

1 **Consumer involvement in dietary guideline development: opinions from European**
2 **stakeholders**

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27
28 **Running title:** Consumers and dietary guideline development

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36 **Abstract**

37 *Objective*

38 The involvement of consumers in the development of dietary guidelines has been promoted by
39 national and international bodies. Yet, few best practice guidelines have been established to assist
40 such involvement.

41 *Design*

42 Qualitative semi-structured interviews explored stakeholders' beliefs about consumer involvement
43 in dietary guideline development.

44 *Setting*

45 Interviews were conducted in six European countries: The Czech Republic, Germany, Norway,
46 Serbia, Spain and the United Kingdom.

47 *Subjects*

48 Seventy-seven stakeholders were interviewed. Stakeholders were grouped as government, scientific
49 advisory body, professional and academic, industry or non-government organisations. Response
50 rate ranged from 45%-95%.

51 *Results*

52 Thematic analysis was conducted with the assistance of NVivo qualitative software (QSR
53 International Pty Ltd.). Analysis identified two main themes: type of consumer involvement and
54 pros and cons of consumer involvement. Direct consumer involvement (e.g. consumer
55 organisations), in the decision-making process was discussed as a facilitator to guideline
56 communication towards the end of the process. Indirect consumer involvement (e.g. consumer
57 research data), was considered at both the beginning and the end of the process. Cons to consumer
58 involvement included the effect of vested interests on objectivity; consumer disinterest;
59 complications in terms of time, finance and technical understanding. Pros related to increased
60 credibility and trust in the process.

61 *Conclusions*

62 Stakeholders acknowledged benefits to consumer involvement during the development of dietary
63 guidelines, but remained unclear on the advantage of direct contributions to the scientific content of
64 guidelines. In the absence of established best practice, clarity on the type and reasons for consumer
65 involvement would benefit all actors.

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67 **Key words:** Dietary guideline, stakeholder, consumer, qualitative, EURRECA

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71 **Introduction**

72 A variety of national and international bodies have promoted the involvement of consumers as
73 stakeholders in health research, policy and practice (1-3). This has included the development of
74 dietary guidelines (4), a set of statements that could be expressed in both nutrient and food-based
75 terms for the promotion of nutritional wellbeing in the general public (5). Suggested benefits of
76 consumer involvement have related to the process of scientific decision-making, such as fostering
77 trust in the process via transparency, as well as improving the quality of final decisions (4, 6, 7).
78 In terms of process, consumer involvement has been led by a move for greater accessibility to
79 science (6, 8, 9), where *'people have the right and duty to participate individually and collectively*
80 *in the planning and implementation of their health care.'* (10). Regarding content, consumer
81 involvement is premised upon incorporation of consumer values and perspectives to broaden the
82 range of knowledge considered and allow the opportunity for assumptions to be challenged (4, 6,
83 11-13).

84 Consumer involvement can take a variety of forms, in terms of who would be involved, in what
85 way and to what degree (13). The general public are the intended end-users of dietary guidelines.
86 Thus, all members of the public have the potential to be involved, from individual lay consumers to
87 those representing vulnerable consumers or consumers in general, such as consumer groups or
88 consumer advocates (14). Participation may be via the use of qualitative or quantitative consumer
89 research data (e.g. focus groups testing draft guidelines or food choice and dietary intake data), or
90 participation at invitational/open consultations and decision-making meetings (6).

91 There has been limited research in Europe on the current practice of consumer involvement in the
92 development of dietary guidelines (15). Timotijevic *et al.* (9), explored stakeholder (including
93 consumer groups), involvement in the decision-making process for micronutrient recommendations
94 and suggested involvement differed across European countries, influenced by a country's political
95 and historical context. For example, in the Czech Republic, where new democratic nutrition policies
96 were in their infancy, stakeholder involvement was encouraged but not consistently employed. In
97 the UK, stakeholder involvement was more formalised. This has likely been in response to the
98 visible health scares that occurred in the UK (e.g. variant Creutzfeldt-Jakob disease, vCJD/nvCJD,
99 the human prion disease caused by bovine spongiform encephalopathy, BSE), as well as the
100 positioning of public health nutrition in key policy decisions (9).

