

Free Sugars Roundtable – Meeting Summary

Obesity Health Alliance, May 2026

Executive summary

- The Obesity Health Alliance (OHA) convened a cross-sector roundtable to explore practical solutions for calculating free sugars under the 2018 Nutrient Profiling Model (NPM). The session brought together non-governmental organisations (NGOs), researchers and officials from the Department of Health and Social Care (DHSC) for a hands-on, problem-solving workshop.
- Participants tested free sugar calculations on three real products - a vegetable lasagne, fruit layered yoghurt and roasted vegetable pizza. Following the DHSC technical guidance and using only the information available on pack, rather than detailed product specifications, there was a wide variation in results reported by attendees. This reflected the real-world constraints NGOs and researchers face compared with manufacturers.
- Three organisations - the University of Oxford, University of Leeds and Nesta - presented emerging methodological approaches to calculating free sugars. While none are finalised or publicly available, all demonstrated that workable solutions are achievable.
- There was strong agreement on what is needed for NGOs and academics to be able to confidently, consistently and accurately calculate free sugars in the absence of detailed product specifications. First, clearer guidance on assumptions and further worked examples in the final technical guidance, secondly, ensuring current labelling regulations are being adhered to and thirdly, in the future, a central 'backstop' calculator for the sector to check compliance, similar to the tool available for the 2004/05 model and a central ingredient/free sugars reference database to address data gaps.
- A sliding-scale exercise highlighted shared priorities: 'good enough' accuracy to enable rollout, a single consistent approach, and clear, defensible outputs - even where some uncertainty remains for those limited to back-of-pack information.
- Overall, the workshop showed that while challenges remain, there is clear alignment on how to move forward and a shared commitment to enabling effective implementation of the 2018 NPM to increase the public health impact of the existing advertising (UK) and promotions (England) regulations.

Background

The OHA arranged a free sugars roundtable with members of its NPM working group and representatives from the DHSC on Wednesday 25th March, 9:45am–12:45pm. The event was hosted by Action on Salt and Sugar at Queen Mary, University of London. The meeting aimed to be a practical, problem-solving workshop focused on calculating free sugars as part of the 2018 NPM technical guidance. A full organisational attendee list is provided in the appendix.

A level of tolerance is both acceptable and normal in the nutrition space. For example, back of pack labelling declarations currently allow for a 20% tolerance of reporting carbohydrates/sugar to account for natural variability (i.e. sweetness of seasonal apples), processing, and storage in accordance with EU legislation¹. For the advertising and promotions restrictions, this allowance is likely to be aligned with NPM 'points'.

As noted in the meeting transcript: *"We're not necessarily looking for a perfect method, but a practical and defensible one."*

The roundtable followed the publication of the 2018 NPM and its associated technical guidance and preceded the government consultation on applying the new model to the existing advertising (UK) and promotion (England) regulations.

Focus areas included:

- Understanding the free sugars calculation.
- Exploring NGO and academic application challenges given the lack of access to detailed product specifications.
- Identifying practical, defensible solutions.
- Considering implications for existing advertising and promotions restrictions, and the forthcoming Healthier Food Standards.

As part of the roundtable, DHSC delivered an overview of the evolving policy context and the rationale behind the transition to the 2018 NPM. Key messages included:

- Children's health outcomes continue to deteriorate. On average they are consuming double the amount of free sugar and 90% of children do not meet the fibre recommendation. The 2018 NPM is an important tool for improving children's diets.
- A number of challenges have been raised by the industry with calculating free sugars. Some of these relate to interpreting the 2018 NPM technical guidance, especially around free sugars and consistency of application and other concerns relate to creating an additional burden to business, questioning the feasibility of implementation.

