

## **Proposals to revise the voluntary salt reduction targets: consultation response summaries**

The salt targets consultation was published in July 2008, with the aim of obtaining views on the proposed revised salt targets for 2010 and 2012 and revised monitoring arrangements. Sixty responses were received from a wide range of stakeholders, including retailers, manufacturers, trade associations, consumer organisations, local authorities, enforcement bodies and health-related organisations.

The Agency has considered in detail the submissions received and held a number of meetings with stakeholders between December 2008 and January 2009 to discuss the issues raised by respondents, in particular the costs associated with reformulation.

This document includes a summary of all the comments received.

### **The consultation letter requested comments on the following five points:**

#### **1. The revised and new targets and the timescale for meeting them**

NGOs welcomed the revised targets, felt they should go further, and supported legislation as a future option if voluntary action does not achieve the 6g intake target. Many industry respondents expressed the view that the proposed targets are challenging and that the timescales proposed were ambitious. However, most food companies remain committed to continuing their work on salt reduction and expressed a willingness to work towards the targets. Some industry stakeholders felt that further research and technical advances may be required before the revised targets could be met.

A large number of comments on individual categories and targets proposed in the consultation were received so these comments have been compiled separately:

## **2. The revised category descriptions and the revised and redefined target categories**

In general the redefined food categories, which were developed in response to stakeholder requests, have been welcomed; it is thought this provides clarification and avoids confusion over product placement. However, a few industry respondents disagreed with the category placement of a small number of products.

## **3. The proposal to adopt a rolling programme of biennial reviews of industry progress and the need for any adjustments to the targets. The first review would take place in 2010.**

The majority of respondents supported this proposal, although concerns were raised over the difficulty of incorporating any proposed new reductions into planned reformulation cycles if targets are adjusted every two years. The potential associated cost increases were also highlighted by some respondents.

A concern that the review process could take too long and could slow progress towards achieving the 6g target intake was also expressed.

## **4. The proposals for a revised monitoring scheme**

Most food industry organisations responded positively to this recommendation since the purchasing of label data by the Agency is expected to reduce the resource burden on industry. Some limitations of label data were also highlighted. Requests were received for 'as consumed' labelling to be taken into account when using label data for monitoring.

Some NGO respondents suggested that more detailed nutritional information should be made available on companies' websites.

## **5. The impact assessment.**

A number of responses were received regarding how industry costs associated with reformulation had been reflected in the impact assessment (IA). Following the consultation, the Agency carried out a further detailed investigation of the costs attributable to the proposed salt targets, details of which can be found in the revised IA.

### **General comments on the consultation**

These cover a wide range of areas including those mentioned above; the need to take account of other Government work with industry; labelling; salt reduction in imported foods; food safety, technical issues and consumer acceptability; how the targets have been set; the use of salt substitutes; the setting of targets as averages and maximums; discretionary salt use; monitoring progress towards achieving the targets and a number of other general areas. Agency comments in response to queries from stakeholders have been included in this document.

## 1. MEAT PRODUCTS

### General comments

Company/Organisation	Comments
Agriculture and Horticulture Development Board meat services and BMPA	Highlights that customer expectations on taste, shelf-life and price will drive salt reduction in meat. Feedback suggests there have been an increased number of customer complaints over taste/texture. Complaints relating to product taste and texture have increased. This indicates that product is at or near limits for consumer acceptability, this will be a key consideration for businesses in deciding whether to make further changes. Do not support the revised salt targets for this category.
Brakes	In meeting 2010 targets, shelf-life has been reduced by 7 days, would expect further reduction of 25-50% at the 2012 targets level, particularly with nitrite use restrictions in bacon and ham. This reduced shelf-life would present significant operational difficulties within the food supply chain. Targets could present food safety risk.
BNF	Proposed 2012 targets are considered to carry an unacceptable food safety risk as they are estimated to increase microbial activity.
BRC	Shelf-life will be reduced by 7-14 days. Taste and colour will be affected, impacting on consumer acceptability.
Freiberger Convenience Food Group	Salt reduction in some cured meats could impair food safety, especially for chilled products. For some authentic raw materials, reformulation is impossible because it will change the character of the raw material and therefore its authentic nature.
GCFG	Need to consider product safety - reducing salt in bacon should be reviewed against the FSA/Campden guidelines on the use of vacuum/modified atmosphere to achieve shelf life in excess of 10 days.
PTF	Cannot support a further lowering of the 2010 targets for bacon or ham, or the new targets for 2012, for reasons relating to food safety, variability of salt levels, risk of <i>Clostridium Botulinum</i> , reduced nitrite levels, and the need for further research. Notes that the risks associated with incremental reductions to salt and nitrate levels in bacon and ham are recognised in the FSA's technical report: Microbial risks associated with salt reduction in certain foods and alternative options for preservation (2005). Research to prove the safety of the revised targets for bacon and ham is required, before further salt reductions in these foods are made. Reducing the total salt content of bacon and other cured meats to meet the 2010 target would concomitantly reduce the 'salt in water' content to a level that may not inhibit the germination of spore formers, especially <i>Clostridium Botulinum</i> , and may be unsafe. Require up to 12 months to assess the effects of reducing salt to the current 2010 targets, combined with the reduced nitrate levels, on shelf life and quality, and potentially food safety, over the range of conditions applying in the market place.
QMS	If salt reduction is going to continue, a range of functional ingredient combinations must be developed/optimised. We would hope that the Agency could offer appropriate time and support in order for the industry to work on such processes. This may involve lengthy and time-consuming product development and consumer research. Concerned that the bacteria-inhibiting properties of salt should not be underestimated. Further reduction in salt could lead to an increase in bacterial growth and food borne illness

### Category and target specific comments

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>1.1 Bacon - 3.25g salt or 1300mg sodium (maximum) for 2010</b> ----- <b>2.88g salt or 1150mg sodium (maximum) for 2012</b>			
AGDBms		Food safety issue for ham and bacon - especially with new limits on nitrate. Concern over the move from averages to maximums; due to variability in brine uptake an average is more workable.	

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
BMPA and BRC		Averages for bacon and ham were agreed due to variability of brine uptake in meat due to water/muscle ratio. Impossible to guarantee the levels present in each slice of finished product. This would have detrimental effects on food safety and quality resulting in poor cure, growth of psychotropic Clostridia and spoilage organisms.	BMPA recommends keeping current targets.
ASDA		Revised 2010 target is achievable. Salt levels can vary by 0.4g/100g so the target for 2012 may result in salt levels of around 2.4g, this level has not passed consumer tasting panels so ASDA would support a final target of 3.25g max.	
Callan Bacon		Concern about the use of maximum limits for bacon as the average salt level in the product would then potentially be too low to guarantee current shelf life standards. Therefore, under current technologies, shelf life will likely be reduced.	
CASH		No technical reason why bacon has higher levels of salt than ham; bacon currently on the market at 780mg sodium, and safety and shelf life stability is primarily a function of good temperature control in retail distribution.	Suggest a 2010 target of 3g salt/1200mg sodium (maximum) and a 2012 target 2.5g salt/1000mg sodium (maximum).
CGFG		Trials using 3% and 2.8% (3.25% max) salt content produced products that still had a recognised bacon flavour. However, a trial product using 2.4% (2.88% max) was not liked by the tasting panel and would not be repeat purchased. Therefore, a 2.8% product is likely to be accepted by consumers, however, consider that a lower level should not be contemplated.	
Kent County Council Trading Standards		Out of 106 samples analysed 37 samples would not at this time meet the proposed 2010 target and 55 would not meet the proposed 2012 target. All samples had satisfactory nitrite/nitrate levels.	
PTF		Any target for bacon should be expressed as an average due to the variability in salt levels in bacon.	
<b>1.2 Ham/other cured meats - 2.13g salt or 850mg sodium (maximum) for 2010</b> <b>----- 1.75g salt or 700mg sodium (maximum) for 2012</b>			
ASDA		At the current level of 2.5g the safety criteria of aqueous salt and residual nitrate is met. Reducing salt further would result in growth of spoilage micro-organisms, decreased shelf-life and increased waste. Do not support change to current target.	

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
BRC		Reduced shelf-life could lead to logistical problems when ham is used as an ingredient of a composite foodstuff; also potential safety issues and certainly increased wastage will result.	BRC
CASH		Many products already at 600mg-700mg level. Concerns over Listeria Monocytogenes should also be considered such as pH, temperature and shelf life. Questions if products currently on the market at 600mg sodium are dangerous to our health?	Suggest a 2010 target of 1.75g salt/700mg sodium (maximum) and a 2012 target of 1.5g salt/600mg sodium (maximum).
PTF	Cured tongue should be included in the definition of 'speciality products'.	Any target for ham should be expressed as an average due to the variability in salt levels in bacon.	
Waitrose		Real concern that revised 2010 target would require major redevelopment together with full shelf life trials. Ultimately, these reductions would affect colour, texture and flavour. Further, microbiological safety - especially in relation to Listeria and Clostridium botulinum - must be fully reconsidered.	
<b>1.3 Sausages - 1.13g salt or 450mg sodium (maximum)</b>			
ASDA		Working towards the proposed target.	
BRC		Shelf-life could be reduced by 5 days.	
CASH			Suggest a 2010 target 1.25g salt/500mg sodium (maximum) and a 2012 target of 1g salt/400mg sodium (maximum).
Unilever UK Foods		Not achievable by 2012. Further reductions in their Peperami product cannot be made.	
<b>1.3.2 Cooked sausages and sausage meat products - 1.63g salt or 650mg sodium (maximum) for 2010 ----- 1.5g salt or 600mg sodium (maximum) for 2012</b>			
ASDA		Revised 2010 target is achievable but 1.5g target is not as it would result in drastically reduced shelf life of <10d (current shelf life is >21 days) and food safety issues (C. Botulinum). It may be possible to reduce water activity and alleviate food safety risk but this would mean adding extra ingredients which impacts on cost, consumer perception and shelf-life.	
Brakes		Scope for further reduction limited for the standard products where salt is major contributor to flavour.	

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
Nestle	Welcome the addition of chilled frankfurters to this category.	2012 target difficult to achieve from microbiological safety perspective. Mini frankfurters have a larger surface area than standard size frankfurters. During the cooling process, they absorb more brine and as a result have proportionately higher sodium content. It will be more difficult to achieve the targets for these products. 2010 target is accepted.	
CASH			Suggests a 2010 target 1.5g salt/600mg sodium (maximum) and 2012 target of 1.25g salt/500mg sodium (maximum).
<b>1.4 Meat Pies</b>			
<b>1.4.1 Delicatessen, pork pies and sausage rolls - 1.38g salt or 550mg sodium (maximum) for 2010</b> ----- <b>1.13g salt or 450mg sodium (maximum) for 2012</b>			
ASDA		Achievable at added cost to allow for additional flavouring.	
BMPA		Pastry research is on-going, premature to revise targets before more information is available.	
CASH			Suggest a 2010 target of 1.13g salt/450mg sodium (maximum) and a 2012 target of 1.0g salt/400mg sodium (maximum). FSA data show that many products already under 500mg therefore cannot see any technical reasons why all products cannot reach proposed target by 2010.
<b>1.4.2 Cornish and other meat-based pasties - 1.13g salt or 450mg sodium (maximum) for 2010</b> ----- <b>1.0g salt or 400mg sodium (maximum) for 2012</b>			
ASDA		Agree that targets are achievable	
CASH		FSA data shows 17% sales weighted products above current target of 500mg sodium and a number of products in range 300-400mg sodium. Cannot see any technical reasons why all products cannot reach the 2012 target by 2010.	Suggest a 2010 target of 1.0g salt/400mg sodium (maximum) and a 2012 target 0.75g salt/300mg sodium (maximum).
<b>1.4.3 Other meat based pastry products - 1g salt or 400mg sodium (maximum) for 2010</b> ----- <b>0.75g salt or 300mg sodium (maximum) for 2012</b>			

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
ASDA		Achievable at added cost to allow for additional flavouring.	
CASH		Agrees with the proposed revised targets.	
<b>1.5 Cooked uncured meat</b>			
<b>1.5.1 Whole muscle or reformed whole muscle- 0.75g salt or 300mg sodium (maximum)</b>			
ASDA		Target is only suitable for 2 types of meat within this category - sliced chicken breast and silverside of beef. The products are whole muscle and are frozen for transportation. The value end of the product range relies on the manufacturing process to bind smaller, cheaper cuts of meat. Without the protein extraction and tenderising properties of salt, the binding of products will be severely affected. This will show in pack as product that is tough in texture and has the potential to fall apart.	
CASH		Target must consider that these products are also eaten by children.	
Waitrose		The proposed 2012 targets potentially impact on shelf-life. This goes against the WRAP study released in May 2008 calling for action to reduce food waste.	
<b>1.5.2 Comminuted or chopped reformed meat - 1.25g salt or 500mg sodium (maximum)</b>			
ASDA		Salt works in reformed products to bind meat and water together. Asda estimates salt levels in these products are 1.5g on average and any further reduction will result in softer, drier texture, and will also affect product yield increasing costs.	
CASH		Target must consider that these products are also eaten by children.	Suggests a 2012 target of 0.75g salt/300mg sodium (maximum).
Waitrose		The proposed 2012 targets potentially impact on shelf-life. This goes against the WRAP study released in May 2008 calling for action to reduce food waste.	
<b>1.6 Burgers, grillsteaks etc - 0.75g salt or 300mg sodium (maximum)</b>			
<b>1.6.1 Standard fresh and frozen burgers and grillsteak products - 0.75g salt or 300mg sodium (maximum)</b>			
ASDA		Without salt extra processing or ingredients will be needed, resulting in textural changes. Further reduction will result in poor distribution of salt, leading to increased microbial activity and reduced shelf-life. Do not support 2012 target.	

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
CASH		Need to consider that the natural concentration of salt in beef is around 63mg. The BRC stated that beef burgers could be made without salt. Must consider that products in this category are often eaten by children.	Suggest a 2010 target of 0.75g salt/300mg sodium (maximum) and a 2012 target of 0.5g salt/200mg sodium (maximum). Believes there is scope for further reductions to be made by 2010.
<b>1.6.2 Speciality and topped burgers and grillsteaks - 0.88g salt or 350mg sodium (maximum)</b>			
ASDA		Proposed target will impact on new product development as inclusion of other ingredients will be severely restricted. Organoleptics will change dramatically, resulting in a plain flavour overpowered by main meat component. Do not support 2012 target.	
CASH	Suggests that separate targets are maintained for standard and speciality and topped burgers.		Suggest a 2010 target of 0.88g salt/350mg sodium (maximum) and a 2012 target of 0.63g salt/250mg sodium (maximum). Believes that there is scope for further reductions to be made by 2010.
<b>1.7 Frankfurters, hotdogs and burgers</b>			
<b>1.7.1 Canned frankfurters, canned hotdogs and canned burgers only - 1.25g salt or 500mg sodium (maximum)</b>			
ASDA		Salt acting on the protein in the meat in conjunction with phosphates, gives the firm snap or bite associated with a frankfurter hot dog sausage. Considerably lower salt levels will cause difficulties in achieving the traditional texture and result in a softer product. Opposed to the target.	
CASH			Suggest a 2010 target of 1.25g salt/500mg sodium (maximum) and 2012 target of 1g salt/400mg sodium (maximum).
<b>1.7.2 Fresh chilled frankfurters - 1.5g salt or 600mg sodium (maximum)</b>			
ASDA		Salt acting on the protein in the meat in conjunction with phosphates, gives the firm snap or bite associated with a frankfurter hot dog sausage. Considerably lower salt levels will cause difficulties in achieving the traditional texture and result in a softer product. Opposed to the target.	

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
CASH			Suggest a 2010 target of 1.25g salt/500mg sodium (maximum) and a 2012 target of 1g salt/400mg sodium (maximum).

## 2. BREAD

### General Comments

<b>Company/Organisation</b>	<b>Comments</b>
ABIM	If technical developments are unable to deliver the solution in the timescale required, more time should be allowed whilst not being viewed as a failure to deliver. Keen to work with FSA for good of the consumer. Frozen batters and doughs require higher levels of baking powders and this should be considered when setting targets.
Brakes	Reductions to meet 2012 targets may only be possible in some bread. Await results of bread project.
BRC	Further reductions will result in the following problems: flavour will be affected with the risk of all products tasting the same. Shelf-life will be reduced due to mould growth. Inferior quality loaves due to affects on yeast functionality. Poor crust colour.
FoB	Notes that the consultation document stated that the current targets for bread will be reviewed in light of the results of the FSA funded research project on bread.
NAMB	Targets have been set following discussions with the plant bakery sector; however these may not be suitable for craft cereal bakers. We think that targets should be reviewed in 2010 following the completion of the a project with the craft bakery sector to better understand the possibilities of salt reduction in these products. A benefit of this type of project will be to provide methodology on recipe reformulation and give the bakers confidence to change. The Agency acknowledged that the setting of targets would be considered against any technical difficulties identified. These have not yet been explored and the project offers the opportunity to consider targets from a more informed position. The Agency has not ruled out setting further targets in the future- This is unsettling to industry and makes business planning very difficult. Smaller businesses are unlikely to remain engaged with proposals that are subject to frequent change.
Waitrose	The current 2010 targets are considered the absolute lower limit with respect to functionality on plant bread products. In addition, this category utilises sodium bicarbonate for its raising properties and thus forms part of the overall salt calculation creating some over declarations.