101 Inconsistency in the employment of consumer involvement across Europe may also, in part, be due
102 to the lack of evidence-based best practice for consumer involvement in scientific decision-making
103 processes (16). Minimal data have been available to evaluate the impact of consumer involvement
104 or highlight the potential advantages of involvement in the development of dietary guidelines (9).

105 A greater degree of research has been conducted in relation to consumer involvement in the clinical
106 healthcare field (clinical referring to the treatment of disease, predominantly at an individual level,
107 as opposed to dietary guidelines which refer to public health promotion at a population level).
108 Various models to describe consumer involvement have been developed, such as Arnstein's ladder
109 of participation (17), which contained three main categories of involvement: non participation,
110 degrees of tokenism and degrees of citizen power. However, this has since been criticised for its
111 lack of applicability in today's healthcare context (18). More recent research has suggested three
112 general classifications of involvement: public communication (e.g. recipients of information
113 campaigns), public consultation (e.g. responders to draft consultation documents) and public
114 participation (e.g. members of advisory committees). Yet, research in the healthcare field has also
115 been limited by a paucity of data evaluating the impact of various types of consumer involvement
116 (6, 13, 19-21). This was illustrated by an updated Cochrane review which emphasised the lack of
117 data from randomised controlled trials on the effects of consumer involvement in healthcare
118 decisions, such as the development of clinical practice guidelines (22). Alternative study designs
119 have attempted to evaluate the impact of consumer involvement, particularly regarding public
120 engagement in health policy development (23, 24). However, evaluation has been hampered by the
121 methodological difficulties of identifying and measuring positive/negative impacts of consumer
122 involvement on either the decision-making process (e.g. decision-maker experience, engagement,
123 financial or time costs), or the content and effectiveness of final decisions and their implementation
124 (e.g. content quality, improvements in public health, use of guidelines (6, 25)).

125 The international and European political will for consumer involvement in scientific decision-
126 making processes does not appear to have been transferred into the practice of consumer
127 involvement across Europe. This may be explained by country specific social, historical or political
128 contexts. However, implementation may have been further complicated by the lack of established
129 best practice guidelines or evidence on the most effective form of consumer involvement. The
130 current study used a qualitative interview design and sought to explore any commonalities in the
131 beliefs of a variety of stakeholders from different European countries on consumer involvement in
132 the development of dietary guidelines. The aim was to bring a multi-national and multi-stakeholder
133 perspective to discussions on potential avenues for pan-European consumer involvement best
134 practice guidelines.

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140 **Method**

141 *Design*

142 Qualitative semi-structured interviews explored stakeholders' beliefs about consumer involvement
143 in dietary guideline development (both nutrient and food-based recommendations). A common
144 protocol was used by the researchers responsible for data collection in each country. Interviews
145 were held face-to-face or over the telephone. Consent was obtained for participation and all
146 interview recordings, which were later transcribed verbatim. All quotes have been made
147 anonymous.

148 *Setting*

149 Interviews were conducted during 2008/9 in six European countries: The Czech Republic (CZ),
150 Germany (GE, predominantly Germany, but also representatives of the D-A-CH countries), Norway
151 (NO, predominantly Norway, but also one Nordic Nutrition Recommendation member from
152 Denmark), Serbia (SE), Spain (ES) and the United Kingdom (UK). The countries sampled
153 represented diversity in geographical location, socio-cultural and institutional infrastructure as well
154 as history of dietary guideline development.

155 *Subjects*

156 Subjects were recruited based upon a template of stakeholders involved in the development of
157 (micro) nutrient recommendations in each country. Stakeholders were defined as 'individuals or
158 organisations willing to invest resources and accept some responsibility for the development of
159 (micro) nutrient recommendations - may also be consumers'. They were grouped as government,
160 scientific advisory body, professional and academic, industry or non-government organisations
161 (NGO, included charities, consumer and special interest groups, Table 1). The 21 CZ participants
162 were recruited within the context of a workshop. Remaining participants were recruited by e-mail or
163 telephone. The response rates ranged from 45% (GE) to 95% (CZ).

164 *Interview schedule*

165 The semi-structured interview schedule consisted of three sections:

- 166 1) Stakeholder general beliefs about dietary guidelines.
- 167 2) Stakeholder beliefs on consumer awareness, understanding and use of dietary guidelines.
- 168 3) Stakeholder beliefs on consumer involvement in developing dietary guidelines.

