Labelling Issues: Stakeholders’ Perspectives on the Design and Use of Nutritional Labels in Malaysia

This study focused on the in-depth interviews of 13 key stakeholders in Malaysia including country policymakers, major food industries, design practitioners and researchers, with the overarching objective to examine and address (i) the views of issues and challenges of nutritional labels among the key stakeholders, and (ii) suggestions to uptake the betterment of nutritional labels to assist the use among consumers. The interviews were conducted with semi-structured questionnaires, data were transcribed, and further analysis was carried out with thematic approach. Results in this study show that the key stakeholders shared similar concern about the consistency, information presentation and design attention given to nutritional labels in Malaysia. Findings highlighted that the design of nutritional labels and the use among consumers are often placed at a less administered and nonessential situation, whilst noting an evident gap between the governance and producer when handling nutritional labels. In order for the nutritional labels in Malaysia moving forward, findings reveal that a better understanding to information design should be coincided in the overall nutritional label design process, and collaborative work among multi key stakeholders is highly vital in this process.

Keywords: Public Health Malaysia; Information Design; Nutritional Labels; Health Safety Governance.

Introduction

With the enormous economic development and the fast-paced lifestyles picking up in Malaysia, the increasing demand for pre-packaged food is parallel between produced, purchased, and consumed. While less time is available for food shopping, nutritional label is seen as a tool to describe the nutritional quality of food factually and informatively (Tee et al., 2002). As nutritional label is widely gauge as one of the most promising instruments to inform food choices (“Centre for Food Safety – Food Legislation/ Guidelines”, n.d.), it has not only been made compulsory for pre-packaged food products in Malaysia since 2003 (Tee, 2011), the Health Expert Committee takes it further to make nutritional labels as means to educate the public about the impact of the use to one’s health.

As a vehicle to communicate information and assists consumers making informed and healthy dietary choice (Ollberding, Wolf, & Contento, 2011; McGuire, 2012), the prevalence to reach at least 50 percent of nutritional label purpose remains a struggle among most general Malaysian populations (Campos, Doxey, & Hammond, 2011). Number of studies examined to tackle this issue associate to common factors such as insufficient level of education, monthly household income, marital status, geographical settlement and cultural background (Besler, Buyuktuncer, & Uyar, 2012; Mhurchu, & Gorton, 2007; De La Cruz-Gongora et al., 2012; Wan Abdul Manan et al., 2012; Themba, &
While these in-depth research studies investigate mixed factors for insight of label use, the Government bodies and health advocates pin the lack of use as the consumers’ responsibilities (*Guide to Nutrition Labelling and Claims, 2010*).

Despite that consumers may be responsible in playing an active role to use nutritional labels for better dietary choice, it is equally possible to question if the nutritional labels are suitably designed, as advocated by Malaysian labelling regulations and requirement, to assist in its proper usage. According to Ritter, Baxter, & Churchill (2014), there is often a fundamental error made by the health advocates assuming that the use of nutritional labels can be drawn from imagining how it will be used. This error presumes that everyone uses the nutritional labels the same way as a nutritionist or a trained health expert. Consequently, poor decision making and lack of interest to use labels are inevitable among the many task-facing consumers (Malhotra, Jain, & Lagakos, 1982; Keller, & Staelin, 1987).

In actual fact, the key determinants to enlighten the process of using nutritional labels are associated to information design. The way a nutritional label is designed and how the information is presented, carry a considerable amount of influence to the use among consumers (Annunziata, Pomarici, Vecchio, & Mariani, 2016). However, with the current Labelling Requirement Regulation put forward in Malaysia Food Regulation 1985 exhibited a number of ambiguities and a lack of attention to information design. Thus, whether the food industry can be guided in a clear way without diluting the message, and consumers are reassured that the nutritional labels are designed accordingly to aid their use remain questionable.

This study focuses on the in-depth interviews of 13 key stakeholders including country policy makers, major food industry, renowned design practitioners and academic researchers. The main objective is to examine and address (i) the views of issues and challenges of nutritional labels among the key stakeholders, and ii) to bring forward suggestions to uptake the betterment of nutritional labels, assisting the use among consumers.

