



EU Platform on Diet,  
Physical Activity and Health

# **Working Paper on Product Reformulation and Portion Size**

**March 2009**

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## **Acknowledgement:**

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# 1. Introduction and approach

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In March 2005, the European Commission established a *Platform on Diet, Physical Activity and Health*<sup>1</sup> as a forum where interested actors could report and discuss their planned contributions to the pursuit of healthy nutrition, physical activity and the fight against obesity, so that over time better evidence of what works and examples of best practice could be accumulated.

The Strategy for Europe on Nutrition Overweight and Obesity related health issues<sup>i</sup>, adopted in May 2007 identifies reformulation as an issue of interest and notes that there have been some efforts by industry but these are not uniform across product lines and the European Union. The Strategy sets out the Commission's intention to facilitate salt reformulation campaigns and other initiatives aimed the nutrient content of manufactured foods. In 2008, DG SANCO worked closely with Member States to develop a framework for salt reduction through reformulation of major food product categories.

The purpose of this paper is to update the Platform on progress in relation to the members' commitments to reformulation and reducing portion sizes. Reformulation is defined as the alteration of the chemical/nutritional composition of foods, mainly targeted at the reduction of salt, fats and sugars. This does not include fortification which is the addition of micronutrients or other substances with a physiological effect.

Progress monitoring in the RAND report<sup>2</sup> in 2008 assessed the extent to which the commitments had been implemented by Platform members. This report attempts to go one step further and discusses the commitments in the context of what has been achieved, based on the information provided in the 2008 monitoring forms on the database, plus any relevant supplementary information that could be found through a review of published literature.

A search of the database of commitments of the EU Platform on Diet, Physical Activity and Health was done to identify all commitments classified under the "reformulation" tag. A separate search was also done using the keyword "portion size" and the commitments listed under "other" were reviewed to see if they contained information about reformulation or portion size.

The commitments identified were then analysed in relation to the objectives. The analysis also took account of a CIAA survey of its members' approaches to reformulation and product innovation 2007,<sup>3</sup> itself a Platform commitment. Analyses of progress were then undertaken in relation to different approaches to reformulation and portion size, by country and by leadership organisation.

A review of published literature in reformulation was also undertaken to inform the paper. Although this review provided information about action taking place on reformulation in other parts of the world, it revealed little additional information on the extent to which the Platform commitments are contributing to public health goals. An additional source of information was the author's own experience of working on the UK Food Standards

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<sup>i</sup> [http://ec.europa.eu/health/ph\\_determinants/life\\_style/nutrition/documents/nutrition\\_wp\\_en.pdf](http://ec.europa.eu/health/ph_determinants/life_style/nutrition/documents/nutrition_wp_en.pdf)

Agency Salt Reduction Program, undertaking a comparative analysis of nutrition policy and the role of industry in the UK and the Netherlands, and current work with the Australian Division of World Action on Salt and Health.<sup>ii</sup>

This report is not intended to be a thorough review of all activity to reformulate foods or change portion sizes within the Member States. The obvious limitation is that it is based primarily on an analysis of the information in the Platform database. The database is not a comprehensive overview of all the actions of Platform members let alone wider action in Europe. What's more, the nature and detail of company reporting does not lend itself to an analysis of if and how the commitments contribute to public health. In most cases it is too soon and there is insufficient information available to accurately estimate the impact of the commitments on public health goals.

It is also difficult to differentiate the public health benefits of reformulation and changing portion size from any benefits that may emerge from related Platform commitments or wider European activity on nutrition. Whilst commitments on labelling are not covered in this report, the inter-relationship between member's commitments or government policies on labelling and reformulation is discussed in the final section on drivers to product reformulation. This section also considers the pros and cons of different ways of implementing and monitoring reformulation programmes.

The paper starts by analyzing the commitments made by Platform members on reformulation. It then identifies key issues emerging from this analysis, and formulates key discussion questions. The intention is to provide a starting point for discussions by the Platform members on the further actions needed to ensure that the trajectory of product reformulation and controlling portion sizes for better health continues, and effectively demonstrate the positive public health outcomes resulting from these approaches.

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<sup>ii</sup> The Australian Division of World Action on Salt and Health (AWASH) [www.awash.org.au](http://www.awash.org.au) is hosted by The George Institute for International Health in Sydney [www.thegeorgeinstitute.org.au](http://www.thegeorgeinstitute.org.au)

## 2. Background

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The potential health benefits of action by the food industry to improve product composition by reducing salt, fat and sugar or of reducing portion sizes have been acknowledged for some time. In 1989, the World Health Organisation (WHO) Expert Report on diet, nutrition and the prevention of chronic disease,<sup>4</sup> having collated evidence linking diet and disease, recommended *“Discussion between the government, the food industry, and the consumers to ensure the development of food products that are low in fat, free sugars, and salt.”* Then, over a decade later in 2003, another WHO report<sup>5</sup> confirmed this evidence and presented convincing new evidence that a high intake of energy-dense foods is linked to an increased risk of obesity. It made a series of recommendations for action, recognising the role of producers and suppliers in ensuring the components of a healthy diet were available. Specifically it said, *“As consumers increase their preference for healthy diets, producers and suppliers will wish to orient their products and marketing to respond to this emerging demand.”*

These recommendations were translated into more specific guidelines in the WHO Global Strategy on Diet, Physical Activity and Health,<sup>6</sup> which was published in 2004 and said: *“The private sector can be a significant player in promoting healthy diets and physical activity to the public. The food industry, retailers, catering companies ... all have important parts to play as responsible employers and as advocates for healthy lifestyles.”* It stated: *“Initiatives by the food industry to reduce the fat, sugar and salt content of processed foods and portion sizes, to increase introduction of innovative, healthy, and nutritious choices; and review of current marketing practices, could accelerate health gains worldwide.”* It made a clear recommendation that: *“Companies should limit the levels of saturated fats, trans-fatty acids, free sugars and salt in existing products and consider introducing new products with better nutritional value.”*

Early in 2007 the WHO held an expert review and technical meeting on salt which recommended that each of its member states implement a national salt reduction strategy.<sup>7</sup> The WHO European Action Plan for Food and Nutrition Policy 2007-2012 also states that *“reformulation of food is considered as one of the key options for achieving dietary goals”*.<sup>8</sup>

As the international pressure for action grew, evidence to support these moves has also continued to accumulate. Much work has been done internationally to show that portion sizes have increased.<sup>9,10</sup> In 2006, evidence of the link between increased consumption of soft drinks and sugar-sweetened beverages with increased body weight and obesity emerged. Growing consumption of convenience foods including unhealthy snack foods also have been identified as key factors leading to the increase in obesity.<sup>11,12,13,14</sup>

Salt has also been implicated in a range of other adverse health outcomes,<sup>15</sup> including raised blood pressure and an increased risk of coronary heart disease and stroke. Evidence is also emerging that children who eat more salt are also likely to drink more soft drinks meaning that higher salt intakes may also be linked to obesity.<sup>16</sup>

It is against this backdrop of changing and developing evidence that food companies have begun to take product reformulation more seriously. A review of commitments and practice of 25 of the world’s largest food companies undertaken by the Centre for Food Policy in London in 2006<sup>17</sup> assessed what companies reported to be doing on

reformulation. It revealed that 10 out of 25 companies reported that they were acting on salt, only five reported on sugar and only four reported on fat. Eight reported on trans-fats. But only two said they were taking action on portion size. The report concluded that more action was needed since less than half the companies reported action.

