



SIMULATION GAME: TRAFFIC LIGHT RATING SYSTEM FOR FOOD

Food Labeling in the European Union

Game Materials

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GAME SCENARIO: TRAFFIC LIGHT RATING SYSTEM FOR FOOD

WHAT IT'S ABOUT

- **Topic:** Consumer protection in the EU – food labelling
- **Objective:** Clear information about what products contain and how healthy or unhealthy they are
- **Idea:** Introducing a traffic light rating system for food
→ Sugar, fat and salt levels are labelled green, amber or red.
- **Scenario:** The EU Commission is preparing a new proposal on legislation for the traffic light system. What will be the exact wording of the proposal?
- Various **lobby groups** from the member states want to have a say and contribute to the commission proposal. Their ideas for the new law differ widely.
- The **Commission** is relying on information and advice from the lobby groups – it has to evaluate their input and formulate a fair legislative proposal.

THE FOOD TRAFFIC LIGHT SYSTEM

	Fat 2,1 g per 100 g
	Sugar 35,3 g per 100 g
	Salt 1,0 g per 100 g

RED = HIGH PROPORTION
AMBER = MEDIUM PROPORTION
GREEN = LOW PROPORTION

CONTENTIOUS ISSUES

Article 1: Should the introduction of a traffic light system be binding?

- Yes, the system must be introduced in all EU states.
- No, the introduction of the system should merely be recommended.

Conflict: An EU-wide introduction would guarantee the best consumer protection. But many member states want to decide themselves how to label a product's ingredients.

Article 2: Starting when?

- Immediately
- Within the next five years
- No fixed date, depending on the states' ability

Conflict: Some lobby groups are pushing for a quick introduction in order to quickly improve EU citizens' diets. Others say that introducing the system will take time and that the individual states should be given more freedom to decide.

Article 3: Exceptions for certain products?

- There can be no exceptions
- Exceptions only for very small products
- Exceptions for products sold directly on farms

Conflict: Some lobby groups find this point particularly important. In their view, the traffic light rating system is not suitable for certain products.

FINAL DOCUMENT BY THE EUROPEAN COMMISSION

FINAL VERSION

of the legislative proposal on a traffic light rating system for food

ARTICLE 1

Introducing the traffic light system...

- ... is binding for all EU states.
- ... is merely recommended to all EU states.

ARTICLE 2

The traffic light system...

- ... is to be introduced immediately.
- ... is to be introduced within the next five years.
- ... does not have to be introduced at any fixed date.

ARTICLE 3

Exceptions...

- ... are not allowed.
- ... are allowed for very small products.
- ... are allowed for products sold directly on farms.



FRANS TIMMERMANS + TEAM

VICE PRESIDENT OF THE EUROPEAN COMMISSION FOR BETTER REGULATION

European Parliament

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YOUR ROLE IN THE EU

You and your colleagues in the Commission must work together to create a legislative proposal. You have the final say in all decisions. Your colleagues are in charge of the detail in the contents of the draft. You keep an overview. Various lobby groups are advising you, and you use their expertise to reach a decision.

YOUR TASKS

1. Listen to and evaluate the arguments and proposals put forward by the lobby groups.
2. Consult with the other Commissioners on what the legislative proposal's wording should be.
3. Reach a common decision (unanimous).

YOUR OBJECTIVES

- You see the clear advantages a traffic light system has, but you have to make sure that the proposed measures are really necessary.
- No unnecessary bureaucratic burdens for EU member states.
- Which measures really do make sense and which ones don't?

POSSIBLE QUESTIONS TO ASK THE LOBBY GROUPS

Article 1: Should the introduction of a traffic light system be binding?

- Which advantages or disadvantages do you see in introducing the traffic light system?
- ...

Article 2: Starting when?

- What are the pros and cons of quickly introducing the system?
- ...

Article 3: Exceptions for certain products?

- Why should / shouldn't there be exceptions?
- ...