**Literature Review**

*Nutritional Labels Surface in Malaysia*

Nutritional label had gone through a longstanding historical development. With the increasing scientific evidence on the effects of nutrition on long-term health along the years, nutritional labels became more apparent to the importance of nutrition education as an essential aspect of public health policy. In Malaysia, nutritional label was first introduced through nutrition labelling regulations in the Food Regulations 1985 (“Food Act 1983 and Food Regulations 1985”, n.d). The main objective was to protect the public against health hazards in food and fraud preparation, sale and use of food.
Currently, there is no mandatory nutrition labelling of foods in Malaysia, and there are a number of products in the market with voluntary nutrition labelling where most of which are imported pre-packaged food products. Additionally, there is lack of uniformity in the various formats used in nutrition labelling. Some of these labels are very brief, with only a few nutrients, whereas others go to the full extent of listing over 15 nutrients. Some are expressed as per 100 g (or per 100mL) whereas others refer to amounts per serving. Some of the labels express the amounts in relation to Recommended Daily Intake (RDI) or Recommended Daily Amount (RDA).

With that, Ministry of Health (MOH) announced the intention in year 2000 with numerous minor amendments made in requests of the food industry and consumer needs. The key focus of these regulations is to enable manufacturers to emphasise the nutritional properties of a food product, thereby guiding the consumers in making better food choices. In 2010, the regulation was interpreted into a guidebook for all related professional such as food industry, regulatory authorities in understanding the regulations.

Current Practices in Malaysia

Generally in Malaysia, the regulation and guideline is created by groups of Expert Committees such as nutritionists, dieticians, medical doctors and food scientists based on scientific findings (Guide to Nutrition Labelling and Claims, 2010). Since 2010, the regulation is interpreted into a guidebook, which is used to assist all related professional such as food industry and regulatory authorities in understanding and complying to the regulations.

Apparently, the guidebook shows more emphasis in two areas. First, the technical application that consists the following: (i) categories of food that require mandatory nutrition labelling; (ii) recommended format for 3 types of packaged food; and (iii) extensive procedure for food content calculation. While second part of the guidebook focuses largely on (i) types of permitted nutrition claims; (ii) the various conditions for making claims; and (iii) description of nutrient for cross checking.

A selection of Part IV for labelling requirement stated in Malaysia Food Regulations 1985 to explain how the information should be designed and presented was extracted and put forward into a guidebook for easy understanding among the food industry and regulatory authorities. The selective requirement was presented in the guidebook with only less than one page of text as below:

- Only non-serif (San Serif) font is allowed (Part IV, No.11: Particulars in the labelling in Food Regulations, 1985).
- The minimum font size for nutrition labelling shall be not smaller than 4 point lettering, and all particulars appear on the label shall not be smaller than 10 point lettering (Part IV, No.12.3: Form and manner of labelling in Food Regulations, 1985).
• The height of letters shall be sufficiently complying with if the letters used are of a greater height than the height prescribed (Part IV, No.13.6: Size and colour of letters in Food Regulations, 1985).
• Lettering on the nutrition labelling shall be prominent in height, visual emphasised and positioned to be conspicuous versus other information on label (Part IV, No.12.1: Form and manner of labelling in Food Regulations, 1985).
• All letters shall appear in a colour that contrasts strongly with its background (Part IV, No.13.7: Size and colour of letters in Food Regulations, 1985).

It is without doubt that the nutrition labelling guidebook has a clear benefit for the standardisation of technical application and the proper use of claims. Nonetheless, issues such as the undefined types of non-serif font posed two arguments: (i) the inconsistent use of non-serif font influence the readability and legibility on small print like nutritional label, and (ii) despite a specific identical font size is required, font size highly depends on which type of non-serif font is used. Furthermore, there are several terminologies such as ‘height of letters’, ‘sufficiently complied’, and ‘contrast strongly’ stated in the requirement are lack of clarity, hence, disparity in interpreting the information are likely to occur.

