



Public Health  
England

Protecting and improving the nation's health

# **Sugar Reduction and Wider Reformulation Programme Stakeholder engagement: May 2016 to March 2017**

## About Public Health England

Public Health England exists to protect and improve the nation's health and wellbeing, and reduce health inequalities. We do this through world-class science, knowledge and intelligence, advocacy, partnerships and the delivery of specialist public health services. We are an executive agency of the Department of Health, and are a distinct delivery organisation with operational autonomy to advise and support government, local authorities and the NHS in a professionally independent manner.

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## Background

In *Childhood obesity: a plan for action*<sup>1</sup> Public Health England (PHE) was charged with leading work with the food industry to develop a structured, closely monitored and transparent programme to reduce sugar in everyday foods by 20% by 2020 with a 5% reduction achieved in the first year. Every sector of the food industry – retailers, manufacturers and eating out of home – were challenged to contribute to the programme and achieve the government's target reductions.

PHE has set guidelines for all of industry (manufacturers, retailers and the eating out of home sector) on how to achieve the 20% sugar reduction across the top nine categories of food contributing the most sugar to the diets of children. This work includes restaurants, cafes, food-on-the-go, coffee shops, pubs, caterers and leisure attractions (eg cinema chains). To accompany the guidelines, PHE has published an assessment of baseline levels of sugar in key foods for different sectors of the food industry for the year 2015.

This document summarises the stakeholder engagement that has informed the industry guidelines and the analysis undertaken to determine sugar baseline levels for 2015. This document supports PHE's report *Sugar Reduction: Achieving the 20%*. A table summarising stakeholder engagement by sector is shown at the end of this document.

## Developing the approach

PHE has developed the approach to, and published guidelines for, the sugar reduction programme after an extensive series of engagement and discussion with all sectors of the food industry, non-governmental organisations (NGOs), other government departments (OGDs) and devolved administrations (DAs). Key learnings from the salt reduction programme<sup>2</sup> and the Public Health Responsibility Deal<sup>3</sup> were taken in to account.

This process has generated background information and intelligence to inform the structure of the programme and provided opportunities for stakeholders to contribute to the initial proposals before PHE has taken the final decisions on the guidelines.

The programme of engagement began in May 2016 and has continued into early March 2017. This has included:

- May/June 2016 – 40 meetings with each of the market leaders in the nine categories and NGOs to inform early thinking
- November/December 2016 – joint industry and NGO category specific meetings to discuss initial sugar reduction proposals on sugar level guidelines and calorie and portion size caps
- December to March 2017 – further series of meetings with individual businesses and NGO's to discuss the programme
- December to January 2017 – written comments on PHE's sugar level guidelines and calorie or portion size cap invited
- January to February 2017 – further stakeholder meetings to discuss the format of the baseline analyses

This document summarises the main issues discussed as well as the submission of written comments and attendees at meetings. Also included is a summary of one-to-one meetings for the initial round of meetings in May and June 2016. These meetings provided background information to inform the development of the structure and approach of the programme. Additional one-to-one meetings reinforced these initial learnings with issues generally similar to those arising through the category-specific meetings and written submissions.

Information is presented in chronological order.

## Key issues arising – May and June 2016 meetings

In May and June 2016 PHE met with 40 food industry organisations including all the major retailers; food manufacturers; and a number of representative trade association bodies and NGOs.

Manufacturers were identified on the basis of having a significant market share in the top nine food categories that contribute to children's sugar intake.<sup>4</sup> The food categories were determined by the National Diet and Nutrition Survey<sup>5</sup> and market shares were calculated using data purchased from Kantar Worldpanel.

The main aims of the meetings were to obtain information on:

- activity already completed by each business on sugar reduction, portion size and switching purchasing towards low or no added sugar alternatives, as well as the nature and size of these changes
- any additional current and future plans in these areas
- any technical or other issues associated with sugar reduction

The main areas discussed are set out below.

### Achievements to date:

- overall many businesses appeared to have already started thinking about sugar reduction and to have taken some action in at least some products in their portfolio, with many initially focusing on those they make specifically for children
- some early good progress appeared to have been made in certain categories by some businesses
- however, there were a number of businesses that said they had not taken any, or only very limited action and currently had no further plans. This was for a number of reasons but was generally due to perceived technical limitations (eg some confectionery manufacturers had already reduced their products to 250kcal per portion or less) or took a corporate view that products do not need to change (eg some businesses these products as a treat). Some manufacturers were reluctant to reformulate leading brands and had either taken little action to date or, if reductions had been made, these were mostly to products in portfolios that were not their biggest sellers

### Setting guidelines:

- some saw consumer demand as driving what they provided, while others saw that they played a major role in influencing choice
- some businesses asked whether guidelines would be set in the same way as had been done for salt reduction. Several suggested that, if so, these should be mandatory. For some this meant setting targets via legislation but for others it meant the targets needed to be universally adopted by all sectors and/or across all products within a particular category. Overall there was a strong agreement to establish a level playing field

### Other nutrients:

- most retailers and a small number of manufacturers have been considering all nutrients of concern to public health at once, ie saturated fat, salt and calories, as well as sugar and fibre. Much of this work had been pegged to businesses' normal product reformulation cycles, eg looking at categories every three years with each year's work programme carefully planned. These timings and across the board nutrient considerations applied less to discounters and branded manufacturers
- most meetings included some discussion of the need (or not) for concurrent calorie reduction, with some highlighting the difficulties they faced in achieving this

