

## SUMMARY OF RESPONSES

### Advertising, Marketing and Promotion

**Q1: What share of advertising, marketing and promotional budgets do businesses spend on promoting reduced/low saturated fat and/or reduced/low/no sugar products? What plans do businesses have to increase these budgets?**

Themes	Summary of Responses	Supporters of Response
<b>Current practices on marketing budgets</b>	Some businesses spend a disproportionately large marketing budget on reduced/low/no added sugar products.	BSDA
	Marketing spend for healthier new products is above their share of sales.	Burton's Foods
	Marketing is in-line with the growth of its healthier ranges, and a proportionate budget is therefore spent on these products.	Kraft, Coca Cola, Bakehouse
	New/healthier products are promoted with in-store pricing activity to encourage trial.	Burton's Foods
	Budgets are focussed on core brands.	Burton's Foods, Coca Cola
	No fixed proportion of marketing budget as this can vary year to year.	United Biscuits
	Greater budget for products with a range of portion sizes than those that are only sold in larger portion sizes.	Nestle
	Advertising spend on staples (such a bread/bakery) is lower due to promotional work in-store.	Bakehouse
<b>Current practices on promotional activity</b>	Low calorie drinks have established a significant market (showing that marketing of these products is already successful).	FDF, Ajinomoto
	Marketing is carried out according to customer/product demand.	Brakes, GSK, Kraft
	Do not advertise products to children.	PepsiCo, Mars
	Do not advertise regular Pepsi.	PepsiCo
	Do not solely advertise regular versions of drinks without advertising low-calorie versions alongside.	Coca Cola

	Have large consumer campaigns for low-calorie products alone.	Coca Cola
<b>Plans to increase budgets</b>	Do not intend to provide information on marketing budgets.	BRC
	Cannot say what future plans are with regard to budgets and marketing.	Kraft, Coca Cola, Premier Foods

### General comments on advertising, marketing and promotion

Themes	Summary of Responses	Supporters of Response
<b>Agency approach</b>	This is a missed opportunity to look at wider issues (e.g. buy one get one free offers, product placements by tills, impulse buys).	ASO
	Advertising is not in the Agency's remit.	BRC
	Agency will need to understand current promotional activity.	BRC
	Support initiatives to improve access to healthier foods, such as supermarket promotions.	Cancer UK
<b>Wider impacts</b>	Promoting reduced/low saturated fat and/or reduced/low/no sugar products could encourage people to start consuming food categories that should be eaten in moderation.	BRC, Dairy UK
<b>Evidence base</b>	Need evidence on the effect promotions have on eating habits.	BRC
<b>Other comments</b>	Current restrictions on the use of reformulation claims limits promotional spend as well as reformulation activity.	United Biscuits
	Monitoring this recommendation will be difficult – this requires a clear understanding of what a 'healthier product' is.	BRC
	Provision of clear information and wide choice means further measures on marketing are unnecessary.	Mars
	Due to supply agreements businesses cannot influence the market place other than	Coca Cola

	through marketing.	
	Low calorie drinks should not be banned from schools etc as this undermines consumer confidence in these products and is a confusing message.	Ajinomoto

## Sugar reduction and sugary soft drinks

### Q2: Is the threshold of 8g sugar/100ml drink a practical threshold?

Themes	Summary of Responses	Supporters of Response
<b>8g sugar/100ml threshold</b>	Support for 8g/100ml threshold above which 4% sugar reduction recommendation applies/below which products are not a priority for action.	Food & Health Worker, PepsiCo
	8g/100ml is practical and feasible.	Which?, ASO
	8g/100ml is not meaningful and it is unclear why this threshold has been chosen.	Coca Cola, BNF, The Nutrition Society
	8g/100ml (i.e. 30% reduction from some standard products) is equivalent to the level at which a product may be defined by legislation as “reduced energy” or “reduced sugar”.	BSDA, GSK, FDF, PepsiCo, Coca Cola
	Request clarification that 8g/100ml is not intended as maximum level.	PepsiCo
<b>Alternative thresholds</b>	Support subsequent lower threshold of 5g sugar/100ml in line with guidelines for nutrient profiling used for Front of Pack labelling.	Heart of Mersey
	Suggest the Agency consider lowering the recommendation to 6g/100ml in the first instance.	The Nutrition Society
	For new products, a lower threshold content of sugar is advised.	The Nutrition Society
<b>Use of Additives</b>	8g/100ml difficult to achieve without the use of artificial sweeteners.	The Sugar Bureau, FDF, PepsiCo
	In many cases, reduction of added sugars can only be achieved by inclusion of other ingredients, such as additives.	GSK
<b>Next steps</b>	Request clarity around whether 8g/100ml is a first step and what further reformulation	PepsiCo

	may be recommended.	
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**Q3: What are your views on the proposed recommendation for at least a 4% sugar reduction by end 2012?**

<b>Themes</b>	<b>Summary of Responses</b>	<b>Supporters of Response</b>
<b>4% sugar reduction</b>	4% sugar reduction by 2012 is feasible and achievable.	Safefood, Which?, ASO
	4% sugar reduction target is modest.	ASO
	Sugar reduction recommendation should be higher.	Heart of Mersey
	4% sugar recommendation appears arbitrary.	The Nutrition Society
	4% sugar reduction in sugar by 2012 is challenging and would discourage the Agency from recommending a higher target at this stage.	PepsiCo
	4% reduction in sugar could be too low to have an impact on sugar or energy intake.	BNF, Coca Cola, Nutrition Society
	Do not support 4% sugar reduction recommendation.	Coca Cola
	Reductions of 2-4% are noticed (and can be rejected) by consumers.	FDF, PepsiCo
<b>Principle of sugar reduction in soft drinks</b>	Support a gradual/step by step approach to sugar reduction so that consumers support the reductions.	Which?, BNF, PepsiCo
	Feasibility of sugar reductions varies on a case by case basis.	FDF, BRC
<b>Impact on Industry</b>	There could be significant costs to industry which might yield an unfavourable cost: benefit ratio for a reduction on this scale.	The Nutrition Society, Safefood
<b>Timescale</b>	Deadline appears to give adequate time for reformulation and product development.	The Nutrition Society, Safefood
	Timescale is challenging.	PepsiCo
<b>Evidence base</b>	Question the evidence base for a 4% reduction recommendation.	Coca Cola

## Portion size and sugary soft drinks

### Q4: What are your views on the proposed recommendation to provide 250ml single-portion sizes?

Themes	Summary of Responses	Supporters of Response
<b>250ml portion sizes</b>	Supports proposed recommendation to widen provision of 250ml single-portion sizes of sugar-sweetened soft drinks.	Heart of Mersey, Safefood, Which? Food & Health Worker, PHN Research Group University of Aberdeen, The Nutrition Society
	Supports principle of reduction in portion size of sugar-sweetened soft drinks.	BDA, 3663, BHF, ASO
	Already offer 250ml sizes.	PepsiCo, Coca Cola
	Sizes determined by retailer/operator.	BSDA, FDF, Coca Cola
	Need research to establish the acceptability of 250ml as a replacement for 330ml and 500ml.	The Nutrition Society
	If manufacturers stop producing certain portion sizes retailers will import from other countries.	Coca Cola
	Support phase out of 500ml in favour of 250/300ml.	The Nutrition Society
	Suggest removal of reference to 2 servings on 500ml packs.	ASO
	Suggest recommendation includes reference to removal of larger size portion packs (330ml and 500ml).	ASO
	Support marketing of 250ml in favour of 330ml and 500ml.	University of Aberdeen PHN Research Group
<b>Costs</b>	Reduction in portion size will result in costs to businesses to change their production processes.	BSDA, GSK, FDF, Coca Cola, BRC, The Sugar Bureau
<b>Outlets</b>	Recommendation needs to include sugar-sweetened soft drinks sold in other food	Heart of Mersey, Which?, BNF

	service environments (restaurants, cinemas, petrol stations, leisure centres).	
<b>Sustainability</b>	Reducing portion size is less sustainable due to reduced shelf life and/or use of same weight of plastic bottles.	BSDA, GSK, FDF, Coca Cola
<b>Hydration</b>	Concern that reducing portion size could result in inadequate hydration.	Ajinomoto
<b>Dental health</b>	Concern that re-sealable bottles encourages prolonged consumption for the same amount of liquid (as a can) which results in dental erosion.	BDA
	Will impact on the sugar intake of children and their dental health.	3663

**Q5: Is there a practical alternative to basing the single-portion size recommendation on actual volume?**

<b>Themes</b>	<b>Summary of Responses</b>	<b>Supporters of Response</b>
<b>Calorie approach</b>	In the future calorie approach may be helpful.	PepsiCo

**Q6: Is a timeframe of 2015 appropriate?**

<b>Themes</b>	<b>Summary of Responses</b>	<b>Supporters of Response</b>
<b>Appropriate timescales</b>	Five years is an appropriate timescale.	Food & Health Worker, The Nutrition Society
<b>Timescale is too generous</b>	Timescale too generous based on understanding that smaller sizes are available elsewhere. Industry should be encouraged to look at this issue now.	Heart of Mersey, Which?
<b>Timescale is challenging</b>	Question how feasible 2015 timescale is, as presumably, investment in new canning facilities would be necessary.	BNF

