



THE SUGARS CONTENT OF BABY AND TODDLER SWEET SNACKS

AND THE HEALTH HALO THAT SURROUNDS THEM

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Food companies can play a valuable role in providing parents with quick, easy, affordable foods that give their babies the opportunity to explore flavours, colours and textures, as well as the nutrients they need for their development, but as the research into baby foods grows, a number of problems are coming to light.

Baby and toddler foods are often high in free sugars, leading to tooth decay, which is very painful, and setting the child up for a taste for sweet foods which could easily track through life.

They're often coupled with health messages that put the parents mind at rest, distracting them from seeing the high hidden sugars content.

Surprisingly, sugars from processed fruits are often added despite them still contributing to free sugars and have the same effect as any other added sugars. The result is that parents think the product is a low-sugar, safe and nutritious choice, without realising they are a sugary snack.

Baby foods have the potential to make life easier for stressed parents and support the needs of the growing baby. But they must do just that: support the growth of the baby, not put their future health at risk, and the parents must have the information to know what they're buying.

At Action on Sugar, we surveyed the current nutrition content of baby and toddler sweet snacks. We talked with food companies about the progress they're making and the problems they're facing. We met with early years stakeholders about their concerns and, we ran an opinion poll of parents to see what their priorities are in choosing snacks for their babies and toddlers.

In this report you'll find the lay of the land as it is now, and how products and labels can be improved to benefit parents and babies and toddlers without compromising on commercial viability.

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The aim of this research

The aim of this research was to review the nutrition content, labelling and claims of sweet baby and toddler snacks and explore opportunities for action.

The research included:

- A consultation with stakeholders
 - A public opinion poll
 - A product survey
 - Engagement with food companies, including case studies
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Summary

1. Babies under 12 months old do not need snacks at all, but 'mini meals' to complement their milk-based diets. Yet there is a growing market of snack products aimed at babies aged 6 months and over.
 2. Our survey of biscuits and other sweet snacks for babies and toddlers shows that these products are often high in sugars – some contain as much as two teaspoons – but carry messages that give them a 'health halo'.
 3. Snacks made with processed fruits are not clearly stated as sugars in ingredients despite contributing to total free sugars. Therefore, parents don't realise they are buying sugary options.
 4. Similar products vary hugely in their sugars content, showing it's possible to reformulate existing products, or make new products, with less sugars.
 5. The public opinion poll found that over 8 out of 10 (84%) said they buy ready-made sweet snacks for their children and 6 out of 10 (59%) say that a 'no added sugar' claim would be the reason for choosing a particular product.
 6. We spoke to several experts in the early years nutrition field to discuss the development of the project.
 7. There is a lack of clear guidance around food for young children, so companies must take responsibility in providing accurate messaging which does not distract or mislead parents.
 8. Many food companies are willing to engage in sugar reduction and responsible labelling and would welcome the guidelines as they will help create a level playing field.
 9. Clear direction from Government is needed, with the publication of its long-awaited guidelines for toddler and baby products.
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Background

Snacking in early years

Weaning advice states that complementary foods (solid foods to complement breastmilk or infant formula) should be introduced from around 6 months of age,¹ but these should be 'mini meals'² including fruits and vegetables.

There is a growing range of products available, which state on pack that they are suitable for babies aged 6+ months. This age criterion is often mistaken as a dietary requirement when in fact it relates to food safety. Furthermore, these products often carry health and nutrition messages, which market the foods to parents and caregivers as healthy choices.

The range of products available are predominantly sweet snacks, despite current recommendations stating that 0-2 year olds should not be eating free sugars. **However, latest data indicate in the first year of life, babies and toddlers are consuming higher than recommended amounts of free sugars and there is a need to re-emphasise the risks associated with free sugars in foods given to babies during the complementary feeding period.**

Free sugars are not required by law to be included in the nutrition table on packaging, leading to much confusion and inconsistency with guidance and understanding of free sugars in the UK. It means parents can buy products sweetened with fruit juice or concentrates thinking they are the healthy choice, without realising they're choosing a sugary product.

Free Sugars

Free sugars include fruit juice concentrates and mashed or processed dried fruit. The definition of free sugars in the UK includes 'all sugars naturally present in fruit and vegetable juices, purées and pastes and similar products in which the structure has been broken down'.¹

Food choices made in childhood track into adulthood

Food preferences and behaviours are formed during childhood – a key time for development – and can directly impact later health. Poor diet in childhood can lead to adolescent health issues such as obesity, likely to remain into adulthood³.