169 This study has presented the results from the research question related to section three: stakeholder
170 beliefs on consumer involvement in developing dietary guidelines. Nevertheless, data from all three
171 sections of the interview were explored regarding this research question.

172 The term 'dietary guideline' was believed to be the most understandable and translatable term
173 across stakeholders and countries and was initially used in section one of the interview schedule.
174 Previously published results from this data set reported variation in the interviewee led

175 interpretation of the term dietary guidelines (26). Thus, please be aware that dietary guideline has
176 referred to both nutrient and food-based recommendations throughout this study.

177 Prompts were used where necessary to encourage elaboration on relevant points. All interview
178 schedules were translated by the researchers responsible for data collection with care taken to
179 maintain the meaning of each question.

180 *Data analysis*

181 The data were analysed using thematic analysis (27). The aim of thematic analysis is to ‘describe
182 how thematic contents are elaborated by groups of participants and to identify meanings that are
183 valid across many participants’ (28). A skeleton coding structure was created and modified by
184 researchers in each country during preliminary analyses. The final template used by all six countries
185 allowed the addition and omission of codes where necessary. All countries completed coding in
186 their own language and then created a summary of identified themes and illustrative quotes in
187 English. Qualitative data analysis software NVivo (QSR International Pty Ltd.), assisted the
188 collation and thematic analysis of multiple country data.

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190 - insert table 1 here -

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210 Results

211 The two main themes *type of consumer involvement* and *pros and cons of consumer involvement*
212 together with their related sub-themes have been reported below with illustrative quotes presented
213 in tables 2 and 3.

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*215 1. Type of consumer involvement***216 1a. Direct or indirect involvement**

217 Stakeholders appeared to discuss several ways that consumers could be involved in dietary
218 guideline development, which have been categorised as either indirect or direct involvement.
219 Indirect consumer involvement utilised information on consumers to aid the decision-making
220 during dietary guideline development (e.g. first-hand anecdotal practice experience or consumer
221 research data on consumer health indicators, dietary intake/nutrient status, lifestyle
222 attitudes/behaviours or opinions on dietary guideline communication materials). Direct involvement
223 referred to lay consumers, consumer group representatives or consumer advocates actively
224 participating in the decision-making process (e.g. presence on committee meeting panels or via
225 plenary/workshop/written consultation practices).

226

227 1b. Which consumers to involve?

228 Stakeholders were not always clear who they believed would be the most suitable consumers to
229 involve. In relation to direct consumer involvement, the majority of interviewees often referred to
230 “consumer organisations”, “consumer associations” and “consumer groups”, with only a few
231 interviewees considering direct lay consumer involvement. The difficulty in identifying the
232 appropriate consumer organisations to involve was highlighted by a few of the stakeholders in
233 terms of the large number of organisations that could potentially represent consumers.

234 Regarding indirect consumer involvement, consumers were described at both a broad population
235 level and a subgroup level. Dietary guidelines were considered applicable to the “general
236 population” with terms such as “citizens” or the “general public” frequently used whilst discussing
237 the data required for guideline development, as well as ensuring effective communication and use
238 of the guidelines. Yet, stakeholders rarely identified themselves as consumers (aside from one
239 stakeholder - UK SAB). Consumer data specific to various target subgroup populations were also
240 mentioned. Subgroups appeared to represent those vulnerable to nutrition inadequacy or
241 overexposure defined by both physiological and social descriptors (e.g. life stage, sex, age as well
242 as education level, socio-economic status, rural/urban, health motivation).

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246 1c. Timing of consumer involvement

247 The majority of stakeholders appeared to believe that consumer involvement, either direct or
248 indirect, was necessary at the end of the dietary guideline development process mainly in regard to
249 guideline communication. A number of interviewees also advocated some benefit in consumer
250 involvement at the initial stages of dietary guideline development. There was a sense that consumer
251 information or opinion would not be required during what was regarded as the scientific content
252 stage of development in between the initial scoping of the problem and later communication stages.

