supports that would help food businesses implement calorie menu labelling 54% of food businesses cited financial support compared to free access to software (8%), engage suppliers (5%) and provide standardised information (5%).

It is clear that time and cost constraints are the main reason for food businesses not accessing technical facilities based in the FSAI. This is also evident from the size of calls for financial assistance. Access to a technical expert through the FSAI appears to have gained more support but essentially more creative and accessible solutions will need to be developed to support food businesses.

### 3.3.7 VIEWS FROM THE FOOD SERVICE TRADE EXHIBITION AT THE RDS, DUBLIN

Of over 2,000 attendees at the food service trade exhibition, 287 (53% female; aged 18 to 55+ years) were interviewed. The majority (73%) wanted calorie menu labelling in all or some food outlets, with significantly more females compared with males (79% vs. 66% respectively) in support of this. Of those in favour of calorie menu labelling in some outlets, most wanted it in fast food outlets (78%), followed by cafes (43%), coffee shops (41%), vending machines (41%), delis (39%), cinema (33%), bakery (32%), pubs (29%), and restaurants (25%). Among those working in food service directly, more females than males would voluntarily implement calorie menu labelling (70% vs. 59% respectively) if this was initiated in Ireland.

**Table 8. Views from the food service trade exhibition on calorie menu labelling**

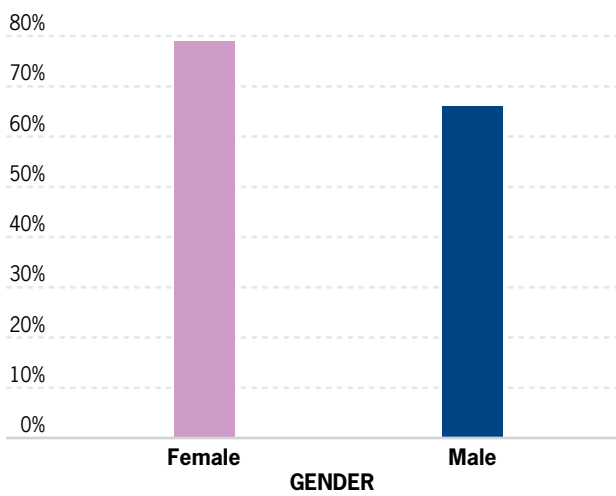
Gender	Total Group		Yes – All/Some food outlets	
	n	(n)	n	(n)
	n 287		n 209	
	%	(n)	%	(n)
Male	47	(134)	42	(88)
Female	53	(153)	58	(121)

**47%**

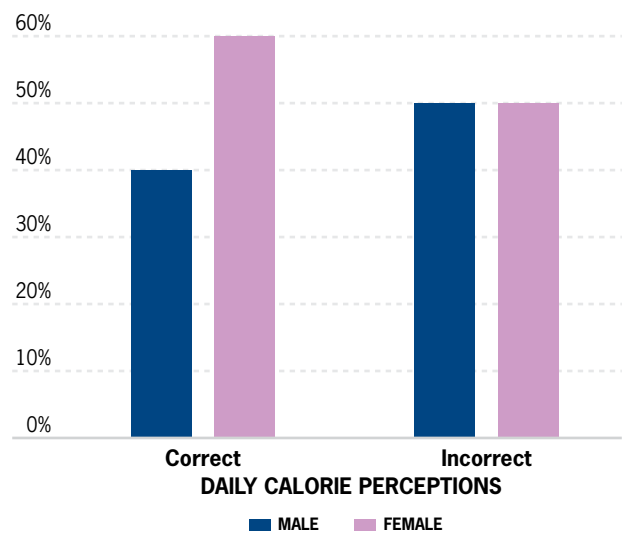
Forty seven percent of food business respondents said they would access the support of a technical expert through the FSAI.

There was a wide range of responses to the question delegates were asked on how many calories they required every day. The range of calories adult delegates perceived they needed in a day varied between 2 calories to 8,000 calories. Almost two thirds (64%) of delegates incorrectly guessed their daily calorie needs. A higher proportion of women, compared with men, correctly guessed their daily calorie requirements which are in fact 2,500 kcal/day for men and 2,000 kcal/day for women.