Current guidance

Age	Sugar amount
Under 4 years old	no limit as free sugars should be avoided
4 - 6 years old	19 grams (5 teaspoons)
7 - 10 years old	24 grams (6 cubes)

Snacking on sweet foods at any age contributes to poor oral health. Both the type of food and drink and the frequency of exposure to free sugars affect the health of teeth.

A gap in advice for early years

The NHS guidance on weaning is based around encouraging homemade snacks or mini meals. There is a gap in advice around commercial ready-made snack foods. For example, only two of the four NHS Start4Life weaning pages for babies of different ages mention snacks, and none refer to ready-made snacks. All the pages mention the importance of

avoiding sugars, but this is only helpful if product packaging doesn't distract parents with implied health and nutrition claims.

This gap means parents won't have information readily available to help them make informed decisions on whether to buy ready-made snack foods and which ones to choose.

Baby and toddler snack market

The baby and toddler snack market is in growth. Recent unpublished sales data shows that the baby and toddler snacks market, including finger foods, has been in huge growth, despite the decline in the overall market. It also suggested that snacking occasions among babies and toddlers have increased.

Labels, claims and the health halo

Research commissioned by Public Health England (PHE) in 2018 found that consumers felt the use of 'organic', 'preservative free', 'no added sugar' and other claims, as well as the use of vegetable ingredients, suggested a healthy product. Many assumed that foods labelled 'no added sugar or salt' meant these were low in sugar or salt, and therefore appropriate for children. Furthermore, participants in the survey did not feel it was necessary to examine labels more closely if labelling suggested a healthy product.⁴

Current UK policy on reducing children's sugar intakes

There are several UK policies that aim to reduce children's sugar intakes, including a sugar reduction programme and a Soft Drinks Industry Levy (SDIL). The sugar reduction programme was launched in 2016, where the government challenged businesses to reduce sugar in foods that contribute most to children's free sugars intake according to National Diet and Nutrition Survey (NDNS) data, by 20% by 2020. This includes products such as breakfast cereals, yogurts, cakes, confectionery, and milk-based drinks. Other sugar-sweetened soft drinks are covered by the SDIL.

It is important to note, however, that the sugar reduction programme and SDIL are based on the intakes and requirements of children aged four and over, so they do not include foods and drinks targeted at babies and toddlers.⁵

In 2019, both the World Health Organisation (WHO) Europe and PHE made several recommendations specifically on commercial baby foods and drinks. WHO recommendations included banning misleading labelling and claims relating to sugars content or product healthiness.^{6 7} PHE held a consultation on their draft proposals titled 'Commercial baby food and drink guidelines' in 2020, the results of which are yet to be published.⁸

The UK Government's Prevention Green Paper, published in July 2019, made a commitment to improve the nutritional content, and the marketing and labelling of, product ranges aimed at infants and young children. The marketing consultation was due in January 2021 and has been delayed due to Covid-19. This work now sits with the Office for Health Improvement and Disparities and are yet to be published.

Consulting with early years stakeholders

Prior to data collection we spoke to several experts in the early years nutrition field to discuss the development of the project. We held a stakeholder advisory workshop in July 2021 to review initial findings of the survey, including public health, NGO and charity representatives.

While this was a closed workshop, two key concerns were raised which can be shared:

1. With the gap in advice around ready-made snacks, companies are filling the gap with information that does not reflect the broader NHS advice that babies should not be eating sugars.
 2. There is a normalisation of habitual snacking among babies as young as 6 months old.
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Public opinion poll – views from parents with young children

We know parents want to make the best choices for their children, right from the start. We surveyed 1,000 parents with children aged 1-3 years old to gain insights on what motivates them when choosing products for their babies.⁹

Key findings

Over 8 out of 10 (84%) said they buy ready-made sweet snacks for their children and 6 out of 10 (59%) say that a ‘no added sugar’ claim would be the reason for choosing a particular product.

Furthermore, we found that 92% said they were more inclined to buy products containing natural sources of sugars (e.g. fruit).

It is clear that parents are being misled by what is written on the front of the pack, regardless of what is written on the back.

