

**EVALUATION OF THE EUROPEAN
PLATFORM FOR ACTION ON DIET,
PHYSICAL ACTIVITY AND HEALTH**

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**Case Study report:
Food / drink reformulation
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1 INTRODUCTION

Reformulation efforts by many large industry players began well before the set-up of the EU Platform for Action on Diet, Physical Activity and Health in response to a need to be socially responsible in the face of pressure from consumer organisations and governments. However, industry's commitments in this area have been given a broader EU remit and a more level playing field among competitors thanks to the consensus building undertaken by trade associations and within the framework of the EU Platform.

In light of this trend towards wider and better product reformulation by companies, and as stipulated in the Terms of Reference, the objective of the case study on food/drink reformulation is to establish how well self-regulation in the area is being implemented and what effect it is having. In addition, it will seek to respond to the specific evaluation question: 'What was the impact of self-regulation commitments on EU or national regulatory initiatives?'

The following case study comprises two elements:

- A descriptive analysis of all the Platform commitments in the area of food / drink reformulation;
- The in-depth study of three commitments through interviews with industry, not-for-profit Platform members and experts; and in-depth research to seek to provide an evidence base to the more contentious issues, as per the interviews.

A detailed description of the methodology and tasks carried out is presented in Annex 1.

2 DESCRIPTIVE ANALYSIS OF ALL THE PLATFORM COMMITMENTS WITHIN THIS AREA

As a first step to establish how well self-regulation in the area of food / drink reformulation is being implemented and what effect it is having, the evaluation team carried out a descriptive analysis of all of the self-regulation commitments in the area of food / drink reformulation. This analysis is presented below.

2.1 The commitments under review

A search of the database of commitments of the EU Platform for action on Diet, Physical Activity and Health was undertaken to identify all commitments classified under “food / drink reformulation”. A separate search was also carried out using keywords e.g.: salt, sugar, fat etc. to ensure that any commitments which are multi-faceted, but were not categorised by members as “food / drink reformulation”¹ were also included. Commitments where the commitment area was listed as “other” were reviewed to see if they contained information about food / drink reformulation. The full list of commitments in this area is presented in Annex 1.

In line with the objective, only the self-regulation commitments in the area of food / drink reformulation have been considered as part of this case study. The commitments to be considered (based on the database provided by the Commission in January 2010 and additional information provided by the Commission in April 2010) are presented in the table below.

¹ On the Commission’s database, Platform members are only able to categorise their commitments as being within one of the action four areas. As some commitments are multi-faceted and may contain a food/drink reformulation element (but not been categorised as such), the evaluation team wanted to ensure that all the relevant commitments were considered as part of this study.

There are 26 commitments on the Commission's database which relate to food/drink reformulation and can be categorised as self-regulation initiatives (this includes the 8 commitments which represent associations' recommendations to members)². These have been included in the descriptive analysis and are presented below:

Table 1: Platform commitments in the area of food / drink reformulation

Actor	Number of actors	Platform member	Commitment	Action number	Timeframe	Geogr. Scope	Commitment area	Self-regulation?
Union of European Beverages Associations	Multiple	Confederation of the Food and Drink Industries of the EU (CIAA)	Products, Choice and Portion Size	583	2006 to 2020	28 countries	Multi-faceted: Calorie intake, packaging size	Recommendations for members
European Federation of Contracting Catering Organizations (FERCO)	Multiple	European Federation of Contracting Catering Organizations (FERCO)	General Nutrition Recommendations	505	2006 to 2010	27 countries	Multi-faceted: Fat, sugar, portion size, variety	Recommendations for members
European Modern Restaurants Association (EMRA)	Multiple	European Modern Restaurants Association (EMRA)	Product composition	535	2006 to 2008	30 countries	Multi-faceted: Fat, sugar, salt	Recommendations for members
Ferrero Group	One	Confederation of the Food and Drink Industries of the EU (CIAA)	Product formulation and portion sizes	807	2004 to 2020	27 countries	Multi-faceted: Fats, portion size, salt, sugar	Yes
Unilever	One	Confederation of the Food and Drink Industries of the EU (CIAA)	Product reformulation and innovations	834	2006 to 2008	29 countries	Multi-faceted: Fat, sugar, salt	Yes
Mars Inc	One	Confederation of the Food and Drink Industries of the EU (CIAA)	Product Reformulations & Portion Size Reductions	1004	2007 to 2010	30 countries	Multi-faceted: Fat, salt, size	Yes
PepsiCo Europe and UK	One	Confederation of the Food and Drink Industries of the EU (CIAA)	Product development, consumer information, marketing/advertising and the promotion of healthy lifestyles	619	2006 to 2010	29 countries	Multi: Saturated fats, salt, sodium and oil	Yes

² Please note that the evaluation team verified whether any further commitments needed to be included in this table further to the receipt and detailed revision of the Commission's database in early January 2010 and the receipt of additional information in April 2010; twelve additional commitments were found to fit within the reformulation area. The category 'Recommendations to members' has been included in this revised table as a half-way house between self-regulation and non-self-regulation as the associations themselves do not self-regulate (it is their members that may do so) and the evaluation team felt it important to make this distinction.

Actor	Number of actors	Platform member	Commitment	Action number	Timeframe	Geogr. Scope	Commitment area	Self-regulation?
Mars Corp	One	Confederation of the Food and Drink Industries of the EU (CIAA)	Reduction of salt levels in rice and sauce products	1016	2007 to 2010	29 countries	Single issue: Salt	Yes
British Retail Consortium (BRC)	Multiple	EuroCommerce	Removing Trans Fats	799	2007 to 2008	1 country (GB)	Single issue: Fats	Recommendations for members
Member States	Multiple	UK Food Standards Agency	Reformulation of processed and prepared foods to reduce salt contents	158	2005 to 2010	1 country (GB)	Single issue: Salt	Recommendations for food industry
Danish Chamber of Commerce	Multiple	EuroCommerce	Facilitate the promotion of healthy diets and lifestyles in various areas	727	2005 to 2010	1 country	Multi: Energy reduction	Recommendations for members
Member States	Multiple	UK Food Standards Agency	Guidance for small and medium sized businesses on salt reduction	777	2006 to 2007	1 country	Single: Salt	Recommendations for food industry
Coop Italia	One	EuroCoop	Club 4-10	1110	2009 to 2010	1 country (Italy)	Multi-faceted: Artificial colourings and aroma, fat, calories, high content of fruit and fibre	Yes
CoopItalia	One	Eurocoop	Spreading the seeds of healthy diets among consumers	594	2006	1 country	Single: Fat	Yes
The Co-operative Group Ltd	One	EuroCoop	Healthy Living product reformulation towards healthier alternatives	602	2006 to 2007	1 country (GB)	Single issue: Salt	Yes
EROSKI	One	EuroCoop	Contigo- Less Healthy Fats, Out!	1031	2007 to 2009	1 country (Spain)	Single issue: Fats	Yes
Kraft Foods	One	Confederation of the Food and Drink Industries of the EU (CIAA)	Reduction of fat, sugar and salt across a range of products	455	2004 - 2006	21 countries	Fat, sugar and salt reduction	Yes
European Snacks Association (ESA)	Multiple	Confederation of the Food and Drink Industries of the EU (CIAA)	Savoury snacks industry commitments in the areas of consumer information, product development and	604	2006	16 countries footnote	Education and Lifestyle: Fat and salt reduction	Yes

