



Saturated Fat and Energy Intake Programme



Food Standards Agency Public Written Consultation on the Draft Saturated Fat and Energy Intake Programme

BACKGROUND AND INTRODUCTION

The Food Standards Agency's (FSA) strategic objectives include a commitment to work with health departments/directorates and other stakeholders to reduce the average intake of saturated fat from the current level of (13.3%)¹ to below 11% of food energy by 2010 for everyone over 5 years of age, and to work with health and other departments/directorates to tackle obesity, by helping consumers to achieving a balance between calorie intake and energy output.

These commitments form part of a much broader goal for the FSA, to improve consumer's diet and health by making it easier for them to make healthy choices. We seek to achieve this through a range of activities that span reformulation of products to improve their nutritional profile; encouraging consumers to make healthier choices and providing them with the information and skills to do so; and by removing barriers to healthier choices, for example food labelling.

The Agency's Saturated Fat and Energy Intake Programme is a UK-wide programme of specific initiatives to deliver our strategic objectives that also complements our broader range of work on making healthy choices easier, and supports the Westminster Government's obesity strategy, Healthy Weight, Healthy Lives, and parallel initiatives in Scotland and Northern Ireland. The Scottish Government Food, Health, Physical Activity and Obesity Action plan will be launched in 2008, and in Northern Ireland, the cross-departmental taskforce report "Fit Futures, Focus on Food, Activity and Young People", was published in January 2006.

On March 27 2007, the FSA published its draft Saturated Fat and Energy Intake Programme for a 12 week public consultation which closed on 19 June 2007. The consultation package, which included the draft Programme and a partial Regulatory Impact Assessment outlining the estimated costs and benefits associated with the proposals laid down in the draft Programme, was published on the FSA website and sent to 360 UK-wide stakeholders, including consumer groups, health organisations, food industry organisations, trade associations, local authorities and other government departments (and directorates).

A total of 84 responses were received. Of these, 47 were from industry organisations (including two retailers, 18 manufacturers/producers, six foodservice organisations and 21 trade associations). There were 19 health-related organisations that responded along with six consumers/consumer organisations, two academic organisations, one local authority and nine 'other' organisations.

An evaluation of the responses shows respondents welcomed the opportunity to contribute to the development of the Programme and broad support for the focus of the FSA' proposed initiatives namely:

- improving consumer awareness and understanding of healthy eating with particular focus on the impact of saturated fat on health;
- encouraging promotion and increased uptake of healthier options, for example reduced fat products and retailers' 'healthier' ranges;
- encouraging increased accessibility of smaller food portion sizes; and
- encouraging voluntary reformulation of mainstream products to reduce saturated fat and energy.

The summary has been developed to capture predominant views, but cannot reflect every comment. Anyone wishing to view the full responses, should contact the Food Standards Agency library (Tel: **020 7276 8181**; email: InfoCentre@foodstandards.gsi.gov.uk) about public viewing arrangements.

¹The Agency's Strategic Plan refers to the average intakes of 13.4%. The National Diet and Nutrition Surveys show that population average intake is 13.3%.

NEXT STEPS

Broad support for the key initiatives identified in the FSA's consultation was expressed in responses, and the FSA is now developing the proposals within the Programme, taking into account the detailed comments received. Our future work across the four themes of the Programme will include:

1. Consumer awareness of the impact of saturated fat on health

The consultation responses demonstrated a high level of stakeholder interest in consumer awareness measures, and a wide range of views were received on: the target audience; type of message; role of any measures within wider healthy eating and lifestyle messages; and routes for delivery. Many suggestions were also received regarding possible sub-groups of the population that might be targeted, including vulnerable groups.

These views and ideas for specific messages, delivery routes, and integration of the Agency's initiative with wider consumer education and tools for dietary change, will be taken into consideration in the development of the Agency's consumer awareness measures.

The support expressed for partnership activities to support the Agency's work is encouraging and we will explore these opportunities further with both food industry and non-governmental organisations.

Consumer awareness next steps

- The Agency is currently exploring routes for the most effective consumer awareness activity to meet our commitments to reduce saturated fat intake. We have undertaken in-depth qualitative consumer research to support the development of communication measures on saturated fat.
- The Agency will work with interested parties to develop partnership activities to support this work and a stakeholder meeting will be held shortly.