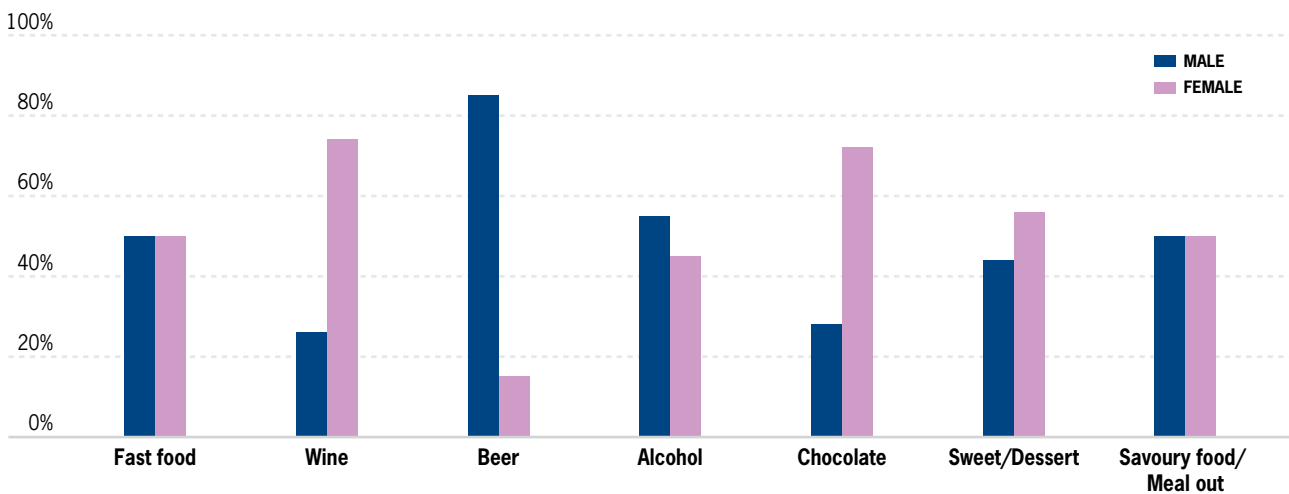
**Support for calories on menus with respect to gender**



**The proportion (%) of correct/incorrect answers given in relation to perceived daily calorie requirements according to gender**



**Responses given by attendees according to gender on what their 'guilty pleasures' are in relation to food**



### 3.4 Discussion and Conclusions

Overall, responses to the technical survey on the four principles of calorie menu labelling and the draft technical guidance for implementing these in Ireland, were positive by a narrow margin. Examination of the total group of submissions in terms of the submitters' background show that there is far less support among food businesses (75% of those completing the technical survey) for the principles and the draft guidance compared with the strong support for these from health professionals (25% of those completing the technical survey). This strong support for calorie menu labelling from the health professionals tips the balance towards the narrow majority in favour that is apparent in the total group of responses.

A concern that was repeatedly registered by submitters was the cost that would be incurred by food business implementing calorie menu labelling. The qualitative data on rationale for responses to questions on technical aspects of calorie menu labelling repeatedly demonstrate that food businesses currently do not have the expertise or resources to implement and sustain a calorie menu labelling scheme. In addition to this, the challenges of standardising serving sizes and ensuring food prepared consistently in line with the recipes used to calculate the calorie values, were raised. Providing and sustaining a scheme for calculating calorie content of food sold is the biggest challenge to the implementation of calorie menu labelling in Ireland.

The provision of technical support to food service businesses that enables them to implement calorie menu labelling is essential as cost and time constraints were most frequently cited by food businesses as barriers for implementation. The FSANI 'Caloriewise' pilot scheme is providing technical expertise and support for food businesses in terms of actually calculating the calorie values that are needed by the eight large food service businesses that have volunteered for the scheme. This service is being provided by the University of Ulster and funded by the FSANI. These volunteer businesses include catering companies serving healthcare trusts and a chain of restaurants in Northern Ireland. This initiative has also recognised that providing support to food businesses is essential to the sustainability of a calorie menu labelling scheme. The evaluation of the six-month 'Caloriewise' pilot will inform potential further rollout of the scheme in Northern Ireland and the need for further work to aid consumer understanding of calorie information. The FSAI has discussed this initiative with FSANI to explore the possibility of an all island of Ireland approach. The Northern Ireland scheme for calorie menu labelling follows all best practice principles and is therefore similar to the scheme proposed for the Republic of Ireland. Sharing resources with FSA(NI) will expedite the scheme as many food service businesses and catering companies