Actor	Number of actors	Platform member	Commitment	Action number	Timeframe	Geogr. Scope	Commitment area	Self-regulation?
			commercial communication					
Auchan	One	Unknown	Healthy diets and lifestyles	736	2005 to 2010	2 countries (Belgium & France)	Reformulation	Yes
Royal Ahold	One	Unknown	Healthy diets and lifestyles	715	2006 to 2010	8 countries & USA	Reformulation	Yes
Federation of Hellenic food industries (SEVT)	Multiple	Confederation of the Food and Drink Industries of the EU (CIAA)	Code of Principles for Diet, Physical Activity and Health	825	2005 to 2007	1 country (Greece)	Other: Product improvement	Recommendation to Members of the Federation
Tesco	One	Unknown	Product Improvement Programme	821	2006 to 2010	1 country (UK)	Other: Reduction of salt, fat, sugar and additives	Yes
Danone	One	Confederation of the Food and Drink Industries of the EU (CIAA)	Improving the nutritional value of Groupe DANONE's biscuits	813	2004 to 2006	2 countries (France & Belgium)	Other: Reformulation (decrease of fat and sugars)	Yes
Marks & Spencer	One	Unknown	Encouraging healthy eating - through labelling, product reformulation, consumer awareness/education	758	2006 to 2007	8 countries	Other: Product reformulation	Yes
KiMs A/S (Part of European Snack Association commitments)	One	Confederation of the Food and Drink Industries of the EU (CIAA)	KiMs' commitments in the areas of consumer information, product development, physical exercise and advertising to children	618	2006	3 countries (Ireland, UK & Denmark)	Other: Fat reduction	Yes
United Biscuits (part of European Snack Association commitment)	One	Confederation of the Food and Drink Industries of the EU (CIAA)	UB's commitments in the areas of product development, consumer information and advertising to children	617	2006	2 countries (UK & Ireland)	Other: Salt / fat reduction	Yes

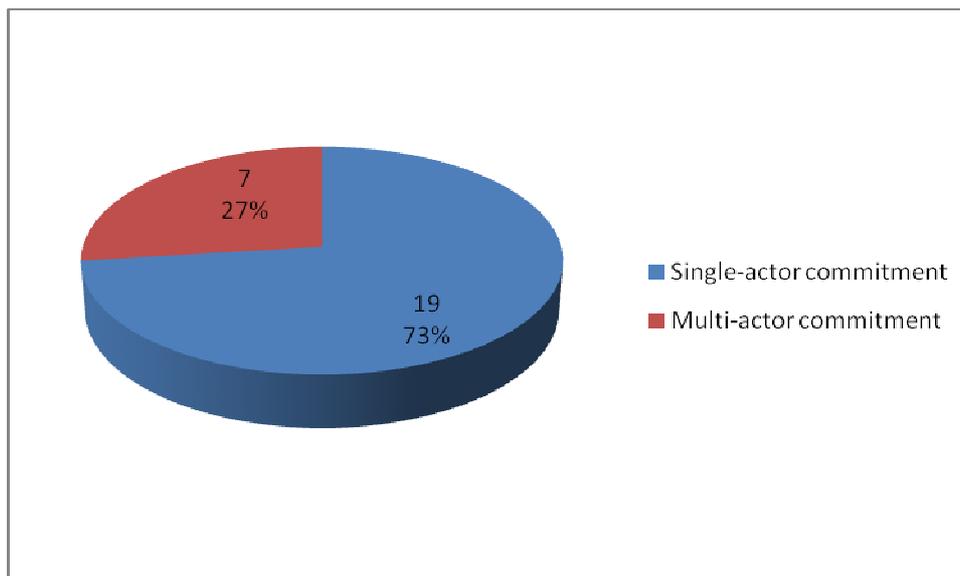
2.2 Descriptive Analysis

In order to establish the potential impact of the commitments, the following criteria have been considered:

- Different types of activity
- Geographical spread
- Number and size of actors involved
- Number of nutrients involved
- Target group
- Duration of commitment
- Extent to which commitment has been extended over the years to include other areas
- Compliance with monitoring requirements

Only two of the 24 commitments were made by not-for-profit organisations, with 24 commitments made by for-profit organisations. With regard to the number of actors involved in the commitments, the graph below shows that 19 of the 26 commitments are single-actor commitments, i.e. only a single organisation works on the commitment. Seven commitments involve more than one organisation:

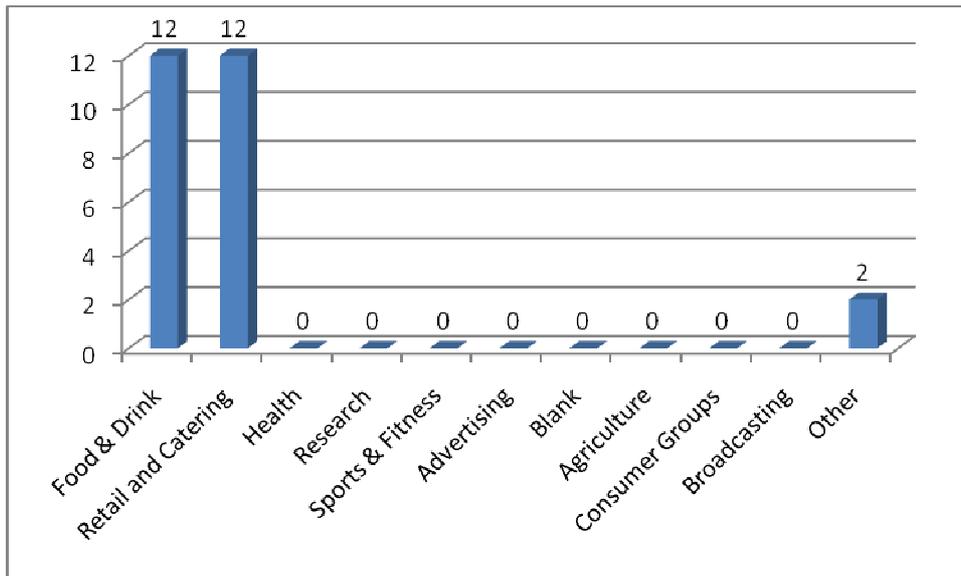
Figure 1: Single / multi-actor commitments



Multi-actor commitments can be seen as potentially having more impact as different actors working on a commitment can contribute to its implementation and add to its success through a joint approach. The fairly low number of multi-actor commitments could potentially mean an overall weakening of the impact of the food/drink reformulation commitments looked at for this case study.

