

Functional Foods Examined

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

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Functional Foods Examined

Summary

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

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

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

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

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

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

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

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

Introduction

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

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

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

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

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

Range of foods

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

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

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

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

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

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

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

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

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

Legislation on claims

Legislation in the UK

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

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

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

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

FAC Review of Food Labelling

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

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

Table 1 FAC recommendations and government response

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

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

Source: MAFF 1992²²

What happened to the FAC recommendations?

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

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

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

Legislation in the USA

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Legislation in Japan

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

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

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

Food Commission Survey

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

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

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

Table 2 Categories of products and numbers making a health claim

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

Source: Food Commission market research 1996

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

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

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

Table 3 Types of dietary benefit or claim made on products

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

Source: Food Commission market research 1996

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

Omega 3

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

Table 4 Added omega 3 products

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

Source: Food Commission market research 1996

Fibre

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

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

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

Table 5 Added fibre products

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

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

Source: Food Commission market research 1996

Lowering cholesterol

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

Table 6 Products claiming cholesterol-lowering functions

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

Source: Food Commission market research 1996

High in protein

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

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

Vitamin and Mineral Claims

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

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

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

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

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

Source: Food Commission market research 1996

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

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

Table 8 Vegetable products containing added vitamin B12

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

Source: Food Commission market research 1996

Problems for consumers

Safety

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

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

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

Efficacy

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

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

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

Compromising the ability to choose a balanced diet

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

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

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

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

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

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

Health and medicinal claims

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

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

The guidance is as follows:

Medicines Control Agency guidelines on medicinal claims

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

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

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

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

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

Table 9 Claims which might be considered medicinal

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

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

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

Price

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

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

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

Source: C Hall, *Daily Telegraph* 9.2.96.

Misleading advertising

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

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

Table 11: ASA rulings on recent 'functional' claims

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

Source: ASA / National Food Alliance 1996

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

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

Consumer protection

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

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

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

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

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

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

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

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

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Appendix: Product Summary Tables

Baby Foods

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

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

Beverages

Soft Drinks - Carbonates

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

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

Soft Drinks - Dilutables

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

Hot Drinks

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

Fruit Juice Drinks

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

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

Fruit Juice (Fresh)

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

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

Fruit Juice (Long Life)

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

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

Bread

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

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

Breakfast Cereals

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

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

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

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

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

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

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

Dairy

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

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

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

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

Dried Pulses & Fruit

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

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

Fish

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

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

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

Margarine, Spreads, Oils & Mayonnaise

Margarine / Spread

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

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

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

Oils

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

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

Mayonnaise

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

Meat, Poultry & Offal

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

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

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

Miscellaneous

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

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

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

Snacks

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

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

Soya Products

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

Spreads

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

Vegetables

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

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