While the government bodies believes that consumers should be responsible to play an active role to use nutritional labels to their beneficial, yet, it is equally plausible to question if the nutritional labels are really designed to assist consumers. With the common practice of designing a nutritional label often involves groups of Expert Committees such as nutritionists, dieticians, medical doctors and food scientists based on scientific findings. The long-standing practice seems to give heavy consideration for nutrient composition and its nutrient value, nevertheless pay minimal attention to how this information should be designed and presented for the use of consumers.

Practices in Other Countries

United States (U.S.)

The ongoing discussion over the years about the function and effect of nutritional labels in U.S. has confirmed that what is on the labels does affect what people purchase and eat (Forbes Welcome, 2016). Similarly, there are too many of the same categories of nutrition information and its calculation often confuse consumers that leads to making poor decision and food choices. The design of type sizes on the original nutritional label is also a critical issue. Its overall presentation of information is another unfavourable case that causes poor layout hierarchy and information is deemphasized (Abdukadirov, 2015).

That said, a change on nutritional label was recently unveiled by the U.S.
Food and Drug Administration (FDA) with the joint effort of former First Lady Michelle Obama. The change is perceived as not just a platform that inform consumers what to eat, but aims to ensure consumers have the tools with accurate information to make healthy dietary choices (Cha, 2016). With the joint advise from a group of designers, the improved nutritional labels retained the minimalist black-and-white table with two column look. Figure 1 shows the key differences of the old and new nutritional labels. Substantial emphasis is given to making larger and bolder type for greater awareness and enable readability.

A more prominent hierarchy can also be seen in the new label. Both thick and thin lines are used as clear divider to segmentise the category of nutrition information, ultimately give consumers an easy roadmap through the label. Furthermore, consideration of white space is also given to each line to reduce clutterness, giving strong contrast between all the text for more legibility. In addition, visual changes in serving size is also created to realistically reflect on how much consumers typically eat at one time (figure 2).

While the new nutritional label has received positive response among consumers, Belser (1994) points out that, nutritional label is often seen as a simple piece of information design, it is however a monumentally complex political and design task. Thus, the change can never be a standalone effort. Additionally, health advocates at FDA, scientists and design experts stress that for nutritional labels to have good design, the collaboration between consumers, designers and health advocates are major (FDA, 2014), because it is what we see and where we based our decision on a daily basis.

Figure 1. Comparison of the Old and New Nutritional Labels in United States

Source: Changes to the Nutrition Facts Label n.d.
United Kingdom (U.K.)

UK had long introduced Guided Daily Amount (GDA) and Traffic light labelling scheme to highlight the different amount of energy and nutrients in colour at the front-of-pack (FoP). Its design intend to assist consumers to gain quick visual comparison in order to avoid negative nutrients through colour contrast. However, with the lack of guidance to maximum, minimum, average recommended amounts, and a direct measure by assigning colour indicators that encourage consumers to lower the perceived nutritional value of food are still questionable.

That being said, Food and Drink Federation (FDF) had reinforced the design for the new styles of labels as a tool to inform people about their food choices with more confidence (“Food and Drink Labelling”, 2014). According to FDF guide, the new styles include the following: (i) the previous GDA is replaced with Reference Intakes (RI) set out in European Law to focus on the RI values for adults; (ii) only two variations of FoP labelling are permitted, the non-colour-coded FoP show either one nutrient or five nutrition information; or the improved version of traffic light colour (red, amber and/ or green) overlaid on top of the nutrition information (figure 3); (iii) Allergen information is further enhanced with typography emphasis such as the use of bold, italic, highlighting, contrasting colour, capitalising text and underlining methods (figure 4); and (iv) four nutrition claims including ‘high fibre’; ‘reduced fat’; ‘low salt’; and ‘no added sugars’ are approved for use. Furthermore, a visual guide was put in place to advocate how the claims should be designed and presented (figure 5).
Figure 3. Two Variations of FoP Labelling (Left) Non-Colour-Coded and (Right) Traffic Light Colour in United Kingdom

![Figure 3](image)

Source: Food and Drink Labelling 2014.

Figure 4. Examples of Allergen Information with Methods of Typography Emphasis

![Figure 4](image)

Source: Food and Drink Labelling 2014.

Figure 5. Visual Examples of Four Approved Nutrition Claims Indicated in FDF’s Guide

![Figure 5](image)

Source: Food and Drink Labelling 2014.