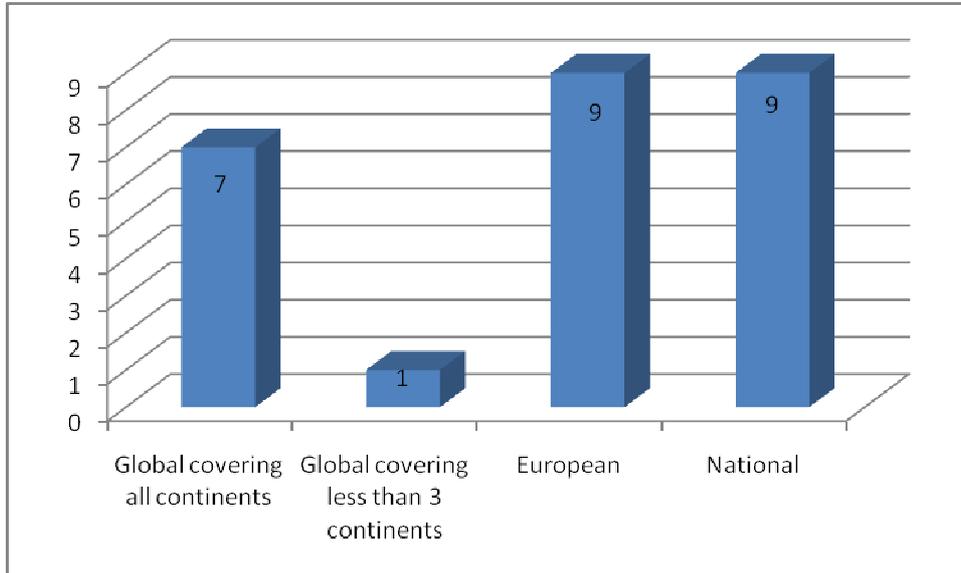
As shown in the graph below, 12 commitments are in the Retail & Catering sector, and 12 commitments are in the Food & Drink sector. The sector of the two commitments by non-profit organisations (both by the UK Food Standards Agency) has not been specified:

Figure 2: Commitments by Platform member sector



In addition to the sectors of the organisations, the evaluation team also looked at the reach of the organisations in terms of the geographical presence. As shown below, seven of the 26 organisations cover all five continents, and one organisation covers two continents (Europe & USA). A large share of the organisations is present pan-European (nine) or in a single European country (nine) only, which could mean that the overall reach of the commitments is limited:

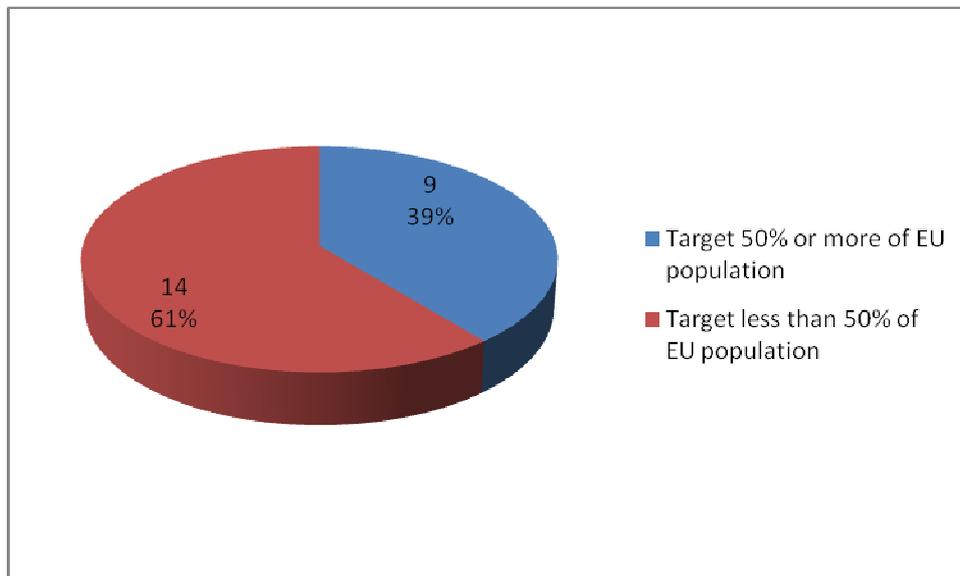
Figure 3: Commitments by geographical outreach of Platform member



As well as the geographic presence of the organisations, the reach of the commitments in terms of the targeted geographic areas has also been considered. The majority of the commitments (16) are multi-national, i.e. they target more than one Member State. The remaining ten commitments are national commitments, targeting one Member State only.

As the graph below shows, nine commitments target Member States that represent 50% or more of the EU population³. The majority of the commitments target Member States that target less than 50% of the EU population:

Figure 4: Population covered by commitments



A good proportion of the commitments (16) target more than one Member State. However, as far as data on exact Member States targeted is available, just over a third of the commitments target Member States that represent 50% or more of the EU population and the impact of the commitments reaching less of the EU population is potentially more limited.

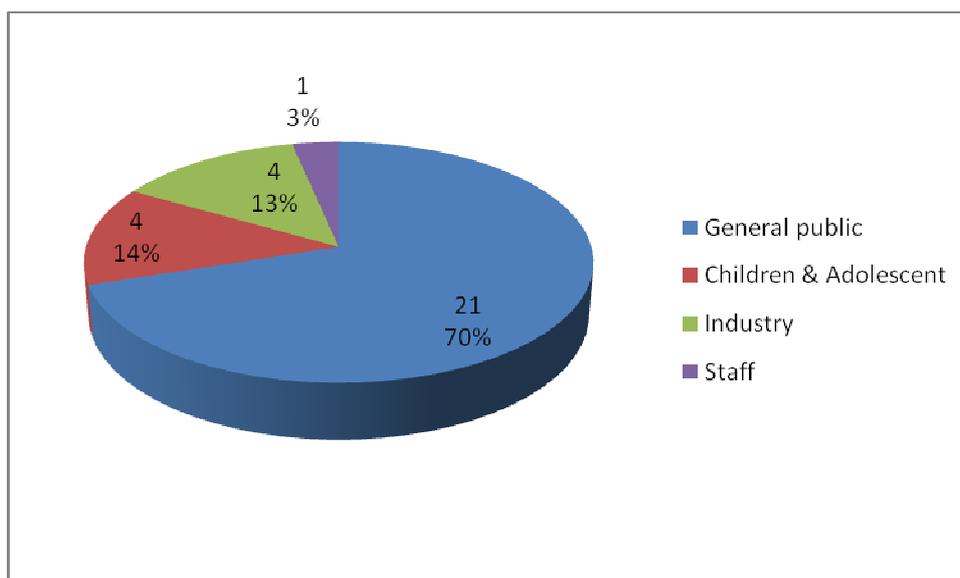
With regard to the type of activity, just over half of the commitments focus on one type of activity, i.e. Food/Drink reformulation. Twelve commitments also partly focus on other types of activity, such as promoting healthy eating. When looking at the number of nutrients involved in the commitment, exactly half of the 26 commitments focus on more than one issue (e.g. sugar, salt, fat), whilst the other 13 commitments focus on a single issue (e.g. salt)⁴. Multi-issue commitments could have a stronger impact as they address more than one issue and thereby go some way to avoiding the reduction in one nutrient leading to an increase in others. The reasonable amount of multi-issue commitments could strengthen the impact of the Food/Drink reformulation commitments looked at in this case study overall.