### Category and target specific comments

<b>Company/Organisation</b>	<b>Comments on categories</b>	<b>Comments on targets</b>	<b>Alternative target suggested</b>

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>2.1 Bread and rolls - 0.93g salt or 370mg sodium (average)</b>			
Kent County Council and CFA		Concerns highlighted that baguettes are not keeping pace with bread. None of those surveyed met the 2010 target and this may be due to quality issues which have been experienced on reduction of salt.	
ASDA		Reductions to date have impacted shelf-life. Suppliers concerned that additives in the dough or alcohol spray in the pack will be required for further reductions, both are very expensive. Keeping target as an average is imperative.	
ABIM		Target unachievable, especially for scones and crumpets. Can not find major producer with knowledge of developments in processing.	
CASH	If special consideration needs to be given to speciality breads, they should be treated as a separate sub-category.	No technical reasons why sodium levels cannot be reduced to this level. CASH data (Sept 2008) found that supermarket own-label bread had sodium levels 0.30 - 0.4g/100g and in-store bakery bread ranged from 0.4 - 0.5g/100g, for both white and brown bread.	Suggest a 2010 target of 0.85g salt/340mg sodium (maximum) and a 2012 targets of 0.75g salt/300mg sodium (maximum).
FoB		The 2012 targets are not achievable in the existing technological or commercial environment. Therefore, the Federation of Bakers cannot commit to the proposed 2012 targets nor propose any alternatives which are lower than the 2010 targets.	
<b>2.2 Bread and rolls with additions - 1.13g salt or 450mg sodium (maximum)</b>			
ASDA		Target is achievable	
FoB		Questions why the target is now a maximum figure and not a sales weighted average figure.	
CASH			Suggests a 2010 target of 1g salt/400mg sodium and a 2012 target of 0.88g salt/350mg sodium (maximum).

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>2.3 Morning goods - 0.75g salt or 300mg sodium (average) 1g salt or 400mg sodium (maximum)</b>			
ASDA		Potato cakes have lowest possible shelf-life of 4 days. If salt is lowered further shelf-life will be reduced, risking mould growth and wastage. Further reductions in muffins, crumpets will affect yeast activity and impact on texture and volume as well as shelf-life. Below current level these products are devoid of normal flavour and considered unpleasant by many. If replaced by potassium chloride, a bitter, soapy, unpleasant taste is found; in addition, it is 14 times more expensive than salt. Other foods in this category are not an issue.	
BRC		No widely available suitable natural alternatives to sodium bicarbonate.	
CASH		CASH data (Sept 2008) shows lowest levels of sodium around 390mg and 460mg per 100 grams.	Suggest a 2010 target of 1g salt/400mg sodium (average) and a 2012 target of 0.75g salt/300mg sodium (average) and 0.88g salt/350mg sodium (maximum). Believe there is scope for further reductions before 2010.
CEHOG	Request that 'wheaten bread' is added to the 'morning goods' category.		
FoB		The 2010 targets are proving challenging to achieve and the 2012 targets cannot be achieved. Notes that work in this area relates to sodium chloride, not sodium embedded in raising agents. Considers that a maximum target for morning goods is not practical and could be overly restrictive. Requests that hot cross buns be included in the 'morning goods' category.	

### 3. BREAKFAST CEREALS

#### Category and target specific comments

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>3.1 Breakfast cereals - 0.68g salt or 270mg sodium (average) 1.0g salt or 400mg sodium (maximum)</b>			
<b>Association of Cereal Food Manufacturers</b>		Will continue to work towards 2010 target where feasible and will review this in 2010.	
ASDA		Targets achievable, but have noted increased complaints of blandness.	
CASH	Note that some brands predominantly consumed by children can contribute up to 35% of the maximum recommended intake of salt for children in a single serving. Emphasises the importance of realistic portion sizes of breakfast cereals and therefore the realistic salt intake with one portion of breakfast cereals.	A CASH survey (Aug 2008) looking at the top-selling breakfast cereals in the UK (2006-07 Mintel Report; branded varieties only) showed that a 300mg maximum target would predominately only affect one company (Kelloggs) and that for these brands, supermarket own-brand versions contained lower sodium levels.	Suggest a 2010 target of 0.5g salt/200mg sodium (average) and 0.75g salt/300mg sodium (maximum), and a 2012 target of 0.38g salt/150mg (average) and 0.5g salt/200mg sodium (maximum).
CPUK		Agrees with the proposal to decrease the average sodium content of breakfast cereal (weighted for sales) where feasible. However, does not support the proposal to set a category maximum as it makes the assumption that it is possible to achieve the same level of sodium reduction in all product types. Considers that factors such as consumer acceptability, volume of sales etc should be taken into account when setting the targets. Notes that it is possible to reduce the salt content of breakfast cereals with no effect on perceived saltiness by removing some salt from the cereal base and then applying and drying a light coating of brine onto the surface of the cereal, however, this process does not yield an acceptable product. The salt must be cooked into the cereal dough.	

#### 4. CHEESE

##### General Comments

Company/Organisation	Comments
BRC	Reducing salt will alter the moisture levels throughout the cheese and change the properties and characteristics of the cheese, e.g. ageing process and texture. Due to vast amount of products and variation in this category the target should remain an average.
Dairy UK and PTF	Salt is essential in producing matured chesses. In processes cheese, in addition to the salt occurring in natural cheese, emulsifying salts are a necessary part of the manufacture. Salt is distributed between the curd and whey in a complicated manner, that is too difficult to control. Cannot commit to average values, with the average being the average overall product in that category (eg hard pressed cheese) produced by manufacturers in a 12 month period. It is scientifically recognised that the salt in moisture ratio, rather than the absolute salt content is critical in ensuring proper development of chesses. If fat contents are reduced in line with the FSA's saturated fat strategy this will inevitably lead to an increase in salt content. Acceptance of a 1.88g average across the category assumes current fat levels. Notes that the targets refer to full fat versions. Moisture levels in low fat, reduced fat, half-fat versions of hard cheeses will in general have higher moisture levels, necessitating higher salt levels.
PTF	Manufacturers reluctant to produce lower salt versions just for the UK market. We note that PGI/PDO products are excluded from the targets within the ham category & urge the FSA to do the same for registered PGI/PDO cheeses.
Kraft	It is standard practice to evaluate lower sodium alternatives within all our quality improvement programmes. This ensures that we regularly try lower sodium products with consumers so that reductions can go to market as soon as they test positively for taste. Revised targets are either technically unachievable or unacceptable to consumers at this stage. Because we have made mistakes on sodium reduction in the past and paid a hard commercial price we won't launch products that push towards salt reduction objectives at the expense of shoppers' custom.
PAPA	Salt is needed for cheese making and maturation process. Further reductions are leading to concerns of spoilage and off flavours over shelf-life.

##### Category and target specific comments

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>Natural Cheese</b>			
<b>4.1 Cheddar and similar "hard pressed" cheeses - 1.8g salt or 720mg sodium (average); 1.88g salt or 750mg sodium (maximum)</b>			
ASDA	Blended cheeses do not have a separate category but where a high salt product is added e.g. olives, ASDA suggests a higher salt target.	Supports target as an average rather than a maximum as achieving distribution of salt throughout the product is technically impossible at this time. Cheddar needs more salt for flavour and to prevent 'blowing' on account of Clostridium butyricum.	
Brakes		Due to our limited influence over this large sector we anticipate that delivering lower salt options will be dependent on the whole of industry making appropriate changes to meet targets.	
BRC		In mature cheeses salt is a preservative, excessive reduction would result in mould and bacterial growth and rancid flavours.	
CASH		Lowest levels currently on the market for both mild and mature cheese is 670mg sodium.	Suggest a 2010 target of 1.7g salt/670mg sodium (maximum) and a 2012 target of 1.5g salt/600mg sodium (maximum).

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
Dairy UK	Notes that a single target for mild and mature cheddar has been proposed for 2012. A disadvantage of this approach is that the manufacture of mature cheddar requires higher salt levels than are required in mild cheddar.	Mature cheddar requires 1.95g salt to allow proper development of the flavour characteristics and to prevent cheese "blowing" on account of <i>Clostridium butyricum</i> . Therefore, unable to accept a maximum of 1.88g.	Would accept a target of 1.88g salt as an average across all cheeses in this category.
Unilever UK Foods		Requests the maximum target is increased to 800mg/100g but the average remain the same. The sodium content of marmite mild cheddar cheese and yeast extract cannot be reduced further as the sodium is from the yeast extract and the cheddar cheese.	
Waitrose		Reduced sodium produces difficulties regarding the texture and structure of Cheddar Cheese. Waitrose continue to be guided by suppliers as to the feasibility of reaching 2012 targets. Further, concerned that the proposed lower target would not prevent the growth of <i>Clostridium butyricum</i> .	
<b>4.2 "Fresh" cheeses</b>			
<b>4.2.1 Soft white cheese e.g. philadelphia - 0.55g salt or 220mg sodium (average); 0.75g salt or 300mg sodium (maximum)</b>			
Arla		Work has been done to hit the 2010 target but greater reductions will require further work to assess technical viability, whilst delivering a safe and acceptable product. Target cannot be agreed until samples are assessed and all products in the market have achieved 2010 target and consequently consumer acceptance of lower salt cheese is not compromised by higher salt variants.	
ASDA		Targets may be achievable over the next 3 years.	
CASH			Suggest a 2010 target of 0.55g salt/220mg sodium (average) and 0.75g salt/300mg sodium (maximum), and a 2012 target of 0.58g salt/230mg sodium (maximum).
Dairy UK		Unable to agree to any tightening beyond the 2010 target (0.8g salt) until consumer acceptability and food safety issues have been assessed.	
Kraft		Technically achievable target but subject to consumer acceptance; current testing shows don't have consumer acceptance at lower than current levels. Reformulation work is continuous. Using chemical flavouring to recreate effect of salt is at odds with consumer expectations. Philadelphia is a reduced salt option within the cheese category. Reducing salt further and too quickly could drive customers towards higher salt alternatives.	
<b>4.2.2 Cottage cheese, plain and flavoured combined - 0.55g salt or 220mg sodium (average); 0.63g salt or 250mg sodium (maximum)</b>			
ASDA		Supports target - already meeting it.	

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
CASH			Suggest a 2010 target of 0.54g salt/215mg sodium (maximum) and a 2012 target set to levels naturally occurring in cottage cheese (maximum). Cottage cheese is viewed and marketed as a healthy product, therefore no salt should be added to this product.
Dairy UK		Accepts the average (0.55g salt) but not the maximum (0.63g salt) - see general comments.	
<b>4.3 Mozzarella (used in food products) - 1.5g salt or 600mg sodium (maximum) for 2010</b> ----- <b>1.38g salt or 550mg sodium (maximum) for 2012</b>			
Arla Foods, ASDA and Dairy UK		Accepts a target reduction to 1.5g but considers it essential that this is an average rather than the maximum. Cannot agree to 2012 target for technical reasons.	
ASDA		Brining process is designed to achieve salt levels of 1.5g-2.0g, therefore even with zero dry salt addition it is almost impossible to reduce to a maximum level below 1.5g, and to do so would involve a re-design of brining process with huge capital investment. Salt levels below 1.5g significantly affects flavour attributes of mozzarella which relies on lactic acid and salt rather than maturation.	1.5g average by 2010, no further reduction for 2012.
PTF		A significant proportion of Mozzarella is imported. Therefore, we could not support a target below 1.5g salt (av) for hard block type Mozzarella.	
CASH			Suggests a 2010 target of 1.38g salt/550mg sodium (maximum).
Dairy UK		It is technologically very difficult to obtain a uniform dispersion of salt in Mozzarella, with consequently a large standard deviation around the mean, and a more uniform distribution is unlikely to be possible in the foreseeable future. Also, the flavour characteristics of Mozzarella arise from the lactic acid and salt contributions. Cannot accept the 2012 target of 1.38g salt (maximum). Considers 1.5g salt (average) is the minimum salt level as the flavour characteristics of Mozzarella relies on lactic acid and salt flavour contributors, and this target will be challenging to achieve.	
<b>4.4 Blue cheese. UK produced blue cheeses only - 2.1g salt or 840mg sodium (average)</b>			
Arla		Arla blue cheese is non-UK but some already hit the target	
ASDA		Support target - already meeting it.	

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
CASH			Suggest a 2012 target of 1.8g salt/720mg sodium (maximum).
Dairy UK		Progress towards the 2012 target will depend on achieving significant reductions in the standard deviation in the levels of sodium in the cheese.	
Waitrose		Concerned that the proposed lower target would not prevent the growth of Clostridium butyricum.	
<b>4.5 Processed cheese</b>			
<b>4.5.1 Cheese spreads - 1.63g salt or 650mg sodium (average); 2.25g salt or 900mg sodium (maximum)</b>			
ASDA		Added salt has been taken out of these products, 50% of sodium-based emulsifying salts have been replaced with potassium-based salts. Separation of oil and water phases occurs if emulsifying salts are reduced further. Higher levels of potassium-based salts cannot be added due to their bitter flavour. Further reductions are not supported.	
Kraft		Current targets are at limit of acceptance so proposed target considered unachievable.	
CASH		These products are sold to children therefore the salt content should be reduced to be lower than other cheeses on the market. Recognise that significantly reducing the salt levels may require products in this category to be labelled 'keep refrigerated'.	Suggest a 2010 targets of 1.25g salt/500mg sodium (average) and 2.25g salt/900mg sodium (maximum), and a 2012 target of 1.25g salt/500mg sodium (maximum).
<b>4.5.2 Other processed cheese (e.g. slices, strings, etc) - 2.13g salt or 850mg sodium (average) for 2010 ----- 1.88g salt or 750mg sodium (average); 2.25g salt or 900mg sodium (maximum) for 2012</b>			
ASDA		Slices have 60% natural cheese content, sodium chloride is no longer added, remaining salt is from raw material cheese and emulsifying salts. Some branded products have smaller proportion of cheese and lower levels of emulsifying salts, resulting in lower salt levels. These products have a consistency closer to cheese spreads. Asda believes that following this target would severely compromise quality. Targets not supported.	
CASH		These products are eaten by children so the salt content should be reduced to be lower than other cheeses on the market. A CASH survey (Jan 2008) found that one slice of processed cheese can contain over 50% child aged 4-6 years max recommended intake.	Suggest a 2010 target of 2.13g salt/850mg sodium (average) and 2.25g salt/900mg sodium (maximum), and a 2012 target of 1.25g salt/500mg sodium (maximum).

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
Dairy UK		<p>It may be possible for some processed cheese products to meet the revised 2010 target of 2.13g salt, however for other products the original 2010 target of 2.9g will remain a challenge. Processed cheese covers a wide range of products with a major point of difference being the cheese content - high levels of natural cheese means a relatively high level of emulsifying salt. Also, notes that the analysed salt content is significantly below the level that would be calculated by multiplying the sodium by 2.55, since a significant part of the sodium comes from the emulsifying salt rather than from the sodium chloride.</p>	
Kraft		<p>The range of products in this category means some SKUs are above and some below target. A change in range of products (through de-listing) means average sodium level will be higher. 750mg target not considered achievable. Cheese slices have been reformulated to sodium levels that have received lower taste scores in consumer testing but the significant sodium reductions achieved make the slight compromise in consumer preference worthwhile. Have stopped short of any further reduction as clear that consumer preference would be severely compromised. Consumer complaints shot up for Dairylea Stripcheese after it was launched with less salt and fat. Had to revert to original recipe, meanwhile work on improving nutritional content while retaining taste continues. Have looked into potassium-based emulsifiers in place of sodium but results in 'soapy', bitter aftertastes.</p>	

5. BUTTER

General comments

Company/Organisation	Comments
Brakes	Due to our limited influence over this large sector we anticipate that delivering lower salt options will be dependent on the whole of industry making appropriate changes to meet targets.
Dairy UK, PTF and Waitrose	Salt is added to butter and dairy spreads to inhibit bacterial growth, and therefore can contribute to food safety. Do not agree to setting a maximum target for butter/spreads as it is technologically difficult to achieve a uniform distribution of salt in the product.

Category and target specific comments

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>5.1 Butter</b>			
<b>5.1.1 Welsh and other regional butter - 2.0g salt or 800mg sodium (maximum)</b>			
Arla		Arla can meet the target	
ASDA		Target would result in uneven distribution of salt through the butter, severely reducing the quality and unique nature of the product. Oppose target.	
CASH			Suggest a 2010 target of 1.5g salt/600mg sodium (average) and a 2012 target of 1.1g salt/450mg sodium (average); the same level for salted butter.
Dairy UK	Welsh butter differs from other regional butters as it is characterised by its higher salt content, which is up to 3.5%, whereas the other regional butters are characterised by their milk source.	Would accept 2.0g salt as the average for all regional butters except Welsh, but cannot accept a maximum salt level - see general comments. Reducing the salt content to 2.0g average would effectively remove Welsh butter from the market. Therefore, would accept an average of 2.5% for Welsh butter, a reduction of 0.5% from the 2010 average target.	