Various factors were involved in choosing to buy snack products. Convenience was most important (76%), followed by flavour, the child asking, food safety and textures

When choosing one product over another, price was the most important factor (49%) followed by flavour (48%), ingredients (42%), health (42%), trusting the brand (42%) and nutrition and health claims (42%), then convenience (41%) and being organic (34%)

Various on pack messages influenced snack purchase decisions. Number one was no added sugar (almost 59%), followed by one of your five a day (51%), age-appropriate guidance (48%), no added salt (42%), no artificial preservatives/colours/flavours (39%), no artificial sweeteners (39%), nutrition information (37%)

69% said they check the sugar content on the back of packaging for ready-made/pre-packaged sweet baby and toddler snacks

83% said they would choose fresh fruit as an alternative if ready-made baby and toddler snacks were not available

50% said they thought ready-made snacks were equally healthy to homemade snacks, and 15% thought they were more healthy than homemade snacks

Product survey – baby and toddler sweet snacks

We surveyed the category of baby and toddler sweet snacks, such as biscuits, rusks and oat bars across the market, examining their nutrition content, labelling, and nutrition and health claim messages.

There are other foods available for babies and toddlers, and this category was chosen following the success of our fruit snacks survey¹⁰ which highlighted their free sugars content combined with health claims on pack. We did not include fruit snacks again in the current survey.

Methods

Data Collection

All major stockists and retailers were visited in person (Asda, Sainsbury's, Morrisons, Tesco, Lidl, Co-op, Boots, Holland & Barret, Waitrose & Partners, Marks & Spencer). Products were purchased in stores between 9th and 23rd June 2021 and uploaded to the FoodSwitch¹¹ database to record their nutrition content, ingredients and all wording (including nutrition and health claims) on the packaging. We also took a snapshot analysis of four of the main online retailers undertaken w/c 25th Oct to analyse the extent of multi-buy and price promotions available at any one time within baby and toddler snacks.

Data Analysis

We defined inclusion and exclusion criteria [Appendix 1] and, after excluding the relevant products, there were 73 products in the data set. We performed an initial analysis of their sugars content from highest to lowest then the data was split into subcategories to make reasonable comparisons within similar products (Table 1 shows **highest and lowest from each sub-category in sugars per 100g**):

1. Baked/Soft texture products including flapjacks, soft bakes and oat bars
2. Baked/Hard texture products including biscotti and rusks
3. Puffed/Aerated texture products including popcorn, rice cakes and wafers

Sugar levels were then compared to the criteria for defining front of pack traffic light labelling [see Box 1].

Box 1 Traffic Light Labelling

The Department of Health and Social Care's colour-coded labelling system will tell you whether a food has high (red), medium (amber) or low (green) amounts of fat, saturated fat, sugars and salt. The colours are determined based on the percentage of fat, saturates, salt and sugars found the product. These are thresholds by 100g (allowing for direct within category comparison) and includes maximum amounts for large portions.

Results

Key findings: sugars content [Appendix 2]

- 27 (37%) were high in sugars¹
- 40 (55%) were medium in sugars¹
- 6 (8%) were low in sugars
- 64 (88%) do not list 'sugar' in the ingredients even though many are sweetened with free sugars
- 72 (99%) use other sweetening ingredients e.g. fruit juice concentrates

Sugars per 100g

Five Kiddylicious products scored the worst for sugars per 100g: Kiddylicious Banana Crispy Tiddlers are made up of over half sugars (59g per 100g), while Kiddylicious Pineapple, Coconut & Mango Juicy Fruit Bars are nearly a third sugars (30.7g per 100g). Table 1 shows highest and lowest from each sub-category in sugars per 100g.

Sugars per serve

Per serving, **Heinz Mini Farley's Rusks Original** was the highest in sugars, containing 8.7g of sugars per serve – the equivalent of 2 teaspoons of sugar – and contains added sugar. This was followed by **Organix Banana Soft Oaty Bars** at 8.1g of sugars per serve, which are sweetened with apple juice concentrate – a type of free sugars.

It's worth noting that the traffic light system exists to provide guidance for adults, and allows for up to 90 grams of total sugars per day, so is particularly shocking to see these products would have red and amber lights when they are made for babies and toddlers.