work in both jurisdictions. Initially, smaller food businesses will require technical support and expertise to calculate calorie content of their menu items. Staff training needs to be an integral part of the scheme. Training modules will need to be developed and provided for catering staff to enable the scheme to be sustainable. This could involve the need to develop online food composition software packages that are suitable for use by catering staff for calorie menu labelling. Resources for these initiatives are essential for the sustainability of the scheme and cost saving synergies may be possible by working on an all island of Ireland basis.

The limitations of this consultation process must also be noted. Some submitters did not demonstrate an understanding of the proposed guidance, e.g. one submitter noted that it is "not easy to do in a restaurant where the menu changes weekly to monthly" and yet it is noted in the proposed guidance for Principle 1 that 'standard' food or drink item is defined as a product that is on sale for at least 30 days a year. Comments of this nature demonstrate that a lack of understanding of the proposed guidance influenced the responses of some submitters. This must be noted when interpreting the results of the consultation.

Guidance for catering staff and food businesses must be clear and as flexible as possible. There are many different types of catering and food service outlets. This was highlighted by the responses received regarding Principle 3 (calorie information should be provided per meal or portion). There are several acceptable ways to display calorie information on combo-meal or meals-for-sharing (such as pizzas) and the most suitable option should be selected based on the requirements of the food business. The only critical aspect is the clarity and accessibility of the information provided to consumers so that they are enabled to make informed food choices. The procedures for calorie menu labelling, therefore, need to be as flexible and diverse as possible allowing for the various options for calorie labelling highlighted in the *Draft Technical Guidance for Food Businesses*, FSAI, 2012.

The findings of the technical survey indicate the need for detailed guidance and training of food businesses in calorie menu labelling. Provision of support and practical assistance will enable the development of this detailed guidance and will also ensure it is suitable for Irish conditions. The feedback received at the industry trade exhibition showed a high level of support among those working in this sector to become involved. While this support was slightly more evident among females, nonetheless it was also prevalent among males. There is a level of good will towards the introduction of calorie menu labelling in the sector, providing the costs and time aspects of implementation can be addressed.

The national consultation indicated that as long as adequate support is provided, calorie menu labelling will be welcomed by all stakeholders in Ireland.

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# Appendix 1. Consumer Survey

(THIS WAS A SURVEY THAT WAS COMPLETED ELECTRONICALLY ON THE FSAI WEBSITE)

## Public Consultation – Questions for Consumers

### WHAT IRELAND SHOULD CONSIDER WHEN PUTTING CALORIES ON MENUS

Showing the amount of calories in foods and drinks helps people make healthier food choices. The Food Safety Authority of Ireland (FSAI) invites you to give your views on the best way this can be put into practice.

#### Information about you

1. Please select the category that best describes you

- Consumer
- Food Business
- Health Professional
- Other \_\_\_\_\_

2. Email (Optional) \_\_\_\_\_

Please give you email address if you would like to receive any further information on the calories on menus initiative

3. Do you live in the Republic of Ireland

- Yes
 

– Carlow	– Longford
– Cavan	– Louth
– Clare	– Mayo
– Cork	– Meath
– Donegal	– Monaghan
– Dublin	– Offaly
– Galway	– Roscommon
– Kerry	– Sligo
– Kildare	– Tipperary
– Kilkenny	– Waterford
– Laois	– Westmeath
– Leitrim	– Wexford
– Limerick	– Wicklow

- No  
Please state where you live \_\_\_\_\_

### If calories were shown on menus, would it affect your food choice?

1. Would you look at calories on menus?
  - Always
    - Please give reasons for your answer
  - Sometimes
    - Please give reasons for your answer
  - Never
    - Please give reasons for your answer
  - Don't know
    - Please give reasons for your answer
2. Would the amount of calories in foods and drinks influence your choice?
  - Always
    - Please give reasons for your answer
  - Sometimes
    - Please give reasons for your answer
  - Never
    - Please give reasons for your answer
  - Don't know
    - Please give reasons for your answer