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254 - insert table 2 -
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256 2. *Pros and cons of consumer involvement*

257 2a. Interests

258 Several interviewees commented that direct consumer involvement in the decision-making
259 processes may detract from the, scientific or other, objectivity of the decision-making process.
260 There was some concern that consumer representatives may act as lobbyists or that ideological or
261 political motives could influence what was regarded as a scientific and independently objective
262 decision-making process. In contrast, a small number of interviewees believed that food safety
263 might be a higher priority for consumers rather than nutrition issues such as dietary guideline
264 development. For example, one stakeholder (CZ NGO) commented on the resources of the
265 consumer organisations. They stated that the often limited resources (manpower and finance), of
266 small consumer organisations would be likely to prioritise food safety above nutrition matters such
267 as dietary guidelines, whereas other stakeholders such as the food retail industry might have the
268 capacity to fund involvement in both areas.

269
270 2b. Credibility and trust

271 The majority of stakeholders recognised that consumer trust in the process of dietary guideline
272 development was an advantage to ensure that the guidelines were perceived as credible. However,
273 only a minority identified direct consumer involvement as a route to establish trust and legitimise
274 the process through adequate representation and transparency. The majority advocated the use of
275 consumer indirect involvement via consumer research, particularly in relation to testing
276 communication messages. The identification of consumers' health and dietary status, lifestyle
277 habits, values and motivations were considered important during the development of guidelines and
278 'testing' the dietary guidelines. Such consumer research was expected to improve guideline
279 implementation and effectiveness. Only one stakeholder suggested that direct consumer
280 representation during the decision-making process might improve the content of the guidelines by
281 bringing a degree of practicality to the discussions (UK NGO).

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283 2c. Complications

284 Several interviewees mentioned that direct consumer involvement would be a disadvantage to the
285 process due to increasing the time and financial cost of guideline development. It was perceived
286 that consumers who did not have any prior knowledge in the dietary guideline area would find it
287 difficult to follow discussions in terms of the technical language used and interpretation of the data,
288 which would limit the degree of their involvement and lengthen discussions.

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316 Discussion

317 Research findings provided an insight into the beliefs of multiple stakeholders across a variety of
318 European countries on the implementation of consumer involvement in the development of dietary
319 guidelines. Stakeholders appeared aware of several different types and potential pros and cons of
320 consumer involvement. Benefits were primarily in relation to indirect involvement via the use of
321 consumer research data to inform guideline development and communication strategies. In addition,
322 direct involvement was believed to help foster trust and credibility in the guideline process to assist
323 with effective guideline implementation. Regarding guideline content, stakeholders either
324 minimally or negatively referred to direct consumer involvement citing the development of content
325 to be a predominantly scientific stage of the process.

326 The role of consumer involvement as described above may be explained by the stakeholders'
327 perception of who a 'consumer' was. In the identified theme *type of consumer involvement* there
328 was a grouping of consumers by education level and a disassociation with consumers by all but one
329 stakeholder. Stakeholders may have perceived an 'imagined consumer' (29), wherein consumers
330 were viewed as passive beneficiaries of expert advice rather than active contributors to advice
331 formation (e.g. public communication involvement, (21). Thus, consumer involvement was
332 considered more appropriate in the non-scientific aspects of guideline development. Similarly, in
333 the identified theme *pros and cons of consumer involvement* there was a perception that consumers
334 would lack the expertise necessary to follow the technical content during scientific discussions.
335 Stakeholders identified this as a limiting factor for consumer involvement which may also prolong
336 and increase the financial costs of the guideline development process.

337 Lack of expertise and resultant additional financial and time burdens has been cited in previous
338 research as a disadvantage to consumer involvement during scientific decision-making and
339 guideline development (9, 20). Consumer involvement, particularly during technical discussions,
340 may present a number of difficulties (30). Consumers may not lack expertise and it may take no
341 longer or be more expensive to involve consumers. Nevertheless, if these difficulties are present
342 they can be overcome to allow consumer views to either complement the technical knowledge of
343 non-consumer experts or challenge any previously held assumptions, both of which may improve
344 the quality of guideline content and ultimate success of any guideline implementation (14, 31).
345 The potential effect of consumer involvement on scientific objectivity was also mentioned as a
346 further barrier to consumer involvement during the guideline content discussions. Stakeholders
347 referred to the possible effect of consumer ideological or political vested interests which might bias
348 the scientific decision-making process during guideline development. Previous research has
349 recognised the difficulties of establishing a truly objective scientific process and that bias has the
350 potential to influence a process such as the development of guidelines (32). Nevertheless, this is