Table 1: Baby & Toddler sweet snacks with highest and lowest from each sub-category in sugars per 100g

Product Name		Sugars (g) Per 100g	Age Guidance (months)	Front of Pack Claims	Ingredients*
Baked/Hard texture					
Highest	Heinz Farley's Mini Rusks Original	29	7+	<ul style="list-style-type: none"> Golden baked goodness Packed with 7 key vitamins & minerals including iron and calcium 	Wheat Flour, Sugar, Sustainable Palm Oil, Raising Agents (Ammonium Carbonates), Calcium Carbonate, Emulsifier (Monoglycerides), Niacin, Iron, Thiamin, Riboflavin, Vitamin A, Vitamin D
Lowest	Nestle Cerelac Wheat, Raspberry & Banana Cereal Snack	2.8	8+	<ul style="list-style-type: none"> Organic 	Organic Rice Semolina 45%, Organic Wheat Flour 41%, Organic Sunflower Oil, Organic Banana Powder 3% , Organic Raspberry Powder 1.2% , Acidity Regulator (Calcium Carbonate), Thiamin (B1), Antioxidant (Tocopherol-Rich Extract)
Baked/soft texture					
Highest	Kiddylicious Apple Fruity Bakes	33	12+	<ul style="list-style-type: none"> Made with real fruit Whole wheat flour No artificial preservatives 	Whole Wheat Flour (39%), Apple Filling (35%) (Apple Purée (67%) , Apple Juice Concentrate (33%)), Apple Juice Concentrate , Sunflower Oil, Rice Flour, Raising Agent: Bicarbonate of Soda, Thiamin (Vitamin B1)
Lowest	Piccolo Mighty Oaty Bars Banana & Cocoa	18.3	12+	<ul style="list-style-type: none"> Organic No added sugar No added salt Gluten free Fibre Perfect for lunchboxes 	Organic Gluten Free Oat flakes 41.5%, Organic Apple Juice 26% , Organic Inulin (from Agave) 9%, Organic Sunflower Oil High Oleic 8%, Organic Banana Powder 7% , Organic Quinoa Flakes 3%, Organic Rice Crisp 2%, Organic Coconut Milk 2%, Organic Cocoa 1.5%, Organic Antioxidant: Rosemary Extract <1%
Puffed/Aerated texture					
Highest	Kiddylicious Banana Crispy Tiddlers	59	12+	<ul style="list-style-type: none"> 1 of 5 a day Gluten Free No artificial additives Packed with real fruit 	Apple juice concentrate 35% , Pear juice concentrate 35% , Banana puree 17% , Puffed rice 8%, Banana flakes 3.5% , Natural flavouring, Gelling agent (pectin), Citrus fibre, Lemon juice concentrate
Lowest	Kiddylicious Blueberry Rice Crispy Sticks	3.1	18+	<ul style="list-style-type: none"> No added salt Gluten and nut free 	Rice Crisps (Rice Flour, Rice Wholemeal Flour) (41%), Sunflower Seeds (19%), Inulin (Chicory Fibre), Quinoa Crisps (Quinoa Flour, Rice Flour) (8%), Sunflower Oil, Acacia Fibre, Blueberry (1.6%) , Natural Flavouring, Thiamin (Vitamin B1)

*Sweetening ingredients are in bold

Claims and health messages on pack

- 44 (60%) make 'organic' claims
- 36 (49%) were aimed at babies under 12 months old
- 28 (38%) were fortified and the most common fortification is Thiamin (B1)
- 17 (23%) products in this survey make a development or feeding claim

Examples of claims:

Suitable for 6 months +
No GM ingredients
One rusk provides 20% of your baby's daily iron requirement
Great way to introduce your baby to solid foods
No artificial colours, flavours or preservatives
Crush in a bowl and mix with your baby's milk
Golden baked goodness
Mix with fruit puree or custard for a yummy dessert
Packed with 7 key vitamins + minerals

There is no requirement for front of pack colour coded nutrition labelling for this age group, and no company currently uses it. However, all the products that would carry a red traffic light (high) for sugars featured a claim that give the impression of healthiness.

The use of sweetening ingredients

72 (99%) of product use sweetening ingredients other than sugar (sucrose), such as fruit juice or fruit juice concentrates.

The most used sweetening element was fruit juice concentrate (classed as free sugars).