Vice President of the European Commission

Public consultations
on the planned legislation
for a traffic light rating system for food

	lobby group
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Positions, lobby group 1

Should the introduction of a traffic light system be binding for all member states?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
When should it be introduced?	<input type="checkbox"/> Immediately	<input type="checkbox"/> Within the next five years	<input type="checkbox"/> No fixed date
Should there be exceptions for certain products?	<input type="checkbox"/> No exceptions	<input type="checkbox"/> Exceptions for very small products	<input type="checkbox"/> Exceptions only for products sold directly at a farm

Notes:

Positions, lobby group 2

Should the introduction of a traffic light system be binding for all member states?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
When should it be introduced?	<input type="checkbox"/> Immediately	<input type="checkbox"/> Within the next five years	<input type="checkbox"/> No fixed date
Should there be exceptions for certain products?	<input type="checkbox"/> No exceptions	<input type="checkbox"/> Exceptions for very small products	<input type="checkbox"/> Exceptions only for products sold directly at a farm

Notes:

Positions, lobby group 3

Should the introduction of a traffic light system be binding for all member states?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
When should it be introduced?	<input type="checkbox"/> Immediately	<input type="checkbox"/> Within the next five years	<input type="checkbox"/> No fixed date
Should there be exceptions for certain products?	<input type="checkbox"/> No exceptions	<input type="checkbox"/> Exceptions for very small products	<input type="checkbox"/> Exceptions only for products sold directly at a farm

Notes:

Positions, lobby group 4

Should the introduction of a traffic light system be binding for all member states?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
When should it be introduced?	<input type="checkbox"/> Immediately	<input type="checkbox"/> Within the next five years	<input type="checkbox"/> No fixed date
Should there be exceptions for certain products?	<input type="checkbox"/> No exceptions	<input type="checkbox"/> Exceptions for very small products	<input type="checkbox"/> Exceptions only for products sold directly at a farm

Notes:

Positions, lobby group 5

Should the introduction of a traffic light system be binding for all member states?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
When should it be introduced?	<input type="checkbox"/> Immediately	<input type="checkbox"/> Within the next five years	<input type="checkbox"/> No fixed date
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Notes:

Positions, lobby group 6

Should the introduction of a traffic light system be binding for all member states?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
When should it be introduced?	<input type="checkbox"/> Immediately	<input type="checkbox"/> Within the next five years	<input type="checkbox"/> No fixed date
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Notes:

Declaration of the decision made by the European Commission

(Vice President's manuscript)

Ladies and Gentlemen,

I welcome you to today's presentation of the draft regulation on food labelling.

The consultations in the Commissions were

We have met with many lobbyists, heard many opinions and were given much advice. The talks with the lobbyists were

After long negotiations, we have reached a result. The proposal for a new law on food labelling reads as follows: *(Read out draft)*

It is of particular importance to us, the Commission, that

Thank you for listening!



VĚRA JOUROVÁ + TEAM

COMMISSIONER FOR JUSTICE, CONSUMERS AND GENDER EQUALITY

YOUR ROLE IN THE EU

You are responsible for consumer protection in the EU. You and your colleagues in the Commission must

work together to create a legislative proposal. Various lobby groups are advising you, and you use their expertise to reach a decision.

YOUR TASKS

1. Listen to and evaluate the arguments and proposals put forward by the lobby groups.
2. Consult with the other Commissioners on what the legislative proposal's wording should be.
3. Reach a common decision (unanimous).

YOUR OBJECTIVES

- European consumers must be informed as effectively as possible about the ingredients of products and how healthy they are .
 - Clear and understandable labelling of food products makes the purchasing decision easier.
 - A better diet improves consumers' health.
-

POSSIBLE QUESTIONS TO ASK THE LOBBY GROUPS

Article 1: Should the introduction of a traffic light system be binding?

- Which advantages does the traffic light rating system bring consumers?
- ...

Article 2: Starting when?

- Which starting date would be best for consumers?
- ...

Article 3: Exceptions for certain products?

- Which consequences will exceptions have for consumers?
- ...