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>5.1.2 Salted butter. Includes all other 'standard' salted butter - 1.5g salt or 600mg sodium (average)</b>			
Arla and Dairy UK		Concerned the reduction could cause a food safety risk.	Supports Dairy UK proposal to keep current level.
ASDA		Microbial testing by the FSA indicates that 1.8% is the lower limit of salt in butter to inhibit the growth of listeria. The aqueous salt content of water droplets within butter also stops growth of pathogens. Lowering salt to 1.5% would reduce the salt content of the water, which could support growth of pathogens. Shelf-life is also a concern, has already fallen by 14 days with reduction to 1.7%. Oppose target due to food safety concerns.	
CASH			Suggest a 2010 target of 1.5g salt/600mg sodium (average) and a 2012 target of 1.1g salt/450mg sodium (average). FSA data shows weighted averages already at 630mg sodium average.
<b>5.1.3 Lightly salted butter. Includes all lightly salted butters (made using different processes to that used for salted butters at 5.1.2) eg Lurpak - 1.13g salt or 450mg sodium (average)</b>			
Arla, ASDA, and Dairy UK		Accepts the 2010 target	
Arla		Need review of implications of salt reductions on shelf-life.	Propose 1.1g salt for simplicity
CASH		CASH data (Sept 2008) found lowest sodium levels at 470mg/100 g.	Suggest a 2010 target of 1.13g salt/450mg sodium (average) and new 2012 target of 0.5g salt/200mg sodium (average).
Dairy UK		Prepared to work to this target, taking into account that sales are lower than salted butter and therefore health risks are lower.	
<b>5.1.4 Unsalted butter. Includes all unsalted butters - 0.1g salt or 40mg sodium (average)</b>			
Arla, ASDA, Dairy UK		Will work towards this target	
CASH			Suggest that targets for this sub-category are set at levels naturally occurring in butter. Believe this product should not have any salt added.
Dairy UK		Prepared to work to this target, taking into account that sales are lower than salted butter and therefore health risks are lower.	

## 6. FAT SPREADS

### Category and target specific comments

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>6.1 Margarines/other spreads - 1.25g salt or 500mg sodium (average) 1.88g salt or 750mg sodium (maximum) for 2010.</b> ----- <b>1.13g salt or 450mg sodium (average); 1.63g salt or 650mg sodium (maximum) for 2012</b>			
Arla		Arla are already meeting proposed target for 2010 and 2012	Suggest rounding to 1.1g salt and 1.6g salt for simplicity
ASDA		Target believed to be achievable.	
BRC		Further reductions would make products bland, particularly the buttery type of products in which salt content is already low for the ideal flavour profile. If salt level reduced there is a risk of mould growth and reduced shelf life.	
CASH			Recommend that targets be revised to reflect those for butter as both butter and margarine are used for the same purpose.
Dairy UK and PTF	Suggests a separate category for "lactic" spreads. In lactic type products the lactic acid/diacetyl additives contribute to both lowering the pH and increasing osmotic pressure, which has a preservative effect. Therefore, salt reductions could be more easily made in these products.	Do not accept the revised 2010 target due to potential impact in terms of food safety and shelf life. Research findings indicating that salt levels in butter below 1.8% do not inhibit Listeria growth are also applicable to margarines and other spreads, which frequently have a higher moisture content than butter and are therefore more susceptible to the growth of Listeria at salt levels below 1.8%. Particularly as cross contamination during use of fat spreads in domestic or catering situations may occur.	
Unilever UK Foods		Unilever fat spreads already meet the current 2010 targets. Do not meet the revised 2010 target if their Stork product is included. The proposed 2012 targets will require considerable work.	
Waitrose		Concerns have been expressed regarding potential Listeria growth in fat spreads at the proposed lower salt levels.	
MSA		Revised targets would be a substantial reduction compared to current levels and it will be a challenge to achieve them and still have consumer acceptance.	

## 7. BAKED BEANS

### Category and target specific comments

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>7.1 Baked beans in tomato sauce without accompaniments - 0.63g salt or 250mg sodium (maximum)</b>			
ASDA		Targets are technically achievable but with great compromise on flavour so do not accept targets.	
CASH			Suggests a revised 2010 target of 0.63g salt/250mg sodium (maximum) and a 2012 target 0.5g salt/200mg sodium (maximum).
Heinz		The reduced salt and sugar variety contains 25% less salt and represents less than 3% of sales. Complaints are regularly received about the blandness of this product. No evidence to suggest target can be achieved in time-frame whilst maintaining acceptable taste. Suitable alternatives to sodium chloride have not been found. Under law products claiming to be 'reduced' in sodium must have at least 25% less sodium than the standard product. Reduced salt beans are acceptable to a small group of consumers but research shows further reduction, following a reduction in standard baked beans, in order to be compliant with labelling legislation, would result in unacceptable product and consumers may add salt or buy other higher salt beans. Concerned that if sales of reduced salt variety drop below a critical threshold the product may be de-listed by retailers.	
<b>7.2 Baked beans in tomato sauce with accompaniments - 0.75g salt or 300mg sodium (maximum)</b>			
ASDA		Targets are technically achievable but with great compromise on flavour so do not accept targets.	
CASH		Heinz showed a simple average of 280mg sodium. No technical reason for salt in this sub-category. Concern that these products are often eaten by children.	Suggest a revised 2010 target of 0.75g salt/300mg sodium (maximum) and a 2012 target of 0.6g salt/250mg sodium (maximum).
Heinz		Reductions in the tomato sauce face the same problems as in category 7.1 and reductions in the accompaniment will depend on suppliers. Children's products are meeting the 2012 target, ravioli variants are almost there.	

## 8. READY MEALS AND MEAL CENTRES

### Category and target specific comments

Company/Organisation	Comments on category	Comments on target	Alternative target suggested
<b>8.1 Ready meals - 0.63g salt or 250mg sodium (average); 1.13g salt or 450mg sodium (maximum)</b>			
BRC and Iceland	Coated fish and poultry should not be included in this category as values quoted are unrealistic. Current target for coated poultry is achievable and fish product is similar. Both products would benefit from one separate target.		
McAusland Crawford		Salt is high in cooked or frozen ready meals to maintain shelf life. Fresh products have salt and other sodium sources (sodium ascorbate, sodium metabisulphite), if salt reduced other sodiums lose the level overtime and this reduces the shelf-life 'best before end' (BBE) of the products. To maintain flavour likely that sugar will be added instead of salt.	
ASDA		Target is achievable for all ready meals apart from Chinese/Thai/Indian meal centres, where reductions will impair quality of these products. Meat texture will be affected as salt solubilises proteins to improve binding and increase succulence, and there is a risk that sauces will split as free water may leach out of the product. Recent independent research by SPA Research showed consumers want to recreate a restaurant/takeaway experience in taste and flavour of these products. Further reductions would lead to increased risk of adverse consumer reaction when comparing products to a takeaway.	
Brakes	Welcome the simplification of the targets.	Average target is very challenging, some meals will be naturally higher so others will need to be well below to achieve the average figure.	
BFFF	Sub-categories for ready meals and pizzas should be retained as there are a wide range of salt contents due to the ingredients used. A manufacturer who had products in just one of the specific sub-categories with a 2010 average target of 1.0g salt would face a massive reduction over a short time period with the proposed single category target of 0.63g salt (average).		
BRC		Proposed targets would restrict product development. Ingredients such as cheese, bacon, Parma Ham or Spanish chorizo could no longer be used. Some cuisines e.g. Thai, Chinese can be inherently salty and retailers seek to replicate the authentic flavour of the recipe. In some products salt is not added as an ingredient but originates from salt present in ingredients used. More complaints over blandness have been received. Reducing quantity of ingredient that contributes most salt will create high consumer dissatisfaction. Shelf life may be restricted.	

Company/Organisation	Comments on category	Comments on target	Alternative target suggested
CASH		A 400-550g serving would contain 3-4.1g salt with a 300mg sodium maximum target. Ready meals are an increasing source of salt in our diet therefore it is essential to reduce levels as far as possible. Emphasises the importance of realistic portion sizes of ready meals and the salt content per realistic portion size.	Suggest a revised 2010 target of 0.63g salt/250mg sodium (average) and 0.75g salt/300mg sodium (maximum), and a 2012 target 0.5g salt/200mg sodium (average) and 0.63g salt/250mg sodium (maximum).
Heinz		Maximum target is being met across the ranges and average being met for a number of ranges. However it is likely the range average of Oriental meals will be above the average target due to use of traditional oriental ingredients to provide characteristic flavours.	
CFA	Inclusion of Chinese ready meals within the broader ready meals category presents particular problems owing to the use of soya sauce, even salt reduced varieties.		
FDF	Concerned about the proposal to align the 2012 targets for ready meals and meal centres at 250mg/100g, particularly in relation to coated products. Coated products require a level of raising agent for functional purposes and reformulation to meet the 250mg target (previously 300mg for coated products) is unlikely to be realistic.		
PAPA		Many Italian products are made to protected traditional recipes, leaving UK businesses at a commercial disadvantage or making it unfeasible to use these ingredients on pizza or pasta dishes.	

9. SOUPS

Category and target specific comments

Company/Organisation	Comment on categories	Comments on targets	Alternative target suggested
<b>9.1 Soups - 0.58g salt or 230mg sodium (average); 0.73g salt or 290mg sodium (maximum)</b>			
ASDA and Mars CASH		Has achieved the target already.	Suggest a revised 2010 target of 0.58g salt/230mg sodium (average) and 0.73g salt/290mg sodium (maximum), and a 2012 target of 0.5g salt/200mg sodium (average) and 0.63g salt/250mg sodium (maximum).
Heinz		2010 target is at threshold of consumer acceptability. Therefore a gradual approach needed to achieve further reductions with continual testing of acceptability. Alternative ingredients that would maintain expected taste, aroma and value for money have not yet been found.	
Unilever UK Foods		Current 2010 targets appear achievable, however the proposed 2012 targets will not be achieved until 2015 in accordance with the Unilever <i>Global Sodium Reduction Strategy</i> .	
Nestle		Reducing salt in dried soups is a huge challenge. When recipe changes the taste difference is noticed, which makes formulation changes more time consuming as they need to be done gradually to ensure acceptability. Have experienced loss of sales due to reduced salt content. Customers choose higher salt alternatives. Setting a maximum ignores the different varieties of products, some sodium levels are not possible in all varieties; meat based soups need more than vegetable based. The FSA TNS dried soup target stands at 280mg sodium, request that this inconsistency is addressed.	Request target be kept at an average of 0.6g salt and maximum target be removed.

## 10. PIZZAS

### General comments

Company/Organisation	Comments
Freiberger UK	Concerned that suppliers to the retail pizza market will be disadvantaged on competitive terms, noting that their competitors (brands manufactured outside of the UK and home delivery and restaurant pizzas) will not be following the salt reduction targets. Concerned that retail products will become bland and consumers will choose products with a higher salt content. Concerned about consumer acceptance of salt reduced pizzas. Notes that pizzas are viewed as indulgent by consumers (TNS data) and past market performance for salt/fat/calorie controlled pizzas shows the likely impact on the consumption of pizzas with no taste.
BRC	Proposed targets would restrict product development. Ingredients such as cheese, bacon, Parma Ham or Spanish chorizo could no longer be used. In some products salt is not added as an ingredient but originates from salt present in ingredients used. More complaints over blandness have been received. Reducing quantity of ingredient that contributes most salt will create high consumer dissatisfaction. Shelf life may be restricted.
PAPA	<p>Bakery technology relies on addition of salt, products like pizzas can not be produced with suitable results as without salt yeast development cannot be controlled. Salt is needed for cheese making and maturation process. Further reductions are leading to concerns of spoilage and off flavours over shelf-life. Urge FSA to do research around the issues of salt reduction in pizza dough. Salt contributes to the taste of a pizza and enhances other flavours. Pizza ingredients such as ham, cheese etc. are typically high in salt. In many of these ingredients salt is used as a preservative and cannot easily be replaced without increasing food safety risk or damaging taste. Typical quantities of cheese on a pizza equate to a portion size of cheese eaten alone. Many ingredients used in pizza toppings are produced by other countries, which are not on board with FSA targets and are reluctant to help, particularly where it would require remodeling products just for the UK. Same applies to ready-made pizzas (frozen) coming into the UK and which are not governed by the same rules.</p> <p>If commercial benefits of UK manufacturing are undermined they could move production overseas. New targets could give pizzas coming in from overseas without salt reductions an advantage. This could result in job losses if companies cannot effectively compete. In the restaurant and delivery sector of the market these new targets could lead to quite serious competitive issues between chains and independents. While chains may feel obliged or be pressured into responding to the targets, independent competitors are unlikely to respond which will result in unfair competition. Additional issue of sub-franchises from the USA where product specifications may be laid down in franchise agreements which exclude recipe changes. In these cases it may not be possible to meet the guidelines as to do so could contravene the terms of the business franchise agreement.</p>

### Category and target specific comments

Company/ Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>10.1 Pizzas - 0.88g salt or 350mg sodium (average); 1.25g salt or 500mg sodium (maximum)</b>			
ASDA	Welcomes simplification of target	Further salt reductions in pizza base not technically possible. Sourcing low salt raw materials may result in being restricted to UK suppliers impacting on availability and cost. Other areas of industry have not reduced salt as much as retailers, could lead to consumers seeking better tasting product elsewhere. Maximum achievable but average unreasonable.	
BFFF	Sub-categories for ready meals and pizzas should be retained as there are a wide range of salt contents due to the ingredients used.		

Company/ Organisation	Comments on categories	Comments on targets	Alternative target suggested
CASH			Suggest a revised 2010 target of 0.88g salt/350mg sodium (average) and 1.1g salt/450mg sodium (maximum), and a 2012 target 0.75g salt/300mg sodium (average) and 1.0g salt/400mg sodium (maximum).
Heinz		Aim to meet the targets but dependent on ingredient suppliers' success in reducing sodium in component ingredients.	
CFA	Notes the challenges of developing certain pizzas that use topping ingredients that are high in salt (e.g. pepperoni).		
Freiberger UK		The 2012 targets would have a dramatic impact on the number of raw materials that could be used for the UK market - approximately 60% of the raw materials currently used have salt contents in excess of 1%. The company has reduced the salt in their pizza base but are at the limit - as salt is required in the base as part of the processing function. Considers the targets for pizzas are disjointed compared to the individual targets for bread, cheese and cured meats. The target of 0.88g on average will be impossible to achieve with significant reductions in the topping levels or the removal of salt/sodium from ingredients.	

## 11. CRISPS AND SNACKS

### General Comments

Company/Organisation	Comments
BRC	Most retailers have reduced MSG and artificial flavours. Reducing salt would make products bland, especially in crisps with high
P&G	Considers the revised 2010 targets for savoury snacks should be achievable. However, questions the value achieving these target will have, especially considering the low contribution savoury snacks make to total sodium intake. Notes that although savoury snacks represent a higher intake in children, generally children do not get high blood pressure and the SACN report acknowledged the lack of data on this and whether effects track into adulthood.
PepsiCo	Proposed targets look extremely challenging. Technological breakthroughs needed before targets can be achieved. Each flavour and product type is unique so a range of sodium levels exist, therefore pleased that average targets have been retained but concerned that the same maxima target has been proposed for extruded, pelleted and salt and vinegar flavour snacks. Consumer trends towards natural products means that some technologies and substitute ingredients will not be favoured by some consumers Will continue to reduce salt but ask that targets be set at achievable levels. maximums should not be set as some products will not be able to meet them. Note that whilst the sodium may look high the actual amount delivered per serving of a snack can be moderate due to its low density.
SNACMA	As a sector we agreed to work towards the original 2010 targets in good faith. We have serious concerns over the latest proposals and will be unable to commit to achieving them within the timeframe to 2010. Overall, for our sector, these targets are unrealistic and at this point in time unachievable. 'Weighted Averages' is the most appropriate way forward. Concentrating on maximum levels might deliver a reduction in some products but not necessarily any significant impact on overall dietary intakes. Further, members rely on differentiation in salt levels to provide diversity in flavour range. This is because many flavouring components contain differing levels of sodium and to put an upper limit on salt reduces the potential variety of products. Opposed maximum limits.
Waitrose	The revised 2012 targets are considered unachievable for many products with an unrealistic time scale; this is also true for the revised 2010 lower targets. Our suppliers are guided by SNACMA with respect to the category as a whole.

### Category and target specific comments

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>11.1 Standard potato crisps - 1.25g salt or 500mg sodium (average); 1.63g salt or 650mg sodium (maximum)</b>			
ASDA		Maximum achievable but not average due to little variation in salt levels within this category.	
CASH			Suggests a revised 2010 target of 1.25g salt/500mg sodium (average) and 1.5g salt/600mg sodium (maximum), and a 2012 target of 1.1g salt/450mg sodium (average) and 1.35g salt/540mg sodium (maximum).