All products use either one, or a combination of, the following:

Syrups
Dextrose
Fruit juice
Fruit powders
Sugar
Fruit/dried fruit
Fruit flakes
Fruit juice concentrate
Fruit purée
Suitable for vegetarians

The use of price promotions

Our analysis found that the use of price promotions was widespread amongst the leading online retailers.

TESCO

- Out of 94 baby and toddler snacks, 29 were on special offer (30%)
- Offers were predominantly Clubcard price reductions, and Multi-buy offers (6 for 3) on Clubcard

Sainsbury's

- Out of 126 Snacks and rusks, 11 were on special offer (9%)
- Offers were predominantly price reductions

ASDA

- Out of 109 Baby, toddler and kids snacks, 43 were on offer (40%)
- Offers were predominantly Roll Back (price reductions), and Multi-buy (3 for 2)

WAITROSE & PARTNERS

- Out of 53 finger foods and snacks, 35 were on offer (66%)
- Offers were predominately Multi-buy offers – 2 for £4.50, 6 for £3, 3 for 2, and Price reductions

We found that at any one time, several pricing strategies within each retailer were used in this category, either to lower the unit price, or to encourage multiple purchases.

Discussion of survey results

The results show that many products contain amounts of sugars that would be considered high or medium if the labelling recommendations for all other food and drinks were used. This is combined with an absence of sugars mentioned on the ingredients list, and instead, other health and nutrition claims giving the products a 'health halo'.

Sugar content and Recommended Maximum Daily Amounts

Government guidance for maximum daily amounts of sugar start from children aged 4+¹², and advise that children aged 4 to 6 years have no more than 19 grams of sugar per day (equivalent to 5 teaspoons). There is no recommendation for sugars for those aged under 4 as sugar-sweetened food and drink should be avoided in this age group.

The baby and toddler biscuit with the highest sugars per serving contributes 8.7g in just one portion, almost half the daily maximum for a 4 year old, and they are aimed at the under 2s.

In line with EU regulation, artificial sweeteners are prohibited in foods for children under 3 years old. This includes foods specifically prepared for babies and young children (i.e. 'baby food').¹³

Variations in sugars content within a category

The variation in sugars content in similar products shows that lower sugars versions are possible and makes the case for reformulation.

In the case of products with added sugar, it's clear that vast improvements can be made. For example, Heinz Farley's Rusks already market a 30% lower sugar version, which could replace the standard version entirely, rather than being sold separately.

Comparison with products aimed at older children and adults

Even though these products are aimed at parents of babies and toddlers, when compared with similar standard versions made for older children and adults, the baby/toddler version is sometimes nutritionally worse, more expensive and often just a smaller portion size.

While many products are lower in sugar, salt and fat than the standard equivalents, they are not as healthy as most homemade fresh fruit and vegetable snacks, which is not reflected by the messages on the pack.

On pack health claims

A variety of claims are made on these products which aim to appeal to parents, and appear to create a 'safe zone' in the baby and toddler aisle.

Claims about being organic are commonly related to pesticides and reassure parents that foods are safe. Broader claims around being natural and full of goodness appeal to parents on an emotional level.

There are several problems with these claims, however. With some containing proportionally more sugars than the adult equivalent and warranting a red traffic light, the health messages do not accurately reflect the overall nutritional value of the product and their suitability for babies and toddlers. Some products contained nearly 30% total sugars, but sugar isn't always listed clearly in the ingredients and the product might even say 'no added sugar' on front of pack.

The age ranges stated on the pack are important given the concern raised in our stakeholder workshop that eating ready-made snacks from 6 months onwards could normalise snacking, and the gap in information for parents around ready-made snacks.

Sugar causes tooth decay and a preference for sweet flavours, which can in turn lead to over consumption and weight gain, so it's imperative that sugar content is accurately reflected on packets and is not masked by other health claims – even though those claims, such as having vitamins added, are true.

Price Promotions

We found that at any one time, several pricing strategies within each retailer were used in this category, either to lower the unit price, or to encourage people to buy more than they need¹⁴. Overall, this represents a huge number of products on promotion. Volume price promotions lead us to buy more than we otherwise would, up to 20% more, and location promotions often lead to 'pester power' from children.¹⁵ **Concerningly, baby and toddler snacks are excluded from the Governments' Price and Place Promotions restrictions due to come into force in 2022.**



Dr Kawther Hashem, Campaign Lead at Action on Sugar and Research Fellow at Queen Mary University of London says,

“It’s ludicrous that certain food companies are being allowed to promote their high sugar sweet snacks to parents with very young children, despite them being aware that babies and toddlers shouldn’t be having any free sugars.