Europe (EU)

85 percent of BoP nutritional label format can be found on all pre-packaged food products in EU. This practice highlights the Big 8 (calories, protein, carbohydrates, fat, sugar, saturated fat, fiber and sodium) to inform consumers about nutrition contents. Variations of FoP is also widely applied among the pre-packaged food products, which summarize the nutrition
information either in mono or duo colour format, while some are presented in graphical pie chart.

When nutritional labels in the U.S. and UK have been regulated, the same level of uniformity was also introduced in EU. The required content and presentation of nutritional labels has become mandatory (Entis, 2015). The legislation that is based on Codex Alimentarius, is also similar to the common practice in Malaysia. According to Food Standard Agency (“Food Information Regulations”, 2014), several improvements are regulated and put forward to the food manufacturers include the following:

- Clearer information presentation are given to three variations of mandatory information in Tabular format. Firstly the mandatory nutrition declaration. Secondly, the mandatory nutrition declaration with supplementary nutrition. Thirdly, the mandatory nutrition declaration with ‘per portion’ or ‘% RI’. The second and third types of format are differentiated with the use of colours as seen in figure 6.
- Scrutiny of minimum font size for printing the mandatory information on BoP is required. For example, the information must be printed in characters using a minimum font size of 1.2 mm for the “x-height”, and for smaller packages the minimum font size is reduced to 0.9mm. A visual guide to measuring the font size and terminologies are provided in the regulation (figure 7).
- New format for allergen labelling must be highlighted in the list of ingredients. While the methods of typography emphasis is similar to the new styles of label in UK. However the ‘allergen boxes’ is no longer allowed and is replaced with ‘ingredients’ (figure 8).

**Figure 6. Three Variations of Mandatory Information applied in Europe**

<table>
<thead>
<tr>
<th>Nutrient</th>
<th>Per 100g/ml</th>
<th>% Reference Intake* Per 100g</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Energy</strong></td>
<td>kJ/kcal</td>
<td></td>
</tr>
<tr>
<td><strong>Fat</strong></td>
<td>g</td>
<td>g</td>
</tr>
<tr>
<td>of which saturates</td>
<td>g</td>
<td>g</td>
</tr>
<tr>
<td>of which mono-unsaturated</td>
<td>g</td>
<td>g</td>
</tr>
<tr>
<td>of which polyunsaturated</td>
<td>g</td>
<td>g</td>
</tr>
<tr>
<td><strong>Carbohydrate</strong></td>
<td>g</td>
<td>g</td>
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<tr>
<td>of which sugars</td>
<td>g</td>
<td>g</td>
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<tr>
<td>of which starch</td>
<td>g</td>
<td>g</td>
</tr>
<tr>
<td><strong>Protein</strong></td>
<td>g</td>
<td>g</td>
</tr>
<tr>
<td><strong>Salt</strong></td>
<td>g</td>
<td>g</td>
</tr>
</tbody>
</table>

* Reference intake of an average adult (8,400kJ/2,000kcal).

**Source:** Food Information Regulations 2014.
**Figure 7.** Visual Guide to Measure the Font Size (Left) and Terminologies of Typography (Right) are Provided in the EU Regulation

![Legend]

1. Ascender line
2. Cap line
3. Mean line
4. Baseline
5. Descender line
6. x-height
7. Font size


**Figure 8.** Comparison of the Old and New Allergen Labelling with Ingredients Highlighted in the List (Left) and (Right) Methods of Using Typography Emphasis


**The Under Focused of Information Design in Nutritional Labels**

Nutritional label is often perceived as a document with factual information, however with the least creativity use. In fact, it has, for too long, been lumped into the category of fact-based things that laypeople are meant to understand. Lebrog (2006) relates nutritional label as part of information design. He states that choosing and buying food may never be easy; it is a process that is informed by design, and nutritional label is where people experience the design of information in both broad and narrower sense upon making certain decision in a daily context.