### Calories on menus – What would you like to see

1. Would you like to see calories on menus? Please choose which statement you agree with most.
  - I would like to see calories on menus in ALL food outlets
    - Please give reasons for your answer
  - I would like to see calories on menus in SOME food outlets
    - Please tick the outlets you would like to see put calories on menus
      - Fast food outlets e.g. Chinese, pizza, chippers
      - Bakeries, coffee shops, delis
      - Restaurants
      - Pubs
      - Cinemas
      - Staff canteens
      - Vending machines
      - Other: please state
  - I would not like to see calories on menus in any food outlet
    - Please give reasons for your answer
  - Don't know
    - Please give reasons for your answer

### Calories information should be clear and shown beside the price of foods and drinks

1. Do you agree that calories should be shown beside the price of food and drink items on the menu?
  - Yes – calories information should be shown beside the price of food and drink items on the menu
    - Please give reasons for your answer
  - No – calories information should not be shown beside the price of food and drink items on the menu
    - Please give reasons for your answer
  - Don't know
    - Please give reasons for your answer

### Foods for sharing – How calories should be shown

1. How would you like to see the calorie information displayed on foods that are meant for sharing?
  - Option one: The calories for the full pizza are shown along with the number of portions it contains. For example a 13.5" pizza has 2,690 calories and contains 4 portions
    - Please give reasons for your answer
  - Option two: The amount of calories in a portion is shown along with the number of portions in a pizza. For example one portion of pizza contains 672 calories and there are 4 portions in a full pizza
    - Please give reasons for your answer
  - Don't know
    - Please give reasons for your answer

### How accurate is calorie information?

1. Would you trust that the calorie information on menus is correct?
  - Yes
    - Please give reasons for your answer
  - No
    - Please give reasons for your answer
  - Don't know
    - Please give reasons for your answer

### Calories on alcoholic drinks

1. Would you like to see calorie information on alcoholic drinks? Please choose which statement you agree with most.
  - Yes – I would like to see calories on alcoholic drinks on menus in ALL places
    - Please give reasons for your answer

- Yes – I would like to see calories in alcoholic drinks on menus in SOME places
  - Please give reasons for your answer
- No – I would not like to see calories on menus in alcoholic drinks
  - Please give reasons for your answer
- Don't know
  - Please give reasons for your answer

### Other nutritional information on menus

1. In addition to calories, would you like to see other nutritional information on menus?
  - Yes
    - Please tick what you would like to see
      - Sugar
      - Total fat
      - Saturated fat
      - Unsaturated fat
      - Trans fat
      - Salt
      - Fibre
      - Carbohydrate
      - Protein
      - Vitamins (Vitamin A,C, D, Folic Acid)
      - Minerals
  - No
    - Please give reasons for your answer
  - Don't know
    - Please give reasons for your answer

### Should it be law that calories are shown on menus?

1. Should food law in Ireland be changed to make large\* food businesses show calories on their menus?
  - \* *Large food businesses are usually defined on the number of outlets the food business owns*
    - Yes
      - Please give reasons for your answer
    - No
      - Please give reasons for your answer
    - Don't know
      - Please give reasons for your answer

# Appendix 2. Technical Survey

(THIS WAS A SURVEY THAT WAS COMPLETED ELECTRONICALLY ON THE FSAI WEBSITE)

## Public Consultation

### SEEKING THE VIEWS OF THE FOOD INDUSTRY IN IRELAND ON PUTTING CALORIES ON MENUS

See the draft technical guidelines for food businesses for more details

#### 1.0. Information about you

1) Please select the category that describes you best:

- Consumer
- Food Business Operator
- Environmental Health Officer
- Healthcare Professional
- Health Agency
- Other  
(If other) Please specify your area of work:

---



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**If you select the option 'Food business operator' you will see the following four questions (Q's 2 to 5) otherwise please skip to Q6 (email optional).**

2) Please select the category that best describes your business:

- Fast food outlet, e.g. Chinese, pizza, chip shop or similar
- Restaurant
- Bakery, Coffee shop, Deli Counter
- Cinema
- Pub
- Staff canteen
- Vending machines
- Other food business, e.g. retailer, food supplement business, food supplier

(If Other) Please specify:

---



---

3) How many establishments are you responsible for?