2. Promotion of healthier options - reduced fat products and retailers 'healthier' ranges

Stakeholder views on the impact of healthier versions of foods on dietary intakes varied widely. Some felt their appeal and impact was limited while others recognised that for some foods the 'healthier' products have the greater market share. Technological issues and the role of effective branding, promotion and clear labelling of products to attract consumers and enable informed choices were highlighted. The restrictions on communication of some claims regarding products imposed by nutrition and health claims legislation were also noted in relation to these products.

Healthier options next steps

- Many manufacturers and retailers offer, to varying extents, a range of healthier options products, we consider there is scope for increasing the range of healthier option lines offered to consumers.
- There is scope for increasing the range of healthier options offered to consumers. We will work with manufacturers and retailers to achieve this, and on the actions that can be taken to help increase consumer take-up.

3. Portion Size

The food industry highlighted the range of different portion sizes already available to consumers, while a wide range of public health groups and some food industry and particularly catering sector organisations supported provision of smaller portion sizes of energy dense foods, coupled with a move towards less energy dense foods. Views on the evidence for the impact of portion sizes on intakes was divided, and only limited evidence was submitted by stakeholders. Guidance on portion size was considered helpful by food industry groups, foodservice and some health bodies. Industry has also raised concerns that a move towards smaller portion sizes will have sustainability implications due to the potential increased use of packaging materials and the associated costs.

Portion size next steps

- The Agency is convening a workshop of leading academic experts, chaired by Dr Susan Jebb, to advise on the evidence available relating to portion sizes, their impact on energy intakes, and scope for specific portion size recommendations, focussing on those foods which contribute significantly to saturated fat and energy intakes.
- The group will meet in Spring 2008, and a literature review of published papers over the last decade has been commissioned to provide background information to support the workshop discussions. The literature review, terms of reference of the group, and its deliberations will be published.
- The FSA will explore with the food industry the development of smaller portion sizes, and the scope to standardise portion sizes for some products. The focus of this work will be on the types of foods which are pre-packed to provide individual servings, eg snacks, confectionery, ready meals, sugary soft drinks etc.

4. Reformulation of mainstream products

There was widespread acknowledgement of the important role that reformulation of mainstream products has within the programme. The food industry responses highlighted existing initiatives to reduce saturated fat levels in foods and technological issues relating to further reformulation. Consumer, health and nutrition organisations, in particular, supported reductions in added sugars and total fat. The importance of consumer acceptability was highlighted by some, as was the greater complexity of saturated fat reformulation compared to salt.

A range of detailed comments were received on the Agency's proposals for the types of foods which should be considered for reformulation, including some recommendations for additional food categories eg sandwiches, ready meals, convenience foods that should form part of any reformulation initiatives. Legislative, technological and microbiological constraints of reformulation were cited for some foods.

The benefits of partnership working were emphasised, and there was broad support for development of a commitments table, although some concerns about this approach were expressed by the British Retail Consortium.

There were mixed views on: the value of developing targets; their basis (per portion, 100g, maxima/minima, or percent energy); and potential approaches to monitoring, although a range of options were suggested including self reporting, surveys (of foods and intakes), databanks/composition tables. The majority of respondents supported publication of monitoring data as part of an open and transparent approach.

Reformulation next steps

- In light of the success of voluntary measures undertaken by the food industry to reduce trans fat and salt levels in foods, and to promote consumer awareness about salt, the Agency is developing a series of voluntary partnerships. These will involve manufacturers, primary producers, and retailers, as appropriate, to focus on reformulation of specific groups of foods.
- The focus of the work will be those food categories which contribute the most to saturated fat, added sugar and energy intakes through their composition as success here has the potential to deliver the greatest reductions in consumers' intakes. The areas under consideration and discussion include meat and dairy products, biscuits and cakes, snacks etc as outlined in the consultation document published on the Agency's website.
- In line with our commitment to openness and transparency, the progress and activities of the partnerships will be made public. We will review the progress that can be achieved via this route after 2 years.
- The FSA encourages reformulation of mainstream products wherever opportunities arise. We wish to recognise the achievements already made by manufacturers and retailers, together with future commitments, and intend to support and publicise these via an Achievements & Commitments Table that will outline high level commitments beyond the partnership work mentioned above. This will offer a level of transparency about progress on reformulation not currently available to consumers.