The majority of the commitments target the General Public, with nine commitments targeting specialist groups such as Children & Adolescent and Industry. Four of the commitments mentioned an additional target group and were therefore counted twice, amounting in the figure below of a total of 30 commitments:

³ Data on geographical reach was not available for 3 commitments.

⁴ Data on the number of issues was not available for four commitments.

Figure 5: Target audience of commitments



The planned duration of the commitments can also be seen as a factor contributing to their impact. As shown below, all apart from two commitments have a planned duration of five years or less (with 15 commitments having a planned duration of only one or two years), which could mean that they have less impact than commitments with a longer duration as they could reach a larger share of the population. Only two commitments have a planned duration of more than ten years. Organisations can also monitor, adjust and improve their implementation over a longer period of time. Planned duration of commitments could also affect the sustainability of activities, as a commitment implemented over 12 years might have a more sustainable effect than a commitment implemented in one or two years.

In order to judge potential impact of the commitments, the evaluation team also looked at whether commitments had been extended over the years to include other areas beyond their initial scope. Commitments that have been extended to cover additional areas could be seen as an indicator for a successful implementation, as the organisation seems to be able to fulfil their commitments and look for ways to increase their activities in this field. An examination of the description of the 26 commitments in this case study showed that only two commitments have been extended beyond their initial scope⁵.

⁵ Data on the extent to which commitments have been extended was not available for five commitments.

3 IN-DEPTH STUDY OF THREE COMMITMENTS

3.1 Key characteristics of the three commitments

Please refer to Annex 4 for an overview of the three commitments under review, including information on their objectives, relevance, key characteristics, and links to further information on their monitoring.

The following table presents the **key characteristics** of the three commitments, allowing for comparison. Please note that FERCO's commitment relates to the catering industry which is different to the food manufacturing industry.

Table 2: Key characteristics of selected commitments

Commitment	Number of actors	Type of industry	Type of products concerned	Nutrient(s) concerned	Approach used (stepwise or general)	Guidelines followed
FERCO's General Nutrition Recommendations	Multiple companies – 10 national associations each with multiple members	Catering	Existing and newly developed recipes and menus.	Fat, sugar, salt and promotion of use of vegetable fat/oil	Stepwise by product line	They either follow national guidelines or their own internal company guidelines for the specifics.
Unilever's Product Reformulation and Innovations commitment	1 company	Food manufacturing	Full range of products. Existing and new products.	Saturated fats, trans fat, sugars and salt	Stepwise although they had the overarching NEP programme Applied to existing products and then new products due to size of portfolio.	Own internal guidelines – based on international standards
Mars' Reduction of salt levels in rice and sauce products	1 company	Food manufacturing	Rice cooking sauces and soups. Existing and new products.	Salt	Stepwise, focussing on the products with the highest levels of salt first.	FSA targets for 2010 (currently considering those established for 2012)

The **input indicators and most recent key process/output indicators**, as presented for these commitments in the monitoring reports and during the interviews, are as follows for the three commitments under review:

Table 3: Key data on inputs and outputs of selected commitments

Commitment	Input indicators	Process/output indicators	Other comments
<p>FERCO's General Nutrition Recommendations</p>	<p>At the <u>EU level</u>, since 2006, 1 person is involved in the administration of the FERCO commitments. 20 working days have been allocated which represent € 10,857.00 from the annual Federation budget.</p> <p>At the <u>national level</u>, <u>6 national associations</u> have set up a dedicated working group. In total, about 75 nutrition experts are involved. Working groups meet at least 3 times a year. The total annual cost incurred since 2008 represents about € 225,200.00, including the contribution in kind from companies (working days and travel expenses for the experts). External evaluation by a third party is envisaged in some countries but not yet quantified.</p> <p>At <u>company level</u>, companies member of the national associations (92.5% of the market) employ together about 1,780 dieticians/nutritionists which represent a total annual cost of about EUR 98m, including travel expenses and overheads. For example, in France, the 19 companies affiliated to the national association member of FERCO employed 382 dieticians in 2007.</p> <p>Dieticians/nutritionists are in charge of 1) the nutritional monitoring and analysis of the food supply, 2) the nutritional analysis and reformulation of recipes, 3) the management of the recipe databases and menu planning, 4) the monitoring of the implementation of the recipes by staff and the training of staff, 5) the inclusion of nutritional considerations in bids.</p> <p>On average, rotating internal nutrition compliance controls on site cover 20% of catering sites per year. Large companies also have external audit systems managed by third parties. The cost of companies' databases and external audits are not disclosed. In quite a few cases, nutritional compliance controls are pursued by the client organisation, especially for school meals, and fines may be applied in case of non compliance.</p> <p>Sodexo Spain evaluated the financial impact of all</p>	<p>Implementation of FERCO recommendations by national contract catering companies:</p> <p>2006: Awareness raising among staff</p> <p>2007: Development of a Health Charter, a Nutrition Protocol for school menus, and training sessions</p> <p>2008: Specific emphasis on salt reduction and reformulation; outputs include central management of healthy recipes; reductions in calories and salt content by members Sodexo and Compass; creation of "Health by Stealth" menus; new concept FOOD4U in secondary schools with a loyalty programme to make healthy food trendy; etc.</p> <p>2009: All FERCO member companies now have a healthy eating programme (which means 92,5% of the contract catering market); further increase in number of units providing "Balanced Choices" programmes; reduction of saturated fats in cooking sauces; etc. Elior achieved a significant reduction in the fat content (nearly 50%) of its recipes.</p> <p>Regarding the translation of the FERCO EU recommendations into national recommendations: the 6 (FR, ES, NL, HU, PT, UK) associations which have adopted national nutrition recommendations have set up specific working groups with experts from the companies. They have their own annual targets and have put in place their own monitoring system at the level of the association. From the 4 member associations (IT, FI, SE, DE) which have not yet set up their own national recommendations based on the FERCO recommendations, 2 (FI and SE) prefer to work along national guidelines and schemes set up by their national authorities; IT and DE opted for working only at company level.</p>	<p>Difficulties encountered:</p> <p>Personnel turnover makes it difficult to maintain a consistent level of training</p> <p>Financial cost and human resources</p> <p>In some cases (fortunately a limited number), client organisations are not interested in the nutritional quality of the menus. They only care about the price and capacity of the catering company to serve a maximum number of consumers in a minimum time.</p> <p>Companies work on the premises of the client and the client's equipment is not always up to date and does not always allow for the use of new cooking technologies favoured by reformulation (source: post-interview questions).</p>