## General comments on sugary soft drinks

Themes	Summary of Responses	Supporters of Response
<b>Agency approach</b>	Support for recommendations to reduce added sugar in soft drinks	Heart of Mersey, ASO, BDA
	Do not support setting targets for reductions in sugar in soft drinks.	GSK, BSDA
<b>Calorie reduction</b>	Recommend that a target calorie reduction be included.	ASO
<b>Industry action</b>	A wide range of products from full sugar drinks to reduced sugar, sugar free and no added sugar provide choice for consumers.	BSDA, FDF, Coca Cola, GSK
	Industry has successfully reformulated products to reduce sugar content.	Coca Cola, GSK, BRC, BSDA
	Recipe formulation and reformulation are on-going for the industry and BSDA will provide updates to the Agency to demonstrate its achievements.	BSDA
<b>Alternative options</b>	A greater effect than reducing sugar would be to recommend consumers switch to sugar free alternatives.	BNF, Coca Cola, Ajinomoto
<b>General reformulation</b>	Sugar-sweetened soft drinks are heavily brand led. Due to the small market share of retail brand goods in this category, reformulation of these products will have little effect in reducing the level of sugar consumption.	BRC
<b>Evidence around soft drink consumption and health outcomes</b>	Evidence around sugar-sweetened soft drinks leading to weight gain and obesity is inconsistent and insufficient.	GSK, Coca Cola, BRC, The Sugar Bureau
	Naturally –occurring and added sugars are treated in the same way by the body and could both contribute to excess energy consumption.	GSK
	It is currently the industry’s understanding that energy consumption levels are within the	BRC

	recommended values. Clarification required on what the Agency is using as starting point for consumption and by how much would the Agency like to reduce sugar consumption levels by.	
<b>Wider diet</b>	Hope that the Agency supports the development and increased availability of juice drinks with high fruit content, which can deliver significant contributions to fruit and vegetable intakes.	PepsiCo
<b>Dental health</b>	Important to raise awareness of the detrimental effect that acidic soft drinks can have on dental health, even if they are reduced sugar.	BDA
<b>Sports and energy drinks</b>	Question why sports and energy drinks have been excluded from the recommendations – these are consumed widely by the general public, not just athletes.	Which?, ASO

## Portion size and chocolate blocks

### Q7/Q10: Is there a practical alternative to basing the recommendation on actual weight?

Themes	Summary of Responses	Supporters of Response
<b>Support for weight reduction</b>	Approach based on weight is the most practical approach.	Heart of Mersey, The Nutrition Society, Safefood
	Agree with approach, but needs to be accompanied by meaningful reduction in calories.	ASO
<b>Calorie based approach</b>	Calorie-threshold approach is an alternative to a recommendation on reducing weight.	Kraft, Mars, BNF, University of Aberdeen PHN Research Group
	An additional, higher (e.g. >100kcal) threshold could be adopted as a stepping stone for those consumers for whom 100kcal is not considered sufficient, but research is needed to support such an approach.	BNF

	Products should be clearly labelled with the energy content on the front of pack to help consumers to estimate energy content.	University of Aberdeen PHN Research Group
	A ceiling of 200kcal per pack could be set.	University of Aberdeen PHN Research Group
<b>Alternative approaches</b>	Targets should focus on reduction rather than absolute weight levels. This also means that achievements made over the last few years can be taken into account.	Mars
	Many fillings for countlines are high in sugar – support a recommendation to reduce sugar levels as well.	The Nutrition Society
	Suggest a need to address products containing two portions wrapped in a single wrapper.	The Nutrition Society

**Q8: What are your views on the proposed recommendation to provide single-portion sizes of 40g or less in chocolate blocks?**

Themes	Summary of Responses	Supporters of Response
<b>Single portion sizes of 40g</b>	Support the recommendation to provide single-portion sizes of chocolate blocks of 40g or less.	Heart of Mersey, Safefood, Food & Health Worker, The Nutrition Society

**Q9: Is a timeframe of 2012 appropriate?**

Themes	Summary of Responses	Supporters of Response
<b>Support for 2012 timescale</b>	2012 timescale is feasible.	Heart of Mersey, Safefood, The Nutrition Society
<b>Concerns over 2012 timescale</b>	2012 is too short a timescale to meet recommendations.	Food & Health Worker, Mars, BCCC, FDF, CAOBISCO
	Depend on the extent to which work in the direction is already in hand.	BNF
<b>Alternative</b>	Sustainable progress could be achieved by putting in place monitoring of reducing	Mars

<b>approaches</b>	portion sizes within much longer, more achievable timeframes. Timeframes might also more appropriately start from 2007, recognising the progress that has been made in recent years.	
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## Chocolate confectionery countlines

### Q11: What are your views on the proposed recommendation to provide single-portion sizes of 50g or less?

Themes	Summary of Responses	Supporters of Response
<b>Single portion sizes of 50g</b>	Recommendation for countlines should be the same as for chocolate blocks – i.e. 40g or less for single-portions.	Heart of Mersey, Safefood, The Nutrition Society, ASO
	Recommendation is ambiguous and not clearly defined.	BCCC, FDF, CAOBISCO, BNF
<b>Market</b>	Reductions in the portion size of recommendations will be very costly. Even small changes would incur large costs to amend moulds, packaging, printing and factory equipment at multiple sites.	Nestle
	A number of confectionery lines are produced in other European countries supplying multiple markets, so do not have sole control over reformulation.	Nestle

### Q12: What are your views on the proposed recommendation for saturated fat reduction by at least 10%?

Themes	Summary of Responses	Supporters of Response
<b>10% saturated fat reduction</b>	Support proposed recommendation for saturated fat reduction by at least 10%.	Heart of Mersey, Safefood, The Nutrition Society
	10% reduction in saturated fat seems reasonable, but it is difficult to see how this could be accompanied by more than a trivial reduction in energy.	BNF
	Oppose across-the-board recommendation for chocolate confectionery.	Mars, Nestle, The Fat Consultant, BNF

<b>Reformulation potential</b>	10% is very high because of the limitations on reformulating chocolate.	VBZ
	Ability to reformulate and achieve 10% reduction in saturated fat varies on a product by product basis.	Safefood
	Saturated fat reductions in countlines are limited to reformulating their non-chocolate components, which will vary considerably from product to product.	Nestle
	Saturated fat reductions might be feasible in some products, subject to extensive multiple trials and consumer acceptability.	Nestle
	Agree that there is likely to be more scope for reductions in saturated fat content in countlines– as well as possibly added sugar which is not currently considered – in the fillings used.	Which?
	Reformulation is technically feasible for pure fillings.	Kraft
	To have a 10% reduction in the countline products means that the whole of this reduction must come from the filling.	VBZ, The Fat Consultant, Cadbury
	10% reduction is achievable in some products – i.e. those with a fat-rich centre.	The Fat Consultant
	Reducing saturated fat in chocolate is a major technical challenge due to fats’ role in taste, mouth feel, structure and shelf-life. Although Mars have made advances in this area of recent years, current approach does not take into consideration specific product issues, such as production capability and future technical feasibility.	Mars
<b>Consumer acceptance</b>	Consumers consistently tell us that they understand that chocolate is a treat and would rather consume small quantities of ‘pure’ product rather than one which has been reformulated.	Cadbury
<b>Next steps</b>	Further reformulation should be considered as a step-wise approach where feasible in the longer term.	Heart of Mersey

**Q13: Is a timeframe of 2012 appropriate?**

Themes	Summary of Responses	Supporters of Response
<b>2012 timescale</b>	2012 is an achievable timescale	Heart of Mersey, The Nutrition Society
	2012 is not achievable.	Cadbury, FDF, BCCC
	Challenging in some cases.	Safefood
	Very challenging target given that reduction in saturates in well established brands is likely to require substantial investment and, technological breakthroughs.	BNF
	Extremely demanding as risks not being achievable for most products. Does not take into consideration the long lead times required to make changes in technologies for new manufacturing processes.	Mars
	It is vital that any reformulations are considered within the context of realistic timescales, which should be assessed on a case by case basis.	Nestle

## General comments on chocolate

Themes	Summary of Responses	Supporters of Response
<b>Agency approach</b>	Support for reduction in portion sizes of chocolate.	BHF, BDA
	Support for recommendations in chocolate confectionery sector, but concerns over blanket approach.	Which?
	Consumers expect a range of products to be available and generally recognise that they are an 'unhealthy' choice. While this does not preclude looking at scope for improvements, we agree that the focus should be on offering a choice of portion sizes, including smaller options.	Which?
	Arbitrary, mechanistic approach to portion size is not helpful.	Kraft
<b>Industry action</b>	Portion sizes of some products have already been reduced.	Mars, Nestle
<b>Impact on industry</b>	This recommendation has little impact on retailers since very few portion own brand chocolate bars are being sold. The market for these products is brand led.	BRC
	Scale of investment required to achieve the proposed recommendations should not be	BCCC, FDF, CAOBISCO, Nestle

	underestimated. Many of the companies manufacturing biscuits, cakes, pastries and chocolate confectionery products are of small or medium size and therefore might find it even more difficult than larger companies to invest in major equipment changes.	
<b>Wider diet</b>	Chocolate confectionery is an indulgent treat for some people, however it is eaten frequently by others and is one of the top contributors to saturated fat and energy intakes.	Which?

### Plain sweet/savoury biscuits

#### Q14: What are your views on the proposed recommendation for at least a 10% saturated fat reduction in plain biscuits by end 2012?