### Future activity:

- some businesses said that further reductions may require the use of replacement ingredients for sugar or may need the identification of a new technical solution. Even so, some were more positive about what additional reductions were possible, including in those categories where it is likely to be more difficult
- some businesses were holding off making further plans or commitments on sugar reduction until they had seen the government's plans for action on childhood obesity

### Research and development:

- it was apparent that there were varying capabilities to conduct research and development to support technical innovation and sugar reduction. Some had significant resource, others seemed to achieve a lot with only minimal research and development or technical innovation, while a third group seemed to struggle to identify any technical solutions, irrespective of the size of investment. There were varying reasons for the different responses including the product type; competitive issues; brand protection; internal support; whether it was a family owned business or a large multinational; and for some whether sugar reduction is a priority against other competing issues

- some organisations had applied for, and/or secured, research grants to help with technical innovation through the Innovate UK programme

#### Portion size:

- a small number of businesses raised the issue of receiving negative press about products providing poor value for money to the consumer once a portion size reduction had been made

#### What measure of sugar to use:

- the issue of total versus free sugars was raised in relation to consumer understanding and the basis for setting any future targets. It was suggested that category targets should be set on a total sugar basis (as this is what is declared on the label) but where relevant, some account should be taken of naturally occurring sugars (eg lactose in yogurts)

#### Replacement of sugars with sweeteners:

- a number of businesses raised different issues around the use of intense and non-caloric sweeteners as a replacement for sugar. Several said they were unlikely to use them because of consumer preferences for 'clean label' ingredients lists and/or because some consumers' actively avoid them. Some businesses raised the issue around current EU legislation that includes a limited number of products in which sweeteners are not permitted. Others mentioned the requirement to make a 30% reduction in sugar levels, accompanied by a 30% reduction in energy, in order to be able to use them, which was not possible in their products

#### Baseline:

- in terms of setting a baseline from which to assess progress on sugar reduction, 2015 was likely to be acceptable to most, although there are some businesses that would prefer an earlier date. The additional benefit of using this timeframe is that it would capture the period that covered the finalisation of Scientific Advisory Committee on Nutrition's recommendations on sugar

#### Retailers' and manufacturers' views on the out of home sector:

- retailers and manufacturers consistently mentioned the need for the out of home sector (such as restaurants and fast food restaurants, sandwich and coffee shops, cafes, cinemas, pubs, takeaways and single food outlets such ice cream parlours) to take more comprehensive action than was perceived to be the case with the salt

reduction programme. Most understood the sector worked differently and needed separate initial engagement but serious concerns remained around the creation of an uneven playing field if the out of home sector did not take sufficient action

- some retailers said that they view themselves as providing direct competition to the out of home sector with their current food offer

#### Action by small and medium enterprises (SMEs)

- It was highlighted that there is a need to also engage SMEs in taking forward sugar reduction. One business has already been successful in encouraging action by this sector

## Category specific meetings – November and December 2016

During November and early December 2016, PHE convened nine product category specific meetings with manufacturers, retailers, eating out of the home, trade bodies, NGOs, OGDs and DAs. These forums were to discuss PHE's initial proposals for setting additional category specific sugar reduction targets, portion size reductions and calorie caps, and new product development caps. These guidelines would complement the overarching target announced in the Childhood Obesity Plan of a 5% reduction by August 2017 and a 20% target by 2020. The purpose of these meetings was to gather feedback and views on the feasibility of the proposals and for businesses to raise specific technical challenges or difficulties they may face on a category-by-category basis.

PHE has taken the information and responses from these meetings, as well as additional written comments received from businesses in December and January, to inform the setting of guidelines around category specific sugar reduction targets.

The structure of the meetings was as follows. PHE presented its proposals on slides, which are published as Annexe 1.

- PHE outlined the wider context of the obesity crisis in the UK and emphasised that the sugar reduction programme is a key policy of the Government's Childhood Obesity Plan and a ministerial priority
- PHE presented a summary of the baseline sugar content of each category, and the sugar reduction category targets. These proposals were based on a 20% reduction of the sales weighted average (SWA) sugar content (g/100g), and figures for a 10% and 5% reduction were presented as well. PHE also presented proposed figures for calorie caps/portion size reductions and new product development caps for most product categories
- PHE also discussed issues around the data and monitoring measures that will be used to assess progress towards achieving the proposed sugar reductions
- attendees had the opportunity to give a brief update on the work their business has achieved to date on sugar reduction
- attendees were then invited to discuss the proposals

The key themes emerging from the meetings are summarised below.