Around the same time, a new driver began to emerge. The investor community had begun to take stock of the fact that consumer fears about obesity and related health problems were beginning to affect sales and profit margins. In 2006 JP Morgan published a report showing that food categories perceived to be less healthy were showing slow growth or a decline in sales in contrast to the growth in sales of healthier categories.<sup>18</sup> Following on from these two reports the International Business Leaders Forum and Insight Investment collaborated to produce *A Recipe for Success: how food companies can profit from consumer health*<sup>19</sup> to encourage food companies to adopt effective responses to pressing consumer health issues, particularly obesity.

In this context, this report reviews the action on product reformulation and portion size in the Platform commitments, assesses progress against stated objectives and considers the extent to which the actions are likely to have an impact on public health, based on the available information.

### **3. Platform Members' Commitments on product reformulation and portion size**

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#### **3.1 Number of commitments**

The database includes 13 commitments made by 11 members with two members each having two separate commitments.

#### **3.2 Timescale of commitments**

There were no new commitments in 2008.

Three commitments do not include monitoring details for 2008. These include:

- The Co-operative Group Ltd – product reformulation towards healthier alternatives (member EuroCoop) (2006-7)
- British Retail Consortium (member EuroCommerce) commitment to remove trans-fats (2007-8) but no 2008 monitoring details
- The Union of European Beverages Associations (Member Confederation of the Food and Drink Industries of the EU) commitment to reformulation (2006 – 2020)

From the ten commitments that provide monitoring details for 2008:

- Three end in 2008
- Two end in 2009
- Four end in 2010
- One ends in 2020

Summary details of the commitments with monitoring details for 2008 are included in Annex 1.

#### **3.3 Categorisation by country and leadership organisation**

Out of the ten commitments with monitoring details for 2008

- One is a Member State (UK FSA)
- Four are European trade associations (CIAA, FERCO (2), EMRA)
- Four are Transnational manufacturing companies (Unilever, Mars Inc (2), FERERRO Group)
- One is a Spanish retail group (EROSKI)

There is very limited information on activities in the retail sector as the retail trade association Eurocommerce has no commitments on reformulation.

There is insufficient data to analyse the commitments by each country. The country examples of FERCO are from Belgium, Spain, Italy, UK, France and Netherlands and EMRA are from the UK, Greece and Europe-wide. The CIAA survey covered Spain, France, Great Britain, Italy and the Netherlands. However, the information provided about the results of the survey in the monitoring framework is not country-specific.

### 3.4 Categorisation by activity

The following activities are covered by the ten commitments with monitoring details for 2008:

- One is a survey of members action on product reformulation, innovation and labeling (CIAA)
- Five include remove trans-fats or reduce saturates (EROSKI, FERCO, EMRA, Mars Inc, Unilever)
- Five include salt reduction (UK FSA, FERCO, EMRA, Mars Inc, Unilever)
- Four include sugar reduction (FERCO, EMRA, Mars Inc, Unilever)
- Three include portion size (FERCO, Mars Inc, FERERRO Group)
- Four are multifaceted programs, including reformulation in relation to trans-fats, fats, salt and sugar and in some cases portion size (FERCO, EMRA, Mars Inc, Unilever)
- One is strengthening relations (networking) between relevant catering organisations in the fight against obesity (FERCO)

### 3.5 Detailed analyses of 2008 actions on individual nutrients

#### 3.5.1 Trans-fats and saturated fat reduction

**EROSKI** is the only retailer with a commitment to remove trans fatty acids (TFAs) from all products, and succeeded in removing trans-fats from 51 products in 2008.

As part of its general nutrition recommendations, **FERCO** has specified reducing salt, fat and sugar in menus where possible. It reports that:

- COMPASS Italy no longer uses fried foods in 60% of the units.
- SODEXHO Belgium has revised cooking methods including banning animal fats and using less fat and saturated fat and less fried products.
- ELIOR UK monitored the implementation of its Balance program using a web survey and found that 77% sites offer fried fish max 1xweek; 17% of sites do not fry at all, 21% no longer offer fried eggs.

**EMRA** members have continued work on trans-fat and saturated fatty acid reduction:

- Quick has launched a program to reduce the fat content in the hamburger sauces it uses in France and Belgium and has introduced new frying oil that reduces saturated fat intake. In 2008 the fat content in 71% of Quick's hamburgers was reduced by 49.9% affecting more than 90 million hamburgers. More than six grams of fat were eliminated per hamburger, equivalent to 583 tonnes a year or 23% less of the GDA for a female per hamburger.
- Burger King has tested new frying oil which it plans to introduce to reduce saturated fat in fries by the end of 2009.
- Goody's is completing laboratory research on a project to replace palm oil with olive oil as a frying medium and expects a 300% reduction in saturated fat in frying oil. It is also keeping the trans-fat free policy active across its whole network.
- McDonald's Europe has nearly completed its plan to substantially reduce TFAs (down to a maximum of 2%) while limiting the saturated fat content to a maximum of 12% in its cooking oils in more than 6,300 McDonald's restaurants.



This substantially reduces TFAs in french fries, fried chicken and fish products, fried pies and other promotional fried products.

The **CIAA** survey showed that four out of 10 companies say they are reducing salt, fat or sugar or introducing new products with lower levels of salt, fat and sugar. It is not possible to identify from the results presented which are taking action on fats; it would be helpful to know this. Two manufacturing companies have made their own commitments on reformulation:

- Mars Inc (having already removed the majority of TFAs from products worldwide), is currently implementing program to reduce portion sizes as well as a program to reduce the level of saturated fatty acids (SFAs).
- Unilever went beyond its objectives to reduce 5500 tonnes of SFAs in 2007/8 by reducing 11000 tonnes of SFAs and 370 tonnes of TFAs. All Family Goodness (Rama, Blue Band) soft tubs in Europe reformulated to 33% SFAs or lower.

### 3.5.2 Salt reduction

There are no commitments on salt reduction from retailers or retail organisations.

The **UK Food Standards Agency** listed a range of new objectives for 2008 but no new commitments. New objectives included:

- reviewing the 2010 salt targets and consulting on proposed new targets
- estimating costs to industry
- research on salt reduction in bread
- working with the Salt Action Network (SAN) members to set up suitable protocols for monitoring, communication and industry engagement in setting salt targets for specific food categories.

This UK salt reduction program is part of an integrated government nutrition program that includes staff resources of 4.8 full time equivalent (FTEs). The results of the second sampling round of the processed food database were published in January 2008. The consultation on the salt targets is ongoing. The first meeting of the SAN was held in Slovenia in March 2008. The bread research was completed in 2008 and the results will be published early in 2009.

Significant new developments occurred in relation to monitoring in that the results of the urinary analysis survey showed that population salt intakes had fallen to 8.6g (from 9.5g in 2000/2001). Salt reductions of between 25-55% have been achieved in a number of foods that contribute most salt to the diet including breakfast cereals, ready meals, soups and crisps and snacks.