- 1 - 5
- 10 - 20
- 20 to 50
- Over 50

4) Approximately how many items do you have on your menu?

- 1 to 50
- 50 to 100
- Over 100

5) Do you display calorie information for your menu items?

- Yes. Calorie information is shown beside the price of my menu items
- Yes. Calorie information about menu items is available on request
- Yes. Calorie information about the menu items is available elsewhere

(If available elsewhere) Please specify:

---



---

- No

6) Email (Optional):

---

Please give your email if you would like to receive any further information on this public consultation



Is your business(es) located in the Republic of Ireland?

- Yes
- No

If you select 'Yes' you will see the following drop-down menu:

Please select county/counties:

- Carlow
- Cavan
- Clare
- Cork
- Donegal
- Dublin
- Galway
- Kerry
- Kildare
- Kilkenny
- Laois
- Leitrim
- Limerick
- Longford
- Louth
- Mayo
- Meath
- Monaghan
- Offaly
- Roscommon
- Sligo
- Tipperary
- Waterford
- Westmeath
- Wexford
- Wicklow

If you select 'No' you will see the following drop-down question:

Please state where your business is located:

## 2.0. Principles of putting calories on menus

See the draft technical guidelines booklet for more details

### QUESTION 1

#### Principle 1: Calorie information is provided for ALL standard food and drink items sold

A 'standard' food or drink item is a product that:

1. Is on sale for at least 30 days a year; and
2. Remains the same each time it is made. In this way, calorie information calculated on these food and drink items remains accurate.

#### Do you agree with Principle 1 as it is written above?

- Agree with ALL of Principle 1
- Agree with SOME of Principle 1
  - Please state your preferred changes to Principle 1

---



---

- Disagree with ALL of Principle 1
  - Please state your preferred changes to Principle 1

---



---

- Don't Know
  - Please explain your answer

---



---

**QUESTION 2**

**Principle 2: Calorie information is displayed clearly and prominently at the 'point of choice' for the consumer**

The 'point of choice' is the place where consumers choose from the food and drink on offer. This place can be a menu board, printed menu, chalk board or display tag, etc. This is where information on both the foods and drinks on offer and the prices is given.

**Do you agree with Principle 2 as it is written above?**

- Agree with *ALL* of Principle 2
- Agree with *SOME* of Principle 2
  - Please state your preferred changes to Principle 2
  - \_\_\_\_\_
  - \_\_\_\_\_
- Disagree with *ALL* of Principle 2
  - Please state your preferred changes to Principle 2
  - \_\_\_\_\_
  - \_\_\_\_\_
- Don't Know
  - Please explain your answer
  - \_\_\_\_\_
  - \_\_\_\_\_

**QUESTION 3**

**Principle 3: Calorie information is provided per portion or per meal**

Calorie information should be provided based on the food and drink served to an individual consumer. Therefore, calorie information must be provided per portion or per meal served.

**Do you agree with Principle 3 as it is written above?**

- Agree with *ALL* of Principle 3
- Agree with *SOME* of Principle 3
  - Please state your preferred changes to Principle 3
  - \_\_\_\_\_
  - \_\_\_\_\_
- Disagree with *ALL* of Principle 3
  - Please state your preferred changes to Principle 3
  - \_\_\_\_\_
  - \_\_\_\_\_
- Don't Know
  - Please explain your answer
  - \_\_\_\_\_
  - \_\_\_\_\_

**QUESTION 4**

**Principle 4: Information on how many calories an average person needs in a day is given to help consumers ‘make sense’ of calorie information on menus**

The average amount of calories women, men and children need every day will be displayed to help consumers ‘make sense’ of calorie information on foods and drinks on sale.

**Do you agree with Principle 4 as it is written above?**

- Agree with ALL of Principle 4
- Agree with SOME of Principle 4
  - Please state your preferred changes to Principle 4
  - \_\_\_\_\_
  - \_\_\_\_\_
- Disagree with ALL of Principle 4
  - Please state your preferred changes to Principle 4
  - \_\_\_\_\_
  - \_\_\_\_\_
- Don't Know
  - Please explain your answer
  - \_\_\_\_\_
  - \_\_\_\_\_

**3.0. What are the best ways to put calories on menus in Ireland?**

See the draft technical guidelines booklet for more details

**QUESTION 5**

**How can Principle 1 be put into practice: Calorie information is provided for ALL standard food and drink items sold**

Calorie information should be displayed for each ‘standard’ food and drink item on the menu (*providing calorie information on alcoholic drinks is at the discretion of the food business*).