### Purpose of guidance around category targets:

- businesses queried whether the priority is achieving a 20% sugar reduction or achieving the category specific targets. PHE clarified that the programme's target is a 20% reduction across all product categories that are relevant. The category targets are there to provide guidance to businesses and to allow PHE to monitor progress based on its baseline assessment for each category
- businesses should focus on achieving reductions in their biggest selling products currently exceeding those targets

### Feasibility of the category targets:

- businesses generally agreed that reformulation on this scale is a significant commitment. Taking up to 5% of sugar out of products was achievable but a 20% reduction was ambitious and challenging, and would require significant technical development for some products (including identifying suitable alternatives to sugar), as well as time, money and a business commitment in redeveloping existing products
- in addition, some businesses stated that achieving the 5% reduction by August 2017 will be challenging for them if the category targets are only published in March 2017. Businesses need to take into account product reformulation cycles and shelf life of products. Therefore, it may take some time before the reformulated products appear on the shelves
- businesses said there is a risk that such significant reductions could change the flavour profile of products, which if made too quickly may ultimately be rejected by consumers. This would not be something they would risk lightly
- concerns were also raised around the proposed targets for new product development as they were seen as restrictive and a barrier to product innovation, particularly for the luxury product categories
- proposed portion size reductions and calorie caps were also generally considered challenging. However, it was agreed that for some categories portion size reductions are more achievable than reducing sugar content (eg confectionery), would create a level playing field and provide a useful benchmark
- the out of home sector had concerns about the feasibility of the sugar targets and the calorie caps due to their different model of operation compared to retailers and manufacturers, and their view that consumers have different expectations when eating out of home
- a proposed new product development target for each category was rejected by businesses

### Technical issues:

- sugar sometimes plays a technical role in some products such as ensuring or extending shelf life, and providing structure, texture, flavour, sweetness and bulk. It was often expressed that there was a current lack of appropriate, alternative ingredients to replace sugar, and that for some categories it was difficult to perform sugar reduction without increasing saturated fat or calories and even salt in one of two examples
- many companies preferred not to use intense and non-caloric sweeteners, and additions such as polyols, due to consumer preference. However, some saw them as providing choice for their customers
- current legislative barriers to reformulation were also raised in relation to both the use of intense and non-caloric sweeteners and regulations governing product composition

### Consumer acceptance of lower sugar products:

- some businesses have already made some significant reductions and they felt it may be a challenge to go further
- there is often criticism from the media and public around product reformulation and particularly portion size reductions where these are not accompanied by a reduction in price. There is a need for the reformulation programme to be accompanied with appropriate consumer messaging and a balanced approach from some campaign groups/NGOs in support of reducing overall size and the benefit to overall public health

### Categorisation of products:

- some businesses raised that having a guideline target for a broad category may make it more challenging for some products to achieve it and suggested narrower categories. Overall the feedback was split, with some preferring further narrower categories and many supportive of keeping the categories broad
- there was discussion about whether the targets should be for total or added sugar, particularly with regards to the yogurt and breakfast cereal sector
- there was also discussion around which products should be included in each category. Following discussions during the meetings some categories have been readjusted and reanalysed by PHE where appropriate

### Reporting and monitoring:

- businesses queried how success will be measured for the sugar reduction programme and what data they will have to provide to demonstrate progress. Ensuring a level playing field is a key issue for retail and manufacturing particularly between products available through retail and those available in the out of home sector, eg morning goods and cakes
- some companies raised that the proposed 'barometer', which would track progress in top selling products within each category, should not be published too regularly. This is because it may suggest no progress is being made as the reformulation cycle will need time to be reflected in the available products
- there was some discussion around how successes in reducing portion size will be celebrated as this may not be reflected in the barometer. PHE plans to report progress on reducing portion size and/or the achievement of calorie caps, in addition to SWA sugar content data, and is considering whether to publish a specific barometer on this

### Issues with data:

- businesses raised that the 2015 baseline does not reflect all of the industry's work in the previous year. PHE will consider any significant changes that have taken place during the immediate previous year (2014) for inclusion in the data narrative. PHE has subsequently confirmed that it will report fully in March 2018 alongside the first detailed assessment of progress
- limitations with currently available data were raised. This included the data for some categories of product sold through retail, as well as more generally what is available commercially from the out of home sector. PHE made requests for all businesses to provide data where possible and said that it is also looking to purchase additional data for the out of home sector specifically, but cautioned that this data will be limited

### Category specific issues

The specific proposals for each category can be seen in Annexe 1.

#### Yogurts:

- it was generally felt that the proposed target for added sugar was too low and was not representative of the amount of sugar added to products because the analysis included natural yogurt. Following the meeting the data was additionally analysed including sweetened yogurts only

- some businesses highlighted that they are unable to measure added sugar easily and therefore a target for total sugar would be preferred
- added sugar can be reduced in yogurts but if replaced with fruit, the total sugar content could stay the same. Therefore there are also problems with expressing the sugar reduction targets as total sugar
- it would be possible to reduce the sugar in products to meet the proposed target but the consumer would have to adjust to a less sweet product. A reduction to the size of 'luxury' yogurt pots would potentially give a 'quick win' for the category
- natural yogurt should be removed from the portion size estimation because it would be preferable for people to eat more of this product
- diet yogurts are generally sold in larger carton sizes than other yogurts. If the portion size of these products decreases, there is the potential for this to result in increasing the proportion of added sugar within the category
- there was a suggestion that a calorie cap rather than a portion size cap would be a better approach