**FERCO** had added a specific emphasis on salt reduction as well as reformulation of the food supply and recipes to its action on implementing general nutrition recommendations. It is hard to distinguish specific actions on salt from general reformulation/healthy choices programs but a few examples are highlighted including:

- 70% of all COMPASS NL soup recipes are now low salt
- SODEXHO Italy has salt action on 480 sites involving 2,500 staff
- SODEXHO UK has introduced a range (300) of lower calorie sandwiches with reduced salt bread

- COMPASS UK introduced its own range of products with a lower salt content. ELIOR UK has removed salt from the table on 52% of sites with the agreement of clients.

There have also been some positive developments in relation to EMRA activities on salt reduction including:

- Goody's initiative to eliminate salting of fries has become a reference for good practice leading to new salt reduction initiatives in hamburger patties and bakery products. It is estimated that the extension of the Goody's programme has led to a 10% salt decrease or effectively a 3.6 tonne salt reduction on an annual basis and that the extension to breads will lead to a six tonne reduction on an annual basis.
- Quick has introduced a similar 'No more salt on fries' program in all restaurants.
- Burger King has undertaken an initiative to make salt reductions in a range of core menu items. In 2008 Burger King introduced two new menu items to the kids menu with lower salt content including chicken bites (reduced by 8%) and char-grilled chicken fillet strips (reduced by 13%). In addition, Burger King reduced salt in chicken bites (8%), in the Piri Piri baguette chicken breast (10%), and in the chicken breast for the flame grilled chicken salad (42%).
- Yum Brands (KFC and Pizza Hut) have continued their program to reduce salt usage in European products. In 2008, the company further reduced salt consumption by 60 tonnes (up to 30% less in tortillas and chicken).
- Domino's Pizza (UK and Ireland) are testing lower salt options for which more details will be available in 2009 and have committed to working with the UK Food Standards Agency to help meet UK targets.
- McDonald's Europe is conducting salt reduction on fries in its major European markets.

The **CIAA** survey showed that four out of 10 companies say they are reducing salt, fat or sugar or introducing new products with lower levels of salt, fat and sugar. It is not possible to identify from the results presented which are taking action on salt; it would be helpful to know this. Two manufacturing companies have made their own commitments on salt reduction:

- Mars Inc has both a general commitment to reformulation and a specific commitment on salt reduction in rice and sauce products. Specific objectives in 2008 were to continue efforts to reduce salt in the portfolio of rice, cooking sauces and soups. To achieve this objective it is reformulating its recipes for these products across all European markets in accordance with UK FSA targets. It notes the following achievements:
  - Approx five FTEs have been employed on this project during 2008.
  - Salt targets have been incorporated into the innovation brief for new products.
  - Salt reductions of between 20 and 35% were achieved across a range of products.
  - There has been no use of salt alternatives.
- The Unilever Nutrition Enhancement Program aimed to remove 340 tonnes of sodium from products in 2007/8 and in fact removed 640 tonnes of sodium including a 10% average sodium reduction in dry soups in Europe.

### 3.5.3 Sugars

**EMRA** members have committed in 2008 to bring sugar levels in line with the recommendations from the appropriate regulatory bodies but does not report on any specific actions in relation to sugar in the monitoring report.

**FERCO's** general nutrition recommendations include promoting the use of less sugar but again it is not possible to identify specific actions on sugar from the monitoring report although it is likely that sugar is included in many of the company programmes such as COMPASS UK "Balanced choice" or ARAMARK's "Health by Stealth" menu.

The **CIAA** survey showed that four out of 10 companies say they are reducing salt, fat or sugar or introducing new products with lower levels of salt, fat and sugar. It is not possible to identify from the results presented which are taking action on sugar; it would be helpful to know this. Two manufacturing companies have made their own commitments relating to sugar:

- Unilever committed to removing 10,000 tonnes of sugar from products in 2007/8 and in fact removed 20,000. One example that contributed is over 40% reduction in sugars in Becel pro-activ minidrinks and yogurts.
- Ferrero Group launched three new products with reduced or no sugar – one Non-Alcoholic Beverage Product (green ice tea) with a reduced sugar intake but without sweeteners – two Ferrero confectionery sugarless products (sugar drops with sweeteners).

### 3.5.4 Portion size

The **FERCO** general nutrition recommendations include encouraging smaller servings and proposing to clients an offer of smaller helpings on a daily basis. There is no reporting specifically in relation to update of this in the monitoring framework.

From the **CIAA** survey, just over half (53%) of companies say they have increased the range of choice in product and portion size. Two manufacturing companies have made their own commitments relating to portion size:

- Mars Inc has a portion size reduction programme to reduce the calorie intake per portion. The 2008 objective is to reduce bar weight by 7% on average and introduce smaller options into major brands. It reports success in meeting both of these objectives. In addition it reports that the move from Kingsize to Duo packs for a number of products was supported by market research showing that the majority of consumers don't eat both at the same time.
- Ferrero's portions, namely those for Kinder chocolate, are tailored to children's consumption and therefore the portion sizes are very small and individually packaged. It launched four new products onto the market in 2008 – one reduced calorie, one reduced sugar and two sugarless. It doesn't say anything about portion size but we can assume they are portion controlled in order to stipulate the level of nutrients.

### 3.5.5 Multifaceted programs

Many of the commitments on reformulation have general criteria rather than being focused in relation to individual nutrients:

**EuroCommerce** member - Casino's - healthy diets and lifestyles commitment<sup>iii</sup> has led to improvements in the composition of 287 products, including reductions in the salt, sugar and fat contents. It has also created an annual nutrition event.

The overall objective of the **FERCO** program is a framework to implement general nutrition recommendations. This part of the commitment has been realised and companies are now developing their own programmes which are part of their brand image and embedded in their food services offer ("Balanced Choices" by COMPASS, "Vitality and Healthwise" by SODEXHO, "Balance" by ELIOR, "Wellness" by ISS, "Right Track" by ARAMARK.) As contract catering is a local service, implementation of the programmes is country-specific. Examples include:

- COMPASS FR has now more than 35,000 recipes that are centrally managed.
- COMPASS UK increased the number of "Balanced Choices" audited units from 602 to 750 by September 2008.
- ARAMARK UK created "Health by Stealth" menus, healthier dishes, without changing their appeal and without explicitly marketing them as healthy. Recipe database includes menu planning guidance for chefs.
- SODEXHO UK has 80% of salad items now served without dressing. A range (300) of lower calorie sandwiches with low salt bread are now available. There has also been an introduction of a range of "5 a day" pots including fruits, vegetables and salads, enabling consumers to have their five a day in one purchase.
- SODEXHO Belgium has introduced a loyalty scheme in secondary schools to make healthy foods trendy, healthy vending machines and an online vegetarian library.
- SODEXHO IT has introduced its "Vitality project" (900 calorie menus), a pilot project for the elderly in Milan, breakfast in schools on more than 35 sites for 9,000 pupils, new vegetables offer at 80 workplaces for 25,000 people.
- FEADRS in Spain has launched a pilot programme for schools (14,000 pupils from 6-10), 67 schools involved (34 in the pilot and 33 as control).
- SERUNION in Spain and ISS Catering and ARAMARK in Belgium have introduced new healthier options in retirement homes.
- ELIOR UK report a 75% increase in number of sites running the "Balance" programme, 37.7% of the sites running "Balance" hold a healthy eating aware or flagship. 50.5% of the Balance sites have introduced the "Delish" concept offering small portions of a new range of deserts.
- ALBRON NL expanded its Food Specification Database with more than 4,000 entries. Over 80% of dairy products; 20% sodas/juices; 60% soups; 60% butter/oils and 80% potatoes vegetables now meet the Ik Kies Bewust (The Informed Choice) criteria.
- VENECA (NL) has adapted the Ik Kies Bewust scheme to the catering setting. There are more than 300 Ik Kies Bewust recipes in the database (200% increase in 2008).