“Babies can have a preference for sweet foods, due to milk being ever so slightly sweet, but liking sugary foods is something they only learn by eating sugary foods. Some companies choose to encourage this preference further by providing lots of very sweet products from an early age. What we need is companies to make products with minimal amount of sugars, so young children can grow up enjoying less sweet foods.”



Holly Gabriel, Registered Nutritionist at Action on Sugar explains,

“Using healthy-sounding claims on sugary foods is normalising sweet snacks at a young age. Given just a few baby & toddler sweet snacks would be considered low in sugar, the Government must release their long-awaited commercial baby food and drink guidelines and make them mandatory to hold all companies to the same standard. The Government must also investigate the best way of labelling foods for babies and toddlers to provide better and more honest packaging for parents.”



Professor Graham MacGregor, Professor of Cardiovascular Medicine at Queen Mary University of London and Chairman of Action on Sugar adds,

“Consuming too much sugar on a regular basis means we’re eating too many calories, and if we don’t use those calories as fuel, our body will store them as fat. This can lead to weight gain, and if this happens to our children, it’s likely they will carry the weight into their adolescent and adult years, potentially leading to overweight or obesity, as well as suffering from agonising tooth decay. It is therefore imperative that food companies act more responsibly and commit to reformulate sugar, salt and calorie reduction instead of foisting unhealthy products with misleading nutrition claims upon well-meaning parents.”

Engaging with food companies

We sought engagement with baby food companies to identify progress and challenges in reformulation and labelling.

The products surveyed were produced by 11 companies. We contacted all 11 companies in October 2021. We asked about efforts to reduce sugars content in their products, the successes and challenges faced, and the criteria they use for age guidance on the pack. We received written correspondence from all apart from Piccolo for whom we could not find contact details and had no response when we contacted them via their website and Kiddylicious, who initially responded but did not issue comment on request. We met with two companies: Ella's Kitchen and Organix.

Overall, there were four brand leaders (**Ella's Kitchen, Heinz, Kiddylicious and Organix**) and one retailer (**Aldi**) who produced most of the products on the market.

While we have been asked to keep most details confidential, we can share some key themes from our correspondence:

- Companies are aware of the Office for Health Improvement and Disparities (formally PHE) guidelines and are eagerly anticipating its publication.
- Some are in favour of the guidelines, as it creates a voluntary level-playing field – if one company is willing to lower their sugar content, it helps if others do the same, so that none are at a commercial disadvantage.
- Some companies have started to follow some of the guidelines ahead of its official launch.
- Companies complained about the main limitation of sugar reduction being the fat restriction in the Commission Directive 2006/125/EC in Annex 1, section 4.1, where products such as biscuits and rusks for babies and toddlers must not exceed 3.3g fat per 100kcal.
- Companies are aware and abide by the Regulation 1333/2008 on food additives, which does not permit food additives (sweeteners, colours etc) to be used in foods for special medical purposes e.g. baby foods.
- Some companies reported the Commission Directive 2006/125/EC legislation for baby foods and drink seemed out-dated now because the categories have outgrown those included in the original legislation, giving the opportunity for less responsible companies to develop products with little regard to the legal requirements.

Case studies

We received case studies from three companies: Ella's Kitchen, Little Freddie and Organix



(10 products surveyed)

Oaty Bars “We have reduced the sugar in our Oaty Bars from 26.6g/100g and 28.8g/100g respectively to 22.4g and 22.5g/100g (a fall of 14% and 22%). We achieved this sugar reduction while still maintaining a safe and appropriate texture, binding properties and fruity taste by using a combination of fruit concentrates, natural fruit flavouring and tapioca fibre to replace some of the malt extract in the original recipe, which still also contains dried fruit. The fat content of baby food products is limited in the baby food legislation so, while fat also helps with binding and maintaining a safe texture, we have a cap on how much we may use. Therefore, the sugar reduction was achieved without an appreciable increase in fat or energy.

Please note, the baby food category has developed far beyond the categories specified in the regulations but we apply the requirements to all of our products including our Oaty Bars.”