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>11.2 Extruded snacks - 1.88g salt or 750mg sodium (average); 2.5g salt or 1000mg sodium (maximum)</b>			
ASDA		Targets are achievable	
BCCC	Understand the reasons for not creating a 'bagged snacks' category for products that do not fit into biscuits or cakes categories, but think the best solution for categorising 'bagged snacks' would be to include them in 11.2 and change the description to 11.2 - Extruded and Baked Snacks		
CASH			CASH recommends a revised 2010 target of 1.5g salt or 600mg sodium (average), 1.98g salt or 790mg sodium (maximum) and new 2012 target 1.35g salt or 540mg sodium (average), 1.75g salt or 700mg sodium (maximum).
<b>11.3 Pelleted snacks - 2.25g salt or 900mg sodium (average); 2.5g salt or 1000mg sodium (maximum)</b>			
ASDA		Trials needed to test expansion. Target not supported without prior testing.	
CASH			CASH recommends a revised 2010 target of 1.75g salt or 700mg sodium (average), 2.1g salt or 850mg sodium (maximum). CASH believes there is scope for these further reductions by 2010.
PepsiCo		Target will not be achieved unless there is an alternative to salt that can be used to achieve expansion in pellet bases.	
SNACMA		Reducing salt levels in our pelleted products has led to problems with increased cracking/splitting of the pellets; a significant adverse effect on product quality.	
<b>11.4 Salt and vinegar products - 2.13g salt or 850mg sodium (average); 2.5g salt or 1000mg sodium (maximum)</b>			
ASDA		Targets are achievable	

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
CASH			CASH recommends a revised 2010 target 2g salt or 800mg sodium (average), 2.5g salt or 1000mg sodium (maximum) and new 2012 target 1.8g salt or 720mg sodium (average), 2.25g salt or 900mg sodium (maximum). CASH believes there is scope for these reductions to be made by 2010.
PepsiCo		Salt and vinegar flavoured pelleted products can not achieve same level as standard flavour.	

## 12. BUNS, CAKES, PASTRIES AND FRUIT PIES

### General Comments

Company/Organisation	Comments
BCCC	Products, with no salt in the dough, would be above the target as sodium comes from various ingredients added e.g. olives, cheese, yeast powder; so the target is unrealistic. Removal of salt may lead to increased use of additives. Many cake and biscuit products are at their limit in terms of salt reductions, technically and organoleptically. Many products are long-standing household favourites and our members want these to retain the same quality and safety. A reduced salt product was rejected by taste panel. Replacement with potassium-based ingredients has proved unacceptable in many cases. 2012 targets not achievable within timescale due to technological constraints; also these products only contain small amounts of sodium so possible reductions are limited. Biscuit and cake recipes vary considerably so maximum targets are unhelpful and unrealistic - could force products to be removed from the market.

### Category and target specific comments

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>12.1 Buns - 0.38g salt or 150mg sodium (maximum)</b>			
ASDA	Hot cross buns, teacakes and belgian buns should be reclassified as morning goods as they use the same manufacturing process, requiring salt to activate the yeast.	Not opposed to target but reclassification of some products necessary.	
ABIM		Target for yeast raised buns are much lower compared to targets for yeast raised bread.	
CASH		If certain products need salt for technical reasons, scientific evidence must be provided by the industry.	Suggest a revised 2010 target of 0.38g salt/150mg sodium (maximum) and a 2012 target of 0.33g salt/130mg sodium (maximum).
FoB		Request that hot cross buns are moved to the 'morning goods' category.	
<b>12.2 Cakes - 0.5g salt or 200mg sodium (average); 1.0g salt or 400mg sodium (maximum) for 2010 ----- 0.4g salt or 160mg sodium (average); 0.88g salt or 350mg sodium (maximum) for 2012</b>			
ASDA		Further reduction would compromise quality. Sodium carbonates are the most effective raising agents. Alternatives, such as potassium carbonates, need to be used in much larger quantities - 20% less rise when used at same level. They cost 50% more than sodium raising agents and either have legal restrictions on which product groups they can be used in (e.g. mono-calcium phosphates) or give a flavour taint (e.g. ammonia-based agents). Shelf-life would reduce by 3-10 days, texture would become denser as aeration is less. Targets strongly opposed.	

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
ABIM		Potassium bicarbonate is too unstable to be used in pre-prepared cake mixes, so suppliers of cake mixes cannot compete with the low sodium levels of scratch cake producers. This puts the bakery ingredient industry at a disadvantage. EFSA opinion on aluminium causes issues with the use of sodium aluminium phosphate as an alternative raising agent.	
BCCC	The revised descriptors will provide additional clarity.	2010 target challenging but could be achieved. Would like maximum removed.	
CASH			Suggest a revised 2010 target of 0.4g salt/160mg sodium (average) and 1g salt/400mg sodium (maximum), and a 2012 target of 0.36g salt/144mg sodium (average) and 0.88g salt/350mg sodium (maximum).
<b>12.3 Pastries - 0.5g salt or 200mg sodium (average)</b>			
ASDA		Supports target	
CASH			Suggest a revised 2010 target of 0.3g salt/120mg sodium (average). No technical reasons why the average target should be raised. Recognise greater amount of work needed in supermarket own-label products.
<b>12.4 Fruit pies and other shortcrust and choux pastry-based desserts - 0.33g salt or 130mg sodium (maximum)</b>			
ASDA		Current levels are at the lowest safe level. Already problems with a softer textured pastry. Further reduction will increase water activity leading to reduced shelf-life on ambient products. Targets opposed.	
CASH			Suggest a revised 2010 target of 0.33g salt/130mg sodium (maximum).

### 13. BOUGHT SANDWICHES

#### General Comments

Company/Organisation	Comments
BRC	Proposed targets would restrict product development. Ingredients such as cheese, bacon, Parma Ham or Spanish chorizo could no longer be used. In some products salt is not added as an ingredient but originates from salt present in ingredients used. More complaints over blandness have been received. Reducing quantity of ingredient that contributes most salt will create high consumer dissatisfaction. Shelf life may be restricted.
Waitrose	See bread category comments.

#### Category and target specific comments

Company/Organisation	Comments on categories	Comments on targets	Alternative targets suggested
<b>13.1 With high salt fillings - 1.0g salt or 400mg sodium (average)</b>			
ASDA		Further reductions in some products precluded by inherent salt content of ingredients. Lower levels in ham, bacon cannot ensure food safety. Would be at competitive disadvantage compared with high street retailers, home-made and smaller sandwich producers. Target opposed.	
Heinz	Considerable work needed to meet 2012 targets; success will depend on reductions in other categories e.g. bread, cured meats, cheese.		
Waitrose		Must take into account comments made regarding bacon, ham, cheese and cooked meats which remain popular sandwich options (see relevant categories for comments).	
CASH		Sandwiches should not contain more than 2g salt (ie. 1/3 max recommended salt intake).	Suggests a revised 2010 target of 1.0g salt/400mg sodium (average) and a 2012 target of 1.0g salt/400mg sodium (maximum).
BSA		Approximately 10% of manufactured sandwiches do not meet the original 2010 targets and are unlikely to do so. The 2012 targets will be difficult to achieve particularly as many sandwich ingredients have higher targets than sandwiches (e.g. bread rolls and bacon). Therefore, targets for finished sandwich products should be aligned with targets for individual ingredients.	
<b>13.2 Without high salt fillings - 0.75g salt or 300mg sodium (average)</b>			
ASDA		Oppose targets because of food safety risk and consumer acceptability issues.	
CASH			Suggests a revised 2010 target of 0.68g salt/270mg sodium (average) and a 2012 target of 0.5g salt/200mg sodium (average) and a 0.75g salt/300mg sodium (maximum).

## 14. TABLE SAUCES

### Category and target specific comments

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>14.1 Tomato ketchup - 2.25g salt or 900mg sodium (maximum) for 2010</b>			
ASDA		Targets are achievable	
CASH		20g serving of Heinz tomato ketchup currently contributes 10% of an adult's and 20% of a child's maximum recommended salt intake.	Suggest a revised 2010 target of 1.83g salt/730mg sodium (maximum) and a 2012 target of 1.6g salt/650mg sodium (maximum).
Heinz		Cautious when deciding to make any changes to the world's favourite ketchup, which is an iconic product. However in new product development has considered the 2010 target. Reduced salt/sugar ketchup constitutes only 3% of total ketchup sales. Ketchup is not a top contributor to salt intakes.	
<b>14.2 Brown sauce - 1.5g salt or 600mg sodium (maximum)</b>			
ASDA		Targets are achievable	
CASH			Suggest a revised 2010 target of 1.5g salt/600mg sodium (maximum) and a 2012 target of 1.35g salt/540mg sodium (maximum). No technical constraints for not achieving the target.
Heinz		Question validity of setting targets for products that contribute so little salt to intakes. 2010 target was too low to maintain taste profile of HP sauce, so low salt/sugar variety was introduced to meet the demands of individuals seeking this option. Product tastes very different to standard variety and represents less than 17% of total sales of HP sauce.	
<b>14.3 Salad cream - 1.75g salt or 700mg sodium (maximum)</b>			
ASDA		Targets are achievable	
CASH		Agrees to maintain the current target for 2010. Industry should dedicate resources to reformulate products to achieve this target.	Suggest a 2012 target of 1.6g salt/630mg sodium (maximum).
Heinz		Question validity of setting targets for products that contribute so little salt to intakes.	
<b>14.4.1 Mayonnaise (not reduced fat/calorie) - 1.25g salt or 500mg sodium (maximum)</b>			

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
ASDA		Extensive research and development work needed. Concerns that reductions would decrease microbiological stability of the product. It may be possible to modify recipe by decreasing pH/adding dry matter or by modifying production process. Further work needed to confirm if target is achievable.	
CASH			Suggest a revised 2010 target of 1.38g salt/550mg sodium (maximum) and a new 2012 target of 1.3g salt/450mg sodium (maximum).
Heinz		Expect to reach targets by 2012.	
Unilever UK Foods		Current 2010 targets achieved in Hellmann's Real Mayonnaise, and 2012 targets likely to be achieved by 2015.	

#### 14.4.2 Mayonnaise (reduced fat/calorie) - 1.88g salt or 750mg sodium (maximum)

ASDA		Reduction would lead to microbiological problems. Severe recipe modification would be needed, impacting on taste (resulting in strongly acidic product). Challenging objective, cannot ensure it is feasible at this stage.	
CASH			Suggest a 2010 target of 1.38g salt/550mg sodium (maximum) and a 2012 target of 1.3g salt/450mg sodium (maximum) - same level as mayonnaise (not reduced fat/calorie). No technical reasons for reduced fat mayonnaise to have a higher sodium content.
Unilever UK Foods		Generally, the targets should be able to be met. Notes that for flavoured mayonnaise (e.g. Dijon mayonnaise) the sodium content is higher than in unflavoured products.	

#### 14.5 Salad dressing - 1.75g salt or 700mg sodium (maximum)

ASDA		Target achievable.	
CASH			Suggest a 2010 target of 1.75g salt/700mg sodium (maximum) and a 2012 target 1.25g salt/500mg sodium (maximum). Notes that most Unilver products are already at 700-800mg sodium.
Unilever UK Foods		Current 2010 target met for Hellman's salad dressings, except Caesar Dressing. Currently considering their own targets for 2015.	
Kraft		Sodium levels are higher than competitors because tied to European formulations. There are no current plans to reduce sodium in the range. As fat levels reduce additional salt is required to maintain product microbiological stability.	

## 15. COOK-IN AND PASTA SAUCES, THICK SAUCES AND PASTES

### General Comments

Company/Organisation	Comment
Heinz	Oriental sauces are based on authentic recipes and contain ingredients that may be 'naturally' high in salt or are preserved using salt. Products could be above targets without any added salt. Suppliers unlikely to change ingredients used extensively in their country of origin to a specification for a UK market. Therefore levels of authentic ingredients will need to be reduced, impacting on flavour, authenticity and provenance of the product if additional 'bulking' ingredients are used in their place. A review of Amoy products includes liaising with manufacturing sites and suppliers in China and explaining basis for requests for lower salt foods. Time-intensive and complex process, it will take many years before there are alternatives to the high salt ingredients. Stability of oriental cooking sauces dependent on salt. Research showed that when salt level approaches 2012 target the pH must be lowered to maintain water activity at a safe level, particularly when sugar also reduced. Taste too acidic and unacceptable to internal taste panels. Artificial preservatives could be used but this contravenes Heinz policy.
Mars	Committed to working towards the 2012 targets for this category, however do not believe these targets are achievable within the proposed timeframe.

### Category and target specific comments

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>15.1 All cook in and pasta sauces (except pesto) - 0.83g salt or 330mg sodium (average)</b>			
ASDA		Target is achievable.	
CASH			Suggest a 2010 target of 0.83g salt/330mg sodium (average) and 0.98g salt/390mg sodium (maximum), and a 2012 target of 0.69g salt/275mg sodium (average) and 0.88g salt/350mg sodium (maximum).
Heinz		All varieties with higher salt levels contain traditional ingredients e.g. soy sauce and little or no added salt. Not possible to meet target without substantially changing major ingredients and resulting in a product which is not authentic.	
Unilever UK Foods		Current 2010 target is met. Working to a 2015 target of 340mg/100g, which may be achieved by 2012.	
Nestle		Agree with 2012 target. It is easier to maintain acceptability and safety with reductions in tomato based sauces due to high acidity. More difficult to meet targets for other flavours because of consumer acceptability and safety.	
<b>15.2 Pesto and other thick sauces - 1.5g salt or 600mg sodium (average); 2.0g salt or 800mg sodium (maximum)</b>			
ASDA		Target is achievable	
CASH			Suggest a 2010 target of 1.5g salt/600mg sodium (average) and 2.0g salt/800mg sodium (maximum), and a 2012 target of 1.35g salt/540mg sodium (average) and 1.8g salt/720mg sodium (maximum).

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
Heinz		Not possible to meet target without substantially changing preparation of the ingredients and/or the recipe, resulting in a product which is not authentic.	
Unilever UK Foods		Current 2010 target is met.	
Mars		To achieve the target for pesto, the technology used to manufacture the product will need to change and hence extra time will be necessary.	
Nestle	Request qualifying weight be added to this category as some manufacturers claim to meet targets for this category with products that do not fit within the description. A tighter definition would help stop this practice.		
<b>15.3 Thick pastes - 5g salt or 2000mg sodium (maximum)</b>			
AB World Foods, ASDA, and Heinz.	Welcome new target category.	Target is achievable or already met.	
CASH			Suggest a 2012 target of 2.5g salt/1000mg sodium (maximum).
Unilever UK Foods		Target unlikely to be achieved by 2012.	
Nestle		Welcome introduction of a qualifying weight in the new category.	

## 16. BISCUITS

### General comments

Company/Organisation	Comments
BCCC	Many cake and biscuit products are at their limit in terms of salt reductions, technically and organoleptically. Many products are long-standing household favourites and our members want these to retain the same quality and safety. A reduced salt product was rejected by taste panel. Replacement with potassium-based ingredients has proved unacceptable in many cases. 2012 targets not achievable within timescale due to technological constraints; also these products only contain small amounts of sodium so possible reductions are limited. Biscuit and cake recipes vary considerably so maximum targets are unhelpful and unrealistic - could force products to be removed from the market.
BRC	2010 targets were challenging, many companies have not met them. Considering a further target seems unrealistic. Reductions would impact on functionality, taste, quality and shelf life of some products especially savoury biscuits.
Kraft	Our biscuit sector in Europe is newly formed and only recently integrated into our business structure. Therefore the brands do not have the same history of sodium reduction as the cheese category. Potential routes for reductions are untested, but revised targets unrealistic. A salt reduction strategy is being devised.
Waitrose	The timescale for such significant reductions is not realistic.

### Category and target specific comments

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>16.1 Sweet biscuits (filled and unfilled combined) - 0.68g salt or 270mg sodium (average); 1.13g salt or 450mg sodium (maximum)</b>			
ASDA		Target is achievable	
BCCC	Categories were self-explanatory but do not foresee any issues with combining filled and unfilled.		
CASH			Suggest a 2010 target for filled biscuits of 0.85g salt/340mg sodium (maximum), and a 2012 target of 0.5g salt/200mg sodium (average) and 0.75g salt/300mg sodium (maximum).
Kraft		In Oreo biscuits sodium bicarbonate is used to increase dough pH and sodium chloride to give taste. Working to reduce both - the former appears to offer more potential. Too much reduction will result in bitterness and colour change.	
Nestle	Agree with combined category	All products meet the 2012 targets. Do not agree with maximum as there is wide variation of products within these categories.	

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>16.2 Savoury biscuits, unfilled - 1.38g salt or 550mg sodium (maximum)</b>			
ASDA		Target is achievable	
CASH		No justification for the high level of salt in this food.	Suggest a 2010 target of 1.25g salt/500mg sodium (maximum) and a 2012 target of 1.13g salt/450mg sodium (maximum). No justification for the high level of salt in this food.
Kraft		Looking to see if other countries have lower salt recipe for Ritz that could be used in the UK. 2010 target seems possible but revised target unrealistic due to the savoury nature of the biscuit.	
<b>16.3 Savoury biscuits, filled - 1.25g salt or 500mg sodium (maximum)</b>			
ASDA		Target is achievable	
CASH			Suggest a 2010 target of 0.83g salt/330mg sodium (maximum) - 2/3 the level for unfilled biscuits.

17. PASTA

Category and target specific comments

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>17.1 Pasta and noodles, plain and flavoured - 0.38g salt or 150mg sodium (maximum)</b>			
ASDA		Target achievable in plain pasta and noodles but not flavoured without incurring high costs. Effective salt replacers are expensive. Target opposed.	
CASH		Need to consider that some of these products (e.g. spaghetti/hoops in tomato sauce) are widely eaten by children. There are no technical reasons for salt to be added to these products.	Suggests a 2012 target of 0.25g salt/100mg sodium (maximum).
Heinz		Expect to meet the target for 2012.	
Unilever UK Foods		Will reduce salt levels in noodle products in a timeframe that does not further disadvantage the brand. Recently experienced a loss of market share after the reduction of the sodium content of their Pot Noodle products by 50%.	
Mars		2012 target already achieved.	