¹ European Commission Health and Consumer Directorate-General: Guidance document for competent authorities for the control of compliance with EU legislation on Regulation (EU) No 1169/2011 with regard to the setting of tolerances for nutrient values declared on a label.
https://food.ec.europa.eu/system/files/2016-10/labelling_nutrition-vitamins_minerals-guidance_tolerances_1212_en.pdf

- Businesses need to know what is in their products and how they are processed to get the most precise free sugar calculation. Businesses producing/selling composite products with processed fruit or vegetables will need a breakdown of ingredient and processing information.
- Working together, we can iron out areas of misunderstanding, increase familiarity with the technical guidance and free sugar definition, and enable a consistent approach to calculating free sugars in composite food products.
- DHSC welcomes stakeholder feedback on the technical guidance and improvements that will support them in making free sugar calculations.
- A brief update on the challenges that arise for products containing processed fruit or vegetables, and for items close to the HFSS threshold, rather than across the entire food supply.

Key discussion points

Challenges in calculating free sugars

Participants were asked to calculate free sugars and 2018 NPM scores for three products using the data available on supermarket websites:

- Vegetable lasagne
- Fruit layered yoghurt
- Roasted vegetable pizza

The approaches taken by NGO and researcher attendees broadly aligned with DHSC's worked examples, but varying results in both free sugars calculations and absolute NPM score occurred, caused by the following factors:

1. Limited information is openly available for NGOs and researchers:
 - As a sector, we only had access to nutrition information available on supermarket websites, not the full product specifications or recipes available to industry.
 - Concerns were raised about data gaps relating to QUID declarations² in the ingredients list on one of the products assessed, which presents further barriers to determining free sugars.
 - Lack of clarity on level of processing as product descriptions were inconsistent (e.g., purée vs whole fruit/veg).
 - Inconsistent / unclear ingredient naming (e.g., concentrated or semi-dried ingredients).

² Quantitative ingredients declaration (QUID) tells a customer the percentage of particular ingredients contained in a food product. <https://www.gov.uk/guidance/food-labelling-giving-food-information-to-consumers#give-a>

2. Interpretation differences
 - Some attendees had not followed the technical guidance precisely or had missed key information which affected total scores, leading to outliers.
3. Subjectivity determining when sugars become “free”, particularly for fruit and vegetables chopped/diced in sauces, soups, semi-dried or marinated ingredients
 - Some attendees assumed all processed fruit was free, some were more lenient.
4. Assumptions made due to missing data. Participants used a combination of:
 - DHSC technical guidance.
 - McCance & Widdowson data.
 - Category-level assumptions.
 - Personal judgement.

However, there are emerging solutions to calculating free sugars. Three guest presentations, not available publicly, showcased different methodological approaches:

University of Oxford (Dr Barthélemy Sarda)

- Uses a large branded food database (Acuity).
- Disaggregates ingredient lists and estimates ingredient percentages.
- Subtracts sugars from non-free sugar ingredients.
- Identifies limitations including uncertainty in processing and ingredient form.

University of Leeds (Dr Victoria Jenneson)

- Developed an algorithmic approach to apply the 2018 NPM at scale.
- Uses keyword searches to identify free sugar ingredients.
- Highlights the challenge of incomplete ingredient lists.
- Notes that some data providers, e.g. NIQ Brandbank often provides estimated, not verified NPM scores (using the 2004/05 model).

Nesta (Dr Monique Tan)

- Exploring whether a central “backstop” tool is feasible.
- Emphasises the need for:
 - Reasonable accuracy
 - Replicability
 - Transparency
 - Timeliness
- Considering whether Nesta should validate existing tools or build a new one.

Together, these presentations demonstrated that multiple viable approaches exist for NGOs/academics to be able to assess products and/or are being considered, although none are yet finalised or publicly available.