Biscuit products “In light of the recent PHE draft guidelines for the infant feeding category, we intend to reformulate our 10 months biscuit products and market them only from age 12 months plus and have identified that we cannot reduce sugar any lower than 17g/100g without the products becoming too hard and therefore a choking risk. Again, the fat restrictions in the baby food legislation play a role in this sugar minimum.”

little freddie

(1 product surveyed)

Puff product “We believe our Little Freddie Raspberry, Pineapple, Wheatgerm & Quinoa Puffs are a great example of offering responsible balance and choice. Nutritious finger foods are a clear need in the category, given the significant market size and growth. We have a total of 6 finger foods, all tailored towards different ages. Little Freddie Raspberry, Pineapple, Wheatgerm & Quinoa Puffs are in fact the only finger food in the market that leads with a fruit flavour, with the other 5 being vegetable or savoury led. Little Freddie Raspberry, Pineapple, Wheatgerm & Quinoa Puffs are also proudly a ‘green’, low sugar product, which is not easy to achieve. This is because we use just the right amount of freeze dried fruits (when the water is simply removed) to deliver on taste whilst also retaining nutrition. We also avoided juice concentrate, refined sugars and trialled a number of different fruit combinations. We decided on Raspberry and Pineapple as the sugar content is lower than many other fruits such as banana and strawberry. Finally, we used a mix of grains (not just maize), such as wheatgerm and quinoa for the nutritional impact.”



(24 products surveyed)

Efforts to reduce sugar “We have been working on ways to reduce sugar levels for a long time, and it does take time as there isn’t an easy fix.

Unfortunately, baby & toddler food manufacturers do not have the same tools available to them as the rest of the industry, as certain sugar reducing ingredients are not permitted. Therefore, the challenge and timescale for this work is greater.

We have been supporting PHE, in the work they are doing to set sugar guidelines for Baby Toddler food. We now eagerly await the guidelines from PHE to have clarity [so we can] take the next steps.”

Biscuits “With new products launched in our toddler range we have reduced the portion size to reduce the sugar level – e.g. our latest biscuit launch is in a 20g portion bag rather than a 25g bag. And this is something we are aiming to roll out across the range (though it’s not easy due to the need to relist).

We have also been doing lots of exploratory work, looking into the different options available to us to reduce sugar in our biscuits range. We have focussed on our baby biscuits to start with, which has been a big challenge due to the constraints of ingredients and safety of the biscuits (total sugar content helps with dissolvability, so something to contend with when trying to reduce total sugar in the food). After what feels like years, we have made progress, and earlier this year we launched ‘Little Ruskits’ which have 13% total sugar vs the 18/19% total sugar in our original baby biscuit range, which has since been delisted. This is not just a reduction in the total of sugar in our biscuit but on average 33% less sugar than other baby biscuits and rusks in the category.”

In response to our press release, Organix also said:

“The majority of the sugar content within Organix Soft Oaty Bars comes from dried fruit which contains naturally occurring sugars, rather than the fruit juice concentrate which is used to hold all the ingredients together and to give a suitable texture for a child.

Organix believes in using natural ingredients such as dried fruit which has the nutritional benefits of fibre, vitamins and minerals rather than using artificial sweeteners, flavours or table sugar, and clearly label the front of our packs to be transparent to parents. This is part of our No Junk Promise. As a brand we are constantly looking at natural ways to reduce sugar and are excited to share new news on this in 2022.”

Recommendations

Many companies have already started making improvements in the sugars content of their product offering, and are willing to do more. Now is the time for all companies to get on board to provide healthy foods for babies and reliable labelling for parents. Children's health is everyone's responsibility, and this is an opportunity for Government and industry to make a meaningful difference for parents and babies and set them up for a healthy life. Based on this research, we have developed the following calls to action.