COMMISSIONER FOR JUSTICE, CONSUMERS AND
GENDER EQUALITY

Public consultations
on the planned legislation
for a traffic light rating system for food

	lobby group
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Positions, lobby group 1

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Should there be exceptions for certain products?	<input type="checkbox"/> No exceptions	<input type="checkbox"/> Exceptions for very small products	<input type="checkbox"/> Exceptions only for products sold directly at a farm	

Notes:

Positions, lobby group 2

Should the introduction of a traffic light system be binding for all member states?	<input type="checkbox"/> Yes	<input type="checkbox"/> No		
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Positions, lobby group 3

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Notes:

Positions, lobby group 4

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Notes:

Positions, lobby group 6

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Notes:



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VYTENIS ANDRIUKAITIS + TEAM

COMMISSIONER FOR HEALTH AND FOOD SAFETY

YOUR ROLE IN THE EU

You are in charge of topics relating to the health of EU citizen and safe food products. You and your colleagues in the Commission must work together to

create a legislative proposal. Various lobby groups are advising you, and you use their expertise to reach a decision.

YOUR TASKS

1. Listen to and evaluate the arguments and proposals put forward by the lobby groups.
2. Consult with the other Commissioners on what the legislative proposal's wording should be.
3. Reach a common decision (unanimous).

YOUR OBJECTIVES

- European consumers must be better informed about how healthy food products are.
 - Clear and understandable labelling of food products makes the purchasing decision easier.
 - A better diet for EU citizens = healthier citizens and less illness caused by wrong food.
-

POSSIBLE QUESTIONS TO ASK THE LOBBY GROUPS

Article 1: Should the introduction of a traffic light system be binding?

- How does the traffic light rating system benefit people's health?
- ...

Article 2: Starting when?

- Which starting date would be best for people's health?
- ...

Article 3: Exceptions for certain products?

- Which consequences will exceptions have for improving people's health?
- ...

COMMISSIONER FOR HEALTH AND FOOD SAFETY

Public consultations
on the planned legislation
for a traffic light rating system for food

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Positions, lobby group 2

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ELŻBIETA BIENKOWSKA + TEAM

COMMISSIONER FOR INDUSTRY AND ENTREPRENEURSHIP

YOUR ROLE IN THE EU

You are responsible for businesses in the EU. You and your colleagues in the Commission must work together to create a legislative proposal. Various lobby groups are advising you, and you use their expertise to reach a decision.

YOUR TASKS

1. Listen to and evaluate the arguments and proposals put forward by the lobby groups.
2. Consult with the other Commissioners on what the legislative proposal's wording should be.
3. Reach a common decision (unanimous).

YOUR OBJECTIVES

- The economic advantages and disadvantages for businesses must be considered.
- The law must not put the work of businesses under too much constraint. And it shouldn't cost too much.

POSSIBLE QUESTIONS TO ASK THE LOBBY GROUPS

Article 1: Should the introduction of a traffic light system be binding?

- How does the traffic light rating system benefit businesses?
- ...

Article 2: Starting when?

- Which starting date would be best for businesses?
- ...

Article 3: Exceptions for certain products?

- Which consequences will exceptions have for businesses?
- ...

**COMMISSIONER FOR INDUSTRY AND
ENTREPRENEURSHIP**

Public consultations
on the planned legislation
for a traffic light rating system for food

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Positions, lobby group 6

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Notes:

ASSOCIATION OF EUROPEAN FOOD RETAILERS AEF

YOUR ORGANISATION



You are the interface between consumers and food producers. You represent supermarkets and other food retailers.

YOUR TASKS

1. Prepare well: Which arguments could convince the Commission? Find statistics, data and facts that support your position
2. Talk to the Commissioners. Try to convince them.
3. Talk to other lobby groups: who could you work with?

YOUR POSITION

Food products must not become dangerous to people's health. But you are convinced that consumers are good at using neutral information on products. It's enough for consumers to know what the ingredients are. They don't need a colour scheme informing them about how "dangerous" a product is. After all, the economic interests of food businesses must be protected, too.