18. RICE

Category and target specific comments

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>18.1 Rice (unflavoured), as consumed - 0.2g salt or 87mg sodium (maximum)</b>			
ASDA		Target acceptable	
Mars		2012 target already achieved.	
CASH		No justification why salt is added to this product.	Recommends that the target (maximum) is set at levels naturally occurring in rice.
<b>18.2 Flavoured Rice, as consumed - 0.45g salt or 180mg sodium (average); 0.63g salt or 250mg sodium (maximum)</b>			
ASDA		Taste complaints have increased since reducing to 2010 target ( 0.8g average). Targets not supported.	
CASH		Recognises that flavoured rice is a new type of product. Consumers have not established a taste therefore there is no reason why this target cannot be reduced.	Suggests a 2010 target of 0.22g salt/87mg sodium (average).
Mars		Notes that the reduction is far greater than for other food categories and believes this is unreasonable and unfeasible. Such a large reduction in salt would significantly alter the taste of products in this category and might not make them acceptable to consumers.	

19. OTHER CEREALS

Category and target specific comments

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>19.1 Other cereals - 0.63g salt or 250mg sodium (maximum)</b>			
ASDA		Targets already achieved	
CASH			Suggest a 2012 target of 0.5g salt/200mg sodium (maximum).

## 20. PROCESSED PUDDINGS

### Category and target specific comments

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>20 Processed pudding products</b>			
<b>20.1 Dessert Mixes, as consumed - 0.5g salt or 200mg sodium (maximum)</b>			
ASDA		No problem continuing with target, note that complaints about taste and texture have increased by 50% since salt was reduced.	
CASH		Agrees with proposed new 2012 target.	
<b>20.2 Cheesecake - 0.35g salt or 140mg sodium (maximum)</b>			
ASDA		Some reductions possible but opposed to the target. ASDA aiming for a target of 0.4g salt.	
CASH			Suggest a 2010 target of 0.35g salt/140mg sodium (maximum) and a 2012 target of 0.32g salt/126mg sodium (maximum).
Heinz		Products are meeting or will meet 2012 target.	
<b>20.3 Sponge based processed puddings - 0.5g salt or 200mg sodium (average); 0.75g salt or 300mg sodium (maximum)</b>			
ASDA		Some products are sealed after cooking resulting in more authentic pudding, with lighter texture and means shelf life is more reliant on preservatives. Maximum target achievable but average opposed.	
CASH			Suggest a 2010 target of 0.5g salt/200mg sodium (average) and 0.75g salt/300mg sodium (maximum).
Heinz		Products are meeting or will meet 2012 target	
<b>20.4 All other processed puddings - 0.18g salt or 70mg sodium (average); 0.3g salt or 120mg sodium (maximum)</b>			
ASDA		Targets are achievable.	
CASH			Suggest a 2010 target of 0.18g salt/70mg sodium (average) and 0.3g salt/120mg sodium (maximum).
Heinz		Products will be adjusted at next recipe change to meet target.	

21. QUICHE

Category and target specific comments

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>21.1 Quiches - 0.7g salt or 280mg sodium (maximum)</b>			
ASDA		Reformulation of fillings has led to depreciation of texture over shelf life and customer complaints about taste. Removal of salt from pastry led to increased water activity and water migration from the filling into the pastry, resulting in soggy pastry at end of shelf-life. Targets opposed.	
BRC		Ingredients will not hold together and large part of the batch will have to be disposed of. Proposed targets would restrict product development. Ingredients such as cheese, bacon, Parma Ham or Spanish chorizo could no longer be used. More complaints over blandness have been received. Reducing quantity of ingredient that contributes most salt will create high consumer dissatisfaction. Shelf life may be restricted.	
CASH			Suggest a 2010 target of 0.58g salt/230mg (average) and 0.7g salt/280mg sodium (maximum).
CFA	Would be helpful to separate targets for foods such as quiches and flans containing relatively high salt ingredients such as ham, bacon and cheese and those without.		

## 22. SCOTCH EGGS

### Category and target specific comments

Company/Organisation	Comments on categories	Comments on targets	Alternative figures
<b>22.1 Scotch eggs - 0.88g salt or 350mg sodium (maximum)</b>			
ASDA		Target achievable.	
CASH			Suggest a 2010 target of 0.75g salt/300mg sodium (maximum).

## 23. CANNED FISH

### General comments

Company/Organisation	Comments
PTF	Questions why canned fish is subject to voluntary salt targets given that most canned fish is imported (including all tuna). The natural variability of salt levels in fish makes it impossible to comply with maximum salt targets.

### Category and target specific comments

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>23.1 Canned tuna - 1.0g salt or 400mg sodium (average); 1.13g salt or 450mg sodium (maximum)</b>			
ASDA		Target achievable.	
CASH		Agrees with the proposed revised targets until the correct salt concentration is known. Urges the industry to carry out analysis on products to find the true sodium levels.	
PTF		Cannot achieve a salt target lower than 1% (average). The salt content of tuna entering factories is not controllable, and the majority of canned tuna is processed without the addition of salt in the factory.	
<b>23.2 Canned salmon - 0.93g salt or 370mg sodium (average)</b>			
ASDA		Talks ongoing with salmon packing trade association (SPA) to lower salt, however this will only be done if target is welcomed by UK food industry as a whole.	
CASH		Will require collaboration from the UK canned salmon industry to approach the North American canning industry to request specific reduced salt tinned salmon. CASH will provide support, including a collective letter from members of the international group (WASH).	Suggest a 2010 target of 0.8g salt/320mg sodium (maximum).
PTF		The salt content of canned salmon is determined by the large North American producers and any change is dependent on influencing them.	
<b>23.3 Other canned fish - 1.25g salt or 500mg sodium (maximum)</b>			
ASDA		Target should be an average to accommodate the few products whose flavour will suffer most from lower salt levels.	
CASH			Suggests a 2010 target of 1.05g salt/420mg sodium (maximum).
PTF	Requests sub-division of this category as it currently includes a number of varied products and suppliers.		

24. CANNED VEGETABLES

Category and target specific comments

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>24.1 Canned vegetables - 0.13g salt or 50mg sodium (maximum)</b>			
ASDA and CASH		Target acceptable.	
<b>24.2 Canned processed/marrowfat/mushy peas - 0.45g salt or 180mg sodium (maximum)</b>			
ASDA		Target achievable.	
CASH			Suggest a 2012 target of 0.38g salt/150mg sodium (maximum).

**25. MEAT  
ALTERNATIVES**

**General comments**

Company/Organisation	Comments
Kent County Council	Introduction of sub groups is appropriate, although unfortunate that this allows an increase in the target for meat free products. Analysis found sodium levels ranging from 0.14g to 0.8g per 100g for mince; 0.25g to 2.3g for sausages, burgers, meatballs and meat slices and pieces; 0.79g to 1.01g for chicken style fillets.
Premier Foods	Revised targets for this category for 2010 were agreed in the sector specific salt targets review meeting. The FSA should amend the relevant targets to reflect the figures agreed.

**Category and target  
specific comments**

Company/Organisation	Comments	Comments	Alternative target suggested
<b>25.1 Plain meat alternatives - 0.7g salt or 280mg sodium (maximum)</b>			
ASDA		Target acceptable.	
CASH		No reason for salt to be added for flavouring purposes to these products, as people are expected to add flavouring to these products in their own home. Sodium levels should be comparable with levels naturally occurring in raw meat. Additionally, foods in this sub-category are marketed as being a healthy alternative to meat - sodium levels must reflect this.	Suggest a 2010 target of 0.25g salt/100mg sodium (average) and 0.5g salt/200mg sodium (maximum).
<b>25.2 Meat free products - 0.93g salt or 370mg sodium (average); 1.5g salt or 600mg sodium (maximum)</b>			
ASDA		Supports the targets.	
CASH			Suggest a 2010 target of 0.93g salt/370mg sodium (average) and 1.5g salt/600mg sodium (maximum).
Premier Foods			New target should be set for 2010 at 1.0g salt/400mg sodium (average).
<b>25.3 Meat-free bacon - 2.13g salt or 850mg sodium (average)</b>			
ASDA		Support target.	
CASH			Suggest a 2010 target of 1.75g salt/700mg sodium (average) and 1.89g salt/750mg sodium (maximum). Quorn currently at 850mg and retailer at 700mg.
Premier Foods			Target should be set for 2010.

## 26. OTHER PROCESSED POTATOES

### General comments

Company/Organisation	Comments
CASH	Manufacturers should be discouraged from giving preparation instructions that involve adding salt. Fresh potatoes contain no salt so the target should be set as low as possible.

### Category and target specific comments

Company/Organisation	Comments on categories	Comments on targets	Alternative target suggested
<b>26.1 Dehydrated instant mashed potato - 0.2g salt or 80mg sodium (maximum) for 2010</b>			
----- <b>0.18g salt or 70mg sodium (maximum) for 2012</b>			
ASDA		Target is achievable.	
Nestle		Staged approach necessary to reduce salt and maintain acceptable product. Product sold in France that meets the 2012 target but salt is added to season the product.	Keep target at 0.25g salt average.
<b>26.2 Other processed potato products - 0.49g salt or 195mg sodium (average); 0.88g salt or 350mg sodium (maximum) for 2010</b>			
----- <b>0.49g salt or 195mg sodium (average); 0.75g salt or 300mg sodium (maximum) for 2012</b>			
ASDA		Targets are achievable.	
CASH			Suggest a revised 2010 target of 0.25g salt or 100mg sodium (maximum).
Heinz		Products are meeting average target for 2012. Weight Watchers no recipe exceeds 2012 maximum. Aunt Bessie no recipe exceeds 2010 maximum.	
FCPPA		Accept the targets, though the 2012 maximum target of 300mg sodium will provide a challenge.	
McCain Foods		The original 2010 target is challenging but we appreciate the Agency's recognition of this by maintaining this figure for 2010 and 2012. We accept the challenge of introducing a maximum ceiling figure. Some products in the range had sodium levels up to 495mg in 2006, so this target will not be easy to achieve but we can deliver the results.	

## 27. BEVERAGES

### Category and target specific comments

Company/Organisation	Comments on categories	Comments on targets	Alternative targets suggested
<b>27.1 Dried beverages, as consumed - 0.15g salt or 60mg sodium (maximum)</b>			
Asda, CASH and Nestle.		Agree with proposed new 2012 target.	
GSK	Where a product is made up with milk then the sodium naturally present in milk and other cereal and dairy components of the beverage could exceed the target even in the absence of any added salt - questions how the revised target was established. Would like confirmation that dried beverages formulated to meet the expenditure of intense muscular effort, especially for sportsmen, are not included in this category, noting that sodium is added to such products to replace that lost in sweat and facilitate re-hydration.	Does not believe that the revised target for this category can be achieved by 2012 as: (1) to maintain consumer acceptability a staged approach will be required to achieve a reduction of up to 40% sodium and (2) dried beverages typically have a long shelf life requiring extended testing.	
R Twining & Co. (Ovaltine)		Salt levels in the Ovaltine range have always been kept as low as possible, given the levels of sodium naturally occurring in the essential dairy and cocoa ingredients. Further, consumer demands for 'clean label' products have resulted in the removal of additives from Ovaltine products which has led to an increase in dairy and cocoa ingredients. This in turn has led to an increase in the sodium contributed by these ingredients. Whilst the current 2010 target is achievable, the proposal to reduce the target further would require reducing the quantities of dairy and cocoa ingredients which would create an unacceptable product.	

General Comments		Stakeholder	Agency Comments
<b>Supports other contributors</b>	Supports FDF response	ABIM	
	Supports Dairy UK response	Arla Foods	
	Endorses CASH response	BPA, HoM and NHF.	
	Supports BRC response	Iceland	
	Supports the Dairy UK submission on the targets for cheese, butter and fat spreads.	PTF	
<b>Targets should be set in the context of other Government work with industry</b>	Not always possible to reduce salt further in combination with other nutritional improvements e.g. energy or saturated fat level reductions.	BCCC	Comments noted.
	Difficult to justify reductions in some categories where retailers are in competition with the catering industry, where difference in salt content could be up to 5 times more. Consumers will not get used to low salt option if high salt options are available. The FSA should look into whether salt quantities specified in recipe books are compatible with targets. Celebrity chefs should be encouraged to convey right message to consumers.	BRC	
<b>Labelling</b>	The FSA must ensure there is uniform labelling to help consumers identify salt content in food. Recommends the adoption of the traffic light labelling system.	HoM	Since the Agency recommended its voluntary front of pack (FoP) nutrition labelling scheme in 2006 (which includes stating the salt content of food) it has encouraged manufacturers and retailers to adopt this labelling approach on their food products. In line with a commitment made in 2006 the Agency has commissioned an independent review of FoP nutrition labelling schemes used in the UK market and the findings of these will be published in the Spring. Additionally, when the Board made its recommendations for FoP labelling in 2006 it agreed it would review the salt criteria in 2008 to take into account work on salt targets. We are in the process of undertaking this work as part of our review for the forthcoming consultation on sign posting. Proposals on Nutrition labelling are also being negotiated in Europe currently.
	A uniform system of labelling should be established (including rules on rounding) and a date set for manufacturers to comply - to assist with consumer understanding about the salt content of foods.	CASH	
	Notes that it is not mandatory for nutrition information to be provided on food labels, and where a voluntary nutrition panel appears it does not always give a figure for salt content. Considers that use of voluntary traffic light schemes to provide this information should be encouraged.	East of England Trading Standards Association Limited	

General Comments		Stakeholder	Agency Comments
<b>Imported foods</b>	AB World Foods distribute products manufactured abroad, they have liaised with some overseas suppliers regarding UK salt reduction targets with mixed feedback. Some are willing to engage with the process and some suppliers say they will meet local demands rather than those of the UK.	<b>AB World Foods</b>	The Agency will continue to support the European Commission in stimulating work on salt reduction across the Community. We will also share our experience with other countries in the European Region of the WHO through the Salt Action Network and through our contacts in other countries outside of Europe.
	Until salt reduction measures at European level gather momentum, imports will continue to put UK manufacturers at a disadvantage. Figures suggest that between 2001 - 2006 biscuit imports increased by more than 44%.	<b>BCCC</b>	
	Imported foods often have higher salt content so reducing targets further, while work outside UK is still being developed, leaves UK manufacturers at a disadvantage and does not give consumers time or incentive to adjust to products with lower salt.	<b>BMPA</b>	
	If rate of salt reduction is too fast it could place UK manufacturers at a disadvantage compared to their competitors importing into the UK market.	<b>BNF</b>	
	Some categories in the market place include imported foods not covered by targets. Request definition of an imported product and what action will be taken to address UK population's intake of salt from imported foods?	<b>Heinz</b>	
	The consultation fails to consider that multinational food manufacturers operate with global brands in an increasingly complex European supply chain which makes it difficult and expensive to tailor recipes to the need of a single national regulator.	<b>Unilever UK Foods</b>	
	If competitor products remain at higher salt levels, consumers will choose these in preference to products with lower sodium levels. The Agency needs to consider levels of salt in imported foods when deciding on targets and time frames for further salt reductions. If European member states were to implement salt reduction initiatives, this would be a powerful enabler for companies such as Nestle UK to implement further salt reductions.	<b>Nestle</b>	
	Although the targets do not apply to imported foods, PTF are encouraging members to reduce salt where feasible	<b>PTF</b>	
Would like to see the FSA encouraging a pan European approach to salt reduction. Sainsbury's are finding it difficult to use ingredients sourced from Europe due to their high salt contents.	<b>Sainsbury's</b>		
<b>Legislation</b>	There should be a cut-off point for voluntary targets not being met and if manufacturers refuse to co-operate the Government should consider legislation.	<b>BPA, HoM</b>	
	Legislation should be introduced to ensure more rapid reformulation.	<b>BMA</b>	
	Legislation not necessary at present in light of willingness shown by industry to reformulate.	<b>BNF</b>	
	There must be a cut-off point for voluntary salt reduction, and if in certain categories of food or particular food manufacturers refuse to co-operate the Government must legislate. Option 3, the Government to legislate, must be kept open and may be necessary to achieve the public health benefit. Though acknowledge the significant cost of Option 3 for industry and enforcement authorities.	<b>CASH</b>	
	Doubtful if the current resources allocated to the local authorities for monitoring and enforcing the 'legislative' option would be available. Therefore, prefers the 'revised targets' option.	<b>East of England Trading Standards Association Limited</b>	
	Supports the current voluntary approach. However, considers that the legislative option should be kept open in the event that some categories or manufacturers refuse to co-operate with voluntary reductions, and impede this important public health measure.	<b>NHF</b>	