However, there is a lack of explanation regarding the information design in relation to nutritional labels. Many scientific journals describe nutritional label...
as a tool to provide factual information for nutrient content on the label of food packages (Tee, 2002; Cowburn, & Stockley, 2005) and commonly used by consumers during food purchasing (Besler, Buyuktuncer, & Uyar, 2012; Blistein, & Evans, 2006). World Health Organisation defined nutrition labelling as a description intended to inform the consumers of nutritional properties of a food (Hawkes, 2004), the Government of Health Canada (Food Labelling, 2015) adherence to nutrition labelling as the information found on the labels of pre-packaged foods.

Even in Malaysia, nutritional label is meant to just provide the salient facts about the nutrition contents of the product (Malaysian Dietary Guidelines, 2010). In actual fact, information design carries the components of various design elements which have a level of complexity to influence consumers to use, read and making informed choices (Cowburn, & Stockley, 2005). In another words, as much as numerical numbers, science facts and nutrient composition have to be concerned; design elements such as the choice of typography, the use of colours and contrast, and the layout presentation each carries major concern for a complex document like nutrition labels to ultimately reach consumers to be used (Campos, Doxey, & Hammond, 2011).

Methodology

Selection of Respondents

In this study, the selection of respondents was based on purposive sampling techniques, which involved selecting certain units or cases “based on a specific purpose rather than randomly” (Tashakkori, & Teddlie, 2003). As shown in Table 1, respondents were categorized in four categories including: (i) policy makers who governed the development and implementation of nutritional label (i.e.: Ministry of Health, NGOs); (ii) food industry unit who were involved in the label regulation within their products (i.e.: major food industry players, small-medium-enterprise); (iii) practitioners in both design and branding (i.e.: drivers of Malaysia design scene, design consultants); and (iv) researchers whom demonstrated expansive study in relation to health and design (i.e.: university-based researchers).
Table 1. Respondents Participated in the In-Depth Interview

<table>
<thead>
<tr>
<th>Policy makers</th>
<th>Food Industry</th>
<th>Design Practitioners</th>
<th>Researchers</th>
</tr>
</thead>
<tbody>
<tr>
<td>R1: Principal Officer of Health Department, Ministry of Health (MOH)</td>
<td>R4: Senior Manager of Scientific and Regulatory Affairs Asia Pacific, Coca-Cola Far East Limited</td>
<td>R7: Chairperson of Malaysia Design Council</td>
<td>Health related: R10: Associate Professor, School of Health Science, Universiti Sains Malaysia (USM)</td>
</tr>
<tr>
<td>R2: Deputy Officer of Food Safety and Quality Division, Ministry of Health (MOH)</td>
<td>R5: Manager of Corporate Wellness, Nestle Products Sdn. Bhd.</td>
<td>R8: Founding member of REKANegara</td>
<td>Health related: R11: Senior lecturer, School of Biosciences, Taylor’s University, Malaysia</td>
</tr>
<tr>
<td>R3: Senior Head of Nutrition Society of Malaysia (NSM)</td>
<td>R6: Founding member of Ladang Sari International Sdn. Bhd. (SME)</td>
<td>R9: Founding member of wREGA</td>
<td>Design related: R12: Assistant Professor, Institute of Creative Arts and Design, UCSI University, Malaysia</td>
</tr>
</tbody>
</table>

Research Instrument

Information was collected via in-depth interviews with five standardized questions as the start of each session. The standardized interview guide approach was intended to ensure that the same questions were asked to all interviewees and regarded an effective interview approach that could be easily analysed and compared between interviewees (Shuy, 2003).

On top of the five general questions, we also further designed four sets of semi-structured questionnaire guide with 10 questions in each set to seek the opportunity to pursue in-depth information for this research. The four sets of questions including topics: (i) issues faced with current nutritional labels; (ii) challenges of using the current nutritional labels; (iii) uptake to the issues and challenges; and (iv) suggestions to the betterment of nutritional labels.

Data Gathering Procedures

In this study, the in-depth interviews were conducted between September to December 2018 with each session ranged from 40 to 60 minutes in length. All interviews were conducted face-to-face in English with audio recorded. Transcripts were transcribed verbatim into English using Microsoft Word in
order to be used in this research. Textual data analysis was conducted using Thematic approach pinpointing, examining, and recording themes within data that were associated to the aim of this study (Boyatzis, 1988).