Themes	Summary of Responses	Supporters of Response
<b>10% saturated fat reduction by 2012</b>	Recommendation is achievable.	The Fat Consultant, Costa biscuit supplier, Safefood
	Supportive of recommendation.	Heart of Mersey, ASO, The Nutrition Society, BHF
	Recommendation is not feasible/very challenging.	BCCC, FDF, CAOBISCO, Burton's Foods, BNF
	An average 10% reduction in saturated fats is achievable across the whole portfolio.	Northern Foods
	Average/flexible reductions across the category would be preferable.	Burton's Foods, United Biscuits
	Preferred approach would be to maintain levels of saturates as low as technically possible.	Kraft
	Should be accompanying targets for sugar in biscuits.	ASO
	Having a recommendation for new products to the market is not helpful as there is not always a comparative product.	United Biscuits
	Should target brands that make greatest contribution to intakes.	BNF

<b>Timescale</b>	Timescale is not achievable.	FDF, United Biscuits, CAOBISCO, BCCC
<b>Technical/legal issues</b>	Could be achieved by switching to a lower saturated fat blend.	The Fat Consultant, Costa biscuit supplier
	Could be achieved by removing some of the fat completely.	Costa biscuit supplier
	Could be achieved by making portion sizes smaller.	Costa biscuit supplier
	Type and amount of fat critical in biscuit quality and to avoid 'checking' (hairline cracks).	BCCC, FDF, CAOBISCO, Burton's Foods
	Difficult to reduce fat and salt simultaneously as both provide structural functions.	BCCC, FDF, CAOBISCO, United Biscuits
	A reduction in total fat (to reduce fats and calories) would negatively impact on taste and texture.	United Biscuits
	A reduction in portion size (to reduce fats and calories) could result in consumers eating more biscuits in one sitting and would be costly in terms of re-sizing packaging/machinery.	United Biscuits
	Replacing sugar with intense sweeteners (even if legally allowed, which it isn't at present) would not result in a calorie reduction as the bulk of the sugar removal is replaced with another carbohydrate (or more fat).	United Biscuits
	Would like FSA to support an extension of the use of sweeteners in bakery ware so that manufacturers can use them if they wish.	FDF
	Plain biscuits not necessarily 100% dough, can contain an oilspray.	BCCC, FDF, CAOBISCO
	There are more opportunities for fat reductions in biscuits (compared to say laminated products).	Baketrans
<b>Industry progress</b>	For some products manufacturers have reached optimal position with regards to technical feasibility.	Kraft, Burton's Foods, United Biscuits
	Work already done in this area has proved costly and taken a long time.	United Biscuits
<b>Exemptions</b>	Products such as all butter shortbread should be exempt from these recommendations.	Costa cake supplier, Burton's Foods, Brakes
<b>Other comments</b>	Any reductions must remain within consumer acceptability.	Baketrans
	Reductions of greater than 10% are likely to be more difficult for smaller manufacturers	The Fat Consultant

	as too technologically difficult/costly.	
	Small and medium sized businesses will find it more difficult than larger companies to achieve the recommendations due to cost and investment restrictions.	BCCC, FDF, CAOBISCO

**Q15: Do you agree that the recommendation can be achieved without raising sugar or trans fat levels?**

<b>Themes</b>	<b>Summary of Responses</b>	<b>Supporters of Response</b>
<b>Trans fats</b>	Agree that recommendation should be/ able to be achieved without an increase in trans fats.	BHF, Costa biscuit supplier, Heart of Mersey, Burton's Foods, United Biscuits, BDA
	Not in industry's best interests to reintroduce trans fats.	BCCC, FDF, CAOBISCO, United Biscuits
	Further work/monitoring required to ensure trans fats levels do not increase.	3663, Safefood
<b>Sugar</b>	Agree that recommendation should be/ able to be achieved without an increase in sugar.	Heart of Mersey, Safefood, BDA, BHF
	Further work will need to be done to avoid raising sugar.	3663
	If achieved by reducing total fat, the percentage of other ingredients will increase (e.g. sugar).	Costa biscuit supplier, FDF, CAOBISCO, BCCC, Burton's Foods, United Biscuits
	Saturated fat reduction without a rise in sugar is achievable if calories are to remain the same.	United Biscuits
	Cannot rule out a sugar increase.	Burton's Foods
<b>Other ingredients</b>	Total fat could be replaced by flour (bringing the fat and sugar levels down) however this would negatively impact on the structure/texture of the biscuit.	United Biscuits
	To avoid replacement of saturated fat with hydrogenated vegetable oil, additives may be necessary which carry negative consumer perception.	3663
	Reducing saturates may result in the increase of sodium levels.	3663
	May impact on our work to reduce salt.	BCCC, CAOBISCO, FDF
<b>Other comments</b>	Hope saturated fat reduction without an increase in sugar or trans fat can be achieved.	The Nutrition Society

	A marginal increase in sugar is preferable to increases in trans fats.	The Nutrition Society
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## Other biscuits

### Q16: What are your views on the proposed recommendation for at least a 5% saturated fat reduction in other biscuits by end 2012?

Themes	Summary of Responses	Supporters of Response
<b>5% saturated fat reduction by 2012</b>	Supportive of recommendation.	ASO, The Nutrition Society, Safefood
	Does not support recommendation.	United Biscuits
	Feasibility of achieving a 5% saturated fat reduction is questionable.	Northern Foods
	Should be 10% reduction rather than 5%.	Heart of Mersey
	Should be accompanying targets for sugar in biscuits.	ASO
	Average/flexible reductions across the category would be preferable.	Burton's Foods, United Biscuits
	A 10% saturated fat reduction in the biscuit should be achievable for uncoated biscuits.	The Fat Consultant
	Smaller % reductions possible.	Nestle
<b>Timescale</b>	Timescale is not achievable.	BCCC, FDF, CAOBISCO, Burton's Foods
	Timescales should be considered on a product by product basis.	Nestle
<b>Technical/legal issues</b>	Reducing saturates could lead to migration and fat bloom in the coating.	The Fat Consultant, BCCC, FDF, CAOBISCO, Burton's Foods, Kraft
	Recommendation assumes a 50/50 split with biscuit and coating/fillings, this is not always the case.	BCCC, FDF, CAOBISCO, Nestle
	Moulded biscuits would contain more chocolate than enrobed biscuits.	Nestle, BCCC, FDF, CAOBISCO
	Products would need to be trialled to ensure food safety, shelf-life, consumer acceptability.	The Fat Consultant, BCCC, FDF, CAOBISCO, Burton's Foods, Nestle
	More research is currently being carried out on cream fillings that could be beneficial to	The Fat Consultant

	this recommendation.	
	Would like the FSA to support an extension of the use of sweeteners in bakery ware so that manufacturers can use them if they wish.	FDF
	Should be achievable by reducing the amount of fat from the biscuit recipe.	Costa biscuit supplier
	Need to find an appropriate/sustainable alternative to fats used.	Nestle
	Should be achievable by reducing portion sizes.	Costa biscuit supplier, BNF
<b>Industry progress</b>	Has already developed a range of reduced calorie products which could not go any further for consumer acceptability reasons.	Nestle
	For some products manufacturers have reached optimal position with regards to technical feasibility.	Kraft
<b>Other comments</b>	Committed to reducing consumer waste and this recommendation may increase it if shelf-life is affected.	Burton's Foods
	Reductions may impact on consumer acceptability.	Northern Foods

**Q17: Do you agree that the recommendation can be achieved without raising sugar or trans fat levels?**

<b>Themes</b>	<b>Summary of Responses</b>	<b>Supporters of Response</b>
<b>Trans fats</b>	Agree that recommendation should be /able to be achieved without an increase in trans fats.	BHF, Costa biscuit supplier, Heart of Mersey, Burton's Foods, BDA
	Not in industry's best interest to reintroduce trans fats.	FDF, Nestle, BCCC, CAOBISCO, United Biscuits
	Further work/monitoring is required to ensure trans fat levels do not increase.	3663, Safefood
<b>Sugar</b>	Agree that recommendation should be /able to be achieved without an increase in sugar.	Heart of Mersey, Safefood, BDA
	Further work will need to be done to avoid raising sugar.	3663, Nestle
	If achieved by reducing the total fat, the percentage of other ingredients will increase (e.g. sugar).	BCCC, FDF, CAOBISCO, Burton's Foods, Costa biscuit supplier

<b>Other comments</b>	To avoid replacement of saturated fat with hydrogenated vegetable oil additives may be necessary which carry negative consumer perception.	3663
	Reducing saturates may result in the increase of sodium levels.	3663
	Due to legislative constraints with chocolate and butter-cream energy reduction may be best achieved by reducing portion sizes.	BNF
	Hope that saturated fat can be reduced without an increase in sugar or trans fats can be achieved.	The Nutrition Society

### General comments on biscuits

<b>Themes</b>	<b>Summary of Responses</b>	<b>Supporters of Response</b>
<b>Imports</b>	Large amounts of biscuits consumed are imported which would not have to comply with recommendations.	BCCC, FDF
<b>Consumer Education</b>	FSA should encourage consumer demand for healthier products by improving consumer awareness/understanding of saturated fat/calories.	BCCC, FDF, CAOBISCO
<b>Other comments</b>	Biscuits should be viewed as a treat.	Brakes, 3663

## Cakes

### Q18: What are your views on the proposed recommendation for at least a 10% saturated fat reduction in cakes by end 2012?