## **Mars Inc**

- Under the Mars Health and Nutrition Strategy, the company will implement a product renovation programme to improve the nutritional balance of its products.

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<sup>iii</sup> This commitment was highlighted in the RAND fourth monitoring report not identified through the original search which is why it was not detailed in the original list of commitments.

As well as removing TFAs and the portion size reduction programme, this includes a move from King-size to Duo packs backed by research that consumers don't generally eat both parts.

### **3.5.6 Capacity building and developing company programs to implement general nutrition recommendations**

**FERCO** also reports that for 2008 companies have:

- increased the number of nutritionists and dietitians on the payroll;
- invested in sophisticated systems for nutritional analysis of products and menus;
- invested resources in drafting guides and setting up criteria for assessment;
- adapted labelling schemes to the catering environment.

### **3.5.7 Intensifying relationships in the fight against obesity**

**FERCO's** objective for 2008 in relation to its action on partnerships was to intensify relationships between relevant organisations in the fight against obesity rather than initiating anything new. Five informal meetings took place in 2008 between January and October involving 12 people. **FERCO** also participated in the CIIA meeting on salt reduction.

## **3.6 Compliance with 2008 objectives**

All of the members that have made objectives for 2008, report compliance with those objectives. Most of the other commitments do not include quantifiable targets and simply report the activities of different members, and occasionally what likely impact this might have. Unilever was the only organisation to establish quantifiable targets in relation to proposed reductions for TFAs, SFAs, sugar and salt. It reported reductions that were approximately twice the target amounts for all nutrients so it more than achieved its objectives.

## **3.7 Full list of the quantitative outputs**

Summarising the above text, the following is a full list of all the outputs that are quantified in the monitoring report:

- The UK FSA showed that population average dietary salt intakes had fallen to 8.6g (from 9.5g in 2000/1).
- Salt reductions on between 25-55% have been achieved in a number of foods in the UK.
- EROSKI reformulated 51 products to remove TFAs.
- Four out of 10 (43%) companies in the CIIA survey say they have reduced the amount of saturated fat, salt or sugar.
- 29% of companies say they have introduced products with less saturated fat, salt or sugar
- Mars Inc reduced bar weight by an average of 7%.
- Mars Inc made salt reductions of between 22 and 35% in a range of products.
- Unilever eliminated 11,000 tonnes of SFAs, 370 tonnes of TFAs, 640 tonnes of sodium, and 20,000 tonnes of sugar from the food supply.
- The FERRERO group introduced four new products onto the market.

- FERCO had five informal meetings involving 12 people as part of a partnership project.
- COMPASS FR: more than 35,000 healthy recipes centrally managed.
- COMPASS NL: 70% of soup recipes are low salt and there has been 40% reduction in calories.
- COMPASS IT: fried foods no longer used in 60% of units.
- COMPASS UK: Balanced choices increased from 602 to 750.
- SODEXHO UK: 80% of salad items served without dressings. 300 low calories sandwiches with reduced salt bread.
- SODEXHO IT: salt action on 480 sites involving 2,500 staff; breakfast at school on more than 35 sites for 9,000 pupils; vegetable offer at 80 workplaces for 25,000 consumers.
- FEADRS Spain introduced a school program involved 67 schools totaling 14,000 pupils (aged 6-10).
- ELIOR UK: 75% increase in number of sites running the “Balance” programme. 37.7% of these sites have healthy eating or flagship award. 50.5% offer small portion desserts. Survey showed 73.4% sites offer fish 3x/wk; 77% sites offer fried fish max 1x/wk; 17% of sites don’t offer fish at all; 67% of sites offer oily fish at least 2x/wk; 91% of sites offer low fat potato option; 95% sites offer a healthy hot main dish; 68% offer healthy snacks; 26% do not offer snacks any more; 21% no longer offer fried eggs; 69% offer healthier options next to fried eggs; 52% of sites have removed salt from the tables with the agreement of clients.
- ALBRON NL – more than 4,000 entries in Food Specification Database
- Goody’s salt extension program will result in a 3.6 tonne annual salt reduction (from hamburgers) and six tonne salt reduction (from bakery products).
- Goody’s switch from palm oil to olive oil has resulted in a 300% reduction in SFAs (this is obviously not possible but this is what they said!).
- Quick’s not using salt on fries reduced salt consumption by 161 tonnes.
- Quick’s hamburger fat reduction affected 90 million hamburgers at six grams of fat per hamburger which is equivalent to 25% less of GDA for a female.
- Burger King reduced salt by between 8 and 42% in range of kids products.
- YUM reduced salt by 60 tonnes, oil by 160 tonnes, and SFAs in core products by 20 tonnes.

## 4. Key Issues

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### 4.1 Drivers of product reformulation

A whole range of factors that are likely to have influenced reformulation of products and portion sizes. Key drivers include:

- Consumer demand
- Existence of governmental policies/guidelines related to product reformulation
- Scientific consensus
- Public opinion and media and legal pressure

These are discussed in more detail below.

#### 4.1.3 Consumer demand

Companies have a strong incentive to respond to consumer demand since it affects their bottom line. If a company perceives that its customers want “health”, then it is likely to respond with, among other measures, product reformulation. In contrast, a company that produces products for the “luxury” or “occasional treat” market might not be so influenced by the health agenda.

There is now clear evidence emerging that health and wellbeing is an increasing concern among consumers and acting as a key growth engine for the sector.<sup>18</sup> Investment reports into food companies claim that some companies are making significant progress in taking advantage of the new opportunities offered to them by the new health agenda but that many companies could be doing a lot more.<sup>19,20</sup> Some of this concerns reputation risk, i.e. maintaining customer trust and the value associated with the brand. The recent Which? report<sup>21</sup> highlighted positive customer feedback (alongside new business opportunities, staff motivation and financial benefits) as one of the clear benefits for businesses of initiatives to offer healthier choices. Several studies have attempted to assess the reputational and financial exposure of company products and range.<sup>18,22</sup> Ability to respond is important not just for consumer branding, but to maintain trust with regulators, NGOs and clients.

That said, whilst companies often claim that they are acting solely in response to consumer demand (which may be used to justify not reformulating in some cases), there are also indicators that it is not so straightforward. For instance, comparisons of salt levels in similar foods in different countries shows that in the same country, some foods are higher in salt than other countries, and others are lower, which seems to imply it is not an overall taste for salt that influences the amount of salt in foods<sup>23</sup>. Similarly, comparison of cereal products in different countries shows no pattern of salt or sugar levels relative to cultural differences<sup>24</sup>. In addition, companies may not market their products as being reformulated at all – the “stealth” approach – which circumvents consumer demand rather than responding to it.