The implementation of **Principle 1** is outlined in detail in the draft technical guidance booklet (page 3) for this questionnaire. Guidance is given on **situations where calorie information for each item on the menu cannot be provided**.

Situations include those where:

- The food or drink can be ‘customised’ according to customer preference, e.g. sandwiches.
- Foods and drinks are only offered for a limited period, e.g. ‘menu specials’
- Portion size is not controlled, e.g. self-service buffet
- Information for ‘meal deals’ or ‘combo meals’ must be displayed
- There is too much information for display, e.g. menu with multiple drink sizes and different types of milks

**Some situations where calorie information for each item on the menu cannot be provided are listed above. Are there any other situations which have not been listed and for which guidance is needed?**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Do you agree with the guidance provided for putting Principle 1 into practice?**

- Agree with *ALL* of the guidance given on putting Principle 1 into practice
  - Please state your preferred changes to the implementation of Principle 1
  - \_\_\_\_\_
  - \_\_\_\_\_
- Disagree with *ALL* of the guidance given on putting Principle 1 into practice
  - Please state your preferred changes to the implementation of Principle 1
  - \_\_\_\_\_
  - \_\_\_\_\_
- Don't Know
  - Please explain your answer
  - \_\_\_\_\_
  - \_\_\_\_\_

**QUESTION 6**

**How can Principle 2 be put into practice: Calorie information is displayed clearly and prominently at the 'point of choice' for the consumer**

The 'point of choice' is the place where consumers choose from the food and drink on offer, e.g. a menu board, printed menu, display tag, etc. This is where the foods and drinks on offer are described *and* the prices are given.

1. Calorie information at the 'point of choice' should be as clear and well-displayed as the price.
2. Calorie information must be available before an order is given.
3. If there is more than one 'point of choice' in a food outlet, calories should be posted at each point.

Please see section two, page four of 'Putting calories on menus in Ireland draft technical guidance for food businesses' for details on the best ways to implement principle 2.

**Do you agree with the guidance provided for putting Principle 2 into practice?**

- Agree with *ALL* of the guidance given on putting Principle 2 into practice
- Agree with *SOME* of the guidance given on putting Principle 2 into practice
  - Please state your preferred changes to the implementation of Principle 2
  - \_\_\_\_\_
  - \_\_\_\_\_
  - \_\_\_\_\_
- Disagree with *ALL* of the guidance given on putting Principle 2 into practice
  - Please state your preferred changes to the implementation of Principle 2
  - \_\_\_\_\_
  - \_\_\_\_\_
  - \_\_\_\_\_
- Don't Know
  - Please explain your answer
  - \_\_\_\_\_
  - \_\_\_\_\_

## QUESTION 7

### How can Principle 3 be put into practice:

#### Calorie information is provided per portion or per meal

Calorie information must be provided per portion or per meal served. However, for foods for sharing or from a self-service, the following guidance is suggested:

#### To put calorie information on foods to share, e.g. a pizza

1. The **calories for the whole pizza** are shown along with the **number of portions** in the whole pizza, e.g. 13.5”  
Pizza – *Whole pizza contains 2690 calories and serves 4 people*

**OR**

2. The **calories in a single portion** are shown along with the **number of portions** in the whole pizza, e.g. 13.5”  
Pizza – *One portion of pizza contains 672 calories. There are 4 portions in the whole pizza.*

#### To put calorie information on ‘multi-portion’ or ‘combo’ meals

1. It is best to provide the calories for each individual item in the meal.
2. An acceptable alternative is providing the maximum amount of calories in the meal items shown, e.g. stating that a combo meal contains ‘*up to 2000 calories*’.