### Breakfast cereal:

- businesses highlighted that the proposed target may change the flavour profile of products and lead to consumers changing their breakfast habits and moving away from cereals. Breakfast cereals can be positioned as contributing to intakes of a range of nutrients including vitamins and minerals, and should not be 'demonised', or consumers could move to less healthy products eg croissants and muffins
- generally businesses were keen to include no added sugar products in the category because this would allow them to shift the sales balance towards lower/no added sugar products, as well as working on reformulation. However, some businesses did not support this inclusion
- businesses queried having to take (dried) fruit out of cereals to achieve reductions as it does not make sense to remove 'healthy' ingredients eg added fruit

### Biscuits:

- having one target for the whole biscuits category may make it challenging for chocolate covered biscuits such as bars to achieve as the SWA also includes biscuits with significantly lower sugar content
- a reduction in sugar content is more likely to be achievable through reducing portion size than solely through reformulation
- reducing sugar by 3-5% should be achievable, but the full 20% reduction would require significant technical investment, time and money to redevelop existing products
- the success of replacing sugar with fibre is dependent on the type of biscuit and may be achievable gradually as consumers' palates adjust, but there is a limit to how much sugar can be replaced without resulting in a flat, hard biscuit minus the crunch.

The name of the replacement fibrous component would be displayed in the list of ingredients, which may also affect consumer acceptability

- some businesses raised that setting a calorie cap would be useful for setting a benchmark for biscuit products
- it was confirmed that seasonal products would be included in the programme

### Cakes and morning goods:

- portion size reduction is a more achievable option for this category
- the role of fruit in cakes and morning goods was briefly discussed, and businesses queried the added/free sugars definition with relation to fruit content
- due to the diversity of the morning goods category some products may easily meet or go further than the targets, whereas it will be more challenging for others
- although the proposed figures are challenging, some businesses said it is possible to work towards them
- the 350 kcal maximum calorie cap seemed achievable
- seasonal products were raised for this category and would be included in the programme

### Puddings:

- setting only one target for all puddings based on the draft SWA target, which does not include data from the out of home sector, may make it challenging for that sector to achieve the target. Representatives from this sector also had concerns about the feasibility of the maximum portion size cap
- a number of comments were made in relation to puddings in the out of home sector generally being made up of a number of components (eg ice cream), while products sold through retail would only take account of the pudding itself and no accompaniments
- a calorie cap might be a more suitable way of reducing sugar/calorie intake for this category

### Ice cream:

- removing sugar has been found by some manufacturers to increase melting time and ice content, as well as changing the overall quality and flavour. Specific concerns were raised regarding the difficulty of reducing the sugar content of certain products such as sorbet and luxury ice creams
- it may be difficult to achieve a cap for new product development based on a SWA that includes ice creams with no added sugar

- given the long shelf life of ice cream, as products manufactured in August 2016 may still be on sale in August 2017, this could affect monitoring as reduced sugar levels would not be visible within the nutrition information on pack
- calorie caps were not raised by businesses
- the issue of seasonality for this category was raised. Due to the category being mainly sold in the summer, changes to products may take longer to be seen in sales. Seasonality also had an effect on development opportunities being restricted to consideration once a year

### Sweet spreads:

- following comments raised during the meeting, the category was reviewed and is now split into four sub categories: chocolate spreads, peanut butter, dessert toppings and sauces, and fruit spreads
- jam is subject to legislation and there are also other products within this category that have clear specifications eg maple syrup
- if sugar is removed from jam, it results in the development of mould. If the sugar is reduced too much in chocolate spread, it will alter the texture so it becomes more like a sauce. For products like peanut butter, it is not always possible to perform sugar reduction without increasing saturated fat
- a 5% reduction is feasible for chocolate spreads but a 10% reduction seems challenging
- the sweetener generally used in this category is sorbitol but it has a laxative effect, which has labelling implications

### Chocolate confectionery:

- there was discussion regarding the lack of success for manufacturers that have produced chocolate containing intense and non-caloric sweeteners. The legislative barriers to the reformulation of chocolate were also highlighted. Views were provided on the lack of success to date by manufacturers in producing chocolate containing intense and non-caloric sweeteners, as well as legislative barriers to the reformulation of chocolate
- calorie caps for chocolate confectionery were viewed as probably the best way forward for this category
- seasonal products were raised for this category and are included in the programme

### Sweet confectionery:

- it was highlighted that the sugar reduction work, alongside the saturated fat and salt reduction work, will be challenging for certain categories such as fudge, which are naturally high in all three nutrients as well as boiled sweets which are 100% sugar

- there is an issue about sugar-free mint gums being included as they are used differently from other sweet confectionery, eg as a mouth freshener
- it was confirmed that seasonal products were included for this category

### Next steps:

- attendees agreed to consider and discuss the proposals
- a high-level summary and the lists of attendees of the sector meetings will be published on the [Gov.uk](https://www.gov.uk) website. Any requested one-to-one meetings with individual businesses will be held in January/early February 2017
- meetings to discuss data with particular focus on the structure and content of the baseline reports to be held in January and February
- sugar reduction targets to be published in March or early April 2017

## PHE's initial sugar reduction proposals – industry and NGO response and key themes

The points below present a summary of the key themes from the written comments received from stakeholders in response to PHE's initial proposals for the sugar reduction programme.