These leads to the question of what actually influences consumer demand. Both the UK and the Finnish salt reduction campaigns were backed by consumer education campaigns (as well as labelling policies) to increase consumer demand. Evaluation after

the first phase of the FSA consumer education campaign in the UK showed public awareness of the 6g a day salt intake guidance had risen from just 3% to 34%, and 58% of consumers claimed to be acting to reduce their salt intake<sup>25</sup> which is likely to have a corresponding effect on consumer demand. A recent Which? survey<sup>21</sup> of consumers revealed that 27% of consumers wanted to government to take action to encourage industry to lower fat, sugar, and salt content of foods making it top of the list alongside consistent labelling, indicating that demand for reformulated products is growing at least in the UK. A study to estimate the impact of the labelling of low salt foods on consumer demand in Finland<sup>i</sup> concluded that the mean salt intake would be reduced by 1.8 grams in men and 1.0 gram in women if the entire population were to chose lightly salted products. It reports that education of the public has been key to the success of the reduction in salt intakes in Finland.

However, it has been also argued that companies are in a key position to create, not just respond, to consumer demand through the marketing of reformulated products, and the competition it creates.<sup>17</sup> According to officials working at the FSA, one of the turning points for the UK salt reduction strategy, was when salt became a competitive issue between companies. Companies began to base their marketing strategies on the fact that individual products or in some cases their whole product portfolio had less salt. Companies stopped making reductions covertly and started marketing them, such as the Heinz “*Check out our salt levels*” slash on cans in stores and Marks and Spencer’s posters in stores claiming “*We are taking salt out of our foods faster than you can say sodium chloride*”. This is a change from the “health by stealth” approach (meaning not publicising the reformulation of the product to the consumer on the packaging or through advertising) and some companies are making changes more overtly and using this as a marketing advantage. The approach chosen can differ between companies and even between different products sold by the same company. In general, there are no hard or fast rules on this. It depends on how a company positions itself in relation to the health market, as well as consumer demand and whether or not the particular issue has become a competitive issue.

#### **4.1.2 Governmental policies or guidelines related to product reformulation**

Government policies or guidelines can affect reformulation either directly, or indirectly by influencing how products are marketed and labelled. Initiatives like the EU Platform, an multi-stakeholder initiative, can also act as a catalyst for action.

National government regulations or guidelines on product reformulation are clearly a strong driver. Many of the examples from FERCO and EMRA are, for example, from the UK, where food issues have been on the agenda for longer and have a higher political priority, as is the case in the UK. There are certainly a much wider range of actions on salt reduction in the UK as a result of the UK FSA’s salt reduction program and the UK FSA’s targets for salt reduction are now being adopted by a range of companies operating in different Member States. One commitment (EMRA) states quite clearly that it will take action “*in line with the recommendations of the appropriate bodies.*” It makes no commitment to changing products if such recommendations are not in place. Many of its members claim to be implementing salt reduction programs in line with the UK FSA targets. This implies that such targets are fundamental to drive change. Likewise, there is reference to the Greek Ministry of Health and Social Solidarity recommendations on olive oil as the best source of oil.



National or international dietary guidelines are another potential driver of reformulation. However, salt intakes in the US have been increasing despite dietary recommendations in place since the 1980s to reduce intakes to six grams a day.<sup>26</sup> In contrast, researchers in the US have argued that the changed dietary guidelines for whole-grains combined with competition from manufacturers to produce new products to meet the increased market demand were together responsible for the increase in retail sales and consumption of whole-grain food products.<sup>27</sup> This suggests that dietary guidelines will only have an effect when reinforced by government action or the potential for competitive advantage.

Labelling schemes and related government policies on health claims or restrictions on marketing of foods to children are also likely to have driven product reformulation. Mandated inclusion of TFA content on food labels in Canada has resulted in a decrease in intake of TFAs. Despite concerns that this might result in an increase in SFA or total fat content, researchers have shown that it has in fact resulted in an increase in cis-unsaturated fat content.<sup>28</sup> Legislation to ban TFAs has been successful in some European countries too e.g. Denmark<sup>29</sup>.

Front-of-pack labelling is another key factor here. Both the UK and Dutch governments have recognised that front of pack labelling schemes and campaigns that increase consumer demand are an important driver to reformulation.<sup>30</sup> Both the Finnish and the UK salt reduction strategies, which are frequently cited as evidence of the effectiveness of such programmes, include parallel activities on labelling. Looking outside Europe, there is clear evidence to show that the Pick the Tick program of the National Heart Foundation of New Zealand has significantly influenced food companies to reformulate products in order to meet the labelling criteria.<sup>31</sup> Both of the major supermarkets – Sainsbury and Tesco – in the UK, have reported that front of pack labelling schemes have led to further reformulation, both directly so that products can get the green light, and as a result of increased demand for healthier products. These schemes all involved voluntary participation by the food industry, suggesting that voluntary action is also a component of government strategies (discussed further below in section 4.2).

Regulations stipulating that products with a health claim must meet certain criteria for salt, SFA, sugar and TFA is another potential driver, as are restrictions that permit only foods adhering to set nutrition criteria from being marketed to children. Likewise, regulations or guidelines specifying nutrition criteria for foods that can be served in schools, the workplace or other public institutions are likely to stimulate companies to reformulate foods.

Thus, it seems plausible to say that companies are more likely to reformulate where government policy or recommendations provide the incentive to do so, whether these policies are direct (i.e. on reformulation itself), or indirect (i.e. via other policy channels).

#### **4.1.3 Scientific consensus**

Agreement on the scientific evidence base and public/media pressure were the two key factors that influenced the Dutch Product Board for Fats, Margarines and Oils (MVO) to take action to eliminate TFAs from foods in the Netherlands.<sup>30</sup> Conclusive agreement on the evidence base was also a turning point for action on salt reduction in the UK and more widely on salt reduction.

Whilst scientific consensus at a national level is sufficient to establish something firmly on the policy agenda in some countries, such as in the case of the UK FSA salt reduction strategy<sup>32</sup>, it seems apparent that international scientific consensus, particularly expert reports and recommendations emerging from the World Health Organisation<sup>6,7</sup> are likely to influence a wider range of countries<sup>33</sup>.

#### **4.1.4 Public opinion and media and legal pressure**

Public opinion on an issue, regardless of scientific consensus, may also influence company nutrition strategies. The role of consumer organisations and NGOs is important here. The Food Commission and Sustain: the alliance for better food and farming, have worked to raise the profile of food issues on the political agenda in the UK for years now. Consensus Action on Salt and Health (CASH) has worked alongside them to ensure that the issue of salt reduction has remained a high profile public policy issue. As well as specifically highlighting the role of the food industry in taking salt out of foods, CASH has ensured that the problem of eating too much salt has received constant media coverage in the UK which, as well as helping to maintain the profile of salt as an issue on the government's agenda, in turn, may help stimulate consumer demand for lower salt foods which could, again, be a driver for reformulation.

CASH has since led to the development of World Action on Salt and Health and is encouraging groups around the world to adopt the same approach. A good recent example is from the Australian Division of World Action on Salt and Health (AWASH) which, as part of World Salt Awareness Week in February, published findings from a survey on salt levels in popular fast food chains showing that some meals contained more than the adults daily recommended amount of salt. The report received widespread media coverage including prime time news on the three major commercial TV stations. Three major companies have since written to AWASH to inform them of plans to reformulate foods. One product was even discontinued following the report.