Commitment	Input indicators	Process/output indicators	Other comments
	<p>activities related to the fight obesity: innovation, reformulation, staff training, controls, audits, consumer information and education, communication. This resulted in an 8% increase in menu costs, including raw material and personnel.</p>		
<p>Unilever's Product Reformulation and Innovations commitment</p>	<p>This Nutrition Enhancement Programme (NEP) is an intrinsic part of the company vitality strategy. For the major part the execution is done within the Nutrition & Health Centre currently employing approx. 150 people with a budget of EUR 20m per year.</p> <p>The interview suggested that over the course of 2002-05, about 30% of the Nutrition & Health Centre's budget of EUR 20m per year was dedicated to the development and implementation of the NEP. This adds up to a total of EUR 24m over the four year period.</p>	<p>2007: Assessment of the nutritional composition of all products; a total of 22,204 products, of which 12,921 products are in Europe.</p> <p>2005 to 2008: Removed a total of 30,370 tonnes of transfat, 18,000 tonnes of saturated fat, 3,640 tonnes of sodium and 37,000 tonnes of sugar.</p> <p>2009: More than 50% of innovation products are compliant with their 'better for you' benchmarks, 20% higher than their existing portfolio.</p> <p>Some reformulation examples:</p> <p>Over 40% reduction in sugars in Becel pro-activ minidrinks and yoghurts (2008).</p> <p>10% average sodium reduction in dry soups in Europe (2008).</p> <p>All Family Goodness (Rama, Blue Band) soft tubs in Europe reformulated to 33% saturated fat or lower (2008).</p> <p>The total European savoury portfolio (soups, sauces, Bouillons) are virtually trans fat free (2008).</p> <p>Between 2006-2009 the average sodium content of Unilever Foodsolutions Knorr bouillons and soups (dry, paste, jelly) in Germany dropped by 12% (2009).</p> <p>All varieties of Knorr Cubitos (seasoning cubes) in Poland now contain 40% less salt (2009).</p>	
<p>Mars' Reduction of salt levels in rice and sauce products</p>	<p>2007: two full-time equivalent Mars associates worked on the project (mainly R&D focusing on recipe changes). In addition, associates carried out expert training and briefing sessions. Consumer research was also carried out.</p>	<p>2007: Research on salt levels in seven product categories, and work on new recipes for a certain number of these products (to be rolled-out in 2008)</p> <p>2008: Reductions in salt levels of between 20 and 35% across a range of products. No use of salt alternatives</p>	

Commitment	Input indicators	Process/output indicators	Other comments
	<p>2008: Approximately 15 Mars employees were involved, spending on average 30% of their time on this specific project.</p> <p>2009: Approximately 15 associates in different departments were involved. The average time that each associate spent on this project is estimated at 15 to 20%.</p> <p>In addition, a budget of EUR 400,000 was spent on consumer research to support decisions on implementation of salt reduced recipes.</p>	<p>2009: Further reductions in salt levels (relative to 2008 levels) of between 10 and 20% across a range of products</p>	

3.2 Interview analysis

As detailed in the methodology section (see Annex 1), industry and umbrella organisation representatives of the three commitments under review, and one not-for-profit Platform member and two experts with knowledge of the Platform and expertise in the area of food/drink reformulation, were interviewed in the context of this case study.

3.2.1 The strengths and weaknesses of the commitments

This section presents the opinions of the not-for-profit Platform member and two experts interviewed on the three commitments under review. Interviewees were given time to take a more in-depth look at the three commitments prior to interview – a brief description of the commitments was sent to them including a few questions on strengths and weaknesses and impact to help guide their thoughts (See Annex 4).

Interviewees mentioned the following strengths and weaknesses in relation to a given commitment (please note that this table represents the opinions of interviewees and is not necessarily exhaustive):

Table 4: Overview of key perceived strengths and weaknesses of selected commitments

Commitment	Strengths	Weaknesses
FERCO's General Nutrition Recommendations	<p>(1) Very clear objectives with sound principles. They have specified their annual amounts and all the elements mentioned there are excellent elements; sourcing, delisting unhealthy products etc.</p> <p>(2) The scope and inclusivity of the commitment in that all members in all countries seem to be taking part.</p> <p>(3) It really tries to address many topics related to healthy eating outside of the own home.</p> <p>(4) They have thought through all the aspects of the reformulation chain.</p> <p>(5) Honesty in the way they describe how the commitment is being implemented by their national federations and individual big contract companies. They provide lot of detail and new illustrative examples on a yearly basis.</p> <p>(6) The impact of their commitment is potentially huge because it covers 92.5% of contract catering markets and 66m consumers /day.</p>	<p>(1) The objectives are not really specific enough to allow for objective monitoring.</p> <p>(2) It's not clear how the different principles link up - just promoting or encouraging does not say how they would address the customers, whether they would perceive the message.</p> <p>(3) The target date for implementation is vague (2012/2015) and unless there is a real target, will there be real buy-in?</p> <p>(4) Implementation is slow:</p> <ul style="list-style-type: none"> • Not all of their associations have implemented their 2005 adopted nutritional principles – various associations are waiting to go along with national schemes. • Whilst all contract companies have healthy eating programmes, the programmes are not yet implemented in all restaurants and do not affect the 6bn meals per year that they have the potential to have an impact on. • Some client organisations are not interested in quality on menus unless their clients are interested. <p>(5) One of the problems is that they have a chain that needs to cascade down – by the time it gets to the client, it may be too weak.</p> <p>(6) The statements are general and cannot be quantified.</p>
Unilever's Product Reformulation and Innovations commitment	<p>(1) Very strong and comprehensive program with clearly measureable objectives.</p> <p>(2) They try to establish benchmarks, a baseline and move forward.</p> <p>(3) The fact that they have the Nutrition Enhancement</p>	<p>(1) Difficult to put in context – you cannot understand the number of tones unless it is put into context.</p> <p>(2) It's sometimes difficult to find out the background to the decision on the benchmarks, whether they are set to WHO references or different references, which can be a minefield.</p>

Commitment	Strengths	Weaknesses
	<p>Programme (NEP).</p> <p>(4) Their nutritional criteria have been written up as a paper and published in a journal. They are showing interest externally as well as internally, showing that they mean business.</p>	<p>(3) It would be good to see a close connection/ relationship between saturated and trans-fats. Sometimes if you reformulate in one respect, you increase the other nutrients. If they only give global statistics, it's difficult to say if the products are healthier.</p>
<p>Mars' Reduction of salt levels in rice and sauce product</p>	<p>(1) It focuses on high salt products first.</p> <p>(2) It uses the FSA targets as benchmarks.</p> <p>(3) They come at salt reduction from different approaches: optimisation of process, perception, use of natural salt enhancer and replacers.</p> <p>(4) It's done on complex level and they would not necessarily replace salt without questioning the alternatives.</p> <p>(5) Gradual approach to make sure gaining consumer acceptance and are still maintain the competitive edge. If they lose this edge, they lose the buy-in from bosses as at the end of the day it's about what they sell.</p> <p>(6) Embedding targets as reference points for new product development.</p>	<p>(1) It only targets a limited range of products. It's narrower in scope compared to the other approaches. The more global approach of Unilever may be of higher interest or impact.⁶</p> <p>(2) The bigger picture is lacking. What was the starting point?</p>

⁶ The interview with Mars revealed that this was due to the organisational structure of the company which is divided into product categories across the globe. The Mars arm dealing with confectionary also has a reformulation commitment relating to its snackfood portfolio – see commitment number 1004 'Product Reformulations & Portion Size Reductions' in Table 1 and on the EC database.