### Industry:

- it was raised that by having 2015 as the baseline year for the sugar reduction and wider reformulation programme, sugar reduction achieved by companies before this date will not be recognised
- for certain categories, there was a tension between whether to include only no added sugar products or to focus on all products for the calculation of the SWA. This is an issue for breakfast cereals, cakes, morning goods and yogurts where dried fruit and lactose (in the case of yogurts) is present, which contributes to the total sugar content. Some companies requested that no added sugar products are included within a category, whereas others wanted to have the average based on all products
- there was wide variability in whether businesses thought the 20% sugar reduction target by 2020 was achievable within their own business and many felt that the target was challenging. Achievability seemed to be dependent on a business's starting point and whether we are measuring a 20% reduction across the category or by business. If a business has already achieved substantial sugar reduction within a certain category, they will find it difficult to lower the amount of sugar by a further 20%. Many felt that they were inhibited by the timescale due to technical, consumer testing and acceptance, labelling, processing and manufacturing issues
- most businesses opposed the new product development target saying it does not provide flexibility for using all three mechanisms of sugar reduction since lower sugar options or smaller portions would still be above this level. It also prevents product innovation as the technology to meet the new product development target is not currently available and would stop new products coming onto the market being able to compete with existing ones. NGOs were supportive of retaining a new product development target
- most businesses welcome the inclusion of calorie caps in the programme because for some it will be their primary mechanism for sugar reduction (eg chocolate confectionery, puddings and cakes), but it was questioned why there is variation in calorie caps across the categories. Some business felt there should be some parity between certain categories, eg sweet confectionery vs. chocolate confectionery and

ice cream vs. puddings. It was considered that yogurts should be subject to a calorie cap like the other categories rather than a portion cap

- there was variation in response as to whether the calorie caps were considered to be achievable; some businesses thought it was possible to meet them, others expressed doubts
- there were queries around the current metric for monitoring progress, ie the SWA sugar content grams/100g, will not capture reductions in portion size or shifts in consumer purchasing to lower or no added sugar products. Businesses asked for metrics to capture these two mechanisms to be included
- businesses considered that monitoring of progress should be done on a category basis rather than by business
- there was widespread opposition to the barometer of progress because businesses felt that it would be used as a naming and shaming tool by the media and other external parties. Also by concentrating on the top 20 sellers, the barometer has the potential to feature lower sugar products solely because they are high sellers or they underwent reformulation before 2015 and are, therefore, limited on the extent to which sugar can be reduced further
- the issue of the out of home sector was raised in particular and how the sectors progress will be monitored against all three mechanisms; the lack of data for biscuits, cakes and puddings means that the SWA sugar content and/or calorie cap could be unrealistically low and that the expectation of portion size is often set within this sector

## NGOs:

- NGOs felt that the 20% reduction was technically feasible. An NGO felt that the sugar reduction target was not ambitious enough. A 20% sales SWA reduction should be the minimum acceptable level of sugar reduction in each category. Targets should not exclude no added sugar products from the calculations to estimate SWA targets for each category
- there was support for PHE's proposals for single-serve portion calorie caps
- NGOs were clear that the food industry should be required to identify the amount of free sugar on the product label
- education and information for the public need to be a core part of the reformulation programme if it is to be a success. More research is needed to examine the public's knowledge and understanding of portion sizes and consumer perceptions of value for money – this would help identifying how these barriers might be addressed. While sugar is an important area of focus, it is important to ensure one nutrient not demonised at the expense of the overall diet
- there was support for the barometer proposal. As much of the data as possible should be released. The release of data on progress should be by category and by business, the 'barometer' of progress should be published for retail and for eating out of home, and progress on portion size should be included

- PHE should commit to reviewing, revising and strengthening the targets downwards at regular two-year intervals. The monitoring process should be comprehensive, standardised, quantified and presented in a way that enables comparisons to be made across products and businesses and available for independent scrutiny by NGOs and others. The in-depth approach for top 20 companies should not be an obstacle for other businesses to share their progress
- the view from the NGOs was that although publishing data (and thereby allowing others to identify those that are failing to meet the target) will undoubtedly serve as an important driver, it is vitally important that this programme is robust (ie the possibility of further action or sanctions that may be taken in the event that a company or sector fail to make sufficient progress to achieve the reduction guidelines set)

### Individual meetings

PHE agreed to meet individually with businesses and NGOs to discuss specific technical issues of relevance and wider approaches, at their request .. A table summarising which businesses and NGOs PHE met can be found at the end of this document.

## Format of baseline report

The full proposals for the baseline report can be found in Annexe 1.

### Purpose of meetings

In January and February 2017 separate meetings were convened with retailers, manufacturers, out of home and NGOs to seek their views on PHE's proposed template for reporting the 2015 baseline data for the sugar reduction programme. Due to the differing nature of the data between retailers/manufacturers and the out of home sector, two separate templates were presented and different categories were used. PHE used the comments received to further refine the format of how data on the sugar content and portion size could be reported as uniformly as possible across each of the nine categories.