351 relevant to all parties involved in the process, as there is a possibility of inherent bias via personal,
352 professional, academic or commercial interests (14, 32). Many scientific bodies have routinely
353 requested members to disclose potential conflicts of interest (33, 34). Difficulties remain with the
354 responsibility on the individual to identify what might constitute a potential conflict of interest. Yet,
355 the transparent declaration of interest from all stakeholders, including consumers, as well as the
356 explicit detailing of evidence and values underpinning decisions, may help to negate some of the
357 apprehension shown towards consumer involvement in this study. Indeed, increased transparency
358 and greater involvement of consumers has been suggested as a means to limit conflict of interest
359 issues and prevent bias from individual or group private interests which may not be in line with
360 public health (35).

361 Stakeholders did acknowledge the benefits of consumer involvement in terms of providing an
362 increased sense of legitimacy, credibility and trust in the process of developing guidelines. The
363 need for legitimacy, credibility and trust was particularly discussed in relation to countries which
364 had multiple guidelines or a high degree of media influence that was seen to confuse or dilute a
365 consistent dietary guideline public health message. This is often proposed as a primary purpose for
366 consumer involvement or public engagement with science (12, 36-38). In addition, arguably, in the
367 Western world at least, trust in the food system and those who oversee its delivery and advice has
368 become ever more important in relation to nutrition where a number of consumers have become far
369 removed from the origin of their food (39).

370 There may be limits to the degree these findings can be transferred outside the sample studied. The
371 exploratory nature of this study justified the use of a qualitative design and steps were taken to limit
372 any biased interpretation of these perceptions. A common protocol was employed to maximise
373 study rigour via clarity of the research goal and the consistent method of data collection, analysis
374 and reporting. This also enabled the combination of data across countries. To maintain the cultural
375 context and authenticity of the data the majority of qualitative interpretation was conducted in the
376 native language. It was not possible to conduct data analysis by country or stakeholder group due to
377 the incompatible nature of the stakeholder groups who appeared to vary in their involvement of
378 dietary guideline development across countries. Instead data were analysed with a focus on
379 commonalities across the whole data set and any observed individual differences were highlighted.
380 The stakeholder views depicted were not intended to represent the totality of views from the six
381 countries or those involved in setting either (micro) nutrient-based or food-based dietary guidelines.
382 Interviewees varied in their previous experiences as either the consumers or working alongside
383 consumers, involved during the development of dietary guidelines. It is unclear the degree these
384 past negative or positive experiences of consumer involvement may have influenced any
385 assumptions about consumers and consumer involvement reported in this study. In addition, the

386 confusion surrounding the terminology in this area (26, 40), has led to the present study
387 interviewing those responsible for and collecting results referring to a variety of nutrient and food-
388 based guidelines (Dietary Reference Values, nutrient goals, Food-Based Dietary Guidelines).
389 Nevertheless, the views presented have provided a glimpse of how consumer involvement may be
390 perceived in relation to the development of 'dietary guidelines' from a wide range of stakeholders
391 across multiple countries. Results have suggested political advocacy for consumer involvement in
392 scientific decision-making needs to be accompanied by clarification on the role of any consumer
393 involvement from the outset of any collaboration. Identifying the purpose, advantages and/or
394 disadvantages of this involvement may assist with identifying the type of involvement required (e.g.
395 public communication, public consultation or public participation (21, 23), ensure expectations are
396 clear, the significance of any input is considered (13, 22, 41) and the possibility of token consumer
397 involvement (17) or the misuse of often limited (guideline development or consumer), resource is
398 avoided.

399 Future research may yet establish evidence-based best practice for the most effective type of
400 consumer involvement to support the successful development of dietary guidelines. Alternatively, it
401 may not be possible to establish harmonised best practice. Different degrees or types of consumer
402 involvement may be warranted due to the variance in experience, influence and visibility of
403 consumers across different countries or situations. Until such time that further data become
404 available on the impact of different forms of consumer involvement it may be prudent to support a
405 flexible approach based upon the practical experience of others and a general set of agreed
406 principles, such as the agreement of clear and specific aims, objectives and outcomes (3, 22, 31, 42,
407 43).

