

## High Level Steering Group (HLSG) Meeting 11 December: Item 3

### Salt Next Steps

#### INTRODUCTION

1. This paper reiterates the key issues, which were discussed at the last meeting, and develops further the proposals for detailed work for each element of the salt reduction strategy for the group's consideration. The strategy, agreed by HLSG in July 2012, covers:
  - reformulation;
  - further activity by the catering sector;
  - behaviour change; and
  - broadening sign up to salt reduction.
  
2. The original model used to deliver early salt reductions has proved highly successful and the reformulation targets have informed action in other countries. However, as salt reduction progresses and becomes more challenging, it needs to evolve to a more holistic approach if we are to maintain progress: ensuring that action across each of the different themes of the salt strategy is proportionate, and takes account of both progress so far and the scope for future action. The proposals outlined below have been developed with these aims in mind.
  
3. This paper invites Members' views on:
  - a framework for action on reformulation beyond 2012;
  - proposals for prioritising engagement with businesses to boost sign up to the RD salt pledges, and to engage small businesses;
  - a proposal for a specific project to help educate chefs on the health implications of consuming too much salt and what action they can take to minimise the addition of salt to food; and
  - actions RD partners might take to encourage behaviour change among consumers towards a lower salt diet.

#### REFORMULATION FRAMEWORK

4. The HLSG considered a range of possible models at its last meeting<sup>1</sup>.

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<sup>1</sup> A summary of the issues raised in these discussions is attached at Annex I.

5. Although the group is in broad agreement on the key objectives of the reformulation framework<sup>2</sup>, there are divergent views on the most effective way to deliver them. To make progress will require that the targets be recalibrated so that they promote maximum continued momentum on salt reduction – by being suitably challenging and wide-ranging *and* by allowing sufficient flexibility to business in recognition of different starting points and technical challenges and to maximise sign-up.
6. A further option for a reformulation framework has been developed which seeks to strike a credible and pragmatic balance between members' views. It offers the opportunity to make real progress, while offering flexibility to businesses to encourage broad sign-up. Details are outlined below together with rationale and possible timescales for development.
7. To avoid undue delays in the delivery of the important public health benefits which reformulation can provide, Members are encouraged to consider and develop the proposed approach with a view to agreeing the way forward at the December meeting.

### **Outline framework for salt reduction**

8. We propose that the framework consists of elements that will deliver progress on salt reduction in both the short and medium/long term by businesses.
9. The **first phase** would involve development of :
  - a new pledge for catering businesses which sets maximum salt targets for the most popular dishes, on a per serving basis;
  - a pledge setting out salt targets for new products; and
  - we would aim to finalise this work in Spring 2013.
10. The **second phase** would involve:
  - a review and recalibration, where appropriate, of all the 2012 salt targets, and the development of a new target for meat extracts (gravy, bouillon etc);
  - the development of a pledge which would include:
    - a limited number of *essential* targets - those identified, following the review, as having the greatest public health

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<sup>2</sup> Deliver the greatest public health benefits whilst also achieving the greatest level of sign up from the food industry. Offer flexibility to businesses and help to create a more even playing field.

- impact which all businesses would be expected to work towards within a set timeframe; and
- *business specific* targets - the remaining salt targets from which individual businesses would select specific salt target categories to work on, in line with their reformulation programmes. Businesses would be asked to meet the optional targets they choose to work on within a set period eg 2-3yrs from the date they sign up to the target, and would be encouraged to build on the number of targets they commit to meeting over time, with annual reporting of progress.
  - we would aim to finalise the development work by the end of 2013. This would not preclude earlier action and pledges by businesses that are forging ahead.
11. To supplement the pledge and support businesses DH would produce guidance /criteria for businesses to help in the selection of business specific targets and to focus their reformulation efforts in key areas in order to make credible commitments in support of the pledge.
12. Businesses would report their progress against these pledges through the usual RD annual monitoring updates.