### Key points raised

#### Retailers and manufacturers:

- the importance of ensuring the accuracy and reliability of the baseline data, as well as its comparability with data on progress, was raised
- it was queried whether seasonal products were included in the analysis. PHE confirmed that as data covers a 52 week period, seasonal products will be captured within the data
- it was agreed that reporting data for 2014 was useful so that achievements on sugar reduction made prior to 2015 could be captured. Businesses asked if information on sugar reduction prior to 2014 could be acknowledged. PHE agreed that this information would form part of the narrative of the report and businesses were requested to send any notable progress from 2010 onwards so that it could be included. *Post meeting note: Following further consideration, this information will be included in the narrative of the first progress report in March 2018. This approach will better serve the businesses who achieved reductions prior to 2015, and who may therefore find it difficult to achieve the 5% reduction expected in the first year of the sugar reduction programme*
- businesses asked whether the baseline report would include data by company; it was confirmed that this was not the intention
- there was concern about the poor coverage of real baseline data in the cakes category. PHE clarified that some businesses had provided their nutrition data to supplement what is available within the Kantar data set and would welcome any further information businesses could share. It was confirmed that the figures presented in the baseline report would be based on the data that is available

- businesses requested that the baseline report should include information on which products were classed as single serve items
- PHE was asked whether it had received data from the out of home sector. Without portion size information from this sector, the average calories per portion data is likely to be a gross underestimate because portion sizes tend to be substantially larger compared to retail and manufacturing
- detailed consideration had been undertaken from PHE and some of industry's concerns had been addressed. Industry welcomed the fact that the proposals for the baseline report included both information on sales weighted averages of sugars, and on energy per portion
- there were queries as to what additional data is being requested and collected and how this will then be used by PHE. It is important that the same data is used in future monitoring, or if substantive additional data is obtained that the baseline is retrospectively amended
- there were questions as to how products high in milk or fruit may skew some of the data and how this may subsequently be interpreted. The narrative around relevant categories should be very clear as to the role of milk and fruit, and the impact this is expected to have on the figures
- significant concerns were expressed that the total weight of sugars sold is not an appropriate metric and may be misused by the media and others who do not understand the complexities
- it would be helpful if the categorisations of products and the portion cut-off for single serve items that PHE has undertaken are clearly set out to enable companies to provide input and undertake the same process

### Out of home:

- there were queries on what information could be gleaned from the NPD Crest data set. PHE confirmed that that NPD Crest circulate 12,000 surveys and the data captured measures volume sales focussed on the out of home sector but it does not include nutrition information. To obtain nutrition information, PHE has used what is available from company websites and the limited data that has been provided by businesses
- it was queried what PHE will do about those companies that do not supply nutrition data. PHE confirmed that repeated requests have been made to individual companies and trade bodies to supply data to inform the baseline figures and guidance on targets but ultimately the reports will be based on the data made available and that PHE has gathered. PHE confirmed that it is willing to consider confidentiality agreements with out of home businesses to assist with this
- PHE was asked about how the data presented for the out of home sector compares to the retail/manufacturing data. PHE confirmed that the SWA sugar content is lower than for in-home purchases as the figure is based on limited data and there is no information on the top sellers for this sector. PHE cautioned that as a result the

guideline figures to help businesses achieve the 5 and 20% reduction across categories maybe set too low and, therefore, be unachievable. Hence business should see this as an incentive to supply data

- it was highlighted that information from contract caterers is missing from the NPD Crest data currently available to PHE. It was raised by contract catering businesses that where organisations operate with chefs making products to their own specifications, they say the exact nutrient composition is unknown. In addition the sales information may be difficult to obtain where products are sold in canteens or vending machines. It was noted that there is concern among contract catering companies about how they will appear in any published progress reports and barometers. Businesses with centralised menu planning have specific products, so PHEs view is that they may be able to supply the information
- a business asked about ensuring confidentiality of any data that is provided. PHE confirmed that it is able to look at and sign confidentiality agreements. It was also clarified that there is no intention to name companies in the baseline reports; data at this stage is required to help inform the baseline reports and guidance for monitoring
- there was concern about duplication of data between information that is taken from websites and data that is provided by individual companies. PHE clarified that if companies supply company specific data this would be used in preference to online data

### NGOs:

- there were no specific comments from the NGOs in attendance at the baseline report meetings

### Next steps:

- PHE will take account of any feedback when finalising the baseline report
- attendees asked to send any further comments or reflections on what was discussed in the meeting in writing and to consider whether they can provide data to help inform the report
- PHE requested that businesses share any recent achievements in sugar reduction that will not be reflected in the data – a template would be circulated for this purpose. *Post meeting note: this information will be collected to inform the first progress report which is due to be published in March 2018*
- PHE will circulate a high level summary and the meeting slides to attendees
- further data related meetings to discuss monitoring and progress reports will be organised after publication of the targets in March

## Out of home – provision of data

### Purpose of additional meetings

Given the absence of a comprehensive independent data set for the out of home sector, PHE has purchased the available data, which is more limited in scope and detail than the data sets available for the retail and manufacturing sectors. PHE has supplemented this data with nutritional information drawn from industry websites. PHE undertook an additional round of focussed engagement with the out of home sector to encourage key businesses to take action on sugar reduction and ask them to provide their individual business data to PHE.

Through a series of further discussions and meetings, PHE requested nutrient content data (as sold) per 100g and per portion (including portion weight) for all foods in the initial nine food categories in the sugar reduction programme. Data was requested for all products that contribute to the top 80% total volume within a specific category and businesses were asked for volume sales data for individual lines to be presented in 000's kg. During these meetings PHE also outlined a preference for 2015 data.