#### To put calorie information on different sized portions of the same food or drink

1. The best option is to provide all of the calorie values  
OR the range of calorie values from the lowest to the highest.
2. Acceptable alternatives include providing the amount of calories for:
  - The most popular choice
  - The default option, i.e. the option given if the consumer does not specify the size at the ‘point of choice’
  - The maximum amount of calories for the largest available portion size of a food or drink, e.g. ‘large Cola drink contains 380 calories’

Please see section two, page five of ‘Putting calories on menus in Ireland draft technical guidance for food businesses’ for details on the best ways to implement principle 3.

### Do you agree with the guidance provided for putting Principle 3 into practice?

- Agree with *ALL* of the guidance given on putting Principle 3 into practice
- Agree with *SOME* of the guidance given on putting Principle 3 into practice
  - Please state your preferred changes to the implementation of Principle 3
- Disagree with *ALL* of the guidance given on putting Principle 3 into practice
  - Please state your preferred changes to the implementation of Principle 3
- Don't Know
  - Please explain your answer

\_\_\_\_\_

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\_\_\_\_\_

\_\_\_\_\_

**QUESTION 8**

**How can Principle 4 be put into practice: Information on how many calories people need in a day is given to help consumers 'make sense' of calories on menus**

The average amount of calories women, men and children need every day will be displayed to help consumers 'make sense' of calorie information on foods and drinks on sale.

1. This calorie information must be clear and easily seen by the consumer *before their choice is made*.
2. This information must be the same in all food outlets, and should read:

**Men need about 2500 calories a day**

**Women need about 2000 calories a day**

**Children need about 1800 calories a day**

Please see section two, page six of 'Putting calories on menus in Ireland draft technical guidance for food businesses' for details on the best ways to implement principle 4.

**Do you agree with the guidance provided for putting Principle 4 into practice?**

- Agree with *ALL* of the guidance given on putting Principle 4 into practice
- Agree with *SOME* of the guidance given on putting Principle 4 into practice
  - Please explain your answer

\_\_\_\_\_

\_\_\_\_\_
- Disagree with *ALL* of the guidance given on putting Principle 4 into practice
  - Please state your preferred changes to the implementation of Principle 4

\_\_\_\_\_

\_\_\_\_\_
- Don't Know
  - Please explain your answer

\_\_\_\_\_

\_\_\_\_\_

**4.0. The FSAI is exploring ways to help businesses put calories on menus**

It is recognised that putting calories on menus will not be easy for most food businesses.

Technical experts and technical tools will be needed.

**Technical experts**

The support of technical experts in nutrition will be required, e.g. dietitians or nutritionists with a recognised qualification.

**Technical tools**

Technical tools to calculate calories in single portions of foods and drinks will be needed. These include food tables which contain information on calories and other nutrients. Computer software based on these tables can also be used.

**QUESTION 9**

**Ways to help food businesses access the support of TECHNICAL EXPERTS**

1. The FSAI is exploring possible options where food businesses can access the support of technical experts to put calories on menus.

**Would your food business access the support of a technical expert through FSAI to put the calorie information on your menu?**

- Yes
- No
- Don't Know

**Please give a reason for your answer:**

\_\_\_\_\_

\_\_\_\_\_

**QUESTION 10**

**Possible ways to help food businesses access technical tools**

1. *Library services in the FSAI could stock copies of the special food tables which contain information on calories*

Technical experts working with food businesses to calculate the calorie content of their menus could use the FSAI library technical tools.

**Would your food business use library services in the FSAI to calculate the calorie information for your menus?**

- Yes
- No
- Don't Know

**Please give a reason for your answer:**

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2. *The FSAI could provide access to computers with special software for calculating calories*

Technical experts working with food businesses to calculate the calorie content of their menus could book time to use this service.

**Would your food business use FSAI computers and software packages to calculate calorie information for your menus?**

- Yes
- No
- Don't Know

**Please give a reason for your answer:**

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**QUESTION 12**

**Can you list other supports needed to help food businesses with the process of putting calories on their menus?**

- Yes
  - (If Yes) Please list your suggestion(s)

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- No
- Don't Know

**Please give a reason for your answer:**

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# Appendix 3. Food Service Trade Exhibition Survey

(THIS WAS AN INTERVIEW ASSISTED SURVEY HELD OVER 3 DAYS)

Researcher Initials: \_\_\_\_\_

Respondent I.D.: \_\_\_\_\_

Male [1]/Female [2]: \_\_\_\_\_

Hi. I'm \_\_\_\_\_ from the Food Safety Authority of Ireland. We are currently gathering views on the Minister's plans to put calories on the menus in Ireland. If you have 4 or 5 minutes to spare, I have 6 really brief questions to get a general picture of your views on this issue. I'd really appreciate your time – Is that okay?