Article 1: Should the introduction of a traffic light system be binding in the whole of the EU?

- The traffic light rating system is not necessary for consumers
- Disadvantage: unnecessary information to consumers and too much effort for businesses
- More freedom regarding the introduction. Introduction should only be recommended, each EU state should be able to decide for themselves.

Article 2: Starting when?

- Disadvantage: Immediate introduction means too much cost and effort for businesses, so no fixed date, please.
- Some wouldn't be able to introduce the system immediately (e.g. some would have to come up with completely new packaging for their products).
- More flexibility. Producers who like the system should be able to introduce it immediately. Others should be forced to at all.

Article 3: Exceptions for specific products?

- Certain products, particularly small ones or products sold directly on farms, are not suited to the traffic light system.
- For some traders (e.g. farmers selling products directly on-site) the traffic light system would cause a big problem. It would be much too complicated.
- Therefore, there must definitely be exceptions.

EUROPEAN OBESITY FEDERATION EOF

YOUR ORGANISATION



Your organisation is fighting obesity worldwide. To do this, you aim to exert influence on politics on a global, national and regional level. The European Union is a key actor to win over in the fight against obesity. Make yourself heard in European politics!

YOUR TASKS

1. Prepare well: Which arguments could convince the Commission? Find statistics, data and facts that support your position.
2. Talk to the Commissioners. Try to convince them.
3. Talk to other lobby groups: who could you work with?

YOUR POSITION

You welcome the Commission's proposal to introduce a traffic light food rating system. Many consumers do not know what food products contain. As a result, more and more people in Europe are obese. Something must be done about it!

Article 1: Should the introduction of a traffic light system be binding in the whole of the EU?

- Advantage: consumers quickly understand what products contain.
- Bad diet is having a disastrous effect on people's health.
- Obesity is a serious problem that concerns everyone.
- The traffic light system must be binding for all. Only then can obesity be combated effectively.


Article 2: Starting when?

- Obesity is a real problem in Europe. It is worsening every year.
- The sooner we act, the quicker the reduction of health risks. The system must be introduced immediately.

Article 3: Exceptions for specific products?

- No exceptions necessary. Non-suitable products must be adapted.
- Otherwise there will be a domino effect. More and more producers might demand exceptions.

YOUR ORGANISATION

 Your represent the consumers' interests in the EU and want to guarantee their safety and health.

When European politics is passing laws on food, you definitely want to have a say in the decision making process. Therefore it is very important to you to have an influence on the legislative proposal on the traffic light rating system. You want to discuss it with the EU Commissioners.

YOUR TASKS

1. Prepare well: Which arguments could convince the Commission?
Find statistics, data and facts that support your position.
2. Talk to the Commissioners. Try to convince them.
3. Talk to other lobby groups: who could you work with?

YOUR POSITION

Food producers must follow the needs of European consumers. This involves informing them clearly on what the products contain. But you cannot lend your support to the traffic light system. It is not suitable for display on products. Consumers often misinterpret it.

Article 1: Should the introduction of a traffic light system be binding in the whole of the EU?

- Disadvantage: The traffic light system over-simplifies information on ingredients and is often misinterpreted by consumers (Diet Coke, for example, would have GREEN for sugar, apple juice would have RED, even though apple juice is much healthier).
- Furthermore, the traffic light system is not suited to many products.
- The traffic light system therefore does not make any sense. Its introduction should merely be recommended to member states.

Article 2: Starting when?

- The traffic light system won't change much. It's not a model suitable for consumers
- More flexibility. Producers who like the system should be able to introduce it immediately. Others should be forced to at all.

Article 3: Exceptions for specific products?

- Since the system won't give correct information, exceptions are not a problem.
- Exceptions are necessary for certain products: small packages are not suited to the system.
- Therefore, exceptions must be made.

INTERNATIONAL CHEWING GUM INDUSTRY ASSOCIATION ICIA

YOUR ORGANISATION



You represent the interests of chewing gum producers in the EU. You are contacting the EU Commission so that your demands regarding particularly small products are taken into account. Some products are just not suited to the planned traffic light rating system.