Engagement has focused on 30 key out of home businesses. Many of these attended sector specific meetings in November and December and a specific data meeting in February 2017. PHE has also presented its requests for data at roundtables with out of home businesses and met separately with individual businesses and trade bodies, several of which have been co-ordinating data on behalf of their members. PHE's individual meetings with businesses have been supplemented by further telephone briefings on the data ask.

At the time of this report, eleven businesses and one trade body (on behalf of four out of home businesses), provided some data to PHE. Some of the data provided to PHE was sparse and PHE has only been able to use data from seven of these 15 businesses to inform the SWA for out of home. Two (of the seven) businesses supplied data for all the measures PHE requested, included sales data. PHE has been able to use data (in some form) within the baseline analysis from nine businesses that provided it. For some, lack of information on where products are sold is a limiting factor, as this detail is needed to work with the commercial out of home sales data PHE has purchased from NPD Crest. PHE also received a further submission from one business after the deadline of 6 March 2017, which it has not be possible to use in the analyses.

The 'Sugar Reduction: Achieving the 20%' technical report sets out the type of information provided by each out of home business.

### Summary of engagement timeline:

- contact with the sector began in June 2016, initially through key trade bodies. PHE updated the data request in November and out of home businesses attended the category meetings, separate roundtables, data meeting and individual meetings. PHE outlined that as commercially comprehensive data was not available for the out of home sector, it would also use nutrition data available online as well as information separately provided by businesses
- PHE circulated the nutrition data template on 23 November 2016. PHE requested nutrition data from 2015 or 2016 but outlined that PHE would take into account, in the narrative, any sugar reformulation that had taken place prior to that in its March 2018 reporting
- individual business data supplied to PHE would at this stage be treated as confidential. PHE confirmed that the data would only be used internally to develop the baseline analysis and would only be used externally in aggregate anonymised form. Any future use would be agreed
- following discussions with industry in early December 2016, the data request was simplified so that businesses with different data sets could still provide PHE with valuable nutrition data on the categories of particular relevance. The amended template was resent to businesses on 2 December 2016
- PHE continued to hold meetings with trade bodies and key businesses throughout December and into late February to discuss data provision. In early January 2017 PHE informed the trade bodies and businesses that the deadline for receiving data had been extended to early March in order to provide them with additional time
- PHE held a specific data meeting with the out of home sector on 8 February 2017 on the approach to setting the baseline and future reporting against progress. PHE restated the requirement for a uniform approach to data provision that would be consistent to retailers and manufacturers. PHE stated that the baseline report would describe the sugar content of products per 100g and calories per portion, in the market, across nine categories. PHE explained that it would use a different template for out of home data in recognition that it is harder to obtain SWA data for the sector. PHE continued to request volume and nutrition data from businesses
- following the meeting, PHE had a number of one-to-one calls with businesses to understand what data they would be able to provide and inform them that the final date of submission was early March 2017

### Next steps:

- PHE is encouraged by the provision of some data. PHE will continue to encourage more data provision and prioritise engagement to build buy in and support for delivery of the programme by the out of home sector
- PHE will keep this issue under close review

## Stakeholder engagement by sector

The table below shows which organisations attended the meetings convened by PHE between May 2016 and March 2017, by sector; and the details of those who provided written feedback on PHE's proposals for the sugar reduction programme.

Company	May/June 2016 meetings	November/ December 2016 category specific meetings	1:1 meetings December 2016 to March 2017	Baseline report meetings January/ February 2017	Feedback response on proposals
<b>Retailers</b>					
Aldi Stores Limited	✓	✓			
Asda	✓	✓		✓	✓
Co-operative	✓	✓		✓	✓
Iceland Foods Ltd	✓				
J Sainsbury plc	✓	✓	✓	✓	
Lidl	✓	✓		✓	
Marks & Spencer plc	✓	✓	✓		
Tesco Stores Limited	✓	✓	✓	✓	
Waitrose	✓	✓		✓	✓
WM Morrison Supermarkets plc	✓	✓		✓	
<b>Manufacturers</b>					
Allied Bakeries		✓		✓	
Bakkavor Group Limited		✓	✓	✓	✓
Beechdean Manufacturing Ltd		✓			
Bokomo Foods UK Ltd		✓			
Burton's Biscuit Company	✓	✓		✓	
Cereal Partners UK	✓	✓	✓	✓	✓

<b>Company</b>	<b>May/June 2016 meetings</b>	<b>November/ December 2016 category specific meetings</b>	<b>1:1 meetings December 2016 to March 2017</b>	<b>Baseline report meetings January/ February 2017</b>	<b>Feedback response on proposals</b>
CSM Bakery Solutions			✓		✓
Dairy UK	✓	✓		✓	✓
Danone	✓	✓	✓	✓	
Disotto Foods Ltd		✓			
Emmi		✓		✓	
ENSA – European Natural Soy And Plant Based Foods Manufacturers Association (Alpro)			✓		✓
F. Duerr & Sons		✓		✓	✓
Federation of Bakers		✓	✓	✓	✓
Ferrero	✓	✓		✓	✓
Finsbury Foods		✓		✓	✓
Fox's Biscuits Ltd	✓	✓			
Frank Roberts & Sons Ltd					✓
General Mills Inc	✓	✓	✓		✓
Greencore		✓		✓	✓
Hain Celestial	✓	✓		✓	✓
Haribo Dunhills plc	✓	✓	✓		✓
ICAM		✓	✓	✓	✓
Kellogg Company	✓	✓	✓	✓	✓
Kerry Group		✓			
Lactalis McLelland UK	✓	✓		✓	✓