General Comments		Stakeholder	Agency Comments
<b>Method used in setting the targets</b>	Justification that some products on the market already meet the targets fails to acknowledge differences between products or consumer acceptability of those 'flagship' products.	<b>BFFF</b>	Food safety, technological constraints, consumer acceptance, and current levels in food, alongside the timescale (2012) were considered in setting the final targets.
	Targets do not reflect meeting discussions. Some category targets have been based on the existence of a single product on the market; however it is not clear if these products are good sellers, acceptable to consumer or whether they contain high levels of artificial ingredients.	<b>BRC</b>	
	Targets based on lowest achieved levels in each category does not constitute sound rationale for the basis of target setting. Question whether sales and consumer acceptability were considered for these levels.	<b>Nestle</b>	
	Targets set arbitrarily, without technical evidence to support feasibility and ignoring industry advice.	<b>PAPA</b>	
<b>Revision of 2010 targets</b>	Potentially anti-competitive to move the goal posts during the process and will put manufacturers who are working to the targets and yet to reach them at a disadvantage.	<b>BMPA</b>	The Agency signalled when it published the targets in 2006 that they would be reviewed (and altered) in 2008 to maintain progress towards the ultimate goal of 6g. We will continue to work with all sectors of the food industry including craft bakers to meet the population intake target.
	Revisions should be made to a wider number of key categories for 2010, and more challenging targets should be set, as there are already examples of foods meeting the targets set for 2010 and 2012.	<b>HoM, CASH and NHF</b>	
	Catering sector needs to be targeted before further alterations to targets and time-scales are made. Will continue to work towards existing targets.	<b>Iceland</b>	
	Members consider the revised 2010 targets to be tight but achievable. However, the new maximum targets proposed for many categories may be more challenging.	<b>FDf</b>	
	Concern that Federation members are now being commercially disadvantaged and that the FSA's focus should be on other plant bakers and small artisan bakers that have not co-operated with the FSA thus far. There is anecdotal evidence that there is significant migration by consumers to products which continue to have a much higher salt content than those products produced by Federation members.	<b>FoB</b>	
	Agree that it is appropriate to revise some of the 2010 targets and also set new targets for 2012	<b>Which?</b>	
	As a sector we agreed to work towards the original 2010 targets in good faith. Our members have put a tremendous amount of resources and commitment into achieving these targets. We are disappointed that the proposals to revise the 2010 targets have been made without any prior consultation. We have serious concerns over the latest proposals and will be unable to commit to achieving them within the timeframe to 2010.	<b>SNACMA</b>	
	Mars has not been affected by the revised 2010 targets and maintain their commitment to achieving the current 2010 targets.	<b>Mars</b>	
The process of salt reduction is delivered via a sustained programme of activity with our suppliers over an agreed time scale (started in 2004). Meeting the revised targets would require substantial changes to suppliers work programmes, which have not been scheduled for. We suggest the Agency consider the revised 2010 targets became the proposed 2012 targets.	<b>Waitrose</b>		

General Comments		Stakeholder	Agency Comments
<b>Setting of further targets for 2012</b>	Further targets should not be considered until outcomes of progress towards achieving the current 2010 targets is clear.	<b>BFFF</b>	Setting targets for 2012 recognises the continuing need to work on salt reduction and reflects feedback received at the stakeholder meetings held in 2008 concerning the planning of reformulation cycles and consumer acceptance. The targets have been set to be stretching and we will monitor progress on a biennial basis and through regular ongoing contact with stakeholders.
	Targets not sufficient to achieve 6g per day target, stricter targets needed. Already some products meeting the proposed targets.	<b>BPA, HoM</b>	
	Welcomes the revised targets.	<b>BDA</b>	
	Welcomes the revised targets but thinks FSA should put more pressure on industry, with naming and shaming of those who are not fully committed to salt reduction.	<b>BHF</b>	
	Supports targets set until 2012 with a mid-point review in 2010, to enable manufacturers to plan how best to reduce salt. Crucial FSA works closely with industry experts to finalise targets. Those working for major retailers have immense experience of what is achievable and at what rate.	<b>BNF</b>	
	Technological constrains, consumer acceptability, safety concerns, lack of a level playing field and having to re-design packaging will make it unfeasible to reach majority of proposed targets by 2012, not that we rule out getting there eventually. Salt reduction needs to be done slowly.	<b>BRC</b>	
	Not achievable for many categories without recourse to unwanted additives, potassium-based salt replacements or by drastically changing the products. 2 year time-scale over ambitious.	<b>Heinz</b>	
	All foods where salt is added must be reduced by 40% and, if some food categories are not reduced by 40%, then greater reductions must be made in other food categories. The current proposals (2010/12) will be insufficient to meet the 6g/day target. Therefore, wherever possible, targets should be further reduced. Stricter targets for 2012 should be set. Review of targets in 2010 will allow time for consideration of new technological advances and research into the minimum levels that might be required for technical and safety reasons.	<b>CASH</b>	
	Targets for breakfast cereals may be difficult to achieve. Further significant salt reductions may not be possible until new, innovative technologies, processing techniques and ingredient solutions are developed.	<b>CPUK</b>	
	As chilled prepared foods are predominantly multicomponent it is through focusing reformulation on key ingredients such as cheese and meats that most future progress can be made.	<b>CFA</b>	
	Notes that reductions in salt can only be made gradually to maintain consumer acceptability and allow for the limits of technology and microbial safety. Surprised that targets for 2012 were proposed without any prior consultation or discussion at FSA stakeholder meetings. Introduction of the 2012 targets has the potential to undermine the willingness and commitment that has been shown by industry to date. Members are currently unconvinced that the levels are achievable within the timescale, given the technical work that would be involved and that only gradual changes can be made in order to maintain consumer acceptability. Questions the basis of the 2012 targets, noting that they appear to have been hypothetically generated to achieve a net daily salt intake of no more than 6g.	<b>FDf</b>	
	Disappointed that targets for 2012 were published without any prior consultation or discussion.	<b>FoB</b>	
	Questions how the 2012 targets were created - as they consider these targets to be unworkable.	<b>Freiberger UK</b>	
Questions whether the FSA should evaluate the impact of achieving the 2010 targets before proceeding with further reduction targets. Notes that unlike the 2010 targets there is no indications of technical breakthroughs to be able to deliver these targets.	<b>P&amp;G</b>		
Notes that further reductions can only be introduced gradually to maintain consumer acceptability and that technology will also limit the pace of developments (especially as less of the salt in the diet now originates from added salt and instead is naturally present in the ingredients). Also, that the impact of further changes must be considered alongside changes to reduce saturated fat, trans fat and sugar in foods.	<b>GSK</b>		

General Comments		Stakeholder	Agency Comments
	<p>Considers that further reductions can only be achieved with potentially damaging consequences for the quality, acceptability and safety of many products.</p>	PTF	
	<p>The 2012 targets take no account of technological or safety impacts of the changes, and some will be extremely challenging to achieve. Considers that future targets need a 'reality check' of what is possible and which timeframes do not disadvantage manufacturers willing to take a leading position.</p>	Unilever UK Foods	
	<p>Sampling results suggest degree of reformulation needed will vary, but where they are technically achievable it is in the interests of health that they are challenging.</p>	Kent County Council	
	<p>Support the targets.</p>	Consumer	
	<p>Surprised that targets for 2012 were proposed without any prior consultation or discussion at FSA stakeholder meetings. Notes that progress can only take place where technologically possible, safe and acceptable to the consumer.</p>	Mars	
	<p>Considers it vital that the 2012 targets are lower than those currently proposed for 2010. Products in each category that have the lowest salt levels must act as the benchmark which all products strive to match.</p>	NHF	
	<p>Surprised to learn of the FSA's intention to set targets for 2012. There have been a series of stakeholder meetings throughout 2008 and yet at none of these was this matter raised. Overall, for our sector, these targets are unrealistic and at this point in time unachievable.</p>	SNACMA	
<b>Revised Category Descriptions</b>	<p>Welcomes the redefinition of food categories as this avoids confusion and improves understanding.</p>	BHF, BNF, HoM, CASH, FDF, QMS, Waitrose, Mars and NHF	

General Comments		Stakeholder	Agency Comments
<b>Biennial review</b>	Supports biennial review process. Reasons for this include potential to reduce the administrative costs associated with reporting.	<b>AB World Foods, HoM, CPUK, FDF, GSK, NIFAC, Nestle and Which?</b>	Stakeholder concerns noted - Urinary sodium excretion in children over the age of 4 forms part of the NDNS rolling programme.
	Revising targets every two years would increase cost of reformulation. Shouldn't revise targets again until 2012.	<b>ASDA</b>	
	Difficult at present to give support to the suggested programme of biennial reviews.	<b>AHDB meat services</b>	
	Welcome this approach, it should be used to determine whether progress across all sectors has been sufficient to achieve expected improvements in intakes before further reductions are recommended.	<b>Brakes</b>	
	Biennial reviews essential, emphasis on the response from different manufacturers, the range of products being adapted and their target market. To be completed in tandem with NDNS to identify influence on nutrient intakes. Monitor the effect of salt reduction on other nutrients.	<b>BDA</b>	
	Supports the proposal for a rolling programme of biennial reviews. However, is concerned that this approach may encourage setting the revision of targets to a later date, which would slow down progress in reducing salt levels in manufactured foods. Considers that the full review process takes too long and delays targets. Would like reassurance that the 2010 review of the 2012 targets will minimise adjustments which delay the targets.	<b>CASH</b>	
	Concerned over the setting of revised targets for 2010 and 2012, which had not been previously communicated, and the possibility of setting further tougher targets in 2010. Targets should be sufficient to ensure population salt targets are achieved rather than industry having to consider new renovation every 2 years should the targets change. Setting new targets every 2 years makes it difficult for companies to plan reductions into planned renovation and innovations.	<b>Nestle</b>	
	Would seem beneficial and supportive. However, industry may require assistance in funding and further research to achieve constantly adjusting targets.	<b>QMS</b>	
	This is a sensible and practical approach to monitoring progress. However, needs to take into account the shortcomings of relying entirely on the label for information. Further, would like the FSA to regularly review the policy on the role of sodium as a public health measure in reducing blood pressure, especially considering the other modifiable factors that have a far greater impact (e.g.. body weight, exercise, general diet, alcohol intake, potassium intake etc.)	<b>SNACMA</b>	
	Concerned that the review process takes too long and delays the setting of targets. Supports CASH's proposal that data collection should be timed to allow the FSA to set tighter targets at each review and avoid the date for which targets should be achieved getting pushed back. Supports the proposal to monitor salt intakes through the NDNS rolling programme with measurement of 24-hour urine analysis. Notes that an adequate sample size is needed so that detailed analysis can be carried out, including a breakdown of results by age groups. Notes that children are not currently included in the urinary analysis - believes this is a gap in the monitoring proposal in view of the much lower target intake levels for children.	<b>NHF</b>	

General Comments		Stakeholder	Agency Comments
<b>Monitoring process via purchase of nutrition label data</b>	Will continue to provide information on salt reduction progress to the Agency on an annual basis as it has done in the past.	<b>ACFM</b>	The Agency believes that monitoring changes in the salt levels of foods through a combination of label data and self-reported data from some industry sectors in combination with information provided by the industry in the form of a commitments table and urinary sodium data to assess changes in intakes will provide an adequate indication of progress towards the 6g intake goal.
	Advise against introducing extra costs that would arise from requirement to submit data on an annual basis, even if voluntary.	<b>ASDA</b>	
	Welcome biennial monitoring to limit resource implications to industry. Consultation states that label data insufficient for Cakes and Self-Reporting Framework will be needed, suggest that the same is true for Biscuits where sodium is also present in small amounts and stepwise reductions will not be seen by monitoring labels.	<b>BCCC</b>	
	Data on reformulation should be widely available in public domain so health professionals can offer appropriate advice, recipe analysis for catering outlets etc.	<b>BDA</b>	
	Information should be obtained from manufacturers or from food labels to ensure most up-to-date information is used, this should be fed into food composition databases used for the NDNS and the electronic datasets used by nutritionists and dietitians in general.	<b>BNF</b>	
	Welcome alternative method of monitoring industry progress, but concerned by the use of label data as some companies provide figures as consumed and some as sold, also concerned as to whether the company gathering the data has the same understanding as the Agency and industry regarding the food category the products belong to. Label data frequently only expressed to 1 decimal point, some targets expressed to 2. Labels may not be up-to-date with latest reformulation.	<b>BRC</b>	
	Data from labels can be problematic because of rounding up and down and small reductions not showing on the label. Recommend more detailed information be made available on the company website. This would reflect most recent reformulation. Self Reporting Framework data should be published in the public domain, on the company website and next to the foods on the shelf. All major manufacturers should publish Salt Commitments on their website and the FSA website. Monitoring salt intakes through NDNS rolling programme including 24-hour urinary sodium analysis with adequate sample size is strongly supported.	<b>HoM</b>	
	Request that Iceland is not penalised for providing nutritional information 'as consumed'. Some products may appear to have higher salt levels than the targets when the salt content 'as sold' would in fact meet the targets.	<b>Iceland</b>	
	Samples of food are submitted for sodium analysis by trading standards services nationally, this could provide useful information in determining progress. Recent surveys have shown some products having higher salt levels than those declared on the label- supporting the need for analysis rather than reliance on nutrition labels.	<b>Kent County Council Trading Standards</b>	
Agree that salt content of foods collected from labels can be problematic. Therefore, recommends that more detailed information, to reflect the most recent formulation, should be provided on the company website. Supports data collection for some food categories within the Self Reporting Framework, and considers this information should be published in the public domain to help consumers make informed choices when purchasing.	<b>CASH</b>		

General Comments		Stakeholder	Agency Comments
	Notes that local authorities are currently conducting a nationwide survey on levels of salt, fat and sugar in various foods - results could assist in monitoring the success of the salt reduction initiative.	<b>East of England Trading Standards Association Limited</b>	
	Notes potential disadvantages of using label data to monitor salt reduction in foods such as: (1) labels only require grams of sodium to one decimal place, (2) the small gradual reductions in actual salt value will not always be reflected in the data on the label, due to the cost of changing the label, (3) for products with a long shelf life, the new products with the lower salt level may not appear on the shelf for some time and therefore would not be included in the survey and (4) for products that need to be reconstituted, the nutritional information on the label is presented 'as sold' whereas the FSA targets are stated 'as consumed'. Therefore, trends in consumption should always be checked against a robust dietary survey, which yields comparable results, based upon urinary analysis of sodium.	<b>FDF</b>	
	Considers that monitoring progress by utilising label data would not be a true reflection of the changes - for the same reasons provided by the Food and Drink Federation.	<b>GSK</b>	
	Supports biennial monitoring of salt levels, to limit resource required for this activity. Currently label sodium and salt to one decimal place and changes can not be accurately recorded and may not be reflected on packaging if small gradual changes are being implemented. Change in sodium levels may not be reflected on pack for some time in order to keep costs and waste to a minimum. Also the case in products with long shelf-life. As sold and as portion information on dried soups and beverages is incomparable to the per 100g data in the targets. Considering labelling of packs with per 100ml data which will have to be implemented over time to avoid additional costs and waste.	<b>Nestle</b>	
	Agree with the proposal for a revised monitoring scheme; keen to ensure the presence of good monitoring and good outcome data including a reliance on urinary sodium excretion rather than merely salt content of foods.	<b>NIFAC</b>	
	Important to continue the monitoring process. However, obtaining information on individual company's performance against the targets may be difficult (given the size and diversity of the Red Meat Industry QMS are representing). Nevertheless, QMS will assist this process where possible.	<b>QMS</b>	
	Keen to ensure they don't spend a disproportionate amount of time monitoring and recording their achievements at the expense of providing products, information, and services that motivate their customers to make a healthier choice.	<b>Sainsbury's</b>	
	Believes label data is an important way of monitoring industry, however, thinks surveys should also be conducted periodically to verify label information. This would also be an important way of assessing progress in catering/foodservice sector and food sold loose	<b>Which?</b>	
	Monitoring urinary sodium analysis via the NDNS survey should continue. The Processed Food Databank has inherent difficulties and could not be relied on to provide true and valid data. The self reporting framework is useful & Waitrose supports it in principal at appropriate dates to be agreed.	<b>Waitrose</b>	
	Concerned that the FSA is dependent on labelling information and self-reported company data in order to assess salt levels in foods. Considers the FSA should develop its own capacity for independent validation of self-reported data in order to spot-check progress against targets.	<b>NHF</b>	
	Concerned about the use of label data to monitor salt levels in foods. Notes that Mars labels display grams of sodium to one decimal place, therefore milligram reductions in salt levels would not be captured during a label survey. Instead, trends in consumption should be checked against a robust dietary survey, which yields comparable results, based upon urinary analysis of sodium.	<b>Mars</b>	