### ***Rationale***

13. The rationale for these proposals is as follows. To deliver progress in the short term and address the need to boost the contribution to salt reduction from the catering sector, we propose that new maximum targets should be developed, per serving, for the most popular dishes. These targets would complement and extend the existing range of pledges (F5a-c) already available to catering businesses. Separately targets for new products would be developed across the food industry would be developed, informed by the 2012 targets, which could attract sign up from existing and new RD partners, and the current 2012 targets would be used to help inform these criteria. Sign up to these targets would offer an opportunity for businesses to demonstrate their commitment to salt reduction in a way which has an immediate effect and will also help to deliver change in the market place and to consumers' palates in the long-term. These proposals stem directly from the Salt Working Group discussions.

14. HLSG discussions have already highlighted that for some foods, including some major contributors to salt intake, the scope to revise the salt targets will be dependent upon future innovations or consumer acceptability issues. Therefore to identify effectively where the greatest scope for reformulation and public health gains arise, it will be necessary to review all of the current targets. By proposing a mix of essential and business specific targets, and providing businesses with appropriate guidance, reformulation efforts should be focussed to best effect within individual businesses, allowing for more targeted effect and proportionate use of resources. This approach also offers businesses considerable flexibility to plan their reformulation programmes in a way which fits with their business models, to prioritise which product categories they choose to reformulate each year, and determine the point at which they choose to sign up to these targets. The guidance will clearly set out how businesses can plan the scope and focus of their work in a way which maximises their salt reduction.
15. To review all the targets will take some time and within this timetable, businesses who have not yet met the current targets will effectively have until 2013 to achieve them before new targets are published. Meanwhile, businesses among the vanguard can also take this opportunity to go further, confident in the knowledge that this will contribute to the post 2012 salt reduction goals. DH will consider appropriate mechanisms to recognise the leading businesses which better the current targets.

### **Best practice**

16. The FDF and BRC have highlighted plans to disseminate best practice in reformulation. This activity will be key to making progress towards a more even playing field and delivering the full potential of the existing salt pledge. DH wish to support this activity and will develop advice in key areas making information on current salt content, based on nutrition label data collected in 2011 widely available. This will serve to highlight the kind of salt levels that have been achieved in different products and to which businesses can aspire and provides greater opportunity for external scrutiny of the salt content of foods.
17. In light of the information provided above, and previous discussions both in the HLSG and Salt Working Group:

**HLSG members' views are invited on the proposal for a reformulation framework, and to develop and agree the approach to be taken forward beyond 2012.**

### **Potassium based salt replacers**

18. Industry bodies have asked the DH to reconsider its advice on the use of salt replacers containing potassium, and to allow their limited use in some products. To assess this request we have asked for specific data on the types of products involved, levels of use, and the impact this would have on sodium and potassium levels in products. Insufficient data has been provided to enable the assessment.

**HLSG members and trade associations, in particular, are invited to consult their members, and provide the relevant information as soon as possible.**

### **BOOSTING SIGN UP TO THE CURRENT SALT REDUCTION PLEDGES**

#### **Partners new to salt reduction**

19. We propose that special arrangements are put in place for new RD partners (post 2012) who have yet to begin work on salt reduction, and for whom these stricter post 2012 targets may be too difficult to achieve in one step. For these businesses, we propose a tiered approach to entry to the RD. An initial Stage 1 pledge would involve businesses signing up to meet the 2012 targets, and then businesses would be invited to progress to Stage 2 and meet the targets which will be developed next year.

20. The pledge for Stage 1 could either ask businesses to meet :

- the 2012 targets within a specific timescale from sign up (eg 2-3 yrs) ; or
- a percentage of the targets (eg 50%) at sign up, or within a relatively short time frame (eg < 1yr), and agree to build on this year on year with the aim of meeting all relevant targets (where technically achievable) within a set period.

**HLSG members' views are invited on:**

- **what approach should be taken with new RD partners – what should they be asked to achieve and by when?**

## **Focus for sign up among the manufacturing and catering sectors**

21. Proposals for the focus of engagement activities to boost industry sign up were presented at the last meeting (attached at Annex B for information).

