



Joint Response from Action on Salt & Action on Sugar to the Government Buying Standards for Food and Catering Services Consultation

Action on Salt

Action on Salt (formerly Consensus Action on Salt & Health, CASH) is an organisation supported by 24 expert members and working to reduce the salt intake of the UK population to prevent deaths, and suffering, from heart disease, stroke, kidney disease, osteoporosis, stomach cancer and obesity.

Action on Sugar

Action on Sugar is a group of experts concerned with sugar and obesity and its effects on health. It is working to reach a consensus with the food industry and Government over the harmful effects of a high calorie diet, and bring about a reduction in the amount of sugar and fat in processed foods to prevent obesity, type 2 diabetes and tooth decay.

Action on Salt and Action on Sugar campaign to improve the nutritional profile of all products by encouraging food manufacturers to slowly and gradually remove salt and sugar, so that consumers are buying healthier products without having to change their purchasing behaviour. While progress is easier to monitor in the retail sector, it is more difficult to evaluate in the out of home and catering sectors due to the lack of nutrition information available. The Government Buying Standards represent an opportunity to ensure increased availability of healthier food and drink in the public sector, and to set an example across the whole food sector.

We commend the Department of Health and Social Care's decision to update the Government Buying Standards to bring them in line with plans set out in chapter two of *Childhood obesity: a plan for action* and we welcome the opportunity to provide our views and feed into the consultation.

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General Statement

The food and drink we now consume is the biggest cause of premature death and disability in the UK and represents a huge burden on the NHS. Poor diets contribute significantly to the onset of heart disease, stroke, type 2 diabetes and some types of cancer. Diets high in salt, fat and sugar and low in fruit and vegetables account for around 30% of all coronary heart disease and 5.5% of all cancers in the UK are linked to excess bodyweight. Obesity is putting an enormous and unsustainable strain on the NHS and society. High salt intake is the leading cause of high blood pressure, which in turn is the leading risk factor for developing cardiovascular disease which includes heart disease and stroke.

While we welcome the update to the standards, we feel that the standards could be strengthened further. We appreciate that the proposed changes include many new mandatory standards, however voluntary approaches across the salt reduction and the



sugar reduction programmes are not working anywhere near well enough and it is time for the government to set mandatory standards for ALL public sector food, not just central government departments. This will ensure improved day to day diets. Setting standards for the entire public sector food would also enable the government to use its enormous financial muscle to improve food provision across the UK and help Government to define 'best practice', encouraging more companies to engage with reformulation work, particularly in the out of home sector. To encourage engagement and compliance with the updated standards, we recommend Government provide guidance for clarity to those supplying food to the public sector.

One of the most important players in public sector is the suppliers that have a huge, but anonymous influence on our eating habits. Interestingly, even they are asking for standards. Hospital food suppliers such as Compass want to know exactly what they need to deliver in terms of local sourcing, sustainability, welfare and healthier food¹. If the hospitals demand higher standards from their suppliers, the cost of good food would come down because of economies of scale, to the huge benefit of all consumers.

We note the guidance states that schools can use the School Food Standards or the Government Buying Standards. We strongly recommend that schools be encouraged to use the School Food Standards, which are mandatory for public-funded state schools and academies. However, should standards in the updated Government Buying Standards exceed the standards set in the School Food Standards, then the higher standard should be applied. We also note that there are no explicit references to products sold in vending machines being covered by the revised standards, and would welcome their explicit inclusion.

We have concerns regarding monitoring and evaluating compliance with the standards. A 2017 Department of Health and Social Care report found just half (52%) of hospitals met the standards² and in 2018, the Sustainable Fish Cities campaign found just one of the contract caterers servicing Ministry of Defence contracts could confirm that they complied³. We recommend that an independent agency monitor compliance with the standards and that annual monitoring report be published publically. There should also be penalties for non-compliance.

Consultation Questions

Reducing Salt Intake

We welcome the change to current salt targets, however we recommend that 100% of all products procured meet maximum salt targets as a mandatory targets rather than the proposed separate mandatory and voluntary standards.

Although Public Health England's (PHE) analysis⁴ highlighted that there was mixed progress towards the 2017 targets, the report found that 81% of in home and 71% of out of home products met their maximum target. The 2017 targets were set back in 2014, giving the industry three years to comply with the targets which were simply the next step in an



ongoing programme of work that the industry were well aware of. Poor progress is most likely due to a lack of monitoring, but may also represent a need for clarity and guidance from Government.