YOUR TASKS

1. Prepare well: Which arguments could convince the Commission? Find statistics, data and facts that support your position.
2. Talk to the Commissioners. Try to convince them.
3. Talk to other lobby groups: who could you work with?

YOUR POSITION

You cannot lend your complete support to the traffic light system. You do see the advantages, but you must point out to the Commission that the traffic light rating system is not suitable for all products. Exceptions absolutely have to be made! The Commission should definitely take this into account in its negotiations.

Article 1: Should the introduction of a traffic light system be binding in the whole of the EU?

- Advantage: It would make it easier for European consumers to see which foods are healthy and which aren't..
- Disadvantage: the traffic light system is only suitable for some products, therefore it mustn't be binding for all.
- The system should merely be recommended: producers should be able to decide themselves whether to introduce it or not..

Article 2: Starting when?

- No fixed introduction date. Many products will have to be changed in order to display the traffic lights. Those products that are well suited to the system should adopt it quickly. Others need more time.

Article 3: Exceptions for specific products?

- Chewing gum packaging is not suited to this system at all.
- Exceptions must be made for small products. You also support exceptions for other product types.

ASSOCIATION OF AGRICULTURAL INDUSTRY agri

YOUR ORGANISATION



You represent the interests of farmers in the European Union. You want to have a voice in this debate about food labelling, because a law introducing a traffic light system would directly affect many of your members.

You particularly want to protect those who sell food products directly on their farms.

YOUR TASKS

1. Prepare well: Which arguments could convince the Commission? Find statistics, data and facts that support your position.
2. Talk to the Commissioners. Try to convince them.
3. Talk to other lobby groups: who could you work with?

YOUR POSITION

You cannot support the traffic light rating system. Your members would have to change the packaging of all their products, which would be far too complicated. Many farmers sell their products directly on their farms, often without packaging. The traffic light system is just not suited to this at all. Consumers can speak directly with the producers, who know exactly what their products contain. A traffic light display would be totally pointless and create extra costs and effort.

Article 1: Should the introduction of a traffic light system be binding in the whole of the EU?

- Disadvantage: Huge complications for farmers while being totally unnecessary for products sold directly on farms.
- Agricultural organisations should be able to decide for themselves → more flexibility.
- The introduction should therefore merely be recommended.

Article 2: Starting when?

- Immediate introduction = high cost and effort for producers.
- Many products would have to be changed before the introduction.
- No fixed introduction date.

Article 3: Exceptions for specific products?

- Traffic light system is not suited to many products. Products sold directly on a farm do not constitute a health hazard for consumers; the traffic light system is therefore pointless.
- Unnecessary bureaucratic burden for farmers selling products on site.
- Exceptions for products sold on site. Definitely.

FOOD MANUFACTURER Food & more

YOUR ORGANISATION



You represent the interests of businesses and producers. When European politics is passing laws on food, you definitely want to have a say in the decision making process. Therefore it is very important to you to have an influence on the legislative proposal on the traffic light rating system. You want to discuss it with the EU Commissioners.

YOUR TASKS

1. Prepare well: Which arguments could convince the Commission?
Find statistics, data and facts that support your position.
2. Talk to the Commissioners. Try to convince them.
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YOUR POSITION

Food producers must follow the needs of European consumers. This involves informing them clearly on what the products contain. But you cannot lend your support to the traffic light system. It is not suitable for display on products. Consumers often misinterpret it.

Article 1: Should the introduction of a traffic light system be binding in the whole of the EU?