Data Analysis

In the data analysis process, constant comparative method was employed where codes and themes were continuously categorized and compared across interviews using MAXQDA software. Additionally, in order to inform the appropriateness and robustness of the data analyzed, each theme was also broken down into unambiguous, mutually exclusive and exhaustive categories. Points of agreement and disagreement were also focused on to understand where consensus and conflicting views arose. At the end of this phase, an overarching thematic map was reached giving a clearer look at how the main themes were formed and related to research objectives (figure 1).

Figure 1. Final Thematic Map Used in this Study

Results and Discussion

Interviews took place in Malaysia between the month of September to December 2018. A total of 13 participants including three policymakers, three key experts from the food industry, three practitioners in both design and branding, and four academic researchers in health and design related. Results showed that there were consensus reached towards the understanding of nutritional labels purpose and use. Whilst the key informants disclosed the issues faced in governing and using the nutritional labels, they also recognised a number of opportunities as an incentive to counter the betterment of nutritional labels. In particular, the findings revealed issues of consistency, information presentation, and design attention, with the suggestions to the betterment of nutritional labels discussed along side.
Consistency

One of the issues asserted by the majority of key informants is the lack of consistency on the current nutritional labels. However, such inconsistency was perceived differently between the design practitioners, policymakers, food industry, and researchers. In particular, design practitioners perceived the inconsistency in labelling system displayed difficulties and confusion especially when various products carried variety of ways to indicate their information.

R8 “... every brand has got its own way of highlighting the nutrition, it creates confusion. Imagine if every product and brand has their own way of highlighting the nutrition information, consumers will drown in that information.”

Policymakers on the other hand see the lack of consistency mostly in the applied text size. While they acknowledged the reason was due to the absence of text size requirement in the regulations, yet, they stressed on the smaller text size applied in the existing nutritional labels is still a critical issue.

R1 “The text size should be bigger but I can see that when we don’t give specific size to follow, some of the information in fact appears too small for reading.”

In contrast, food industry perceived the lack of consistency appeared when applying information on the nutritional labels. Apart from the mandate, they are often required to deal with the remaining limited space with no advise from the health authorities on how the other information should be appropriately applied. As a result, its leaves a small room for the food industry to decide on which other information should be best included to aid the consumers. Hence, not only such limitation do not allow them to maintain the consistency on the label, the challenge with the limited space also may not compensate the appropriate application for type size and information presentation.

R4 “If you look at the nutritional label, it has limited space. So when we have so much of information required to comply, yet little space to use and there is no specific regulation on how to use the space.”

Subsequently, the researchers interviewee perceived the lack of consistency is due to limited concrete research data and researchers working to further examined problems in this area. According to Hawkes (2004), studies related to nutritional labels is often lacking among the ASEAN countries because they are still new in food labelling regulation and implementation. As a result, not only the lack of accurate data did not allow more in-depth findings
of nutritional labels use, the insufficient data was also unable to support a better understanding in the application of the nutritional labels in Malaysia.

R3 “… we lack the accurate data and very little researchers focusing on area in nutritional labels to support more findings in Malaysia. Even if we wanted more information about when, why and how people use nutritional labels, or what are the problems with nutritional labels, we do not have enough data to support a case.”

R11 “… we are always debating whether the data collected is accurate, and we are always questioning if it is accurate to conclude a case especially on a nationwide level.”

With that said, the experience of dealing with inconsistency across key informants exhibited a tedious and sometimes taxing process. Thus, design practitioners and researchers suggested giving consideration to standardizing the labeling system and format presentation for the same type of food products. By standardizing the labelling system, not only do they believe it is useful for consumers during the information search and comparing nutrient items, they also view such standardization will equip food industry to perform easy application for mass printing production, also a less hectic governance task for policymakers.

R8 “With every product and brand carry their own way of highlighting the nutrition information, it should have a more standardize labelling system where it has to be simple to read and easy to be used by the consumers.”

R12 “… if all the same product category carries the same format it may be easier for manufacturers for printing especially in mass and also easier for many consumers to compare and understand.”