General Comments		Stakeholder	Agency Comments
<b>Setting of targets as Averages or Maximums or both</b>	How should the maximum and average figures be addressed? Does average mean average for an industry sector or for the food category or for individual suppliers?	<b>ABIM, Brakes</b>	The Agency has clarified in the target document the two types of average - a process average to take into account variations of sodium due to processing and a range average (calculated on a sales weighted basis) which covers either a range of products or a range of flavours. Each company should apply the range average target figure to the products they manufacture or supply that fall within the same category. We recognise that some manufacturers have a limited portfolio of products that may be naturally high in sodium. In these circumstances the Agency would expect companies to achieve the lowest salt levels possible.  Maximum targets have been proposed where there was a large range in the sodium levels and similar products are on the market at far lower levels (data as at 2007). Maximum targets should stimulate manufacturers to look at their products that are high in sodium and benchmark them against their competitors. One of the main reasons for originally setting targets was to ensure that the whole market reduced sodium levels at a similar rate so that consumer
	Welcomes setting both average and maximum targets, as the average takes into the account diversity of products whilst maximums will help restrict very salty produces. Suggested that averages and maximums should be set for all categories.	<b>BDA, HoM, CASH and NHF.</b>	
	Confusing to have average and maximum targets and in some cases the difference is very narrow. Feel strongly that one or the other as appropriate is a more workable option. Request clarification on what the agency hope to achieve by setting average and maximum targets?	<b>BRC</b>	
	The principle of the average and maximum salt level is a potential issue if interpreted to be applicable to a single manufacturer's activities - a manufacturer may not be able to achieve the average salt target across the range that it produces although across the whole range of the category (i.e. single retailer) this may be achieved. In relation to new product development, average targets may be more difficult to work towards and monitor compared to maximum targets.	<b>CFA</b>	
	Notes the inherent variability in measured salt levels arising from the salting process, the sampling process (both within the same product and from product to product), and the testing itself. Use of a chloride meter for testing adds difficulty in converting results to sodium values as sodium chloride is not the only source of chloride.	<b>Dairy UK</b>	
	Requests that more information about how average and maximum figures relate to each other in a particular food group be provided.	<b>East of England Trading Standards Association Limited</b>	
	Questions the justification for introducing maximum targets, in addition to or instead of average targets, for 2012. Considers the introduction of maximum levels is a significant change from earlier discussions with industry, and could prove to be unrealistic and overly restrictive.	<b>FDF</b>	
	Considers that setting of a maximum as well as an average appears disproportionate if frequency of intake of a higher sodium level product would be an occasional occurrence.	<b>P&amp;G</b>	
	'Weighted Averages' is the most appropriate way forward. Concentrating on maximum levels might deliver a reduction in some products but not necessarily any significant impact on overall dietary intakes. Further, members rely on differentiation in salt levels to provide diversity in flavour range. This is because many flavouring components contain differing levels of sodium and to put an upper limit on salt reduces the potential variety of products. Therefore, strongly oppose maximum limits.	<b>SNACMA</b>	
Unclear as to the justification for introducing maximum targets in addition to average targets for 2012. Mars' preference is for average targets in most cases. Considers a maximum target for some categories with lots of variation (e.g. soups) to be overly restrictive.	<b>Mars</b>		
The move from average to a maximum target further compounds the significant challenge of salt reduction and we along with our suppliers seek clarification as to the rationale for this.	<b>Waitrose</b>		
<b>As sold labelling vs as consumed</b>	As 'consumed' more relevant to the consumer. EC regulation 1924/2006 states that 'health and nutrition claims must refer to the food ready for consumption'. Time consuming to compare the data we have on file with targets specified only 'as sold'. It would help if the Agency include their 'as consumed' limits within the final document as these must have been considered before setting the targets.	<b>ASDA</b>	
	Notes that retail groups adopted the 2010 targets on the basis of 'as consumed', whereas the FSA base their targets on 'as sold' - the effect is a further tightening of the target by 5-8%.	<b>Freiberger UK</b>	

General Comments		Stakeholder	Agency Comments
<b>Food safety</b>	Concern about the food safety implications of further salt reductions in foods where salt is used as a preservative. Considers the FSA should thoroughly assess the food safety implications of reducing salt levels in foods, for all high risk ingredients that could pose a risk to public health, before any new targets are set.	<b>BFFF, BNF, BSA, Nestle and Mars.</b>	The Agency supports IFRs recommendations that changes in product formulation should be accompanied by an adequate assessment of product safety. Manufacturers will need to consider the environment in which the product is made, the recipe, handling practices - pre and post packing, temperature control of any chill chain and the shelf life assigned to the product.
	Arla believes potential safety issues in dairy foods arising from reductions in salt, fat and sugar need to be identified and will work with the Agency to support advances to enable progress.	<b>Arla</b>	
	FSA should request a detailed opinion from the Advisory Committee on the Microbiology Safety of Food (ACMSF) and the Committee on Toxicology (COT) on the specific implications salt reduction could have on certain foodstuffs. Reductions in nitrites, saturated fat, additives and evidence on health effect of contaminants (e.g. acrylamide) should be considered before targets are set. Extensive additional safety controls will be necessary if targets are used. Concern that SMEs would not have the knowledge or resources to cope with additional controls.	<b>BRC</b>	
	Requests that shelf life trials are undertaken to micro test the growth of bacteria with reduced salt levels, allowing for ingredient yield losses and typical inclusion rates.	<b>BSA</b>	
	Research required to assess the impact of low salt levels, including the effects of temperature abuse at any point in the supply chain, on the shelf life of bacon products before the levels are agreed.	<b>Callan Bacon</b>	
	Concern that for several food categories implementing the targets could compromise food safety if the issue is not thoroughly investigated and tested first.	<b>FDf</b>	
	States that the safety of some foods could be compromised by pursuing the new targets. Quotes from a review undertaken by the Institute of Food Research which investigated the safety of salt reduction in non-cereal foods. Conclusions from the review included that: (1) any change in formulation, processing or storage conditions means that product safety and shelf life must be re-evaluated and action taken if new hazards are identified, (2) the inhibitory effect of salt on microbiological growth varies, therefore, it is not possible to make overall recommendations on safe levels of salt, (3) safety margins should account for the inherent variability of a product, (4) changes in formulations to lower the saturated fat, sugar and additive content of foods must be considered along with salt reduction, and (5) product safety cannot be considered in isolation, as the organoleptic and technological properties of reduced salt products must also be acceptable to consumers.	<b>Salt Association</b>	
	Where salt is used as a preservative, further reductions will impact shelf life which will result in increased waste for both Sainsbury's and their customers. Moreover, Sainsbury's are concerned that customers will expect the same shelf life as they have always had in products such as bacon and will use the product beyond its stated shelf life.	<b>Sainsbury's</b>	
Notes the findings of the Institute of Food Research paper on the safety of salt reduction in non-cereal foods (2005).	<b>Mars</b>		

General Comments		Stakeholder	Agency Comments
<b>Shelf-life, technical and consumer acceptance/taste</b>	Highlights the issue of consumer acceptance of lower salt foods and the increase in complaints of blandness and the addition of salt at the table.	<b>BFFF, Breaks, Salt Association and BSA</b>	Comments on shelf life and technical constraints noted. The Agency also recognises that consumer acceptance of food products is a key factor. We commend the approach of some companies who always include lower salt alternatives in taste panels, whatever the reformulation being undertaken, to ensure that they are always producing products at the lowest salt level that will be tolerated by consumers.
	Targets set without regard for technical achievability.	<b>BFFF</b>	
	Reducing shelf-life may have an effect on lower income families who may risk eating out-of-date foods for fear of wastage.	<b>BDA</b>	
	Earlier mould growth, decreased shelf-life and wastage is projected for some products including some meats, morning goods and dairy products. Technical issues can affect organoleptic profile e.g. water migration into pastry from fillings in pies/quiches, yeast activation in leavened goods. So that consumers do not make less nutritious food choices the pace of reformulation needs to take account of consumer complaints of blandness and the fact that imported foods often have higher salt.	<b>BNF</b>	
	Meeting 2012 targets would result in safety concerns, unpalatable food and high wastage. Salt also used as emulsifying agent to bind ingredients, producing food with low salt in a lab maybe possible but difficult to do this on an industrial scale to a constant standard without wastage of a high percentage of the production run e.g. quiches will regularly crumble. Large increase in number of customer complaints and products which do not pass retail sensory panels suggests we are close to the acceptability border line. One retailer has seen increase of 30% on last year figures on 'tasteless' customer complaints. Another has seen a 63% increase in some food lines.	<b>BRC</b>	
	Research suggests consumers are unable to detect salt reductions of up to 10-15%, so reformulation of this magnitude should not affect consumer acceptability, even of iconic brands.	<b>HoM</b>	
	Blandness complaints have increased year on year by 63% in frozen and ambient products despite making slow, phased reductions and carrying out palatability checks. Sales of table salt and salt cellars have increased, this may be due to the habit of adding salt plus the effect of eating out.	<b>Iceland</b>	
	States there is no evidence that peoples palates can infinitely adjust to less salt and work needs to be done to understand this on a product-by-product basis.	<b>BSA</b>	
	Shelf life times of bacon products will need to be reduced in line with any reduction in salt in the product.	<b>Callan Bacon</b>	
	Does not accept objections from the food industry to achieving the targets in relation to taste/consumer acceptability, technical constraints and safety issues. Notes that in all categories of foods that are being considered there are examples of foods currently being sold that have salt/sodium contents below the targets for 2010 and 2012. Research suggests that consumers are unable to detect salt reductions of up to 10-15%, so any reformulations of this magnitude should not affect consumer acceptability, even of iconic brands	<b>CASH</b>	
	Concern that if breakfast cereals were to become less appealing that consumers may switch to other breakfast choices, which may be higher in fat, saturated fat, sugar, calories and/or sodium.	<b>CPUK</b>	

General Comments		Stakeholder	Agency Comments
	Notes that much of the sodium now present in products does not originate from added salt, and instead is from inherent ingredients essential to these products for their functional, organoleptic and physiological properties. Therefore, notes that further progress to reduce salt levels in products is likely to be slower and in some instances will not be possible until new, innovative technologies, processing techniques and ingredient solutions are developed.	FDF	
	Significant technological issues still exist for plant bakers in order to further reduce salt levels in bread.	FoB	
	Notes that any reduction in salt in raw materials could have an impact on shelf life - can determine quickly for chilled products but would need a minimum test of 9 months for frozen products.	Freiberger UK	
	The key consumer issue is taste - need to consider timing and stagger reductions so as not to jeopardise the brand. Notes from experience that if consumers perceive a different taste profile, after a significant and sudden reduction in salt, they are likely to swap to an alternative product with a higher salt level.	Unilever UK Foods	
	Foods must be acceptable to consumers to ensure reductions are not counterproductive.	Nestle	
	Lack of salt leads to lack of flavour development, processing difficulties and increased wastage.	PAPA	
	Supports aim to reduce salt levels where it is technologically achievable and acceptable to the consumer. However, we are now reaching a stage where further reductions can only be achieved with potentially damaging consequences for the quality, acceptability and safety of many products, and there is a danger that we are seeking change, at speed, without fully considering all the implications	PTF	
	Require time to rebalance the salt in products and find new ingredient solutions, so that the product is acceptable to consumers.	Mars	
	Proposed targets are reducing salt too dramatically and too quickly resulting in a compromise on taste and consequently reduced customer acceptability (Customer complaints have been markedly up)	Sainsbury's	
	There may be products already meeting targets but is there evidence that these are accepted by consumers and bought to a significant level or are they 'niche' products that appeal to the "worried well"? Does the FSA have a 'sales threshold' where they determine that a food is deemed acceptable by the general population?	Heinz	The Agency has not used a sales threshold to determine 'foods deemed acceptable to the general population'. Neither have we chosen salt levels only found in 'healthy eating' ranges as targets for the overall market. In many cases the lowest levels that we found were in standard products and we believe that as consumer tastes adjust the market can support a move towards the levels found in these products.
<b>Salt substitutes</b>			
	Considers that consumers are likely to have a negative perception regarding the nature of currently available salt replacers, noting that most consumers perceive salt as a natural ingredient.	CPIK	The Agency's position is that we do not recommend the use of salt replacers. This is for two reasons; the first is that we recommend the gradual reduction of sodium so that consumers palates become adjusted to lower salt levels across the board; the second is that there is some concern around supplementation with potassium. Although this issue has not been assessed in detail by EFSA/SCF we know that there may be a risk of hyperkalaemia in children aged 4-6 years at total KCl intakes of 3 - 3.9 g per day and that the elderly may also be at risk due to decreased kidney function. We have therefore taken a precautionary approach in our advice to date.
	States there is significant pressure from retailers to look at substitute products to sodium such as potassium, but that potassium is not acceptable to the FSA. Questions what is the 'trade-off' between sodium and alternative products.	FoB	
	Notes that use salt replacers, which have chemical names, goes against the trend over the last few years of clean label products.	Freiberger UK	
	Where salt has been successfully replaced with other ingredients, these are not natural ingredients. They require additive labelling and little is known about the long term health effects of these chemicals. Risk is that we could be trying to combat one health risk only to discover in years to come that we have introduced another. Reduced shelf-life will lead to increased consumer and industrial waste. Costs will increase as production is less efficient.	PAPA	

General Comments		Stakeholder	Agency Comments
	<p>Committing to revised targets may stifle future product development. Certain ingredients, including authentic PDO ingredients, will become impossible to use due to their salt content. This is also true of many ingredients obtained from countries outside the UK. Sainsbury's do not and would not consider using flavour enhancers or salt replacements but fear this may become more commonplace as a result of excessive reduction targets.</p>	<p>Sainsbury's</p>	

General Comments		Stakeholder	Agency Comments
<b>Cost to Industry</b>	Highlighted that there are costs involved in reducing salt. Examples of costs include production trials and potential wastage, alternative ingredient costs, consumer/microbiological/shelf-life testing, re-labelling, re-branding and any ongoing costs due to flavour rebalance are significant	<b>BCCC, BFFF, BMPA, Brakes, BRC, FoB, GSK, PAPA, Sainsbury's and Mars</b>	As a result of the comments on costs the Agency undertook an exercise to better understand the costs that are attributable to this policy - see final impact assessment.
There are costs involved in reducing salt levels in products. Reducing salt in ingredients carries with it added cost in the form of development expenditure, and this cost will ultimately will be passed on to the consumer in higher ingredient prices. Provided examples from ingredient suppliers about the cost implications. Identified potential losses to the manufacturer of consumers abandoning pre-packed sandwiches, for homemade or catering outlet products, if products become unacceptably bland. Additional costs and product wastage associated with reduced shelf life of products. Many sandwich ingredients are imported and will not be subject to the same targets - this could have implications for the UK supply base.	<b>BSA</b>		
The reduction of salt levels in bacon products will lead to higher prices, as shorter shelf life means shorter production runs and higher costs and increases in waste.	<b>Callan Bacon</b>		
There are costs to industry of undertaking salt reduction work. Notes that previously most reformulation could take place as part of the business' usual cycle, however, this is less likely today. As the amount of sodium has been reduced, the technical effect of the remaining sodium is now at a more critical level to ensure product texture, flavour and quality, and consumer acceptability. Costs to companies may include: costs of new technology, costs of having multiple recipes and therefore losses in efficiency, administrative costs, commercial and technical resources associated with new recipes (e.g. trials, pilot plant, taste testing) and packaging write off costs.	<b>CPUK</b>		
There is significant cost involved in reformulating to reduce salt levels - approximately £10,000 per recipe. Costs relate to trials, organoleptic assessments, and review of HACCP and suppliers' reformulation activity on ingredients.	<b>CFA</b>		
Considers the scale and timing of the proposed targets go above and beyond what could be considered routine, and therefore cannot be accommodated as part of a manufacturers ongoing reformulation work. Costs associated with salt reduction work include: reformulation costs, production changes, alternative ingredient costs, consumer/microbiological/shelf-life testing, re-labelling, re-branding and any ongoing cost due to flavour rebalance. Estimate the cost would be approximately £50,000 per product line. Further costs may be incurred by a potential loss of sales of products if consumers reject lower salt versions of products. Believes the FSA should produce a rigorous impact assessment.	<b>FDf</b>		
Considers there may be a restriction on supply of raw ingredients - with the UK targets lower than any other European country, new lower salt raw materials, if technically feasible to produce, would restrict sourcing options, which could impact on both availability and cost. Potential increase in wastage through shorter shelf life.	<b>Freiberger UK</b>		
States there are costs to industry in any reformulation activity. Costs include reformulation, taste testing, stability testing, safety testing, product re-labelling, potential raw material cost increase of new product formulation etc - £10,000+ per product. Notes that salt/sodium reduction programmes are unlikely to have happened without the FSA pressure and therefore all of this cost is additional to normal business.	<b>P&amp;G</b>		
Disagrees that there are "no direct costs" to industry. The costs to the meat and dairy industries are considerable in terms of research to ensure product safety & an acceptable shelf life. Also, reductions in shelf life lead to increased costs which are either absorbed by the manufacturer or passed on to the consumer.	<b>PTF</b>		
Disagrees with opinion that salt reformulation entails no additional costs. The new targets can not be easily incorporated into existing innovation and renovations. Salt is relatively cheap so even small reductions increase cost of manufacturing the product. Reformulation can cost up to £50,000 per product line when taking into account more expensive ingredients, new product development, consumer testing etc. Additional costs will be incurred in reporting progress, even if only biennially.	<b>Nestle</b>		