3.2.2 The main barriers to reformulation

Not-for-profit Platform member and expert interviewees were asked why certain nutrients had been subject to more reformulation than others. The reasons given included:

- Some countries have focused on some nutrients more than others, for example the UK on salt and Denmark on trans-fat. The countries where industry has taken the most action are the countries where the government had specified that they should take action.
- The focus on salt in particular is due to the fact that the link between salt and health is more straightforward and everybody needs to reduce their salt intake. On the other hand, not everybody is overweight, so one could argue that it's more about people reducing what they eat than taking fat or sugar out of foods.
- Things like sugar may not have been reformulated as much because they are not necessarily perceived as being as unhealthy as salt or saturated fat. There is no conclusive scientific evidence that says that high sugar is bad and no consensus about the appropriate amounts of sugars.
- The baseline: Many companies have already reformulated to get rid of trans-fatty acids. It's already been done so there are few commitments about this.

The main barriers to reformulation were seen by the not-for-profit/expert interviewees as:

- The need for scientific agreements on the rationale: for salt this was clear but for fat and sugar it's much harder – one could argue that one just needs to eat less or reduce portion size rather than the fat or sugar content.
- Taste and acceptability – the need for food industry innovation. How much the consumer is going to accept reformulation in terms of taste – how low can you go until the consumer switches to another (tastier) product?
- Lack of consensus on exactly what is needed – lack of a level playing field or clear targets.
- Technical constraints
- Cost / benefit issues
- The ability or not to communicate it – if there is regulation that means you can't communicate it on the label, this will limit efforts.
- Legal constraints: for example cocoa and sweeteners are not allowed in fine bakery products

3.2.3 Implementing and monitoring the commitments

The implementation

Industry members interviewed in relation to the three commitments used varying approaches to the reformulation of their products. While Mars first focussed on the products with the highest levels of salt, Unilever had a global programme but implemented it through a stepwise, category approach due to the size of their portfolio (over 22,000 products) and later extended their criteria to their product innovations, once they had got the experience through the reformulation of existing products.

Mars described the process they follow for salt reduction:

1. First they reduce the amount in the recipe. They can do this to certain levels until it is perceived by the consumer; the stealth approach.
2. Then they “play culinary artists” – they need big chefs, need knowledge of how to combine things. This may increase costs, and they may not find an ideal solution.
3. Then there is the option of using salt replacers – here they have said no as they feel they should not bring in another potential negative. They have found that there are limited opportunities with salt replacers.
4. Then they look at the technology: a recent finding is that you could have exposure to the salt taste in pulses, but for a consumer it comes in as a continuous flow of salt. *“If we can crack this, it would be great!”*

They organise workshops to look at such issues: *“There is another workshop coming up to look at taste. There is a lot of information around on dry systems, but we need to look at the wet systems .e.g. sauces, rice, cooked rice, and think about how we are behaving in those situations and what technologies can help us.”*

One interviewee commented: *“At Mars, we work hard to make sure the consumer does not notice.”*

Sodexo France (a member of FERCO) worked on reformulation by product line, applying a three-level filter to its 8,000 products. The interviewee explained that as a catering company, Sodexo can directly influence the primary products used in their recipes as purchasing is managed centrally, however, when it comes to exerting an influence on their individual canteens it’s more complicated. They do not have one production site which offers a fixed range of products, but 3,000 canteens in France that offer a multitude of dishes; what is on offer depends on the profile of the client in a given site. The level of engagement of individual canteens tends to vary and the sector they fall in tends to play a role; the tertiary sector tends to be more receptive than the industrial sector. Certain of their products, like the Vitality products, will only correspond to a certain type of consumer. To increase buy-in to the reformulation commitment, there is a need to have trained teams to go on-site and train canteen staff and present a common view.

When asked what methods they used to ensure compliance within their company, one interviewee answered: *“Sticks and carrots! What should not be underestimated is that when we came up with the reformulation programme, it was quite difficult for our people responsible for brands and various products to grasp it, as it represented a real change in culture. They needed to look at products from a different angle. Some were more difficult to convince than others”*. Another interviewee said that they have a certain number of structures that define the standards – these are imposed and the subsidiaries need to apply them. That said, there is a need to find a balance, as even among regions in France there is a

difference in tastes; there is a degree of freedom in what they prescribe through their centrally-determined standards and it is up to the individual canteens to make that call. The interviewee further said: *“We are present in 80 countries, and in each country there is a subsidiary. The word standardisation does not make sense within this context, but we have a will to harmonise”*.

Only one company (Unilever) said that implementation across the company was relatively straightforward as it was a ‘top-down’ process: *“The management team gave its approval so all those that were dependent on it had to cooperate.”* The process involved R&D first, then the activity management cycle (making of new labels etc.), and then it’s implemented in factories and all the systems are adapted. The fact that the company concerned produces food in a limited number of factories for the whole of Europe facilitated compliance. The interviewee further said that Europe had taken the lead, but the U.S. was following suit and compliance is being monitored on a global, not just a regional level since the company’s restructuring into product categories. To do so, they use a ‘compliance index’ which rates each product against the targets by referring to their GDA levels.

Setting salt reduction targets at Unilever:

Unilever mentioned that it had agreed a salt reduction strategy for the next five years or so. *“In 2010, we want to bring overall salt consumption to 6g per day based on a WHO recommendation. The ambition by 2015 is to reduce it even further to 5g.”* In order to meet this target, they have placed their products in a national or regional diet, estimated what the role of a given product is in the diet and established what its salt level should be according to the 6g intake. The outcome will be salt reduction in some products and others may not change at all.

The main impediments to the implementation of the commitments ranged from getting buy-in to on-site training:

- Getting people to grasp the concept – see comment above. *“Most of the time it was a matter of explaining and providing the right tools, saying that this should be the outcome and asking them to report back.”*
- Getting buy-in across the board and catering to the different types of consumers.
- *“Initially reformulation was seen as being much less sexy than product innovation. [...] This was an impediment to reformulation at the start. Now reformulation has been put on a level with innovation – it’s seen as a good achievement and employees are applauded for it.”*
- Being able to apply the right amount of pressure to ensure a change in the products offered by their suppliers (this was possible with their soup supplier for example.)
- Training – they produce food at a number of different sites and human input is high. They need to be very persuasive and insist on on-site training.

See Table 3 for further impediments mentioned in the monitoring reports.

The role of trade associations / government / the EU

Industry interviewees were asked what role their trade association played in relation to their commitment. Two separate industry members said that their trade association did not influence how the

commitment was implemented as they had either begun working in the area before their trade association did or felt that they had guided their trade association with the help of a few others. However, industry was also of the opinion that their trade association played a role in the development of the commitment by giving it a multi-company / European face and creating a level playing field. One interviewee said that their trade association helped them *“define a common basis which they could use as a basis for development and tailor to their own and their clients’ needs (translated)”*. He also said that: *“Industry is mistrusted, and if there is a European dimension then it becomes less suspicious. The fact that they can lean on the common commitment is something that is very important, even if technically everything is undertaken in-house (translated)”*. Another interviewee opined that its trade association *“plays a vital role in coordination”* as if only one company reformulated the impact would be smaller, and there would also be a risk that the consumer would switch to different products, making the whole reformulation effort useless. A further industry interviewee said: *“We are happy to reformulate, but there is a point where you can’t go on reformulating if others don’t – that is the role of the trade association.”* Finally, an expert commented that *“there is a need for both [companies and trade associations to develop an approach to reformulation] as trade associations can set top level standards that they want companies to move towards, but at the end of the day individual companies need their action plans and can move further than the standards set by the trade organisations”*.