Government

- To release their commercial baby and toddler food and drink guidelines
- To mandate the guidelines to create a level-playing field in the sector
- To ensure the guidelines are strong yet achievable
- To transparently monitor and evaluate progress
- To include baby and infant food in the upcoming 9pm watershed, online advertising, place and promotions restrictions legislation

Companies

- To remove distracting and misleading marketing claims around 'no added sugar/refined sugar' on pack of products containing other sweetening ingredients such as fruit concentrates or processed dried fruits
- To reduce the sugars content of products
- To not recommend sweet snacks products as suitable for babies under 12 months
- To re-position sweet snack products in the supermarket aisles to clearly show they are suitable for babies 12 months plus

Consumers

- To understand that these products are often healthier overall than non-baby snacks (which have higher levels of sugars and added salt), but are not as healthy as homemade or fresh fruit and vegetable snacks
- To provide homemade fruit and vegetables for babies and toddlers, which are soft and easy to chew so they are not a choking risk
- To opt for fewer rusk and biscuit options and more puffed and aerated snacks, when choosing any ready-made snack products

Conclusion

Many health experts working in early years would like to see the end of these products being marketed as appropriate for babies and toddlers, or even existing, but they are unlikely to go away any time soon. A surprisingly high number of these products go against guidelines around free sugars intake in babies and toddlers, without breaking any laws. Companies should do all they can to make their products the healthiest they possibly can. The variation in sugars content for these products, with commercially successful products with much lower levels of free sugars, demonstrates it can be done.

To help them on their journey, the government must support all measures to provide a level-playing field, so companies (and parents) can lower their sugar levels across the board, allowing children to grow up enjoying less sweet foods.

Food systems must deliver for children, and they must deliver from the start.

Appendices

Appendix 1: Inclusion and Exclusion Criteria for data collection purposes

Included	Excluded
Baby & Toddler Biscuits -Teething biscuits -Rusks -Baby rice cakes	Savoury foods/flavours -Crisps -Nuts -Popcorn*
Initial online search criteria: -Children's biscuits -Children's snacks -Baby & Toddler Snacks -'Kids'	Processed fruit snacks /bars, Cakes*, flapjacks*, Breakfast bars*, Baking kits
Any sweet snack product with age criteria on packaging (0-36 months) Cakes, flapjacks etc	Child friendly/targeted packaging (e.g. Iced Gems, Cadbury Animals)
Popcorn if age guidance included e.g. 12month +	Sweet and chocolate confectionery

*See inclusion criteria for exceptions

Appendix 2: Higher 10 and lower 10 products in sugar per 100g

Product Name	Category	Serving size (g)	Sugars (g) Per 100g	Sugars (g)Per Serve
Higher				
Kiddylicious Banana Crispy Tiddlers	Puffed/Aerated	12	59.0	7.1
Kiddylicious Apple Fruity Bakes	Baked/Soft	22	33.0	7.2
Kiddylicious Strawberry Fruity Bakes	Baked/Soft	22	33.0	7.2
Kiddylicious Banana & Strawberry Juicy Fruit Bars	Baked/Soft	20	32.0	6.4
Kiddylicious Pineapple, Coconut & Mango Juicy Fruit Bars	Baked/Soft	20	30.7	6.1
Aldi Organic Mamia Soft Carrot Cake Oaty Bars	Baked/Soft	25	29.0	7.3
Aldi Organic Mamia Strawberry & Apple Oaty Bars	Baked/Soft	25	29.0	7.2
Heinz Farley's Rusks Original	Baked/Hard	17	29.0	4.9
Heinz Mini Farley's Rusks Original	Baked/Hard	30	29.0	8.7
Kiddylicious Cherry & Blackberry Juicy Fruit Bars	Baked/Soft	20	28.8	5.8
Lower				
Kiddylicious Banana Wafers	Puffed/Aerated	4	6.4	0.5
Kiddylicious Apple & Carrot Rice Crispy Sticks	Puffed/Aerated	10	5.6	0.6
Organix Goodies Banana Puffcorn	Puffed/Aerated	10	5.6	0.6
Organix Banana Rice Cakes	Puffed/Aerated	6	5.0	0.5
Ella's Kitchen Raspberry & Mango Puff Pops	Puffed/Aerated	9	4.8	0.4
Ella's Kitchen Vanilla & Banana Melty Hoops	Puffed/Aerated	4	4.8	0.5
Little Freddie Pineapple, Raspberry Wheatgerm & Quinoa Puffs	Puffed/Aerated	5	4.7	0.2
Bickiepegs Teething Biscuits for Babies	Baked/Hard	4	3.5	Undeclared
Kiddylicious Blueberry Rice Crispy Sticks	Puffed/Aerated	10	3.1	0.3
Nestle Cerelac Raspberry & Banana Cereal Snack	Baked/Hard	7	2.8	0.2

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