Themes	Summary of Responses	Supporters of Response
<b>10% saturated fat reduction by 2012</b>	Support a reduction in saturated fat of cakes by 10% by 2012.	ASO, The Nutrition Society, Safefood
	Support a reduction in saturated fat of cakes by 10% by 2012 but to achieve this recommendation, should seek a 20% saturated fat reduction to take account of the legal constraints.	Heart of Mersey
	Recommendations are realistic.	Bakehouse
	An average 5% reduction to allow for components that cannot be reformulated may be more achievable.	Burton's Foods
	A recommendation applicable to all cakes is not appropriate.	BRC, BCCC, FDF
	For small chocolate cakes that are fully enrobed with chocolate, these other components are usually a small part of the total weight of the cake and so ask the FSA to consider a 5% voluntary target for saturated fat reduction for chocolate enrobed cakes similar to the approach that has been taken for non-plain biscuits.	Premier Foods
	10% reduction will be challenging in some products, but 10% reductions in cake sponge should be achievable.	Premier Foods
<b>Alternative approaches</b>	Suggest a plain cake recommendation as with biscuits to cover cakes where reformulation is not limited due to chocolate or buttercream components.	The Nutrition Society
	Suggest that there should be an accompanying target for reduction in sugar.	ASO
	Suggest that there a reduction in sugar in cakes considered for the future.	The Nutrition Society
	Cakes category is very diverse and suggest tackle first those which make the greatest contribution to saturated fat intake (popularity and/or content).	BNF

	Suggest include recommendations on portion size for cakes.	ASO
<b>Potential for reformulation</b>	In a 'standard' cake then a 10% reduction in saturated fat should be achievable by using fats in the cake batter and (non-butter) cream that are lower in saturated fat.	The Fat Consultant
<b>Calorie reduction</b>	A reduction in saturated fat would not necessarily result in a reduction in calories, so further work is required to reduce total fat and/or sugar to ensure an effective reduction in calories. This should be achievable for cakes.	Brakes
<b>Product quality</b>	10% reduction in saturated fat would impact negatively on product quality.	Costa cake supplier, Park Cake Bakeries, Bakehouse, 3663
	Cakes are very diverse and saturated fat reductions should be considered on a case by case basis.	BCCC, FDF, CAOBISCO
	The level of saturates is at the minimum level possible without impacting on product quality.	United Biscuits
	Need to consider saturated fat contribution of other (non fats and oils) ingredients such as emulsifiers, chocolate and citrus curds.	Park Cake Bakeries
	Decreasing the amount of butter or margarine, using lower fat spreads or reducing portion size will all have a negative impact on quality, appearance, taste, price, research and development cost and production cost.	Delifrance
	It is an unrealistic expectation for the product to be the same quality. The consumer will perceive the change, but that will actually become less with time.	Greencore
	May need to look at reducing portion sizes as a way to counteract the cost of reducing fats.	Dorset Village Bakery
<b>Timescales</b>	2 years is not sufficient.	FDF, Park Cake Bakeries, BCCC, CAOBISCO
	Difficult to meet 2012- some companies are looking at 3-5 years from now to deal with re-engineering issues.	Baketrans
	Achieving 2012 timescale may be very challenging given the likely need for development of new solutions especially for products that combine several components, e.g. cakes will	BNF

	filings and covering.	
	2012 is very challenging due to the diverse nature of cakes.	Premier Foods
	Likely to be a 2 to 3 year project.	British Sugar

**Q19: What are your views on how this recommendation sits alongside existing legislative requirements and current best practice?**

Themes	Summary of Responses	Supporters of Response
<b>Chocolate and buttercream composition</b>	Legal requirements for the composition of chocolate, cream and buttercream limits the reformulation opportunity for cakes.	Park Cake Bakeries, 3663, BCCC, FDF, CAOBISCO, United Biscuits, BNF, ABIM, The Fat Consultant

**Q20: Do you agree that the recommendation can be achieved without raising sugar or trans fat levels?**

Themes	Summary of Responses	Supporters of Response
<b>Trans fat</b>	Saturated fat reductions should be/able to be achieved without increases trans fat level.	The Fat Consultant, Heart of Mersey, Burton's Foods, BNF, Premier Foods, United Biscuits
	It is not in industry's interest to reintroduce trans fats.	BCCC, FDF, CAOBISCO
	Important to avoid a rise in trans fat and there should be an overall reduction in energy.	The Nutrition Society
<b>Sugar</b>	Reductions in saturated fat through total fat reductions may lead to increases in sugar, because sugar will be a larger proportion of the product.	BCCC, FDF, CAOBISCO, BNF, ABIM, Premier Foods, Bakehouse, Burton's Foods, United Biscuits
	Reductions in saturated fat may mean that more sugar is required to produce a quality product.	Burton's Foods
	Saturated fat reductions should be achieved without an increase in sugar.	Heart of Mersey, Safefood
	Important to avoid a rise in sugar and there should be an overall reduction in energy.	The Nutrition Society

## General comments on cakes

Themes	Summary of Responses	Supporters of Response
<b>Industry</b>	The scale of investment required to achieve the recommendations should not be underestimated. Many of the companies producing cake products are of small or medium size and therefore might it even more difficult than larger companies to invest in major equipment changes.	BCCC
<b>Skills and Training</b>	Significant investment in new product development training for staff required in order to aim to meet recommendations.	Park Cake Bakeries
	There are skills issues in using reformulated ingredient in process technology of bakeries.	Baketrان
<b>Ingredients</b>	There can be significant implications on the taste and texture of the product when using non-lauric fats, in addition to significant capital implications for factories which do not currently work with these ingredients.	Premier Foods
	Would cake mixes also fall into this category?	3663
<b>Other comments</b>	Cakes should be viewed as a treat.	3663

## Pastries

**Q21: Is there an alternative to developing recommendations for the pastry component of pastry products that will encourage and guide businesses on saturated fat reductions in pastry products – including sweet and savoury products?**

Themes	Summary of Responses	Supporters of Response
Alternatives	For savoury products recommendation could be applied to whole product to lessen the impact on pastry quality.	Kerry Foods
	A reduction in the ratio of pastry to filling would be supported.	The Nutrition Society

**Q22: What are your views on the proposed recommendation for at least a 10% saturated fat reduction in pastry sold as such or use in further manufacturing by end 2012?**

Themes	Summary of Responses	Supporters of Response
10% saturated fat reduction by 2012	Supportive of the recommendation.	The Nutrition Society
	Recommendation is achievable.	Premier Foods, BNF, Bakehouse
	Considers that saturated fat reductions for pastry are possible.	FDF, BCCC
	Supportive but indicate need for flexibility.	Which?
	Suggest recommendation raised to 20% reduction.	Heart of Mersey
	A 5-10% reduction (especially in puff pastry) is a more realistic level of reduction.	WC Rowe
	Suggest include a recommendation on portion size.	ASO
	Encourage introduction of a recommendation on fillings.	Heart of Mersey
Timescale	Timescale is not achievable.	Brakes, ABIM

	Timescale should be extended to 2015 to coincide with retailers' timescales for a change to sustainable palm oil.	Charnwood
	Need more time to find alternative ingredients, recipe changes, new product development.	ABIM
	Timescale not practical for smaller businesses.	Dorset Village Bakery
<b>Technical/legislative issues</b>	Saturated fat provides a functional property in pastry (especially puff) so difficult to reduce.	Brakes, BNF, ABIM, WC Rowe
	Fat reductions may be possible in products with support (foil casing).	Charnwood
	Quality (taste, texture, shelf-life) of pastry may be impacted if you remove some of the saturated fat.	Bakehouse, Delifrance
	Level of reduction that is possible will differ on a case-by-case basis.	Kerry Foods
	Recommendation poses a specific challenge for puff pastry.	BNF
	'All butter' pastry could not be reformulated and retain its name.	FDF, BNF, Premier Foods
	A 10% saturated fat reduction in the pastry component might not result in a 10% saturated fat reduction in the final product.	WC Rowe, Premier Foods
	Characteristics of the pastry will be lost.	Costa pastry supplier
	Reductions in saturates could be considered for new product development, but then there is a problem with benchmarking new products to 2008.	WC Rowe
	Manufacturers will continue the successful work on pastry that has already been in progress.	BCCC, FDF
	A lower saturated fat could be used in pastry but this may be more expensive and have a negative economic impact on sales.	Delifrance
<b>Portion size</b>	The only way to reduce saturates and calories is to reduce portion size which won't be popular with consumer (and will be costly).	WC Rowe, Brakes
	Reducing portion size would be an expensive option due to associated equipment/packaging changes.	Delifrance
	Portion size may need to be reduced to counteract costs of reformulation.	Dorset Village Bakery
<b>Other comments</b>	Would consider the recommendation if consumers asked for it.	Costa pastry supplier

	Reformulated products will have to remain acceptable to consumers.	Big Bear, FDF, Charnwood, Which?, ABIM
	Consumers want clean label ingredients.	Brakes

**Q23: Do you agree that the recommendation can be achieved without raising sugar or trans fats levels?**

<b>Themes</b>	<b>Summary of Responses</b>	<b>Supporters of Response</b>
<b>Trans fats</b>	Agree that recommendation should be able to be achieved without an increase in trans fats.	Heart of Mersey, BNF
	Not in industry's interest to reintroduce trans fats.	Kerry Foods, Premier Foods, FDF, BCCC
<b>Sugar</b>	Reducing saturated fat levels through total fat reduction may result in the increase of sugar or other carbohydrates.	BCCC, FDF, BNF, Bakehouse, ABIM, Premier Foods
	Agree that saturated fat reduction can be achieved in savoury pastry without an increase in sugar.	Kerry Foods
<b>Other comments</b>	Hope that a saturated fat reduction can be achieved without an increase in sugar or trans fats and with an overall reduction in energy.	The Nutrition Society