### ***Manufacturing & Catering***

#### **HLSG members' views are invited on:**

- **potential ways forward to secure further sign up, including the potential to extend the RD at a local level?**
- **the scope for businesses to support SME's to procure or reformulate products to meet the salt targets?**

**Do HLSG members agree with the proposal to focus engagement on the remaining major high street caterers (200+ outlets) and any major remaining unsigned contract caterers?**

**What actions will trade associations take to encourage businesses to sign up to the salt pledge(s)?**

22. One issue which has been cited as an obstacle to reducing salt in catered foods is chefs' preference for saltier foods and a culture which places a strong emphasis on salt as a flavour or flavour enhancer of foods. Although the salt catering pledge F5a, on training and kitchen practice, seeks to raise awareness among chefs and catering staff of the importance for health of reducing the salt in foods, and promote behaviour changes through kitchen practices and ingredient selection, there is potentially more that could be done to support this activity.

23. DH will undertake a scoping exercise on the viability of developing a basic training course which would support sign up to the pledge by helping to address this training need for both staff and chef in catering establishments of all sizes.

**HLSG members views are invited on the proposal for chef training, and what actions they could take to help promote businesses to take up a training module if it were developed.**

## **CONSUMER BEHAVIOUR CHANGE**

24. Previously the HLSG were presented with a range of opportunities (Annex II) that would enable all sectors to support consumer

behaviour change towards a lower salt diet. These range from education and information to raise awareness and engage consumers through to promotional activities in-store and on-pack (promoting lower salt of products over their higher salt equivalents), trade events and support for businesses, for example through guidance and best practice to promote reformulation.

25. Consumers receive diverse information about salt through a range of media and it is important that messages on the risks to health of consuming too much salt and recommended intakes are consistent and provided through trusted sources. This might include action in support of Change4Life messages, advice on the use of front of pack food labelling, and food swaps, and potentially activity with celebrity chefs.

**HLSG members' views are invited on:**

- **what activities might be undertaken/promoted through the RD to promote consumer behaviour change on salt; and**
- **how these might be framed for the RD eg individual or collective pledges, guidance on the RD website etc?**

**Next Steps**

26. Subject to HLSG's views and preferred approaches we will:
- finalise details of the reformulation framework and circulate for information
  - set out the detailed processes and timeframe for delivery of the framework;
  - consult HLSG members, individually, to scope and refine the proposals for a project on chef training; and
  - progress engagement to boost uptake of the salt reduction pledges.

## **Annex I**

The key points which HLSG members raised during the discussions about a possible framework for reformulation included:

- the need for further action to continue progress to the 6g daily intake target was well recognised. The framework for action on salt was considered broad. Some felt it important to consider further the relative potentials for each strand of activity to deliver salt reduction and, in particular, what complementary activities could be undertaken to help individuals to select healthier choices.
- reformulation had been successful so far, with gradual reductions in intakes and levels in food achieved. This approach was seen as a good model to continue. A broad approach to reformulation was viewed as important to encourage consumer palates to adjust.
- there was a general view that in principle targets were valuable. They help businesses prioritise, provide clear objectives and promote a level playing field. However, there was no consensus about whether some or all targets should be reviewed. Industry felt that further reductions in all categories of salt targets would be difficult due to technical issues and consumer acceptability, and highlighted insufficient resources to achieve this, and therefore a need for flexibility. In contrast, NGO's felt that all targets should be reviewed quickly and maintained in their entirety, to maintain the current pace in salt reduction and maximise potential public health gains.
- historically a great deal of progress on reformulation had already been made, early adopters' progress should be acknowledged and not penalised. A key concern was how the vanguard of businesses could be encouraged to go further, whilst also ensuring that businesses that had been slower to reformulate catch up, and businesses new to the RD sign up.
- maintaining momentum on salt reduction was important and it was recognised that time taken to review salt targets would automatically introduce an opportunity for slower businesses to catch up.

Other issues raised included:

- some felt that further consideration of the methodology to prioritise the salt categories which should be reviewed was necessary. Further

consideration of the breadth of products within a category was also important for some;

- action to promulgate technical innovations and businesses learning from reformulation was seen as key to developing a level playing field, and guidance about where reformulation would achieve the greatest public health impact would be valuable;
- the scope for a pledge which offered a stepped /tiered approach to salt reduction;
- flexibility for industry could be complemented with guidance about the areas where salt reduction would deliver the greatest public health benefits.