408 **Conclusion**

409 Organisations will continue to call for greater consumer involvement, primarily as part of a wider
410 request for improved public engagement with science and a multi-stakeholder approach to
411 preventing dietary related ill-health. There is currently limited data on the impact of, or to justify
412 best practice for, consumer involvement in the development of dietary guidelines. Until this can be
413 established it may be wise to adopt a flexible approach to involving consumers. The main
414 conclusion from this study has been that whatever type of consumer involvement is undertaken it
415 would be advisable to make transparent the role of consumers to all parties prior to any involvement
416 as well as in the final report writings to aid the evaluation of consumer impact.

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Table 1 Sample

Country	Stakeholder group						Total
	IND	GOV	NGO	PRO	SAB	Other	
CZ	4	4	4	6	2	1	21
GE	2	2	2	2	2	0	10
NO	2	2	1	1	3	0	9
SE	3	3	4	5	0	0	15
ES	1	3	2	4	2	0	12
UK	4	1	2	1	2	0	10
Totals	15	15	15	19	12	1	77

IND = food industry; GOV=government; NGO=non-governmental organisation;

PRO=professional/Academic; SAB=scientific advisory body

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Table 2 Main theme 1 : type of consumer involvement

Subtheme	Quote (identification reference, country and stakeholder group)
<i>1a. Direct or indirect involvement</i>	<i>“It would have to be a multi-disciplinary body and within that body should be one of the consumer representatives.” [41 SE GOV]</i>
	<i>“I think consumers already participate through the surveys done with them, as the food frequency questionnaires or the diet histories.” [56 ES NGO]</i>
<i>1b. Which consumers to involve?</i>	<i>“They’ve just got a list of consumer organisations, and actually it’s a much broader sector than that. So say for example they tend not to think of environmental organisations as being consumer organisations.” [68 UK, NGO]</i>
	<i>“Predominantly the relatively educated consumer [will be more aware of dietary guidelines] because he will also understand them right away” [22 GE GOV]</i>
<i>1c. Timing of involvement</i>	<i>“[...] [the consumers] can of course not be a part of what the dietary guidelines should be, but how one should give such advice and guidelines.” [32 NO NGO]</i>
	<i>“Perhaps at the first stages, someone representing the consumers, i.e. a Consumer Association, should participate to guide and give their opinion. At a final stage, when the draft is done, then we could test it with the consumers.” [57 ES IND]</i>

CZ = the Czech Republic; GE = Germany + D-A-CH countries’ recommendation representatives; ES = Spain; NO = Norway + one Danish Nordic Nutrition Recommendation representative; SE = Serbia; UK = United Kingdom. IND = Food industry; GOV=Government; NGO=Non-governmental organisation; PRO=Professional/Academic; SAB=Scientific advisory body

Table 3 Main theme 2: pros and cons of consumer involvement

Subtheme	Quote
2a. Interests	<p><i>“What do not belong to the process, in my opinion, are for example interest associations [...] it could compromise the objectivity.” [23 GE PRO]</i></p> <p><i>“We sometimes deal with consumers’ questions about foods in our consumers’ association. But they are more connected to food safety and quality. So DGs aren’t very important for us. Consumers don’t approach us with these questions.” [1 CR NGO]</i></p>
2b. Credibility and trust	<p><i>“But I do not see that the consumers have a large role in the development of the DG. That is scientific based, but it is extremely important that the consumers have trust in the process of making the DG.” [33 NO SAB]</i></p> <p><i>“[...] part of their [consumer representatives’] responsibility is to ensure that we are operating in a way that is accessible. All of the processes that we engage in are open for public scrutiny, and there are explicit invitations at the start of many of the process for people to provide information.” [69 UK GOV]</i></p> <p><i>“We can still learn from consumers, their wishes and their habits, good and bad.” [42 SE PRO]</i></p>
2c. Process complications	<p><i>“I don’t think there are any disadvantages other than, it might take longer, because obviously a bigger group, you’re going to have more discussion. You’re going to have, you know, more views to take into account.” [70 UK PRO]</i></p> <p><i>“The disadvantage is that consumers complicate scientists’ work [...]” [2 CR SAB]</i></p>

CZ = the Czech Republic; GE = Germany + D-A-CH countries’ recommendation representatives; ES = Spain; NO = Norway + one Danish Nordic Nutrition Recommendation representative; SE = Serbia; UK = United Kingdom. IND = Food industry; GOV=Government; NGO=Non-governmental organisation; PRO=Professional/Academic; SAB=Scientific advisory body