**General comments on pastry**

<b>Themes</b>	<b>Summary of Responses</b>	<b>Supporters of Response</b>
<b>Consumer awareness</b>	Reformulation should work alongside consumer awareness of the contribution pastry makes to saturates intakes.	Which?
<b>Suppliers</b>	Reliant on the fat suppliers to provide suitable alternative fats that produce same standard of products.	NAMB

<b>Other comments</b>	Pastries should be viewed as a treat.	3663, ABIM
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## Doughnuts

### Q24: Do you agree with the Agency's approach to buns by developing a recommendation on doughnuts only?

Themes	Summary of Responses	Supporters of Response
<b>Agency approach</b>	Agree with recommendation.	The Fat Consultant, Brakes, Which? The Nutrition Society, BNF
	Agree that the focus should be on doughnuts rather than other buns.	ABIM, FDF
	Agree with principle and suggest specific values should be included with this recommendation.	Heart of Mersey
	Buns should not be excluded from 10% reductions in saturated fat levels.	ASO
<b>Technical issues</b>	Lower saturate oils may have less stability therefore lowering shelf-life of the doughnut.	The Fat Consultant
	A more saturated (liquid) frying oil may affect the ability to hold sugar to the surface.	The Fat Consultant
	Iced/glazed doughnuts cannot be produced using blended oils.	BRC
	Lower saturated oils will not result in a calorie reduction.	Brakes, BNF
	Would need trials to evaluate quality and shelf-life using lower saturated oil.	3663
<b>Sugar content</b>	Buns may not be high in saturates but some are high in sugar, as are doughnuts with toppings/fillings, this should be addressed.	Heart of Mersey, Which?, The Nutrition Society
<b>Oils</b>	Lower saturate blended oils cost more than palm oil.	BRC
<b>Trans fats</b>	Guidance on frying practice to reduce trans fats should be included.	Heart of Mersey

<b>Industry action</b>	Already provide a range of portion sizes for doughnuts.	Brakes
	Offer baked doughnuts which are lower in calories.	Brakes
	An alternative for doughnuts is to change dough fat rather than simply looking at frying oil.	ABIM
	Already produce some doughnuts with reasonably lower saturated fat compared to others on the market.	3663, Brakes
	Where buns are low in saturated fat the FSA should work to suggest these products as alternatives to higher saturated fat products.	ASO
<b>Other comments</b>	Need to get people to consume these products less frequently or in smaller amounts.	BRC

## Overarching and General Comments

### Objectives and Agency approach

Themes	Summary of Responses	Supporters of Response
<b>Objectives</b>		
<b>Agency objectives</b>	Support for Government and Agency work to improve health and reduce CVD.	Heart of Mersey, ABIM
	Support for Government and Agency work to reduce saturated fat intakes.	NHS Scotland, BHF, MRC – HNR, Brakes, Which?, Mars, ASO, BRC, Premier Foods, 3663
	Support for Government and Agency work to reduce saturated fat/sugar in foods through reformulation.	NHS Scotland, BHF, Safefood, BDA
	This work has an important role to play in delivering the Scottish Government’s National Outcome “We live longer, healthier lives”.	NHS Scotland
<b>Agency Approach</b>		
<b>Voluntary recommendation</b>	Support approach of voluntary recommendations, not targets (which implies mandatory compliance).	WC Rowe

<b>approach</b>		
	Support a target-based voluntary approach.	BHF
	Disappointed that recommendations remained focussed on setting numerical targets for specific nutrients in certain foods, rather than focussing on the need for everyone to achieve a healthy balanced diet.	FDF
	Targets may discourage companies from reformulating if they feel that they will not achieve the recommendations. Targets will also restrict companies in the type of products they could put on the market. Concern that companies would be criticised by the FSA and NGOs for not meeting targets.	BRC
	The saturate reduction targets proposed are, on the whole, achievable, but a simple strategy of saturates reduction only will not work in the longer term.	ABIM
<b>Category-wide recommendations</b>	Some of the categories included are very broad, including a wide range of products. Consideration should be given to how targets for reduction would work within more specific sub-categories.	Which?
	As some of the foods that fall within the categories covered in this consultation are by their nature 'indulgent' product, we do not think that a blanket approach to reductions will always be feasible.	Which?
	Do not support setting across the board targets for saturated fat reformulation.	Kraft, BCCC, FDF, CAOBISCO, VBZ, Kerry Foods, BNF
	Question the use of/disagree with blanket numerical targets for whole food categories because we recognise that reformulation, even within a category, is not a level playing field.	BNF, GSK
<b>2008 benchmark</b>	Saturated fat reduction before 2008 must be taken into account.	VBZ, Jo Bruce, BRC, Walkers Charnwood, Mars, Park Cake Bakeries, BNF
<b>Calorie reductions</b>	Saturated fat and calorie reductions should not be tackled together. Combining saturated fat and energy reductions makes the recommendations extremely challenging/unrealistic.	BCCC, CAOBISCO, VBZ, Kraft, Mars, BNF, BakeMark UK, WC Rowe
	Calorie reduction is not possible/feasible.	United Biscuits, Burton's Foods

	Recommend a target calorie reduction, otherwise this could be so small as to be meaningless. Concerned at how “...unless a technical case can be made...” may be interpreted by industry.	ASO
	Request clarity on Agency priorities in relation to saturated fat reductions and calorie reductions.	ABIM
	Support an overall reduction in energy content alongside saturated fat.	The Nutrition Society, Heart of Mersey
<b>Format of the recommendations</b>	Recommendations should be less prescriptive and allow for flexibility rather than detailing percentages and grams.	BCCC, FDF, CAOBISCO, VBZ, BRC, Nestle
	Unclear how the various targets have been derived.	BNF
	Welcome Agency’s encouragement to use alternative approaches.	PepsiCo
	These recommendations should be flexible enough to allow reformulation where possible, without incurring excessive costs.	United Biscuits
<b>Next steps</b>	Unclear whether recommendations are part of a stepwise approach.	BCCC, CAOBISCO, VBZ, Park Cake Bakeries
	This approach should be the start of a step-wise approach to lower saturated fat intakes (even lower than 11% of intakes would be ideal).	Heart of Mersey
<b>Additional and other approaches</b>		
<b>Consumer education and information</b>	Focus should be on consumer education and labelling.	Dairy UK, BRC
	Agency should be continuing to inform consumers how to interpret nutritional advice from labels/advertising.	BHF
	Labelling is an important means of providing consumers with information about the product.	BSDA
	FSA can encourage consumer demand for healthier options and smaller portions.	BCCC
	Important to also encourage healthier food choices.	3663
	Request support from Agency to improve consumer understanding around sweeteners safety.	Ajinomoto, Coca Cola, PepsiCo, BNF, FDF
	Important that healthy eating and physical exercise messages are clearly communicated	BSDA, 3663

	to consumers.	
	It would be useful for the Agency to communicate the recommendations to the general public.	BHF
	Essential that recommendations to industry are accompanied by measures to increase consumer awareness about the importance of saturated fat reduction and tools to enable consumers to make healthy choices.	BHF, Which?
<b>Animal feed</b>	There is research from the LIPGENE project to show that altering the diet of ruminants towards feeds that are naturally high in mono-unsaturated fatty acids (MUFAs) can change the fatty acid profile of milk towards cis-MUFAs.	WC Rowe
<b>Focus on population groups</b>	Strongly encourage the Agency to consider the saturated fat and energy content of products aimed particularly at children and whether the same targets apply or whether there is scope for tougher targets (particularly in relation to sugar).	ASO
	Focus should be on 'over-consumers' of energy, not a population based approach.	The Sugar Bureau
<b>Legislation</b>	Mandatory regulation should be considered as an alternative if recommendations are not successful.	BHF
	Introduce legislation to prohibit the addition of saturated fat and sugar to food.	Consumer 1
<b>Sector contributions to intakes</b>		
<b>Biscuits, cakes, pastries and buns</b>	Bakery and confectionery products contribution only 5 and 8% to fat and saturated fat in the diet, respectively.	WC Rowe
	Bakery products only account for 9% intake of saturated fat in the overall diet.	ABIM, AAK, Park Cake Bakeries
<b>Soft drinks</b>	Aware that dietary surveys indicate relatively high contributions from carbonated drinks to NMES intakes, but understand that the contribution of sugar-sweetened soft drinks to energy intakes is 2% of adults and ranges from 3-5% for some children.	PepsiCo
	Sugar-sweetened soft drinks provide an average of only 3% of total daily energy for adults.	Coca Cola

<b>Chocolate confectionery</b>	According to NDNS data chocolate confectionery provides 4-5% of saturated fat intakes for adults.	BNF
	NDNS data demonstrates 2% of total daily energy intake by adults came from chocolate confectionery.	Cadbury
	NDNS data demonstrates that chocolate confectionery contributed 3 and 5% to total and saturated fat intakes.	Cadbury
<b>Current market</b>		
<b>Reformulation</b>	Companies are already reformulating products to reduce saturated fat, where technically possible.	FDF, BRC, Nestle, 3663, Kraft, Mars, 3663, United Biscuits, Which?
	Many consumers prefer to eat regular, mainstream products in moderation rather than adopt reformulated versions and we believe there should be choices for all consumer preferences.	Kraft
	Support the approach of encouraging reformulation of standard products rather than only new products.	ASO
<b>Portion size</b>	Support work to reduce portion sizes and make smaller portion sizes more widely available.	Cancer Research UK, BHF, Which?, BNF, BDA
	Some outlets, such as petrol stations and certain newsagents, tend to only sell larger portions even when the manufacturer already produces smaller options.	Which?
	Support discouraging businesses from marketing larger/supersize portion sizes which may encourage overconsumption.	ASO
	An end goal of creating common pack weights does not recognise factors such as consumer acceptance, brand integrity and usage occasion.	Mars
	A wide range of different portion sizes is already available.	BCCC, FDF, CAOBISCO, BSDA, Kraft, Mars, Cadbury, Nestle, The Sugar Bureau, GSK, PepsiCo, Coca Cola
	Concerns that smaller portion sizes will result in poorer value for money for consumers.	Dairy UK, BCCC, CAOBISCO, VBZ, FDF
	Smaller portion sizes should be offered at proportionate value for money to consumers.	Safefood, Which?, University of Aberdeen PHN Research Group
	Important that industry is responsible for the way in which it prices smaller portion sizes	Which?