## **Annex II**

### **Boosting sign up to the current salt reduction pledges**

1. We have considered the scope to boost sign up to the current salt reduction pledges across the manufacturing, retail and catering sectors, in particular how best to prioritise engagement, and the impact this would have on overall coverage of the marketplace. Our analyses are set out below for HLSG members' consideration.

### **Catering Sector**

2. Sign up to the original salt pledge achieved 48% market coverage among the major<sup>3</sup> catering companies and their suppliers, and sign up to the three salt catering pledges by early signatories has increased market coverage to 64% so far.
3. Of the major high street caterers with 200 or more outlets, there are eleven companies who have not yet signed up to a salt pledge. By securing sign up of the top 11 high street caterers, and any remaining major contract caterers with the most significant market shares, the market coverage of the pledges could be increased to 87%. However, at least four of these businesses, including the largest of these companies and a number of major high street names, have shown strong resistance to signing up to salt reduction or failed to engage<sup>4</sup>. Every effort will continue to be made to encourage these companies to sign up. However, before taking this step it would be helpful to consider what actions trade associations will take to encourage them to sign up to the salt reduction pledge(s).
4. Companies with less than 200 outlets who have not signed up to a pledge make up around 13% of the market, and account for around 50 businesses. Some of these are franchises and thus far they have proven very hard to reach. Franchise businesses tend to have less control over their outlets and making a change to their menus that is consistent across outlets is more difficult compared to non-franchised businesses. We suggest that encouraging sign up by the bigger companies described above should be our first step and is more likely to achieve greater results faster.

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<sup>3</sup> The top 80 high street caterers and top 16 contract caterers (by outlet)

<sup>4</sup> Without these businesses market coverage would reduce to 78%.

**Q: Do HLSG members agree with the proposal to focus engagement on the remaining major high street caterers ( 200+ outlets) and any major remaining unsigned contract caterers?**

**Q: What actions will trade associations take to encourage these businesses to sign up to the salt pledge(s)?**

### **Retail and manufacturing sectors**

5. The majority of large manufacturers and retailers are already signed up to the original Responsibility Deal salt reduction pledge, F2, giving market coverage of around 75% of the retail environment.
6. Of the remaining unsigned businesses, around seven primary companies (and some of their subsidiaries) account for a relatively large share of the market for specific salt target categories, in total amounting to around 7.75%.
7. We have previously engaged most of these businesses in discussions on salt reduction. Some have made good progress towards the original salt pledge and will be contributing to achieving public health goals but have taken the decision not to sign up because they have been unable to meet all the targets for their portfolio due to technical challenges (eg for products such as coated fish). Others have faced technical challenges, and have yet to identify solutions that will allow them to make significant reformulation progress. A few, those who primarily source products from other companies, cannot meet the targets because they do not have control over the manufacturing process of their products, this applies particularly to some canned meats and fish products. Overall, the scope to achieve sign up among these businesses is currently very limited and we propose to engage with these businesses again in light of any developments arising from HLSG's discussions if this allows a more tailored approach.
8. Below this group, there are a large number of small or medium sized businesses (1000+) who make a very limited number of products covered by the salt target, and whose individual contributions to retail salt sales is around 0.01% or less.
9. While the aggregate contribution of these businesses is significant, it is clearly not possible to engage with all of them individually.

However, as part of a range of actions to broaden and deepen the impact of the RD, we are considering the scope to expand the reach of the RD at a local level and facilitate sign up by small and medium sized enterprises (SMEs). We are currently considering how the RD framework might be tailored to meet the needs and capabilities of SMEs, how such an arrangement might operate in practice and the tools which would be required to enable Local Authorities and other networks and organisations and SME's to engage more fully in the public health agenda. One step proposed by the SWG which would also prove beneficial to small businesses would be use of averages rather than sales weighted average as a guide to procuring or reformulating products. RD partners can also support this activity, for example by mentoring small businesses to deliver reformulation safely, and providing basic advice on where they can find information and who to consult to ensure any information they provide to their customers is compliant with the relevant legislation. Such activity could constitute an individual RD pledge.