Information Presentation

Difficulties in searching for information is condemning among the policymakers, food industry and design practitioners. With the positioning of the information and the less appealing presentation in many of the current nutritional labels, it had in fact posed discouragement for the use of nutritional labels. The collective consensus about the essentiality of information presentation demonstrated the preference of key informants in making the front-of-pack (FoP) labelling a compulsory application.

R5 “… it’s good to make the front-of-pack more compulsory than just voluntarily, but it should not be made based on the economy of a company per se, what is more important is consumers’ awareness.”
R10 “It is not what the industry (manufacturers) wants the consumers to know, it should be consumers who push the manufacturers on what should be put on the label so that it helps the consumers to be more aware of their food choices.”

The food industry and health researcher further suggested that when a product carried FoP labelling, it simply denotes quick identification and projecting information transparency that would enable consumers to identify the nutrients quicker. Thus, resulted in more awareness raised during purchasing activity. It is also believed that with such transparency, it elevated consumers’ confidence with the food products and food industry, on the other hand may pushes consumers to take note of their food choices as well.

R5 “We believe that on the front-of-pack is where the consumers is facing all the time, and this is where the important information should be to give confidence to the consumer with the products and company, and help them make the right choices.”

Furthermore, food industry, design practitioner and design researcher suggested the use of visual language such as graphics, icons or symbols were deeming to communicate more effectively than in plain text. It could easily translate the food intake and nutrient measurement into clearer guidance, allowing the content of a food product to better communicate with consumers without requiring much specialized knowledge from them. Similarly, the key informants suggested that layout presentation also played a role in manifesting the clarity of information search process on a nutritional label in assisting resolution to the issue in information presentation. Although there was no consensus amongst all key informants about the use of colour, one of the policymakers and health researcher however believed colour would enable an easier process for information search, assisting the time-conscious consumers.

R12 “The information has to be put in the proper positioning, such as to consider the sequence of your thoughts. So when you read, there is a proper sequence of reading and that allow you to read properly and not searching for information.”

R7 “… I’d say with the visual help (...like 1L of milk is equivalent to 1 glass of milk is a good visual representation to tell clearer) is easier to explain without much knowledge to understand as a layman.”

R2 “… people might not like numbers, so colour could be easier to make a decision, even for children it is easier for them to use colour to learn too… when people are lacked of time to read, probably the colour will help them to quickly identify their decision.”
There is no consensus amongst the key informants about the labelling system that was best use for information presentation, although one of the policymakers note that the use of high, medium, low labelling system or symbols such as a tick is seen as an oversimplification to making direct product judgment on behalf of consumers. In addition, health researches stressed that the priority for which information to be properly presented should not be shortchanged for the sake of making the nutritional labels to look more attractive.

R3 “The high, low, medium system is certainly not allowed in this country and it is controversial. There is no exact guideline given even if you use this kind of system or giving a tick or given a healthier choice logo. It is oversimplified at the same time you are making a judgment about what is the criteria to say it is high, low or medium, or to say it is red or green…we should not make judgment for the consumers in this aspect.”

R11 “I think that designer needs to understand and consider certain information needs to be included especially those labels with long nutrient information… to consider how to make the information looks as attractive as possible is one concern, but to include less information so that people will look at it can also be a worrying issue.”

Design Attention

Policymakers and food industry disclosed factors such as the design of nutritional labels and how information should be presented are often not a mandatory to them. On the overall, there are differing views asserted by key informants repectively. For example, food industry proclaim that the attention to design was in fact less inclusive in their usual practices. Although they engage working with design house, however, the emphasis to ensuring the appropriateness of information design for optimal use remain a less important concern comparing to the mandatory information. They regard the mandatory information is prime to comply to as advocated by regulatory authorities.

R5 “We engaged with the design house, but they don’t decide the design elements used on the packaging... Our regulatory affairs will be the one who advise on part such as nutritional label according to the requirement given by the ministry.”

