

## **Obesity Health Alliance Feedback on the Public Health England Sugar Reformulation Sector Specific Meetings, November – December 2016**

The Obesity Health Alliance was pleased to be invited to participate in PHE's recent reformulation meetings with the food industry. We summarise our key observations and recommendations from participating in this process below.

### **The proposed targets**

- In 2016 the Obesity Health Alliance proposed a 50% reduction in the added sugar content of all food and drink by 2020. As part of its work to assess the potential impact of reformulation on sugar intakes, PHE examined the impact (but not the technical feasibility) of reducing the sugar content of the top 8 product categories by 50%. It found that sugar intakes would reduce to 9.2% of total energy in adults and 10.9% of energy in children aged 11-18<sup>1</sup>. These levels would still be significantly above the SACN target of 5% energy in both adults and children.
- The proposed PHE target for a 20% sales-weighted average reduction in sugar across a range of product categories aims to provide a balance between being ambitious and achievable. OHA supports this target as the minimum acceptable level of sugar reduction achieved across each product category.
- PHE's analysis has demonstrated that a small proportion of lower sugar products already exist in every category. This suggests that the proposed targets are technically feasible. We therefore do not support the proposals made by industry for the targets to be relaxed by excluding products with no added sugar from the calculations to estimate the sales weighted average targets for each category.
- Given the size of the gap between current sugar consumption levels in the population and the SACN targets, and the prevalence of overweight and obesity in the population, there is no room for complacency.
- We recommend that in addition to undertaking a comprehensive monitoring and evaluation programme to assess progress, PHE should commit to reviewing, revising and strengthening the targets downwards at regular two-year intervals (as occurred under the successful FSA salt reduction programme).

### **Data, monitoring and publishing the barometer of the market**

- We recommend that the data collection and monitoring process adopted by PHE is:
  - Comprehensive, allowing for progress to be measured across all products within the priority categories; across both manufactured food products and out of home food outlets; and on reducing portion sizes.
  - Standardised, quantified and presented in a way which enables comparisons to be made across products and companies.

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<sup>1</sup> PHE 2015. Sugar Reduction: The evidence for action. Annexe 5b: Food supply. A secondary analysis of the National Diet and Nutrition Survey (NDNS) to assess the potential impact of reformulation on sugar intakes. [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/470176/Annexe\\_5\\_Food\\_Supply.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/470176/Annexe_5_Food_Supply.pdf)

- Overseen by an independent, external scrutiny panel which has the final decision on any data and reports that are published for monitoring purposes.
- Transparent and made publicly available for independent scrutiny by NGOs and others.
- We support PHE's proposal to publish three barometers which take a deep dive analysis of the highest selling products (identified through Kantar data where available), to get a sense of the progress being made by industry. This process should complement but not replace the comprehensive monitoring and evaluation programme to assess progress.
- The proposal for the deep-dive to assess the formulations of the top 20 products by sales weighted average from each category, across each of the 10 categories could be a suitable approach provided that the data was representative of the progress being made, and allows comparisons across products and companies. However, these deep dives should not be an obstacle to sharing and publicising progress made by other manufacturers outside of the top 20 sellers. The monitoring process should itself be reviewed to ensure that it is fit for purpose.

### **New product development caps**

- We strongly support PHE's proposal that the sugar reduction targets should serve as a maximum sales weighted average (SWA) targets for new single-serve products, as well the proposal to set maximum target levels for new single-serve products.
- PHE's analysis has demonstrated that across all categories, a small proportion of products are already meeting the proposed targets. This demonstrates that achieving the targets is technically feasible.
- Having a level playing field will stimulate innovation among those companies who are motivated to support PHE in the achievement of its objectives.
- We also support proposals for single-serve portion calorie caps.

### **Other considerations**

- At the reformulation meetings, the public's patchy knowledge and understanding of portion sizes, as well as their perceptions of value for money on smaller portion sizes and their frequency of consumption of unhealthy products were identified as potential barriers to reducing sugar consumption.
- PHE should examine the public's knowledge and understanding of portion sizes and garner insights into their perceptions of value for money as a first step to identifying how some of these barriers might be addressed.
- PHE should also publish guidance on appropriate portion sizes, and communicate this information to the public. This could be undertaken firstly through its social marketing and communications programme. Secondly, through work with industry to alter the marketing/promotions mix and incentivise consumers to switch to lower-sugar variants and healthier options.
- We also recommend that the food industry is required to quantify the amount of free sugar they have added to their products on the product label.

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