Sector Priorities

Participants took part in a “sliding-scale” exercise to explore trade-offs. The room’s overall leanings were:

Trade-off	Where participants leaned
High accuracy ↔ Good enough accuracy enabling rollout	Good enough accuracy
Tool ready in time ↔ More time for robust solution	Tool ready in time
Clear, explainable, repeatable results ↔ More automated / less transparent	Split
One consistent approach ↔ Flexibility for real-world variation	One consistent approach
Flag uncertainty ↔ Clear, defensible outputs	Clear, defensible outputs
Fully open data ↔ Use proprietary data if more accurate	Fully open data

Participants emphasised that the existing 2004/05 NPM already involves estimation and tolerance (as per EU regulations³), and that the goal for free sugars should be equivalence and defensibility rather than perfect precision.

As summarised in the transcript: *“Most people agreed that good enough accuracy that enables rollout was absolutely the priority.”*

³ European Commission Health and Consumer Directorate-General: Guidance document for competent authorities for the control of compliance with EU legislation on Regulation (EU) No 1169/2011 with regard to the setting of tolerances for nutrient values declared on a label. https://food.ec.europa.eu/system/files/2016-10/labelling_nutrition-vitamins_minerals-guidance_tolerances_1212_en.pdf

Agreement on what's needed both in the short and longer term for the NGO and academic sector:

There was strong NGO and academic alignment on what is needed for the sector to be able to confidently, consistently and accurately calculate free sugars to monitor compliance, including:

- Updated technical guidance to include a set of assumptions (e.g. thresholds, rounding, negligible quantities) and further worked examples (including out of home products).
- Addressing issues of missing data on food labels, ensuring that existing food labelling regulations are being met, and relevant quantities of ingredients are clearly stated, to assist in calculating free sugars.

In time, the NGOs and academics present would like to see:

- A central ingredient/free sugars reference database to address data gaps.
- A 'backstop' universal calculator or tool for non-food businesses.
- Improved training and technical support available to NGOs/researchers.
- Better labelling compliance and enforcement for the whole food sector.
- Free sugars added to back of pack labelling regulation requirements.

As one attendee noted: *"Failure to enforce current labelling legislation is a big issue."*

Outstanding questions

The workshop identified several outstanding questions from the NGOs and researchers present, which will need further clarification in due course:

- How should free sugars be determined in mixed or partially processed ingredients in the absence of detailed product specifications? (e.g., soups, sauces, semi-dried fruit, marinated vegetables). For simplicity should all 'non whole' fruit be classed as free sugars?
- What level of ingredient detail (e.g. % product and level of processing) should be required on labels? And to what extent would calculation issues be overcome if current legislation is followed?
- How can consistent interpretation of the guidance be ensured across NGOs, research, businesses, regulators, and researchers?
- How can free sugar calculations be verified within an acceptable 'tolerance'? What constitutes a 'defensible' result for enforcement?
- How should uncertainty be handled? Should borderline cases be flagged and reviewed by an independent expert? What learning can be taken from the current 20% tolerance for sugars as part of EU regulations?

OHA position and recommendations

Current regulations do not comprehensively restrict unhealthy food and drink advertising and promotions. Updating how foods are classified is a necessary and common-sense next step.

The OHA therefore supports the implementation of the 2018 NPM and is committed to working with stakeholders to ensure free sugar calculations are practical, defensible, and consistent.

We make the following recommendations to support our sector to be able to calculate free sugars, at the roundtable:

- For the Government: Address the issue of a lack of readily available ingredient-level reference database, and update the technical guidance as part of the consultation response.
- For Academia: Develop a standardised calculation methodology as a 'back-stop' for our sectors and other non-food businesses.
- For Industry: To adhere to current labelling regulations in full.

Signposting information

- [2018 NPM briefing](#)
- [Nutrient profiling model 2018](#): Technical guidance
- [Open consultation](#): Applying the new NPM to advertising and promotions restrictions
- [Draft Impact assessment](#): Applying the new NPM to advertising and promotions restrictions

Appendix

Organisation Attendee List

Obesity Health Alliance
Department for Health and Social Care
Queen Mary University of London
Action on Salt and Sugar
University of Leeds
Bite Back
Nesta
Independent
Diabetes UK
City St George's, University of London
British Dietetic Association
University of Oxford