The risk of litigation is probably quite low in this area in Europe (although the same was thought of tobacco 20 years ago). However, there are an increasing number of examples from the US, including for fraudulent claims on products that have been argued to promote obesity<sup>34</sup> and cases taken out against KFC (since closed due to action taken) and Burger King (dismissed but being appealed) on trans-fats<sup>35,36</sup>.

## **4.2 Strategic direction and leadership**

Who takes leadership for promoting and implementing reformulation activities will inevitably have an impact on the extent to which they are implemented. Commitments and pledges by companies have been made in three different forms: by individual companies (Unilever, Mars Inc (2) FERERRO Group, EROSKI), by trade associations (CIAA, FERCO (2), EMRA), or by companies/trade associations in partnership with government (UK FSA salt reduction strategy).

The advantage of individual companies establishing their own policies is that they can often go further than trade associations or governments who need to take into account the capacity of all players which often results in them acting in accordance with the lowest common denominator.

From a private sector perspective, whilst individual manufacturing companies or retailers can develop a policy or approach and implement it uniformly throughout the company in different countries, trade associations do not have the same power. They have to act in the interests of all members and can therefore often only develop general recommendations. FERCO's approach through a comprehensive set of guidelines that can then be adapted in each country in accordance with requirements or simply to suit the culture of the country or organisation seems to work well. EMRA's approach is less directed stating instead that members should act in accordance with the guidance or recommendations in each Member State.

Another approach has been through the establishment of Public Private Partnerships (PPPs). According to the Working Paper on Public-Private Partnerships for Health prepared for the High Level Group in 2008,<sup>37</sup> product development (innovation and reformulation) is often the focus of PPPs. This includes public-led partnerships designed to reduce salt in food products, private-led commitments to expand company portfolios with more nutritious products, and research-based PPPs to develop foods to address obesity.

### **4.3 Contribution of reformulation to public health goals**

It is not possible to analyse the extent to which the commitments made to the Platform meet public health goals, since the public health goals are not really specified and the information provided in the monitoring forms insufficient to assess the impact on public health. For example, FERCO and EMRA highlight examples of what some of their members are doing on salt, fat or sugar reduction but this is not a sufficient basis from which to make an objective assessment of how much salt, fat or sugar will have been eliminated from the food supply in total, let alone the impact that will have on public health.

Evaluating the impact of the commitments on reformulation, or of reformulation in general would require more specific output indicators at different levels. One such outcome indicator is population nutrient intakes i.e., the impact of an X% reduction of a specific nutrient in a particular product on the population intake of that nutrient. This would require knowledge of the contribution of that product to nutrient intakes in the country in question and the market share of the company for that particular product in that country.

Another outcome indicator would be the incidence of a disease linked with the nutrient, say, coronary heart disease. This would require knowledge of the impact of reducing population nutrient intakes by Y% on incidence of coronary heart disease in the country.

At the moment, the only Platform commitment to include measurement of such public-health oriented outcome indicators is the UK FSA salt reduction programme, notably the only government-led commitment. The programme has demonstrated a reduction in average population sodium intake levels. This has not yet been correlated to health outcomes in terms of blood pressure or incidence of coronary heart disease and stroke.

Whilst not included in the Platform commitments, an example of a member state that has demonstrated an impact on health outcomes as a result of product reformulation is Finland. Finland was one of the first countries to implement a population-wide salt reduction campaign beginning in the early 1970s with the main emphasis on the food

industry to develop reduced salt food products through the use of potassium and magnesium enriched Pansalt. Products that use Pansalt can also display this logo. Foods that are high in salt are required to carry a salt warning and foods that are low in salt are allowed to carry a low salt label. These different measures have resulted in a substantial reduction in the average salt intake of the Finnish population since the 1970s. Accompanying this reduction in salt intake there has been a reduction of over 10mmHg in both systolic and diastolic blood pressure and a corresponding decrease of 75-80% in both stroke and coronary heart disease mortality. A reduction of fat intake and an increase in potassium intake via the use of reduced-sodium, potassium and magnesium-enriched salt and an increased consumption of fruit and vegetables have also contributed to the fall in cardiovascular disease.<sup>38</sup>

Thus far, no attempt has been made to evaluate the impact of reducing portion sizes on public health, but this too would require careful consideration of outcomes indicators, perhaps the most obvious possibility being caloric intake obtained from the food category.

This leads to another public health aspect of the commitments on reformulation: whether they address such one nutrient, and whether this implies a reduction of caloric intake or not. There seems to be no pattern concerning whether a company, or indeed a Member state, addresses reformulation piecemeal or as a whole, with some companies (EROSKI/UK FSA) targeting one nutrient at once and others (e.g. FERCO, Unilever) approaching reformulation in a more integrated manner. The UK FSA identified salt as a priority initially and subsequently developed a programme on SFAs and energy balance building on the experience of the salt reduction programmes. However, many companies report that it is more efficient to address the composition of foods overall not least in that this helps to avoid reducing one nutrient but inadvertently increasing another nutrient which is also detrimental to health.

#### **4.4 Monitoring product reformulation**

At the moment there appear to be two main mechanisms for monitoring the commitments on reformulation in the Platform. The members themselves provide annual monitoring reports. RAND Europe then provides an annual overview of the commitments and the member's monitoring activities. The main purpose of the RAND monitoring reports is to communicate the achievements of the Platform members as represented in the monitoring forms.

There are three key components of monitoring approaches to product reformulation: monitoring what commitments have been made; monitoring whether these commitments have been implemented (or, where no commitments have been made, what action has been taken); and monitoring the public health impact of the commitments/actions.

In relation to the latter, the two questions that it would be useful to be able to answer are:

1. What has been the impact of product reformulation and changing portion size on population nutrient (and calorie) intakes?
2. What impact has this had on health outcomes?

In the first instance, it is important to have as comprehensive an overview of reformulation as possible to really be able to monitor impact. Yet the information in the

Platform database does not reflect the scale of activity that is going on in the European Union. For example, a recent request to all Member States to complete a questionnaire on existing Public Private Partnerships (PPPs) for health revealed a few examples of reformulation initiatives that are not listed in the Platform commitments including:

- **The Czech Technology Platform** for Food Products.
- Quality standards for factory and staff canteens in cooperation with enterprises and companies **in Germany** to improve ready-to-go meals for adults and meals in the workplace with a similar initiative on school meals.<sup>37</sup>
- The **Irish Health Department** Salt Reduction Strategy.
- The **Polish Platform for Action on Diet, Physical Activity and Health** cooperation on a range of actions including reduction of salt, fat and sugar content in food products.
- **The Spanish Food Safety and Nutrition Agency** partnerships with the food manufacturing and distribution companies and restaurant chains and school food providers to gradually reduce the proportion of salt, sugar and fats in products and with the Confederation of Bakeries to reduce salt in bread.

The database is also not necessarily up-to-date with existing commitments; for example, as already noted, the UK FSA more recently developed a SFA and energy strategy, but this is not reported. There are undoubtedly many more examples.