When the not-for-profit Platform member and experts interviewed were asked what would encourage more public-oriented action in reformulation by companies, it was generally agreed that **government** would have to play a role in this, though not necessarily through legislation:

- *“For individual governments to make it a priority and be specific about what they want companies to do, for example government setting targets which are based on the levels that need to be reached rather than a percentage reduction; they need to say potato chips should have no more than 250mg of salt rather than set a target for a reduction of 25% as then you can’t monitor progress.”*
- *“It does not need to be legislation – if governments say what the targets are and they have systems for monitoring them this can be effective. Government needs to take the lead here: just saying that industry can reduce what it wants does not work. Government needs to say what the levels should be.”*

However, industry was of the opinion that companies were reformulating and the key was to have common efforts among industry players and build consensus, such as in France where the 17 members of the SNRC (*Syndicat National de la Restauration Collective*) have signed a Charter on reformulation which enables the SME members to benefit from the technical know-how of the larger members. One interviewee stated:

“What is important is that [companies] can reformulate and communicate about reformulation, but there is another area where the public at large should be made aware of the fact that there is an incentive in buying those products. But we are a company and consumers will always look at a company critically, they have a certain level of trust but it’s limited. What would help is if there were campaigns to encourage the consumers to buy products with a better nutrition profile”.

When asked what would be the best way to ensure a global, nutrient-wide approach to product reformulation, not-for-profit, expert and industry interviewees seemed to agree that industry and the public sector should work together, though views on the form this should take varied slightly, with a more or less strong role for the public sector. A not-for-profit Platform member stressed the importance of having industry and the public sector work together, noting that there have been examples, such as the Neptune

programme in salt reduction in the UK, where this has been done quite successfully. However, one expert interviewee stated that having governments set the standards and provide strong leadership was the way forward, albeit with input from industry. Some further comments to this effect included:

- *“Getting stakeholder buy-in, industry buy-in” is the best way to ensure a global, nutrient-wide approach to product reformulation. “It can’t be something that is demanded of industry – you need to take industry along with you.”* (not-for-profit/expert)
- *“Without having ideas developed in individual companies, it’s difficult to get a pragmatic drive to reformulate, but without helping to establish benchmarks, set goals on a more global level, without giving guidance, feeding results back to national agencies in public health, then individual companies are more or less lost.”* (not-for-profit/expert)
- *“PPPs are an option, but at the end of day I think it should be about government leadership, engaging with food industry about what the most appropriate way forward is and then move forward from there with strong government leadership”.* (not-for-profit/expert)
- *“We are actively involved in such a PPP on salt reduction, i.e. the high level group at the WHO where the EU and trade associations are present. However, this does not mean that individual companies should not have their own salt reduction programme.”* (industry)

The food manufacturers interviewed saw the role of the public sector as providing guidance/setting benchmarks, but not looking to set one blanket standard: *“I would say that it’s not realistic that we would have one benchmark. Cultures and diet are too different for that, and the products and means employed differ so much from one company to another”*. While one not-for-profit / expert interviewee favoured global targets, two were of a similar opinion to industry, stating that this was not the best way forward as *“unfortunately nutrition is not black and white”* and *“it’s about communicating a balance rather than dos or dont’s”*. A few further comments included:

- Coming to an agreement on *“global targets and global monitoring”* is the best way to ensure a global, nutrient-wide approach to product reformulation.
- *“It would be almost impossible and unrealistic to do a blanket standard as the products and categories and technical constraints are so different, as are the current legal constraints at national and EU level.”* (not-for-profit/expert)
- Rather than using a nutrient-wide approach, it can be done collectively by sector, ensuring you *“think about the products more holistically as you can’t just keep stating take this out as it impacts on the products texturally and the taste”*. (not-for-profit/expert)
- *“What we need to look at is global guidance.”* (industry)

However, the contract catering industry stood apart in its opinion of standard setting, as it does not provide a standardised type of food offer:

- *“You can set the maximum salt content in soup, this is achievable, but for meals it becomes much more complicated as they could achieve that only with very standardised meals or dishes which then means it’s an industrial product and not a cook and serve dish.”*
- *“We did not put forward quantitative targets as it is dependent on the national framework and standards. We do not see the capacity for harmonisation at the EU level. It’s feasible to implement national standards if you have a standardised food offer, but not if it is non-standardised.”*
- *“When you are in a situation where you have service-captive consumers it’s feasible, but when they are not captive and they have access to extra salt and oil if they want to add more, they will*

do it. Sometimes being too prescriptive prevents innovation – this is sometimes the case with public authorities.”

The contract catering interviewees also viewed public-private partnerships (PPPs) positively, but one stated that *“the role of governments should be to promote investment in research, and the monitoring of compliance and impact”*. Another industry interviewee was of a similar opinion: *“PPPs are an option in order to develop technologies; look at how to resolve issues of taste versus salt reduction; and also for communication and education.”*

It was also mentioned that PPPs could be a vehicle to facilitate more education to increase consumer buy-in, as well as communication on successes to ensure an exchange of best practice among industry. In relation to this, the interviewee commented: *“PPPs have the potential to be good in providing information to consumers and motivating them, but they have not taken off. In addition, in the Platform there is a degree of mistrust in those that exist.”*

While using legislation to ensure a global, nutrient-wide approach to reformulation was seen by expert and not-for-profit interviewees as good because it reaches everyone, is straightforward, shows stronger leadership, sets a clear level playing field, allows for sanctions and guarantees a certain impact, legislation was perceived as being *“very theoretical and not very practical as it does not go to the nuances of industry foods and food categories, and you end up with massive derogations”*. Moreover, *“it takes so long to agree the standards that they become less strong than if a non-legislative approach were adopted”*. *“In the EU any rules would be watered down as they would need to be applicable to all 27 MS”*. A further disadvantage of legislation was said to be the impact that it can have on the shape and face of the market in that SMEs often do not have the resources or know-how to implement wide-spread reformulation. Forcing SMEs to reformulate risks either creating a food market place dominated by multi-nationals, or pushing them to seek out the grey areas in the law. That said, one interviewee mentioned that a legislative compromise may be possible:

“You could have a stepwise approach by giving things a little bit more time, or promoting a range of only minor changes step by step so it might not be as bad, but you would have to think about this and do an impact assessment with companies beforehand.”