	so that consumers are not discouraged from buying them and that they are available in a wide range of outlets.	
	Any actions taken should not disadvantage lower income/vulnerable groups e.g. smaller portions should not be relatively more expensive.	ASO
<b>Monitoring</b>		
<b>Industry progress</b>	Request clarity on how the Agency will monitor the implementation of its voluntary recommendations. The Agency should be mindful of the resource implications to industry of any method adopted.	FDF
	Stress the importance of independent monitoring of progress towards achieving recommendations. Whilst action on reformulation can be publicly assessed with relative ease, monitoring of marketing and promotion activity places greater responsibility on Industry to provide access to data. Systems may need to be introduced to make the provision of this information mandatory.	MRC- HNR
	Request clarity on how timescales and reformulation will be monitored.	ABIM, AAK, BNF
<b>Wider impacts</b>	Important to monitor the saturated fat of other processed foods to ensure that the saturated fat removed from the foods in the present consultation are not added to other foods.	University of Aberdeen – PHN Research Group
<b>Marketing and labelling</b>	Agency needs to monitor use of claims and nutritional advice on marketing material/labels so that consumers aren't misled.	BHF
<b>Achievements and Commitments Table</b>		
<b>Agency approach</b>	Support the proposal to publish achievements and commitments on the Agency website to highlight progress.	BHF
<b>Wider impacts</b>	Achievements and Commitments table could result in endorsement of products which divert consumers from a healthy diet.	Dairy UK
	Publishing an Achievements and Commitments table, would effectively make the recommendations compulsory for those businesses that choose to take a responsible	FDF

	view on the issue.	
<b>Recognising achievements</b>	Would like information on how the Agency intends to support and publicise the achievements of industry, in addition to the Achievements and Commitments table.	FDF

<b>General reformulation and technical issues</b>
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<b>Technical issues</b>	There are a number of technical issues with reducing saturated fat in bakery products, which make reformulation challenging.	VBZ
	Saturated fat reduction is only possible for industrial fat blends and the Agency should only focus on these fat blends.	VBZ
	There are very significant technical, financial and consumer challenges that companies have to overcome.	FDF, ABIM
	It is for individual companies to assess reformulation and portion size opportunities in individual products.	FDF, BSDA
<b>Reduction in calories</b>	Replacing fats to reduce saturated fat will not lead to reduction in energy. Reformulation and product development to reduce calories could reduce product quality.	BRC, VBZ, United Biscuits
	Saturated fat reduction will not necessarily result in a calorie reduction.	Brakes, Burton's, Nestle
	Replacing fats to reduce saturated fat will not necessarily lead to reduction in energy. However, where there is a technical solution that can also reduce calorie content we will use it.	Premier Foods
<b>Use of additives</b>	Potential use of additives to achieve recommendations goes against consumer and retail current preference for 'clean labels'.	Nestle, Park Cake Bakeries, 3663, ABIM, BCCC, CAOBISCO, FDF, VBZ, GSK, United Biscuits, BSDA
	Oppose the use of artificial sweeteners.	ASO
	If sugar is substituted by artificial sweeteners, need to consider their use and potential consequences for health.	BDA

	Must consider role of sweeteners – beneficial to adjust consumer’s preference for highly sweetened products.	Which?
<b>Product quality and acceptability</b>	Complying with some of the recommendations will compromise the quality and taste of some products.	BRC
	Balance needs to be struck between reformulating to reduce saturated fat and added sugars, but without compromising on taste.	Which?
<b>Sustainability</b>	Important that sustainability of new ingredients is assured.	FDF
	Agency needs to be aware of challenges from within industry to move to sustainable palm oil without increases in saturated fat by 2015.	Walkers Charnwood
	Availability of sustainable palm oil will play an important role in reformulation.	Nestle
<b>Role of Agency</b>	The Agency could play a role in encouraging successful companies to share information about reformulation.	BRC
<b>Sugar</b>	Unclear why a saturated fat reduction should not result in an increase in sugar.	VBZ
<b>Fibre</b>	In accordance with EU law, changes to the definition of fibre and energy conversion factor may result in an increase in declared calories, with no change in product.	BCCC, FDF, CAOBISCO, VBZ, Nestle, Premier Foods
<b>Traditional/niche products</b>	Appreciate Agency recognition that for traditional, niche or seasonal products there may be particular constraints and different considerations in terms of reformulation or portion size.	NFU
	Limited reformulation potential for traditional and niche products.	BRC, Premier Foods
	In practice a lot of bakery products are very traditional and traditional recipes and not changed/reviewed regularly and changing these recipes is risky with poor consumer acceptance.	VBZ

**Portion Size**

<b>Principle</b>	Oppose recommendations to reduce portion size of food products	Consumer 2, Consumer 3, Consumer 4
<b>Evidence base</b>	Little evidence of a direct association between portion size and weight gain and obesity.	BNF, Cadbury, FDF
	Lack of evidence around 'tipping point' for consumers choosing two smaller portions instead of one.	BCCC, FDF, CAOBISCO, VBZ, Safefood, Mars, BNF, Nestle, BDA, Coca Cola
	Lack of evidence to suggest that wider availability of smaller portion sizes will have any impact on obesity rates.	The Sugar Bureau, BCCC
<b>Further research/areas of work</b>	Need for further research and understanding of portion sizes.	Mars, BNF, BCCC, FDF, CAOBISCO, VBZ, Nestle, WC Rowe
	Recommend Agency discusses with the IGD the recent portion size work carried out by its Nutrition Strategy Group.	NFU
<b>Labelling</b>	Products should have appropriate, clear and easy to quantify labelling that reflects what is considered a portion. This labelling should also use adult or child portions based on who is the primary consumer.	BHF
	Suggest sharer packs indicate recommended portion size prominently.	Safefood
<b>Consumer acceptability</b>	Manufacturers are aware that reductions in portion size are viewed negatively by consumers, often driven by negative coverage in the press. FSA should actively support the need to reduce portion sizes such that moves are viewed positively by consumers in the future.	FDF
	Important that industry is responsible for the way in which it prices smaller portion sizes so that consumers are not discouraged from buying them and that they are available in a wide range of outlets.	Which?

**Legislative issues**

<b>Nutrition and Health Claims</b>	The Nutrition and Health Claims Regulation (EC) No. 1924/2006 presents reduced incentive for reformulation due to restricted opportunities to make claims, such as “X% less” on pack.	ABIM, BNF, BCCC, FDF, CAOISCO, VBZ, Mars, Nestle, Jo Bruce, United Biscuits, Premier Foods, Bakehouse
	A reformulation claim e.g. “10% less saturated fat” would provide incentive to reformulate products.	BCCC, FDF, CAOISCO, VBZ, United Biscuits, Premier Foods, Mars
	The Nutrition and Health Claims Regulation (EC) No. 1924/2006 does not permit products to highlight reformulation unless reductions of 30% or above are achieved.	Dairy UK, ABIM, AAK, Park Cake Bakeries
	Use “X less” claims should be consistent for energy and sugar.	FDF
<b>Nutrient profiling</b>	FSA should prevent specific health claims being made about products when the overall product could not be considered healthy.	ASO
	European nutrient profiles will limit potential for reformulation to be communicated to consumers.	BRC, FDF
<b>Chocolate and cocoa products</b>	Current EU legislation on chocolate limits reformulation potential.	Cadbury, Kraft, BCCC, FDF, CAOISCO, VBZ, Mars, Nestle, BNF, Northern Foods, The Fat Consultant
	EC Regulation presents challenges/restrictions to saturated fat reductions in chocolate.	Mars, Which?, Burton’s Foods
<b>Buttercream</b>	Legislation controls the composition of buttercream so limits opportunities for reformulation.	BNF, Northern Foods
<b>Use of sweeteners</b>	Use of sweeteners is currently regulated by Directive 94/35/EC on sweeteners for use in foodstuffs, this limits the reformulation strategies.	FDF, BCCC, CAOISCO, VBZ, United Biscuits, ABIM
<b>Other comments</b>	Encourage the FSA to work at an EU level to remove any current legislation which restricts the formulation of products which would have health benefits.	ASO, Heart of Mersey
	Would like to see changes in legislation of widely consumed primary ingredients used in processed foods.	BRC