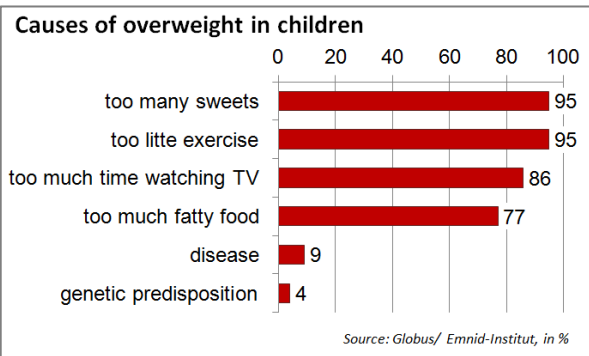
- Disadvantage: The traffic light system over-simplifies information on ingredients and is often misinterpreted by consumers (Diet Coke, for example, would have GREEN for sugar, apple juice would have RED, even though apple juice is much healthier) .
- Furthermore, the traffic light system is not suited to many products.
- The traffic light system therefore does not make any sense. Its introduction should merely be recommended to member states.

Article 2: Starting when?

- The traffic light system won't change much. It's not a model suitable for consumers
- Therefore no fixed introduction date.
- More flexibility. Producers who like the system should be able to introduce it immediately. Others should be forced to at all.

Article 3: Exceptions for specific products?

- Since the system provide consumers with correct information, exceptions are not a problem.
- Exceptions are necessary for certain products: small packages are not suited to the system.
- Therefore, exceptions must be made.



Experience with the system gained in the UK shows:

- ✓ Consumers, even children understand the traffic light system.
- ✓ Consumers use the traffic light system. They buy more healthy food.
- ✓ Fat have been reduced in order to avoid red lights. Food products have become healthier.

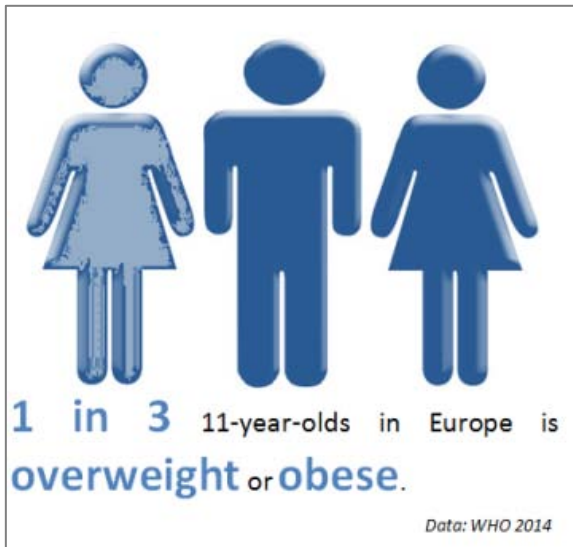
Quelle: Which? (British consumer association)

Traffic light rating on chewing gum package

	Fat 2,1 g per 100 g
	Saturated Fatty acids 1,3 g per 100 g
	Sugar g pro 100 g
	Salt 0 g pro 100 g

Food labelling so far

	per 100g	per portion
Energy	1769 kJ 420 kcal	347 kJ 82 kcal
Protein	5,5 g	1,1 g
Carbohydrates Of which Sugar	72 g 42 g	14 g 8,4 g
Fat Of which saturated fatty acids	11 g 5,6 g	2,2 g 1,1 g
Fibres	5,5 g	1,1 g
Sodium	0,06 g	0,01 g

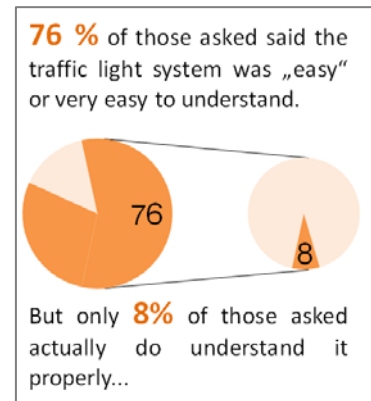


The traffic light system is expensive:

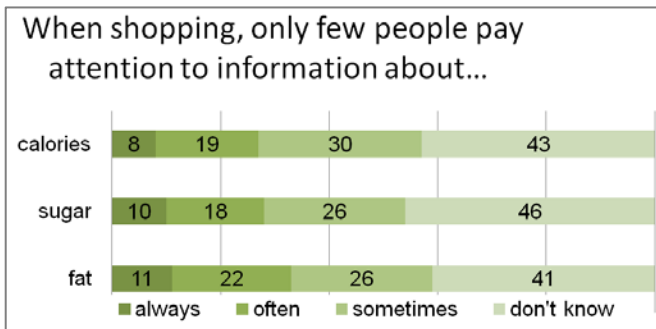
- The data displayed needs to be scientifically proven.
- New packaging must be designed and produced.