General Comments		Stakeholder	Agency Comments
<b>Reformulation (fat and sugar)</b>	<p>Questions which of the FSA's reformulation strategies (saturated fat, energy or salt) is the priority as this can lead to conflicting agendas e.g. to reduce salt and fat but to use 'cupboard ingredients'. Request that FSA aligns its work for salt, saturated fat, energy and additives. In addition highlights the impact of reducing salt on other nutrients such as fat e.g. adding fat to retain succulence in sausages due to lower levels of salt. Removal of MSG in snacks coupled with move to natural flavourings has meant higher salt in retailers own brand crisps compared to branded equivalents</p>	<b>Breaks, BDA, BRC, FDF, Nestle and Mar.</b>	<p>The Agency recognises the challenge of reformulating to reduce salt, saturated fat, nitrates and colours alongside wider industry efforts to reduce the use of other additives in response to consumer demand. We will continue to meet and discuss industry concerns where they arise.</p>
	<p>Reformulation for salt may see fat levels rise to counter balance the effect of salt reduction in taste.</p>	<b>Freiberger UK</b>	
	<p>Notes that to reduce salt and maintain flavour it is likely that sugar will be added for the flavour profile.</p>	<b>McAusland Crawford</b>	
<b>Comments on foodservice sector</b>	<p>Suggests that the food service industry needs to engage more on salt reduction to ensure that salt reduction is achieved across the board and in order to effect changes in the palate of the population as a whole.</p>	<b>BMPA, CFA, FDF, Sainsbury's, SNACMA and Waitrose.</b>	<p>The Agency recognises the need to work with all sectors of the food industry to ensure that the 6g intake goal is achieved. We have therefore extended our work with the catering sector on salt reduction - and on healthy eating more widely - in the last 18 months. Focussing in the first instance on the largest providers of the sector that serves the most meals, the Agency has published commitments for future action from the UKs largest providers of work place catering and their suppliers (accounting for around 1.6 million meals each day) and the six largest operators of quick service restaurants (serving around 3 million customers a day). Similar commitments are anticipated from major pub dining, casual dining and coffee/sandwich chains shortly.</p>
	<p>Sandwich manufacturers and retailers of packaged sandwiches (55% of the UK market) are in direct competition with the foodservice sandwich sector where currently there have been very few reductions in salt levels - this distorts the market and potentially creates an unfair trading situation, and ultimately may result in job losses. Therefore, requests equitable reductions in salt through foodservice sandwich retail outlets, before further pressure is placed on sandwich manufacturers.</p>	<b>BSA</b>	
	<p>The proposed targets do not apply to foodservice products, creating a commercial advantage to that sector which is a disincentive to other suppliers.</p>	<b>PTF</b>	
	<p>Time consuming keeping up to date with all the targets set, alongside nutrient profiling in UK and Europe. Inconsistencies between targets and Target Nutrient Specifications for foods used in school meals. Scottish executive's nutritional requirements for food and drink in schools are different to those set by the School Food Trust in England. Encourage FSA to align between countries and targets to ensure compliance and taste acceptability. Suppliers to foodservice market should be involved in meetings with caterers. Without manufacturers' commitments that products will meet salt targets, caterers will be unable to fulfil their commitments. Having salt targets may reduce competitiveness. In the foodservice arena targets are no longer 'voluntary but a must have in order to do business. Products are sometimes compared against 2010 targets and flagged if they do not meet. Customers demand targets be met now, well in advance of 2010.</p>	<b>Nestle</b>	
	<p>The rate at which industry has removed salt has not been reflected in reductions in population intakes. Conclude that far more salt is coming from the out of home market than was originally thought. It is now estimated that one third of all food and drink is consumed outside the home. Reducing salt contributed by the out of home market must now be the priority. This should be the focus of the FSA until similar levels of salt reduction have been achieved in this sector as by manufacturers and retailers.</p>	<b>Premier Foods</b>	

General Comments		Stakeholder	Agency Comments
<b>Monitoring health and diet</b>	Requests clarification on the basis of the improved QALYs calculation based on a hypothetical change in blood pressure. What evidence is this calculation based upon?	<b>FDF, Proctor and Gamble, and GSK</b>	The figures used in the IA are derived from Ofcom's Impact Assessment on Television Advertising of Food and Drink to Children, published in November 2006. <a href="http://www.ofcom.org.uk/consult/condocs/foodads_new/ia.pdf">http://www.ofcom.org.uk/consult/condocs/foodads_new/ia.pdf</a>
	Supports the monitoring of salt intakes through the NDNS rolling programme with measurements of 24-hour urinary sodium from an adequate sample size. Suggests the health benefits (QALYs) afforded by one gram average reduction in salt intakes be illustrated rather than for one-third of a gram.	<b>CASH</b>	
<b>Other factors affecting hypertension and comment on the science</b>	Considers there is a lack of evidence to support the case for reducing salt in diets - citing a review conducted by Dr Joel Dunning (James Cook University Hospital, Middlesbrough) and the Cochrane review. Also, a population sodium restriction approach may place some sectors of the population at risk, for example athletes, older people and sufferers of polyphagia. Therefore, considers research should be undertaken to understand the health risks to vulnerable groups of making major general reductions in salt levels.	<b>BSA</b>	The Agency keeps a watching brief on emerging evidence on salt and health and has reviewed all the papers cited in consultation responses. The scientific consensus remains that there are real benefits to be achieved by decreasing salt intake which has been shown to reduce high blood pressure. As high blood pressure is a major risk factor for cardiovascular disease, a reduction in blood pressure will contribute to a decrease in the risk of heart disease and stroke. SACN found no evidence to suggest that any particular group of the population would be at risk from a reduction in salt intake to 6g/day. In contrast, SACN found that the population as a whole would benefit from reducing their intake to 6g per day. This amount is one and a half times the amount needed for most of the population. There is no evidence to show that in a temperate climate, such as that of the UK (even during a hot summer) salt intakes of 6g/day would have any adverse effects on older people. Pregnant women have their blood pressure monitored throughout pregnancy and are advised by their d
	Encourage the FSA to continue monitoring emerging research on the health benefits of salt reduction.	<b>FDF</b>	
	States that there is some evidence that a low salt diet is not beneficial to health of some groups as salt plays an important part in the physiology of the body. The opinion of the ifp Institute for Produktqualität GmbH in Berlin is that there is no causal chain between consumption of salt and hypertension, and conclude that for the general population there are more negative effects of low salt/sodium intake than positive ones.	<b>Freiberger UK</b>	
	Challenges the evidence on the relationship between sodium intake and blood pressure, noting the paucity of strong data supporting any clear health benefit to sodium reduction, and questions the usefulness of the current salt reduction programme. In relation to the DASH sodium trial, considers an independent review of the potential impact of the differential levels of potassium on the blood pressure observations needs to be conducted. Also, that the role of potassium in the ion exchange in the kidneys needs to be further examined. Assumes that an intervention to reduce sodium in common foods would move the normal distribution of intakes down the sodium intake scale - raises the following questions:	<b>P&amp;G</b>	
	1.As further reductions become more and more costly to achieve, what are the benefits and is there sufficient evidence to support such claimed benefits? 2.Is there a potential negative impact at the bottom of the intake scale? 3.Why is there not a close association on an individual basis between sodium intake and blood pressure? 4.Why does sensitivity to sodium in regard to blood pressure vary within the individual, is it related to potassium intake? 5.In the evidence base considering the significant positive impact of potassium in reducing blood pressure, was potassium adequacy properly assessed in the sodium trials or studies?		
	States that there is growing evidence that the FSA's salt reduction strategy is scientifically unsound and that the FSA SACN Review may have "got it wrong on salt". Provides references to five studies/surveys in support of this statement, including the 2008 update of the 2003 Cochrane Review, the 2008 NHANES III Survey and a recent study by Connell JMC et al (2008). Considers that with the weight of emerging evidence that recourse to the 'precautionary principle' as a basis for reducing population sodium intake is not a justifiable public health policy. Considers that a comprehensive large-scale independent review is essential, and that all work on salt reduction and targets should be abandoned until this is complete.	<b>Salt Association</b>	
	States that major population groups may be at risk from the FSA's salt reduction policy, including older people, those who sweat heavily when they exercise or work (hyponatraemia), and pregnant women (increased risk of pre-eclampsia). For these groups low salt levels could be dangerous and even life-threatening. States that evidence suggests that population-wide salt reduction strategies do not work, citing evidence from Finland where a 25-year anti-salt campaign has been in place.		
Reviews of the science have concluded that there is no conclusive proof of a link between salt and blood pressure and also raised questions of the dangers of sodium restriction to the population.	<b>PAPA</b>		

General Comments		Stakeholder	Agency Comments
<b>Discretionary salt use</b>	Suggest: An equivalent approach to catering and food service industry as with pre-packed retail sector to ensure everyone playing their part. More research on behaviour patterns with regards to reduced salt products and use of discretionary salt. Government funded consumer education initiatives.	<b>BMPA</b>	The data supporting the Agency's message that 75% of the salt we eat is already in the foods that we buy is supported by studies in other European Member States and further-a-field. We will continue to monitor salt intakes and dietary patterns through the new NDNS programme. The Agency recognises the part consumers have to play in meeting the population average 6g target intake and that is why we are launching the 4th phase of our consumer awareness campaign later in 2009.
	Welcome research by FSA into changes in discretionary salt use. Consumer education campaign is a great support, hope this will continue in order to drive consumer demand for lower salt products.	<b>Brakes</b>	
	Low income groups may not benefit from salt reductions in foods that rely on salt as the main flavouring as opposed to more elaborate products where herbs and spices are used for flavouring. Could result in families adding discretionary salt or cheaper products not meeting targets. Would welcome research on changes in discretionary salt use. Supports plans to help small businesses to reduce salt along-side major supermarkets. Would welcome advice for consumers on frequency of consumption and portion size to support public awareness campaign.	<b>BDA</b>	
	Research on discretionary salt use should be a priority.	<b>BNF</b>	
	Believes that industry salt reduction initiatives must continue to be accompanied by a government-led and scientifically-based consumer education programme. Important that consumers are educated on how to reduce salt in cooking and at the table. Concerned that efforts to reduce salt in products may be negated if consumers then increase the amount of salt they add during cooking and at the table. Therefore, recommend that table salt sales should be monitored to ensure that sales aren't increasing in response to industry salt reductions.	<b>Mars</b>	
Does the Agency plan to monitor household salt intake in any way?	<b>Heinz</b>		

General Comments		Stakeholder	Agency Comments
<b>Other general comments</b>	Has the FSA included dietary intake data in their assessment of a food's contribution to intake?	Heinz	Yes, NDNS dietary intake data along with TNS sales data have been used to model the percentage contributions that foods make to salt intakes.
	The Halal Food Authority will do everything to encourage Muslims to eat less salt and is confident that manufacturers and suppliers will contribute to this goal.	The Halal Food Authority	
	Suggest a more targeted approach to consumer education on salt reduction for high salt consuming subgroups.	AHDB	
	The dairy sector is committed to reducing salt levels as far as possible.	Dairy UK	
	Congratulates manufacturers and supermarkets for their achievements to date	BPA	
	Need to raise awareness of risks of high salt diet. Concerned by lack of traffic light labelling. Foods high in fat, salt, sugar tend to be cheapest sources of calories.	BMA	
	Strategy should be based on evidence on sources of salt in the diet. Should understand what proportion of the 8.6g salt comes from food outside the home, and from over consumption of certain foods. If these are main sources of salt consumption, Agency should concentrate on catering sector and consumer messaging; salt reduction should be a message picked by the FSA on the healthy eating messaging campaign set to run from Feb 2009. Committed to salt reduction where possible and welcome further discussion on technological developments needed to be invested in.	BRC	
	Should understand what proportions of the 8.6g salt intake come from food consumed outside the home and from over consumption of particular foods. Mintel report (2006) says 1 in 5 people eat out more than once a week. Local authority surveys have found takeaway meals containing over 200% of the RDA of salt and fat. Catering sector needs to be targeted before further alterations to targets and time-scales are made.	Iceland	
	Analysis of tomato juices found salt levels much higher than canned tomatoes and the canned vegetables target, setting a target for these products should be considered.	Kent County Council Trading Standards	
	Considers the FSA may lose the goodwill of industry to work towards the targets if the targets are being constantly revised. Considers the FSA is getting a distorted view at public meetings on the targets – some industry participants feel they cannot fully participate in the presence of consumer groups. Need evidence of further reductions in salt levels in sandwiches made in the home (some research of comparable levels may be needed).	BSA	
	More information should be published about salt levels in foods to assist consumers to make informed choices. Would like all major food manufacturers to publish salt commitments both on their own and the Food Standards Agency's website - revised annually to reflect current targets.	CASH	
	Estimates that more than 95% of UK chilled prepared foods are retailer own label, with retail customers therefore playing a key role in new product development and setting the final recipes to be followed by their suppliers.	CFA	
	Believes that industry salt reduction initiatives must continue to be accompanied by a government-led and scientifically-based consumer education programme. Important that consumers are educated on how to reduce salt in cooking and at the table, and on nutrition labelling.	FDF	
	Questions if health warnings will be given with each cookery book and on trailers for television shows - as the recipes used show little regard for the amount of added salt. Notes that use of analytical data gives widely different results depending on the laboratory used.	Freiberger UK	
	The Government education programme must continue in order to meet the public health benefits of the salt reduction initiative. Considers that the efforts made by industry to reduce salt in processed foods would be negated if consumers' add more salt or sugar during preparation.	GSK	

General Comments		Stakeholder	Agency Comments
	Will follow their own <i>Global Sodium Reduction Strategy</i> as their commitment to salt reduction in the UK, which has targets based on the World Health Organization guidelines. Believes that nutrition profiles should be set on an international basis in order to minimise the number of different schemes and to account for the international supply and cross-border trade of foods.	<b>Unilever UK Foods</b>	
	Gluten-free products have higher salt levels compared to their 'normal' equivalents making it difficult for someone with Coeliac Disease to have a lower salt diet.	<b>Consumer</b>	
	Leading retailers and manufacturers should not be continually targeted, whilst other more resistant companies/sections of the market are left out (e.g. out of home and imported products). Reformulation involves significant cost, resource and potential loss of competitiveness and ultimately consumers. Accordingly, such groupings and their work should be supported by all stakeholders. It takes a significant amount of time to implement salt reductions as tests need to be carried out (e.g. consumer acceptability, product stability and safety) These tests need to be acceptable at the end of the products shelf life and many products have shelf lives in excess of 12 months.	<b>Nestle</b>	
	Current targets are based on a survey where the data was collected in 2000. Consumption habits and salt levels in many foods have changed dramatically since then. We recommend the FSA review salt consumption levels and review where salt comes from in the diet utilising an up-to-date National Diet and Nutrition Survey and Expenditure and Food Survey, alongside an evaluation of the salt levels in the out of home market. The FSA would then be able to determine where further salt reduction would need to take place in order to meet the 6g target.	<b>Premier Foods</b>	
	New data on salt intake from all sources will need to be considered. Habits will change in response to lower salt products and this should be monitored.	<b>NIFAC</b>	
	Consumers should have the freedom to choose the product they want. Major retailers are consulted more than manufacturers, who are often more knowledgeable about technical issues. Some retailers accept new targets so that their brand is seen positively without giving sufficient attention to technical consequences. FSA should fund research before new targets are considered.	<b>PAPA</b>	
	Sainsbury's believe that consumer education is the cornerstone of salt reduction. As such, they will continue to educate their customers about salt and think it is vital that the government continue to invest in customer education campaigns.	<b>Sainsbury's</b>	
	The FSA's stated intention to focus on all areas of the food supply chain is essential if further reductions are to be achieved.	<b>SNACMA</b>	
	Future monitoring should include children's salt intakes, and be used to support strict reductions in salt levels for processed food products marketed to children.	<b>NHF</b>	

**Consultation respondents and abbreviations**

<b>TYPE</b>	<b>ORGANISATION</b>	<b>CODE</b>
<b>Retailer</b>	Asda	
	Sainsburys	
	Iceland	
	Waitrose	
<b>Manufacturers</b>	AB World Foods	
	Arla Foods	
	Brakes	
	Callan Bacon	
	Cereal Partners UK	CPUK
	Freiberger UK	
	GlaxoSmithKline	GSK
	Grampion	
	Heinz	
	Kraft	
	Mars	
	McCain Foods	
	Nestle	
	PepsiCo	
	Premier Foods	
Proctor and Gamble	P&G	
Twinings		
Unilever		
<b>Trade Associations</b>	Agriculture & Horticulture Development Board meat services	AHDB
	Association of Bakery Ingredient Manufacturers	ABIM
	Association of Cereal Food Manufacturers	ACFM
	Biscuits Cakes, Chocolate and Crisps Sector Group	BMPA
	British Frozen Food Federation	BFFF
	British Meat Processors Association	BMPA
	British Retail Consortium	BRC
	Chilled Food Association	CFA
	Dairy UK	
	Federation of Bakers	FoB
	Frozen and Chilled Potato Processors' Association	FCPPA
	Margarine and Spreads Association	MSA
	National Association of Master Bakers	NAMB
	Pizza, Pasta & Italian Food Association	PAPA
	Provision Trade Federation	PTF
	Quality Meat Scotland	QMS
	Salt Association	
	Snack, Nut and Crisp Manufacturers Association	SNACMA
The British Sandwich Association	BSA	
Food and Drink Federation	fdf	
<b>Consumer organisations</b>	Chief Environmental Health Officers Group NI	CEHOG
	Halal Food Authority	
	Which?	
<b>Health related</b>	British Dietetic Association	BDA
	Consensus Action on Salt and Health	CASH
	British Nutrition Foundation	BNF
	British Heart Foundation	BHF
	British Medical Association	BMA
	Heart of Mersey	HoM
	National Heart Forum	NHF
Blood Pressure Association	BPA	
<b>Local Authority</b>	Kent County Council Trading Standards	
	East of England Trading Standards	
<b>Other</b>	Consumer	
	Northern Ireland Food Authority Committee	NIFAC
	McAusland Crawford	
	<b>Other Abbreviations</b>	
	Waste & Resources Action Programme	WRAP
	Protected Designation of Origin	PDO
	Protected Geographical Indication	PGI
	Best Before End	BBE
	National Diet and Nutrition Survey	NDNS
	Scientific Advisory Committee on Nutrition	SACN