Effectively gauging the type and levels of reformulation activity across Europe would require a comprehensive audit combining both self-reporting of commitments and actions, which could be through questionnaires supplemented by interviews with each company, accompanied by an analysis of company product portfolios.

On the second component, the fourth RAND monitoring report<sup>39</sup> is useful in terms of monitoring the extent to which platform members are reporting effectively but is limited in terms of assessment of coverage or impact of actions. The general overview of progress in relation to each of the different areas inevitably means that the specifics needed to quantify progress in any area are lost. It notes one new commitment on product reformulation in 2008 (Mars inc) and no new commitments on product range modification or portion size. In terms of continuing commitments, it only provides a fairly general overview and little in the way of quantifiable data as outlined in section 3 above.

Consumer groups, such as the UK Which? and Consumentombond in the Netherlands have already done some very effective work on this.<sup>40,41</sup> The recent Which? healthier choices progress report<sup>21</sup> monitored action by government and the food industry in the UK in response to a list of 12 Which? demands for action to make it easier for people to make healthier food choices. This included a demand for companies to reduce levels of saturated fat, sugar and salt in their products. On this, out of a total of 5 points, Which? scored the government 3.5, food manufacturers 3, food retailers 3 and food caterers and food service 1. It praised positive action on salt as a result of coordinated FSA initiative and trans fats as a result of voluntary industry action but said action needed to be taken more widely now by the food industry as a whole and particularly by caterers. It said that saturated fat and sugar needed a greater focus now – as well as tackling portion size.

Such monitoring is also a very good way of holding companies to account thus stimulating further activities. Another effective way of increasing accountability and providing a baseline from which to monitor changes in nutrient levels in products is

through the establishment of food composition databases. The databank of salt levels in foods has been key to the success of the UK program. That non-legislated program has delivered an average reduction in population salt intake from 9.5 to 8.6g/day with the effect driven primarily by reductions in the salt content of processed foods.<sup>42</sup>

The third aspect is the monitoring of the public health impacts. As highlighted in the WHO European Action Plan for Food and Nutrition Policy,<sup>43</sup> the impact of reformulation “*can only be established through regular surveys on food consumption in the population and post-launch monitoring of new and reformulated foods*”. Only when we know what impact reformulations of food have had on what people are actually eating will we be able to assess whether they have had an impact on public health.

Up to date surveys of population intakes combined with comprehensive and up to date databases on the composition of foods mean that it is possible to model the impact of changes in the food supply on population intakes. Existing knowledge about the impact of changes in population intakes on health outcomes<sup>44</sup> means that it should also be possible to model the impact of changes in the food supply on health outcomes.

Again, this was a key tool in the development of the UK FSA salt reduction strategy where a salt model was developed to assess how much salt different foods were contributing to salt intakes and by how much you would need to reduce different foods by in order to reduce population salt intakes to six grams. This model has subsequently led to the development of salt reduction targets for key product categories established through negotiation with the food industry on what is feasible and achievable taking into account constraints related to technology, consumer taste and economic factors associated with the reformulation of products. The model and the targets can now be used to evaluate the extent to which the salt reduction strategy is meeting its objectives and hence is likely to be having an impact on wider public health goals.

A similar model adapted expanded for other nutrients needs to be developed and the feasibility of expanding the model so that it is relevant to the whole of Europe vis-a-vis developing models for individual Member States needs to be considered.

Similar consideration could be given to the establishment of an international food composition database so that it is possible to monitor changes in product composition year on year.<sup>iv</sup> In the meantime, it would be useful if companies could report in relation to percentages of product portfolio and market share rather than just percentage reductions for different products.

## 5. Questions for discussion

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- **Why have some nutrients been subject to more reformulation than others?**

There seems to be more activity on salt reduction and trans-fats than other nutrients or portion size. Is this the case? Or is it just a reflection of the commitments recorded? If it is the case, then what are the reasons for this?

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<sup>iv</sup> The George Institute for International Health in Sydney (Australia) is currently in discussion with potential collaborators about an initiative of this kind drawing on its expertise for setting up a comprehensive database of sodium levels in Australian foods.

- **Would simply reducing portion size be a more effective strategy than reformulation?**

Is reformulation an effective strategy to reduce caloric intake, or just rebalance the intake of nutrients? In this regard, what is the role of reformulation versus portion size control?

- **“Health by stealth” vs marketing opportunities?**

Is it desirable to try and move away from the “health by stealth” approach to reformulation to ensure that any advantages of the emerging market opportunities in relation to health products are fully realised? If so, how is this best achieved? Alternatively, is the “health by stealth” approach more likely to bring public health benefits? Or should it, as it does now, vary between products? If so, why?

- **What is going to encourage more public-health oriented action in product reformulation by companies?**

Why are some companies acting and others not? What are the existing barriers to wider reformulation and how might they be overcome?

- **Are company-specific, or alternative, approaches, the best way forward?**

Are individual companies best placed to develop strategies or is there a need for a more generic approach such as those developed through trade associations?

- **Would the establishment of a European Framework (targets, template for strategy design and implementation etc) be a helpful driver?**

Targets for specific food categories have been developed as part of the UK FSA salt reduction strategy and are being considered more widely in Europe. Would it be worth considering targets for other key nutrients at the same time? As front of pack labeling has been identified as a key driver for reformulation, should discussions on targets for different nutrients be linked to discussions on front of pack labeling?

- **What should be the role of government in product reformulation?**

Coordinated government policy, strategic leadership and clear monitoring processes have been identified as key to effectiveness.<sup>30</sup> Should national governments therefore be taking a stronger role? If so, what role should government have? Or would it be better to leave it to the companies and trade associations?

- **What is the best way to monitor the public health impact of product reformulation?**

Comprehensive dietary surveys and up to date information on food composition are essential components of any system to monitor the impact of product reformulation. What is the scope for establishing such mechanisms at a European level vis-à-vis national approaches? What other mechanisms need to be put in place to ensure that the public health impacts of product reformulation can be effectively monitored at national and European levels?

- **How could the reporting processes of the EU Platform be improved?**

Would it be helpful if companies provided information on market share for different products as part of the monitoring reports? Would it be helpful if all companies reported outputs consistently? For example, this might be in relation to the amount

of each nutrient that they had taken out of the food supply or the reduction in % contribution to GDA that had been made for each product?



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## 7. Annex 1

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### Analyses of 2008 commitments by each company

#### ***Contigo – Less Healthy Fats Out! (2007-2009)***

EROSKI (Spanish Member of EuroCoop) has a commitment to reformulate foods to remove TFAs. The program started in 2007 and is currently scheduled to run until 2009.

**Objective for 2008:** The program is on-going and has no specific objective for 2008.

**Progress towards achieving objective:** Out of 132 products identified for reformulation, 26 were reformulated in 2007 and 51 in 2008. The remainder will be reformulated in 2009 or taken off the market.

#### ***FERCO Partnership with EU Stakeholders in the Food Chain (2007-2008)***

FERCO (European Federation of Contract Catering Organisations) has a commitment to reformulation from 2007-2008.

**Objective for 2008:** to intensify FERCO relations regarding the fight against obesity with the following organisations (HOTREC (horeca) EMRA (fast food) EVA (vending), EUROCOMMERCE (retail), CIAA (food industry).