**Q: HLSG members' views are invited on:**

- **potential ways forward to secure further sign up, including the potential to extend the RD at a local level?**
- **the scope for businesses to support SME's to procure or reformulate products to meet the salt targets?**

**Consumer behaviour change**

10. HLSG agreed at its July meeting that actions to promote consumer behaviour change and amplify the effects of further reformulation activity should form part of the forward strategy for salt reduction. Set out below is a brief update on the supporting activities to promote behaviour change that are being taken forward through the next phase of the Change for Life social marketing campaign, and a range of potential activities that could be taken by all sectors.

*Change for Life Campaign – Next Phase*

11. The next phase of the campaign will be launched in January 2013, and the target audience is socio-economic group C2DE including parents of children aged 5-11 years old. The campaign messages will complement and potentially amplify the impact of the Responsibility Deal pledges by focussing on four healthy eating themes: salt, sugar, fat and 5 A-day with advice on calories running throughout as a supporting element.

12. The consumer messages include advice to check food labels for salt, look for calorie labelling when eating out, and swap to healthier fats and lower sugar foods. The aim is to take consumers on a journey in which they learn where the hidden salt, fat and sugar occurs in our diet, the potential adverse health effects of over consumption of these nutrients and insufficient fruit and vegetable intake, and provide them with appropriate tips and tools that will enable them to make simple, affordable and sustainable stepwise improvements to their diets.
13. Subject to Ministerial agreement it is anticipated that the campaign will comprise TV advertising, digital advertising and tools, recipe booklets and possibly offers on healthier foods for consumers. Discussions are ongoing with commercial partners to identify opportunities for partnership working to support the campaign.

*Other activities*

14. Through the Core Commitments and Supporting pledges of the Responsibility Deal partners have already committed to encourage and enable people to adopt a healthier diet, and to ensure that the information they provide to people is consistent with Government public health advice.
15. Members are now invited to consider what specific activities could be undertaken by organisations from all sectors to promote behaviour change to help people reduce their salt intake, and how these might be framed for the RD, for example, as individual pledges. These ideas are not intended to be comprehensive but are offered to help stimulate discussion about what organisations could deliver in practice:
  - *Government* might consider how NHS choices could be linked/updated to take into account the Change 4 life message;
  - *Health professionals* organisations eg Royal College of General Practitioners, British Dietetic Association etc., could consider how they might use Change for Life messages and material in their work with patients;
  - *Public Health Groups & NGO's* might consider how they can
    - raise consumer awareness by providing accurate information through their campaigns, websites and leaflets about the

health benefits of a lower salt diet, recommended dietary intakes, and the steps people can take to achieve this, making use of Change for Life tips and recipes as appropriate;

- encourage people to get their blood pressure checked and attend health checks when invited by their GP;
- *Food businesses* might consider
  - becoming Change 4 Life commercial partners;
  - promoting awareness of salt and health and how to choose lower salt options through promotional activities including posters, messages on till screens, radio, in-store videos, websites, in store shelf barkers, experientials, recipes with nutrition labelling and information, magazine articles, table talkers in catering establishments;
  - consider activities which build on their own reformulation activity to encourage consumers to choose the lower salt options at retail and in restaurants;
  - retailers with in-store pharmacies might offer free blood pressure checks;
  - To ensure effective and consistent messaging, co-ordination of food businesses communications with NGO activity could enhance information to consumers and make these public health message more effective.
- *Trade associations* might
  - develop guidance/share best practice on reformulation and how businesses can communicate their progress on reformulation to their customers;
  - hold events to encourage members to sign up to the salt reduction pledge(s) including salt catering pledge F5b, which promotes provision of information about the salt content of dishes in leaflets, websites etc

**Q: HLSG members are invited to consider:**

- **what activities might be undertaken/promoted through the RD to promote consumer behaviour change on salt; and**
- **how these might be framed for the RD eg individual or collective pledges, guidance on the RD website etc?**