Policymakers on the other hand, acknowledge the enforcement in fact pay less less attention to nutritional label design, they also argued that the less strigent enforcement is stipulated as a responsibility of food industry in deciding how they would want their label to be designed and presented. While it may be true that food industry is given the freedom to exercise their own decision, whether consumers can actually be benefitted from their decision is
another matter. In order to better manage how the nutritional labels should be
designed and presented, policymakers suggest that the leadership role in
enforcing the implications should in fact come from the country enforcement
division to assure the enforcement takes place appropriately.

R3 “...we do not pay much attention to the design of nutritional label; the
factual information is generally what we pay more attention to. In terms of
other factors such as design or how the information should be presented or
why consumers are not using it, we leave it to the food industry to decide.”

Design practitioners and health researchers perceived the little emphasis
given to design deemed lack of understanding to information design among the
food industry and policymakers. Given the fact that nutritional label was
although a small part of a food label, yet, it is the only locus a consumer could
obtain more detailed nutrition information in the purchasing activity. Therefore,
the design practitioners see the need for those who govern and involve in
designing the nutritional labels to first understand the importance of
information design. After all, a better consideration of information design
would enable to make this part of label an easier to interpret document for the
overall average users.

R7 “When you look into nutritional label design, this is although a small
thing, but it has a lot of impact... people who determine how the
nutritional label should look like must understand the importance of
information design and they should take it seriously.”

On the overall, there was an agreement amongst nearly all the key
informants that the current nutritional labels require further improvement, and
they regard the improvement is a complex affair. Thus, policymakers, design
practitioners and health researchers deemed such complex work should venture
as collaborative effort with a convergence of experts from many other fields.
They reckon such collaboration will allow experts in each field to contribute
their know-how in making the nutritional label a more beneficial tool for the
consumers use.

R10 “The issue with just specific group of people who govern how the
nutritional label should look like seems like a departmental territorial
thing. I suggest that policymakers should open up and start working with
experts from other fields to make nutritional label communicates better, it
is quite important for the users.”

R9 “…work like nutritional label should be a convergence of all experts in
the related fields. There is no more working in an isolation situation; it’s
all about collaboration effort within the experts in different fields and each
It has been argued that the design and implications of nutritional labels in Malaysia shown limited growth in examining the influence of use among consumers. Government bodies and health advocates pinned the liability in heightening the use as the consumers’ responsibilities believing that the labelling regulations and requirements necessitated a guide for nutritional labels to be complied to, thus encourage the use. However, through this study, results were recorded that information design entails the way a nutritional label is designed and how its information is presented played a key role in determining the use among consumers.

In particular, the inconsistency in format presentation and labelling system pose difficulty and confusing especially when the same category of products carry variety of ways to indicate their information. Stakeholders acknowledge the inconsistency could be better managed while the attention to design will derive from the increase of understanding towards information design. Collectively, typography is seen as a critical issue. In particular, the type size is treated with insufficient consideration for use and with the limited space in nutritional labels, it demands compensation in typography presentation.

Although there was no consensus amongst all key informants about the use of colour, yet, colour is believed to enable an easier process in information search, assisting the time-conscious consumers. In addition, the positioning of information and layout presentation are perceived less appealing, thus, pose discouragement for the use of nutritional labels. Key stakeholders see the layout presentation as one of the useful methods in manifesting the clarity of information search process on a nutritional label in assisting resolution to the issue in information presentation helping the reduction of information presentation to be obscured and superfluous when using nutritional labels.

The key stakeholders recognized the benefit of having FoP scheme and they see a need to be applied as compulsory scheme instead of maintaining as a voluntarily. They believe it helps elevates consumers’ confidence with the food products and food industry, on the other hand pushes consumers to take note of their food choices. Furthermore, they perceived the use of visual language could easily translate the food intake and nutrient measurement intro clearer guidance, allowing the content of a food product to better communicate with consumers without requiring much specialize knowledge.

On the overall, the findings from this study open many doors for the design and use of nutritional labels in Malaysia moving forward. In order to have greater effect on the design and increase the use of nutritional labels, it is highly important (i) for key stakeholders to collectively recognise the effect of information design in making the design development of nutritional labels a
more beneficial tool at the social and national level, and (ii) all relevant parties should be given remarkable roles to collectively contribute to making the use of nutritional labels a less exhausting task for the consumers.

References