**Progress towards achieving objective:** The objective has been achieved through bilateral or cross-industry meetings and correspondence between the EU Secretariats. No specific resources were allocated to this action. Five informal meetings took place involving 12 people. In addition FERCO participated in a meeting on salt reduction which took place at CIAA with representatives.

**Comments:** FERCO believes that the Platform offers FERCO a unique opportunity to make other actors of the food chain more aware of challenges and opportunities for the promotion of healthier foods but that ultimately reformulation activities need to be conducted at the national and the company level. Hence it does not intend to register this commitment anymore on the Platform after 2008.

#### ***UK Food Standards Agency salt reduction program (2005-10)***

The UK Food Standards Agency has a commitment to work with food processors and manufacturers to reduce salt in foods in order to achieve its population intake of six grams a day by 2010. This included the development of targets for specific food product categories.

**Objectives for 2008:** review the 2010 salt targets and propose new targets commensurate with reaching the six gram population intake target; estimate cost to industry associated with salt reduction targets policy in order to update Impact Assessment; research salt reduction in premium bread to understand the influences on physical and chemical properties on stickiness, collapse and open texture; work with Salt Action Network (SAN) members to facilitate implementation of the WHO action plan and to establish best practice and set up suitable protocols for monitoring, communication and industry engagement in setting salt targets for specific food categories.

**Progress towards achieving objective:** Total staff time allocated to the project is around five FTEs. All the work has been carried out as planned. The results of the FSA's urinary analysis survey, carried out in the first quarter of 2008 and published in July 2008 showed that the population average salt intake had fallen to 8.6g (from 9.5 grams in 2000/1) Salt reductions between 25-55% have been achieved in a number of foods that contribute most salt to the diet including breakfast cereals, ready meals, soups and crisps and snacks. FSA Guidance for Small and Medium Sized Businesses on salt

reduction has been made available through the British Meat Processor's Association (BMPA) and the FSA web-sites.

#### **FERCO General Nutrition Recommendations (2006-2010)**

FERCO members have made a commitment from 2006-2010 to follow general nutrition guidelines where they exist and implementing the FERCO nutrition guidelines, which include promoting the use of less fat, sugar and salt. The initial overall objective was to implement a general framework common to all FERCO members and contract catering companies. This was officially endorsed in December 2005 and is discussed annually. National associations have set up working groups and coordinate the implementation of the guidelines. Companies are developing their own programmes which are part of their brand image and embedded in their food services offer – as contract catering is a local service these are country specific.

**Objectives for 2008:** At the request of DGSANCO a specific emphasis put on salt reduction and the reformulation of the food supply and the recipes.

**Progress towards achieving objectives:** It is difficult to quantify the outputs overall as they relate to individual companies but some examples are that companies have increased the number of nutritionists and dieticians in their pay role. Companies are investing in software systems for nutritional analysis of food products, ingredients and recipes and setting up recipe databases for their staff. National associations have been drafting guides and setting criteria for nutrition. Front of pack labelling schemes e.g. Ickes Bewust have been adapted for catering locations. Whole menus have been adapted, salads served without dressings, low calorie sandwich ranges developed, five a day pots introduced etc.

#### **European Modern Restaurants Association Product Composition (2006-2008)**

Work with suppliers to reformulate foods in line with recommendations of the appropriate regulatory body

**Objectives for 2008:** EMRA members will reasonably endeavour to bring salt, fat or sugar levels in line with the recommendations of the appropriate regulatory bodies

**Progress to date:** Salt reduction: no more salt on fries in Goody's and Quick, KFC and Pizza Hut continued their program to reduce salt in European products. Domino's pizza UK and Ireland testing lower salt products. McDonald's conducting salt reduction on its fries in major EU markets. Extension of Goody's program from fries to burgers. TFAs and SFA reduction: Several companies have launched programs to reduce TFAs and SFAs including through the introduction of new frying oils.

#### **Unilever Product Reformulation and Innovations (2006-2008)**

Nutrition Enhancement Program to review all products worldwide for levels of TFA, SFA, salt and sugar

**2008 Objectives:** 2007/2008 period goals were 5,500 tonnes of SFA, 340 tonnes of salt and 10,000 tonnes of sugar

**Progress towards achieving objectives:** Have overachieved and have been able to remove more than 11,000 tonnes of saturated fats, 370 tonnes of trans fats, 640 tonnes of sodium and 20,000 tonnes of sugar.

**Comments:** Notes that product reformulations is approaching its limits although efforts will continue. Focus has now shifted to making the NEP principles part of all innovations.

#### **Mars Inc. Product Reformulations and Portion Size Reductions (2007-2010)**

Product renovation to reduce trans-fats of all products to 0.5%. Salt reduction also undertaken in relation to certain products. From 2008-10 special focus on SFAs. Plus portion size reduction program.

**2008 Objective:** Continue to implement the program to reduce the portion size of filled bars through a reduction in bar weight

**Progress towards achieving objectives:** reductions were made to the portion size of a whole range of different bars in different countries resulting in an average reduction of 7%. Plus the move from King-size to Duo packs is supported by recent market studies that show few consumers eat both portions.

#### **Mars Inc Reduction of salt levels in rice and sauce products (2007-2010)**

Reduction in levels of salt in rice, cooking sauces and soups

**Objectives for 2008:** continue efforts to reduce salt levels in the portfolio of rice, cooking sauces and soups. To achieve this Mars is reformulating its recipes for these products across all European markets in accordance with the objectives agreed with the UK Food Standards Agency.

**Progress towards achieving objectives:** reductions of between 20 and 35% across a range of products. No use of salt alternatives.

#### **CIAA Survey on product reformulation innovation and labeling (2004-2009)**

A representative market research to survey the efforts/improvements that the food and beverage industry is making in areas such as reformulation, innovation and labeling since January 2004.

**Objective for 2008:** survey all companies in Spain, UK, France, Italy and the Netherlands. Estimated almost 80,000 companies in total and interviews done with approx 2,000.

**Progress towards achieving objective:** Survey completed. Results showed that reformulation innovation and labeling fairly wider spread. Four in ten companies say that their company has either reduced the amount of SFAs, salt or sugars in their current products or introduced new products with less SFA, salt or sugars or done both. CIAA companies are most likely to say they are reformulating. Larger and smaller (rather than medium) companies seem to be reformulating. 81% of CIAA members surveyed say they have increased the range and choice of products and portion size.

**Comments:** more work to be done to understand the why behind these changes. Why are some companies acting and others not? Additional research around this question will shed light on what a reasonable ceiling for reformulation would be.

#### **FERRERO Group – Product reformulation and portion size 2004-2020**

Tailoring portion sizes to children's consumption and reducing the levels of TFAs, sugar and salt.

**Objective for 2008:** to continue to participate in EU and national initiatives aimed at reformulating food products, to the extent that this is feasible from the point of view of technology, taste and costs, as well as reducing portion sizes.

**Progress towards achieving objective:** four new products have been launched on the market with reduced calories or sugars or sugarless products. No quantitative data can be provided as the results are still being carried out.

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<sup>i</sup> Pietinen, P., Valsta, L.M., Hirvonen, T. & Sinkko, H. Labelling the salt content in foods: a useful tool in reducing sodium intake in Finland. *Public Health Nutr* **11**, 335-340 (2008)