Rather than weaken this standard to account for mixed progress, we recommend that Government demonstrates support for Public Health England's targets and help encourage reformulation work, particularly in the out of home sector. More than a quarter of adults in England have high blood pressure⁵ and salt reduction is internationally recognised as one of the most cost effective public health priorities to reduce high blood pressure and cardiovascular disease⁶. Salt reduction is a shared responsibility between the food industry, individuals and the government and this includes food procured and provided in the public sector.

Furthermore, new targets have been proposed for 2020, to be met by 2023⁷. As part of this ongoing programme of salt reduction, industry should be encouraged to use the 2017 targets as a baseline for the 2023 targets.

Increasing fruit and vegetable consumption

We strongly support efforts to increase fruit and vegetable consumption as the National Diet and Nutrition Survey shows that both adults and children eat less than recommended⁸. However, we recommend that the standards specify the number of portions of vegetables required with each main meal as two portions. We also recommend strengthening of language in relation to whole fruit as a dessert option to "we strongly recommend making whole fresh fruit available as a dessert" to encourage its procurement in place of hot or cold sugary desserts.

Meal Deals

We welcome the mandatory standard to ensure that meal deals do not include products that are high in fat, sugar or salt (HFSS), including SSBs. However we recommend a consistent method of defining HFSS is used, rather than relying on colour-coded front of pack labelling in this case. The Nutrient Profile Model (NPM) used to class food and drinks as HFSS is an established and evidence based tool, which is understood, accepted and currently in use by the food industry for advertising purposes across the UK. With this in mind, using an existing tool that the food industry are already familiar with would make the restrictions easier to follow and adopt.

Based on our research⁹ we feel strongly that this is a policy that should be adopted by all retailers and therefore it is imperative that this standard is measured and monitored for its effectiveness. If it is successful, it can be implemented across the board.

Reducing Saturated Fat

We support measures that will reduce saturated fat in products that are main contributors to the typical diet.



Increasing Fibre

We strongly support the mandatory and voluntary standards to increase fibre intake as the National Diet and Nutrition Survey shows all age groups consume less fibre than recommended⁸. Adequate fibre in the diet is associated with a lower risk of heart disease, stroke and type 2 diabetes.

Reducing Sugar Intake

We welcome a mandatory standard to reduce sugar intake but we recommend strengthening this standard to 100% of products meeting proposed calorie limits. We believe Government should demonstrate support for Public Health England's reformulation targets and help encourage reformulation work in light of current mixed progress from industry, particularly in the out of home sector.

Breakfast Cereals

We support the mandatory standard to reduce sugar intake from breakfast cereals and feel that aligning the standard to the sugar reduction programme will give an added incentive to the food industry to reduce sugar from their products in line with the Government's 20% by 2020 target.

Fish

We support this standard.

Savoury Snacks

We strongly support a mandatory standard to limit savoury snack pack size, which will aid work to reduce both salt and calorie intake. However, we do not agree with both a voluntary and mandatory standard here and recommend instead that the mandatory package size be 30g. A 30g pack size is an established voluntary standard within the GBSF and therefore should be acceptable to industry as a mandatory standard.

Confectionary

We feel this can be strengthened to 100% of confectionary and sweet snacks meeting the smallest serving sizes and calorie caps. This will be easier for industry to adhere to, but we strongly recommend that current confectionary portion sizes be assessed so that a mandatory maximum serving size can be set as part of this guideline.

Beverages

We strongly recommend that 100% of fruit juice, vegetable juice and smoothie products should be available in 150ml bottles. This will align with the Eatwell Guide and will help encourage industry to review pack size.

Menu Cycle Analysis

We support this standard.



Calorie and Allergen Labelling

We strongly oppose the removal of calorie and allergen labelling from the standards and recommend instead that this is made mandatory.

While we note that DEFRA have announced full ingredient labelling for all food pre-packed for direct sale, this does not cover unpackaged food. Furthermore, despite a Government consultation on mandating calorie labelling in the out of home sector there has been no progress on this policy to date. These plans may exclude some types of business and it isn't yet clear whether such policies will also cover catering settings where meals are not paid at the point of consumption (e.g. free school meals, hospital and prison food). We believe that menus should provide clear nutritional, ingredient labelling regardless of whether food is packaged or not, for the benefit of public health.

References

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