OTHER ISSUES

Trans Fats

In October 2007 the Secretary of State for Health, Alan Johnson, asked the FSA to undertake a review of health effects of trans fats and scope for action in light of mandatory restrictions placed on these types of fats in Denmark and New York City.

The Board considered the issue in December 2007, and reviewed advice from the independent Scientific Advisory Committee on Nutrition (SACN), stakeholder views, and evidence of voluntary industry action to reduce levels of artificial trans fats in food through the removal of hydrogenated vegetable oils.

SACN advised that the available evidence supports the conclusion that trans fats have a moderate impact on increasing the risk of coronary heart disease, however average dietary intakes are just 1% of energy, and half SACN's recommended maximum intake. The Committee also advised that the evidence for an association between trans fats and cancer, obesity and diabetes was insufficient and contradictory.

In light of this independent expert health advice, and evidence of successful voluntary initiatives by the UK food industry that have delivered consumer benefits equivalent to the most restrictive legislation, the Board recommended that mandatory restrictions are not necessary. The Board also recommended that the Agency's priority should be to work with industry to reduce saturated fat levels. Intakes of saturated fat (13.3% of energy) far exceed public health recommendations (11%), and are the greater health risk for the UK population, and a major contributor to heart disease, which is the leading cause of premature death in the UK.

The Secretary of State for Health, Alan Johnson, has considered the Agency's recommendations on trans fats and agreed that the focus for action should be to reduce saturated fat in the diet through voluntary measures, while maintaining the progress already made on trans fats, as this is likely to have a significant impact on the health of the population.

Milk

Since the public consultation on the draft programme closed EU rules on the marketing of drinking milk have changed. Milk with a fat content which falls outside the categories of whole, semi-skimmed and skimmed milk may now be marketed provided it is clearly labelled with the fat content so as not to mislead consumers.

Since 1st January 2008 producers have been able to offer consumers a wider range of drinking milks with potentially lower fat, and saturated fat contents. We will be encouraging producers and retailers to make use of these provisions and offer consumers milk with lower fat, and saturated fat levels.

The Agency issued advice in July 2007 to confirm that there is no prohibition on the use of milk containing 1% fat as an ingredient in food products, there are no restrictions on the fat content for milk used as an ingredient, so long as it is clearly labelled.

We encourage manufacturers to make use of lower fat milks, including 1% fat milk as an ingredient in foods to assist in reformulation to produce lower saturated fat foods.

Foodservice

We have been encouraged by the number of responses to the consultation from organisations within the foodservice sector, who recognise the increasing importance of food eaten outside the home, and their potential contribution to the programme. In addition to the work proposed under the Saturated Fat and Energy Intake Programme, the Agency has been working closely with businesses responsible for workplace catering to encourage complementary voluntary activities and commitments that will help their customers make healthier choices. Further details of this initiative are published at www.food.gov.uk

This area is particularly important, and was chosen as our initial focus because of the large number of meals served and the contribution that it makes to individual's diets. The Agency now plans to extend this work more widely to different sectors within the foodservice and catering industry, and our initial discussions show that a number of companies have already done significant work in this area.

Because the foodservice sector is both diverse and very different to manufacturing and retailing, the Agency has developed a flexible framework covering: procurement, kitchen practice, menu planning and consumer information, within which companies can develop commitments to suit their food service operations. Businesses' commitments will drive towards a range of goals (e.g., salt and saturated fat reductions, promotion of fruit and vegetables, provision of healthier choices, energy density, portion size etc.) and can be tailored to fit the needs of each business and its customers. The framework is therefore adaptable to catering businesses of all types and of any size, and is complementary to the work proposed within the Saturated Fat and Energy Intake Programme.

Meals served in schools and institutions are subject to separate initiatives and controls, and will not be considered as part of the Programme.



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