So, first of all, I just want to ask you a couple of questions to get a general idea of what you think about having calories on menus **as a consumer**.

<p><b>Q.1.</b> How many calories do you think you need every day? <i>(Record the number of calories given)</i></p>		<p>1 = Correct 2 = Incorrect 3 = Don't Know</p>
<p><b>Q.2A.</b> As a consumer, do you want to see calories on menus in Ireland? <i>(Use front page for code 2)</i></p>	<p>1 = Yes – all food outlets 2 = Yes – some food outlets 3 = No 4 = Don't know 5 = Indifferent</p>	<p>'Some' codes</p>
<p><b>Q.2B.</b> What is your main reason for your answer? <i>(Not prompted – just tick as appropriate)</i></p>	<p>1 = Health 2 = Weight 3 = Choice 4 = Don't eat out</p>	<p>5 = Informed already 6 = Special occasion 7 = Don't care 8 = Other</p>
<p><b>Q.3.</b> Which of these statements best describes your diet? <i>(Prompt with list)</i></p>	<p>1 = 'My diet is <i>mostly healthy</i>' 2 = 'My diet is <i>both healthy and unhealthy</i>' 3 = 'My diet is <i>mostly unhealthy</i>' 4 = 'I don't know how to describe my diet'</p>	

I just have a couple of questions here to get an idea of what you think about putting calories on menus **from a food business perspective**.

<p><b>Q.4.</b> What is your role in the food service industry?</p>	<p>1 = Serve food and drink 2 = Supply food and drink 3 = Food display 4 = Printers</p>	<p>5 = Consultant or Education 6 = Maintenance 7 = Other</p>
<p><b>Q.5.</b> What is your area in the food industry?</p>	<p>1 = Pub/Bar 2 = Cafe 3 = Restaurant 4 = Cinema 5 = Bakery 6 = Coffee shop</p>	<p>7 = Fast Food 8 = Delicatessen 9 = Vending machines 10 = Hotel 11 = Other 12 = All Areas</p>



<p><b>Q.6.</b> If food businesses were asked to voluntarily put calories on menus this year, would you become involved?</p>	<p>1 = Yes 2 = No 3 = Don't Know 4 = Not Applicable</p>	
<p><b>Q.7.</b> What is your main reason for that answer? (Not prompted – just tick as appropriate) (Prompt with list)</p>	<p>1 = Cost 2 = Lack of time 3 = Impractical 4 = Not my responsibility 5 = Good business 6 = Promoting health 7 = Transparency 8 = Profits 9 = Meet demand/Competition 10 = Other image</p>	
<p><b>Q.8.</b> Finally – in relation to your health and the food and drink you enjoy, can I ask you what your guilty pleasure is? (Prompt with list)</p>	<p>1 = Fast food 2 = Wine 3 = Beer 4 = Alcohol 5 = Chocolate 6 = Sweets / Dessert 7 = Savoury Foods (Steak) 8 = Meal Out (Restaurant) 9 = Fizzy Drinks</p>	

Then I just need you to indicate your age category: 15-25 26-35 36-45 46-55 >55

Thanks so much for your time, I really appreciate it. If you want to give your views in more detail on how putting calories should be managed, please read this information booklet and visit [www.fsai.ie](http://www.fsai.ie). Thanks again!

## Appendix 4.

### Food Service Businesses and Health Professionals invited by Email to make Submissions through completion of the Consumer and Technical Surveys in the National Consultation on Calories on Menus in Ireland

Nutrition Society

Irish Heart/National Heart Alliance

Irish Nutrition and Dietetics Association

Official Food Microbiological Laboratories

Public analyst laboratories

Senior Environmental Health Officers

Principal Environmental Health Officers

Healthy Eating For All

GALA Group

Euro-Toques

Diabetes Society

Local authority vets

Department of Agriculture, Food and the Marine

Sea Fisheries Protection Authority

Department of Health and Children





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