**Impact on businesses**

<b>Imported products</b>	Imported products are not covered in the scope of these recommendations and UK manufactured products may be disadvantaged as a result.	FDF, The Sugar Bureau, BNF, Park Cake Bakeries, BCCC, Coca Cola
	This initiative would affect European manufacturers in addition to UK ones.	CAOBISCO, VBZ
<b>Cost to businesses</b>	Costs to businesses of making changes in line with recommendations will also include the cost in lost business to manufacturers who retain their traditional products and concentrate their energies on them.	The Sugar Bureau
	Costs associated with reformulation need to be taken into account.	CAOBISCO
	Recommendations put brand leaders at a competitive disadvantage when compared to other manufacturers who will not face the same reputational issue and who will be able to wait and see how consumers react before deciding on whether to implement the recommendations for themselves.	FDF
	These recommendations should be flexible enough to allow reformulation where possible, without incurring excessive costs.	United Biscuits
<b>Product quality</b>	When developing a product, there is considerable pressure to match or exceed the stated quantity of key dairy ingredients, when compared to competitor products.	WC Rowe
<b>Catering</b>	It is important to raise the importance of this issue across the food industry, including the food service and catering sectors.	Which?
	Consideration also needs to be given to improving catering practice in catering establishments.	3663
<b>Standardisation</b>	Recommendations could lead to “harmonisation” (particularly in relation to portion size). It is generally recognised that by introducing standards, some aspects of competition can be stifled. Standardisation of portion size might ultimately lead to standardisation of	FDF, Cadbury

	price, blunting the competition which may currently exist.	
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<b>Evidence base</b>
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<b>Evidence of efficacy of recommendations</b>	General approach of influencing food energy intake of those individuals likely to gain weight is not supported by any evidence.	The Sugar Bureau
	Recommendations are not underpinned by sound scientific evidence and lack evidence of efficacy.	FDF, Coca Cola, BRC, The Sugar Bureau, BCCC, CAOBISCO
	No conclusive evidence that shows the proposed recommendations provide a workable solution and will not result in commercial losses.	BCCC
	Agency should be confident that focussing on particular nutrients or ingredients will actually lead to an improvement in dietary health status of the population that is comparable to the impact on industry of following these recommendations.	NFU
<b>Basis of recommendations</b>	Figures in the specific recommendations arise from informal 'discussions with industry' rather than from modelling which would establish the effect of such recommendations.	BRC
	Some of the data used are out of date. When the new NDNS database becomes available at the end of the year, the figures will have to be recalculated.	BRC
<b>Sugar and energy</b>	No evidence that recommendations to reduce sugar in foods will lead to reduction energy intakes.	The Sugar Bureau, FDF, Coca Cola
	Question whether the link between sugar and obesity is as clear as for sugar and dental caries.	NFU
	Highlight that Government recommendation of no more than 10% of total dietary energy should come from sugars is in relation to dental caries, not obesity.	FDF, The Sugar Bureau
	Agency should wait for SACN to report on review of carbohydrates.	The Sugar Bureau, FDF
	Evidence linking sugar to obesity and weight gain is poor/not clear.	The Sugar Bureau, FDF, BRC, Coca Cola, GSK

	More transparent justification for recommendations for reductions in added sugar required.	BNF
	Uncertain why focus is on “added sugar” rather than energy – focus is not justified.	The Sugar Bureau, FDF, Coca Cola
	Lack of evidence on the impact of energy proposals on those who are, or may become, underweight.	The Sugar Bureau
<b>Saturated fat</b>	Saturated fatty acids have varying effects on blood cholesterol.	VBZ, Kraft, Nestle, Cadbury
	FSA should consult expert bodies to understand whether different saturated fatty acids should be considered separately, if there are negative consequences of increased saturated fat replacements and whether there are differences between individuals with high and normal cholesterol.	FDF, Nestle

## Impact Assessment

**Q25: Do you agree that the information provided on improvements to public health are accurate and cover the range of benefits?**

Themes	Summary of Responses	Supporters of Response	
<b>Accuracy of improvements to public health</b>	The information on public health improvements are accurate.	Costa biscuit supplier, Costa cake supplier, Costa pastry supplier, Bakehouse	
	The range of health benefits is recognised.	United Biscuits, 3663	
	Public health gains are likely to have been exaggerated.	The Sugar Bureau, FDF	
	No timeframe to which improvements are expected to occur has been given.	The Sugar Bureau, FDF	
	The claimed improvements are based on questionable assumptions.	The Sugar Bureau, FDF	
	Other studies on health benefits have proved inconclusive.	The Sugar Bureau, Coca Cola	
	Not enough consideration has been made to the nutritional impact of replacing certain fats with others, or carbohydrates.	Nestle	
	Need to look at the health effects of different saturated fats.	Nestle	
<b>Recommendations do not go far enough to improve public health</b>	Should also consider the benefits to public health of reducing trans fat levels.	Heart of Mersey	
	The benefits to oral health should be highlighted; as should the dangers of acidic drinks (whether low in sugar or not) to dental health, and the indirect effect of fat reduction on dental health through improved general health.	BDA	
	No mention of impact on lower income groups – reformulated	PHN Research Group – University of Aberdeen	

	products need to be made available to all groups.	
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**Q26: Is the data on industry sectors affected an accurate representation of those affected? If not please provide new evidence.**

Themes	Summary of Responses	Supporters of Response
<b>Sectors</b>	It is an accurate representation of industry sectors affected.	Costa biscuit supplier, Costa cake supplier, Costa pastry supplier, 3663
	Manufacturers that also produce retailer brand products should be taken account of.	United Biscuits
<b>Additional information</b>	Breakdown of figures for annual sales of in-store pastry products provided.	Bakehouse

**Q27: Is it possible to indicate how much of your reformulation costs, where saturated fat or energy reduction has taken place, relate directly to saturated fat/added sugar/portion size and how much are related to other product changes?**

Themes	Summary of Responses	Supporters of Response
<b>Sharing of cost information</b>	Able to indicate reformulation costs but have not shared with the FSA as yet.	Costa biscuit supplier
	Unable to disclose this information.	Costa pastry supplier, Burton's Foods
	Difficult to differentiate the costs.	Costa cake supplier, Nestle, Brakes
	Have shared this information with the FSA directly.	Premier Foods
<b>Additional information on reformulation costs</b>	Sweet/savoury biscuits 85% of reformulation investments to date relates to saturated fat reductions.	United Biscuits
	In pastry there could be an additional cost of up to 15% to achieve saturated fat reductions that the recommendations suggest.	Brakes

**Q28: Could you indicate how much of the reformulation work is triggered by the work of the Agency and how much is influenced by other factors?**

<b>Themes</b>	<b>Summary of Responses</b>	<b>Supporters of Response</b>
<b>Drivers for reformulation</b>	Reformulation is triggered by the FSA on core lines.	Costa cake supplier
	Reformulations are based on many inputs, consumers, retailer, business partnerships as well as the FSA and DH.	Burton's Foods
	Primary driver is consumers.	United Biscuits, Brakes
	The FSA's initiative is in addition to the business plan for reformulation.	Premier Foods, 3663
	Have already been working on this area from an ethical stance, but having FSA targets is helpful for building business cases.	Bakehouse
	Cannot pinpoint specific areas where the FSA has influenced reformulation.	Nestle
	Where there is a reduction in saturated fat/energy it is usually due to a specific project.	Bakehouse
	Able to indicate drivers for reformulation but have not shared with the FSA as yet.	Costa biscuit supplier
<b>Other</b>	Important to change consumers' behaviour surrounding saturated fats so that they demand healthier products as they are the driver to reformulation.	Brakes
	Unable to supply this information.	Costa pastry supplier

**Q29: How does the Agency's existing salt reduction strategy impact on your ability to engage with the Agency on reducing saturated fat/added sugar/portion size?**

<b>Themes</b>	<b>Summary of Responses</b>	<b>Supporters of Response</b>
<b>Resources</b>	Resource intensive as the same resources are used for salt reformulations as for saturated fat/energy.	Burton's Foods, Premier Foods
<b>Timings</b>	The two strains of work are very different and working on them in tandem is not possible due to the nature of the changes required.	Burton's Foods
	Would prefer for the FSA to have a whole strategy for nutrient based initiatives and this be carried out at the same time so that resource needs can be assessed.	Premier Foods
<b>Other</b>	Helpful to have guidance on the FSA's priorities for these different initiatives.	Premier Foods
	No implications foreseen regarding engaging with the Agency on this. All of our biscuit products meet the 2012 salt targets.	Nestle
	Does not impact on ability to engage with the FSA on saturated fat/energy reductions.	Costa biscuit supplier, Costa cake supplier, Costa pastry supplier, Bakehouse

## Costs relating to saturated fat/added sugar reduction

Q30: Page 51 outlines the reformulation process costs. Is this a fair representation of the factors influencing reformulation costs?