<b>Company</b>	<b>May/June 2016 meetings</b>	<b>November/ December 2016 category specific meetings</b>	<b>1:1 meetings December 2016 to March 2017</b>	<b>Baseline report meetings January/ February 2017</b>	<b>Feedback response on proposals</b>
Lakeland Dairies Group					✓
Macphie of Glenbervie			✓		
Mars	✓	✓	✓	✓	✓
Mondelez International	✓	✓	✓		✓
Muller UK and Ireland	✓	✓	✓	✓	✓
Munoz UK				✓	
Nestle UK and Ireland	✓	✓		✓	✓
Oppo ice cream Ltd		✓			✓
Park Cake Bakery		✓		✓	✓
PepsiCo UK and Ireland	✓	✓			
Pladis (formerly United Biscuits)	✓	✓		✓	✓
Premier Foods	✓	✓	✓	✓	✓
R&R Ice Cream/Froneri	✓	✓	✓	✓	✓
Samworth Brothers	✓	✓		✓	✓
Tangerine		✓			
The Jordan's and Ryvita Company	✓	✓	✓	✓	✓
Unilever UK Limited	✓	✓	✓	✓	✓
Valeo Foods		✓			✓
Warburtons	✓	✓		✓	
Weetabix		✓	✓	✓	✓
Wrigley		✓	✓		✓
Yeo Valley	✓	✓		✓	✓

<b>Company</b>	<b>May/June 2016 meetings</b>	<b>November/ December 2016 category specific meetings</b>	<b>1:1 meetings December 2016 to March 2017</b>	<b>Baseline report meetings January/ February 2017</b>	<b>Feedback response on proposals</b>
<b>Retail and manufacturing trade bodies</b>					
Association of Cereal Food Manufacturers		✓			✓
British Frozen Food Federation		✓		✓	
British Retail Consortium	✓	✓	✓	✓	✓
Food and Drink Federation	✓	✓		✓	✓
Provision Trade Federation		✓		✓	✓
<b>Out of home businesses</b>					
Aramark Ltd				✓	
Bidvest Foodservice Group Ltd		✓		✓	
Brakes		✓		✓	
CH & Co Group		✓		✓	
Casual Dining Group		✓			
Compass Group UK		✓			
Costa Coffee		✓		✓	
Elior Group UK		✓			
Greggs plc		✓	✓	✓	
Greene King			✓	✓	
ISS Food and Hospitality UK				✓	
J D Wetherspoon plc			✓		
McDonald's Restaurants Ltd		✓		✓	
Mitchells & Butlers plc		✓		✓	
Pret a Manger				✓	

<b>Company</b>	<b>May/June 2016 meetings</b>	<b>November/ December 2016 category specific meetings</b>	<b>1:1 meetings December 2016 to March 2017</b>	<b>Baseline report meetings January/ February 2017</b>	<b>Feedback response on proposals</b>
Sodexo UK & Ireland				✓	
Starbucks UK		✓	✓	✓	
Subway UK & Ireland			✓	✓	
Whitbread PLC		✓	✓	✓	
WSH Group		✓		✓	
<b>Out of home trade bodies</b>					
Association of Licenced Multiple Retailers			✓	✓	
British Beer & Pub Association		✓	✓	✓	
British Hospitality Association	✓		✓	✓	
Business Services Association	✓				
UK Cinema Association			✓		
<b>NGOs</b>					
Action on Sugar		✓	✓	✓	✓
British Dietetic Association		✓		✓	✓
British Dental Association				✓	
Which?			✓		
Obesity Health Alliance (coalition of 39 organisations including medical royal colleges, health charities,		✓	✓	✓	✓

<b>Company</b>	<b>May/June 2016 meetings</b>	<b>November/ December 2016 category specific meetings</b>	<b>1:1 meetings December 2016 to March 2017</b>	<b>Baseline report meetings January/ February 2017</b>	<b>Feedback response on proposals</b>
campaigners and professional associations					
<b>Other</b>					
Leatherhead			✓		

## References and endnotes

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<sup>1</sup> Childhood Obesity Plan: A plan for action 2016

<https://www.gov.uk/government/publications/childhood-obesity-a-plan-for-action>

<sup>2</sup> Public Health England. Sugar reduction: The evidence for action Annex 5 Food Supply. 2015

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/470176/Annexe\\_5.\\_Food\\_Supply.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/470176/Annexe_5._Food_Supply.pdf)

<sup>3</sup> Department of Health (DH) Public Health Responsibility Deal

<https://responsibilitydeal.dh.gov.uk/>

<sup>4</sup> Breakfast cereals; confectionery (sweet and chocolate); yogurt and fromage frais; ice cream, lollies and sorbets; sweet spreads and sauces; cakes; morning goods (eg pastries, fruited buns), puddings; and biscuits.

<sup>5</sup> Bates B LA, Prentice A, Bates C, Page P, Nicholson S, Swan G. (Eds). (2014) National Diet and Nutrition Survey: Headline results from Years 1 to 4 (combined) of the rolling programme from 2008 and 2009 to 2011 and 2012.