Estimated cost: € 1,2 billion.

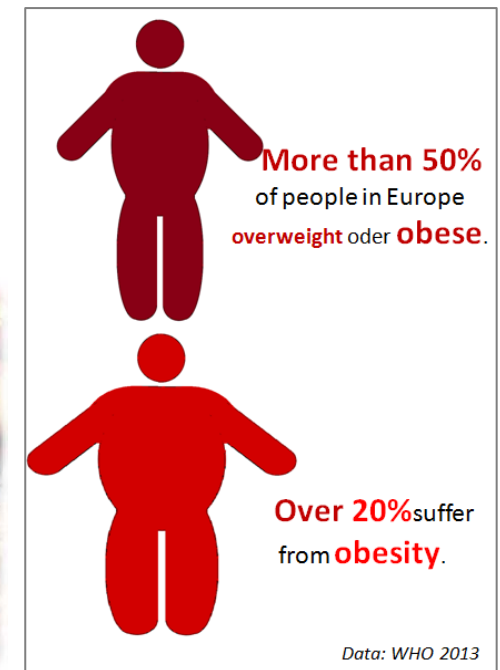
- This makes the food products more expensive.



Studies have shown that:
Unhealthy food products with traffic light displays sell less.



Size of a chewing gum package:
around 40 cm²



<p>FRANS TIMMERMANS</p>  <p>Vice President of the European Commission</p>	<p>STAFF MEMBER</p>  <p>Vice President of the European Commission</p>	<p>STAFF MEMBER</p>  <p>Vice President of the European Commission</p>
<p>VYTENIS ANDRIUKAITIS</p>  <p>Health and Food Safety</p>	<p>STAFF MEMBER</p>  <p>Health and Food Safety</p>	<p>STAFF MEMBER</p>  <p>Health and Food Safety</p>

VĚRA JOUROVÁ



**Justice, Consumers and
Gender Equality**

STAFF
MEMBER



**Justice, Consumers and
Gender Equality**

STAFF
MEMBER



**Justice, Consumers and
Gender Equality**

ELŻBIETA
BIEŃKOWSKA



**Industry and
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MEMBER



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**Industry and
Entrepreneurship**

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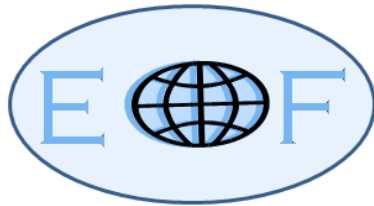
LOBBY eat safe

**Association of
Consumer Protection**

LOBBY eat safe

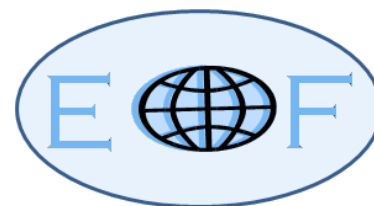
**Association of
Consumer Protection**

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**European Obesity
Federation**

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**European Obesity
Federation**

<p>LOBBY</p>  <p>International Chewing Gum Industry Association</p>	<p>LOBBY</p>  <p>International Chewing Gum Industry Association</p>	<p>LOBBY</p>  <p>International Chewing Gum Industry Association</p>
<p>LOBBY</p>  <p>Association of European Food Retailers</p>	<p>LOBBY</p>  <p>Association of European Food Retailers</p>	<p>LOBBY</p>  <p>Association of European Food Retailers</p>

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Food Manufacturer

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Food Manufacturer

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Food Manufacturer

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Association of Agricultural Industry

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Association of Agricultural Industry

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Association of Agricultural Industry