Themes	Summary of Responses	Supporters of Response
<b>Reformulation process cost</b>	Agency has outlined a fair representation of the costs.	Costa biscuit supplier, Costa cake supplier, Premier Foods, Bakehouse
	Labelling costs are misrepresented, should be more like £3-5k per SKU.	Burton's Foods
	Artwork and design for packaging would be about £550, although many factors will affect the costs for packaging, including whether the product needs primary and secondary packaging, the label colours, existing stocks etc.	3663
	Should also include costs for sourcing new ingredients, and take into account that the price for raw materials has increased/fluctuates.	United Biscuits, Nestle, BCCC, FDF
	Should account for research and development costs, putting new recipes into practice, changes in equipment, and the costs relating to portion re-sizing, all in the current economic climate.	Nestle, BCCC, FDF, ABIM
	Additional costs are incurred when changing the raw materials – this could slow down production and require new equipment.	ABIM
	Costs will vary dramatically as they are dependent on individual companies.	Nestle
	Small and medium businesses may find it more difficult than larger companies to invest in these changes.	FDF, ABIM
<b>Other</b>	Unable to disclose this information.	Costa pastry supplier

**Q31: The Agency would welcome any costs or estimates of costs relating to R&D and/or capital expenditure relating to saturated fat or energy reduction.**

<b>Themes</b>	<b>Summary of Responses</b>	<b>Supporters of Response</b>
<b>Costs</b>	Difficult to estimate.	Burton's Foods, United Biscuits
	Example of a new oil supply system would cost in the region of £millions to service a site.	Burton's Foods, United Biscuits
	Costs could be up to an increase of 20% on selling price.	NAMB, Baketran
	Should take into account lost opportunity costs for development of new products whilst work is diverted to reformulation.	Premier Foods
	Hidden costs involved if you account for lost sales.	Jo Bruce
	Costs should include that of removing an ingredient and substitution of others, and the additional required testing of the new products.	3663
<b>Other</b>	Unable to disclose this information.	Costa biscuit supplier, Costa pastry supplier, Bakehouse

**Q32: Do you think that variable costs can be realistically measured?**

<b>Themes</b>	<b>Summary of Responses</b>	<b>Supporters of Response</b>
<b>Information on variable costs</b>	Agree that variable costs can be measured.	Costa biscuit supplier, Costa cake supplier
	It is difficult to measure variable costs as the scope is too broad (can't generalise across companies).	Costa pastry supplier, United Biscuits, Premier Foods, Bakehouse
	Variable costs likely to be unique to our company.	Premier Foods
	Information is commercially confidential.	Premier Foods
	An example could be a trial, where the product is sent to waste which costs about £35,000 per day per product (typically 3-4 trials	United Biscuits

	are needed per product ~ £140,000).	
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**Q33: Is there too great a variation between products to come up with an idea of average cost per product group?**

Themes	Summary of Responses	Supporters of Response
<b>Average costs per product group</b>	There is too great a variation between products to get an average cost.	Costa biscuit supplier, Costa cake supplier, Costa pastry supplier, Premier Foods
	Small recipe changes could result in one cost (£5-10k) but a more significant change in recipe could run up to £200-300k per product to include all trials and research. An average cost is too difficult to achieve.	Burton's Foods
	Have many types of biscuits which each require a different technical/manufacturing solution.	United Biscuits
	Making a change to a critical component of the dough will result in consequent changes in the end products for our whole range.	Bakehouse

**Q34: Would it be possible to derive average uses of ingredients such as shortening, cake margarine, pastry margarine, biscuit oil blends amongst product groups e.g. product type x use 40% shortening? Would this be meaningful?**

Themes	Summary of Responses	Supporters of Response
<b>Average uses of ingredients</b>	Would not be a worthwhile exercise.	Costa biscuit supplier, Costa cake supplier, Costa pastry supplier, United Biscuits, Premier Foods, Nestle
	Within our own range this is a helpful exercise, but not for generalised product groups.	Bakehouse
	This could be possible if the groupings were done according to product type i.e. sweet, semi-sweet, cream etc.	Burton's Foods

**Q35: Could you provide an estimate of how much ingredients such as shortening, cake margarine, pastry margarine, biscuit oil blends comprise of the final retail cost of products in pastry, cakes, biscuits and chocolate confectionery?**

<b>Themes</b>	<b>Summary of Responses</b>	<b>Supporters of Response</b>
<b>Cost estimates of ingredients</b>	Unable to disclose this information as too commercially sensitive.	Costa pastry supplier, Burton's Foods, United Biscuits, Nestle
	This information could be provided to the Agency directly.	Premier Foods
	Between 9.5%-10% of the commercial cost (not consumer cost) of the product.	Bakehouse
	This could be disclosed for recipes where there is no commercial intelligence to be protected.	Costa biscuit supplier
	Varying packaging, manufacturing and retail costs make this difficult to calculate as a percentage of the final cost (and too sensitive).	Burton's Foods

**Q36: Do you think that the cost increases for ingredients are accurate?**

<b>Themes</b>	<b>Summary of Responses</b>	<b>Supporters of Response</b>
<b>Accuracy of cost estimates</b>	Agree that the cost increases are accurate.	Bakehouse
	Do not agree that the cost increases are accurate.	Costa biscuit supplier
	Difficult to confirm whether the cost increases are accurate due to huge fluctuations in commodity costs.	Burton's Foods, Nestle
	Not possible to state as many different potential ways to reduce saturates.	Premier Foods
	Information provided is not comprehensive. The scale of investment required from companies should not be underestimated.	Nestle
	Cake margarine could be double the costs the Agency has estimated.	United Biscuits

	Biscuit oils costs could increase by 25%.	United Biscuits
	Unable to disclose this information.	Costa pastry supplier

### Costs relating to portion size recommendations

#### Q37: What is the amount of packaging stock (measured by months and units) you have in reserve?

Themes	Summary of Responses	Supporters of Response
<b>Amount in reserve</b>	Up to 6 weeks for packaging, but labels are continuously produced.	Costa pastry supplier
	3-4 months.	Premier Foods, Costa biscuit supplier
	6 months.	Costa cake supplier
<b>Other</b>	Depends on the rate of sale/seasonality etc.	United Biscuits, 3663
	Do not have customer facing packaging, so minimal cost.	Bakehouse
	Lead-time for packaging is approx 12 weeks.	United Biscuits

#### Q38: How much would it cost to design a new label for a smaller single-portion size per product and how many products would that affect?

Themes	Summary of Responses	Supporters of Response
<b>Labelling costs</b>	£3000 per printed film/£300 per outercase.	Costa biscuit supplier
	New artwork and design would be approx £550.	3663
	Design agency work can cost £40k.	United Biscuits
	Re-origination costs for packaging between £1-2k, large ranges could cost up to £100k.	United Biscuits
	Portion size reduction is not appropriate for roll wrap biscuits.	United Biscuits
	Cost of re-packaging depends on whether requires primary or	3663

	secondary packaging, how many products in the range require new artwork etc.	
	Costs depend on product type.	Costa cake supplier
	Produce outer packaging/labels only.	Costa pastry supplier, Bakehouse

**Q39: What factory/transportation changes would need to be undertaken to account for the new single-portion sizes?**

Themes	Summary of Responses	Supporters of Response
<b>Changes to take into account</b>	Require new moulding roller, modifications to jam depositing & cookies would need new dies.	Costa biscuit supplier
	If outer cases need re-sizing then the packaging equipment & automatic palletisation would need to be amended which would be very expensive.	Bakehouse
	Could be virtually none as products are bulk packaged for sale in individual portions, so factory/transport may not need to change.	Bakehouse
	Products would take up less space on baking trays/ovens so these might need to be changed.	Bakehouse

**Q40: How much are these changes likely to cost, broken down by activity?**

Themes	Summary of Responses	Supporters of Response
<b>Costs</b>	£5000 for moulding roller rings. £2000 for jam depositer modifications. £1000 for cookie dies.	Costa biscuit supplier
	Hundreds of thousands of Euros to amend packaging equipment.	Bakehouse
	Significant costs associated with reduced portion size of bottled soft drinks, and will also be seen as poorer value for money.	FDF
	Large costs are associated with changes in labelling/data sheets.	ABIM

	Reformulated products may have shorter shelf lives which could affect distribution costs and waste creation.	
<b>Other</b>	Unable to disclose this information.	Costa pastry supplier

**Q41: How many vending machines/other channels to distribution, not including retail, would you be likely to change to accommodate smaller single-portion sizes?**

Themes	Summary of Responses	Supporters of Response
<b>Changes to vending</b>	A smaller pack size might require a change in parts for vending machines.	FDF
	Unknown.	Costa biscuit supplier

**Q42: How much is this likely to cost per machine and how many machines are there in the current market place?**

Themes	Summary of Responses	Supporters of Response
<b>Costs</b>	Unknown.	Costa biscuit supplier, Costa pastry supplier, Bakehouse

**Additional questions on the consultation**

**Q43: How long would it take a business to familiarise itself with the Agency recommendations?**

Themes	Summary of Responses	Supporters of Response
<b>Timescales</b>	Up to 1 week.	Costa biscuit supplier, Costa cake supplier
	A few hundred hours.	Burton's Foods

	A short period of time as we are already working in this area.	Bakehouse
	2 months.	Premier Foods
	3 months.	United Biscuits
	It is not possible to state how long it would take to formulate plans to achieve the recommendations. Discussions with retailer partners could take longer.	United Biscuits
<b>Other</b>	Relies on the assistance of the FDF to help with this.	Burton's Foods
	Depends on the impacts/demands from customers.	Costa pastry supplier

**Q44: Can you provide any further information/case studies showing the extent of the costs to achieve the levels of reformulation and portion size changes described in this consultation?**

Themes	Summary of Responses	Supporters of Response
<b>Case studies</b>	Refer to the Mr Kipling Delightful case study used previously.	Premier Foods
	Not able to disclose further information.	Costa biscuit supplier, Costa pastry supplier

### General comments on the Impact Assessment

Themes	Summary of Responses	Supporters of Response
<b>Other comments on Impact Assessment</b>	No clear evidence base for the Impact Assessment	FDF
	Impact Assessment needs to be more comprehensive (including estimates of costs of the proposals, impact on competition and a rural proofing assessment)	FDF, The Sugar Bureau
	Impact Assessment should recognise that these recommendations may be in conflict with the intention of Directive 2007/45/EC	FDF

	(Nominal Quantities for Pre-Packed Products) regarding standardisation of portion sizes	
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