Finally, one interviewee stated that she would like to see national governments *“encouraging the link between public health, the food composition area and what is being done in industry. At the moment the work is done more or less in different areas [...] and there is not really a feedback cycle. They need to invest more resources to ensure foods are represented in national food composition tables and what is used to set health goals accurately reflects what is out there in the market.”*

The monitoring

One industry member stated that the implementation of the internal monitoring system was initially quite difficult as they did not have a mechanism in place for feedback on nutritional parameters specifically and what they wanted the reporting back to include. *“It took time to get this right.”*

While two interviewees stated that they did not find any differences in the quality of the monitoring across the company affiliates/categories, due to the centralised nature of their organisations, one interviewee said that its quality varied. In fact, while they have the structures in place that allow for the centralised design of a certain percentage of recipes and the distribution of these across the company to each

canteen, and that the interviewee would like for these to be followed to the letter, there are strong degrees of regionalism and sensitivities that mean that there can be deviations away from these standards. They have three means in place to deal with this:

- a. They know what the canteens are purchasing as this is centralised, so they can keep tabs on, for example, the amount of salt being used etc.
- b. Internal monitoring by their quality department of the food on offer: In 2009, 18 people visited a site each day to carry out a total of more than 600 evaluations out of the 3,000 sites in France. This is a standard audit which includes looking at whether the recipes, the menus and the preparation of the meals conform to standards.
- c. For specialised areas, such as the medical sector, where they require control over their meals, an external company including dieticians has been contracted to monitor and verify the quality of the menus proposed by these canteens.

Not-for-profit and expert interviewees were asked to provide comment on the pertinence and level of transparency of the monitoring being carried out by industry in this area. Some insights into this are presented in the table on strengths and weaknesses (see Table 4). In addition, one interviewee stated: *“At the moment, commitments are not made according to a certain target, they are more general, they look at the whole portfolio and make reductions where possible, making it really hard to monitor. It is not as transparent as it could be”*. Furthermore, it was said that there *“could be more in the commitments on how they are going to measure it. There could almost be a consistent framework, template for it. If the umbrella organisation can get the data, then why can’t those individual companies put that into their commitments?”*

Not-for-profit and expert interviewees agreed that government has a role to play in the monitoring of compliance. One interviewee stated that *“governments or public health bodies also need a clear system for monitoring”*. She provided the example of a database which they have developed with the nutrient levels of all foods recorded for each brand so that they can track changes over time; it relates to processed foods and the main fast food companies (see Section 3.2.4 for more information on this database). Another expert interviewee stated that the easiest way to carry out the monitoring was *“to make sure that industrial product information is available at national and EU level, making it easy to see how products change and whether they are compliant with guidelines or not”*.

Not-for-profit and expert interviewees were of the opinion that monitoring should ideally be carried out by external, independent third-parties, such as government or government contracting an independent body. However, one interviewee said that *“the systems for monitoring should be discussed and agreed with the food industry so that they are practicable and appropriate”*. One interviewee said she had nothing against the idea of having a self-regulatory organisation (SRO) to monitor compliance, as *“the data exists and companies should be able to show laboratory figures on products”*. *“It would give more trust in the fact that when companies say they are doing things, it is actually being done”*. That said, she also opined that *“if individual companies keep doing what they are doing, and can talk about what they have done then it gives them a Corporate Social Responsibility (CSR) competitive edge”*.

However, industry, when asked whether it would favour having a SRO undertake the monitoring, had mixed opinions. A couple of interviewees stated that they did not feel it was necessary as this was the role of companies and the consumer ensures compliance through his buying behaviour. On the other hand, another interviewee said he had no problem with third party monitoring as it had the benefit of increasing industry’s credibility, but that the key barrier to it tended to be the cost:

- *“It is questionable whether independent monitoring on top of [internal company monitoring] will generate more actions, but it will generate more bureaucracy.”*
- *“The experience we have with monitoring is mostly in the area of advertising and marketing and there we work with external auditors. What is different in marketing and advertising is that consumers can’t indicate support for a certain strategy, so there is a need for third party monitoring. However, for reformulation, the consumer through his buying behaviour can indicate support for a certain product. Another way of making sure of compliance is having the means to communicate to the consumer what’s been done on reformulation and hope that the consumer will appreciate products with better nutrient profiles than those with slightly less healthy nutrient profiles. You can ensure compliance through consumer buying behaviour.”*
- *“From a public health point of view, it’s our role to look at the impact of salt reductions across Europe; to have comparable data across Europe. We do not start at the same point from one country to another and this is why we don’t have European objectives.”*

3.2.4 Assessing the impact of the commitments

The views of experts / the not-for-profit Platform member

Expert / not-for-profit interviewees were asked to **judge the commitments' (future) impact** on food/drink reformulation and on people's eating habits, based on the information provided by industry in their monitoring reports. While it was felt that the output figures provided by companies (see Table 3) often lacked an overall context and/or baseline enabling a true assessment of their impact, a couple of interviewees deduced from the scope of the commitments that they were likely to have (had) an impact on food / drink reformulation and on children's eating habits. That said, a number of other factors which can influence the degree of impact also need to be taken into account, such as the company's approach to reformulation in terms of how it is communicated to the consumer, taste, cost, education etc. Some of their comments are shown in the table overleaf:

Table 5: Likely impact of selected commitments

Commitment	Impact on food / drink reformulation	Impact on children's eating habits
FERCO's General Nutrition Recommendations	<p>It is <i>"likely to have an impact on food but not possible to state objectively from the information provided"</i></p> <p><i>"Once you have a critical mass of organisations, it serves as best practice for the rest. There is political and competitive pressure there as well for those who have not joined in and there should be pressure from national schemes and governments as well."</i></p>	<p>It is <i>"likely to have an impact on eating habits but not possible to state objectively from the information provided"</i></p> <p>The commitment has <i>"huge potential outreach as long as can provide taste along with healthy option, easy signposting for the healthiest options and education at the point of sale in the canteen."</i></p>
Unilever's Product Reformulation and Innovations commitment	<p>It has <i>"definitely had an impact on overall nutrient quality of food"</i></p> <p><i>"Because it's such a large company and they are applying it to so many products, the outreach to consumers must be great. They also cover a lot of everyday products – spreads, sauces; not just niche products."</i></p> <p><i>"They are showing leadership and other companies can follow the best practice."</i></p>	<p>It <i>"will have had an impact on diets without people changing their eating habits which is a good thing"</i></p> <p><i>"As long as the taste is there, the cost is there and people are educated, i.e. the stealth health idea, it will have an impact."</i></p>
Mars' Reduction of salt levels in rice and sauce product	<p>It <i>"will have positive impact on salt levels of products targeted"</i></p> <p><i>"If Mars can show that it can do this with sauces, soups and rice then it's showing best practice and other companies are then slightly more pressurized to follow from the health and CSR aspect."</i></p> <p><i>"it looks like rice and sauce products [...] are big sellers for them so it will have a certain impact."</i></p>	<p>It <i>"will not have impact on eating habits, but will lead to improved diets"</i></p> <p><i>"It depends on whether it's a for stealth health approach, i.e. reducing salt, but not telling people; whether consumers are encouraged to eat products that are reduced in salt or are turned off by them; whether it impacts on the taste negatively, or on the cost; whether consumers are educated about lower salt and the labelling indicates the salt level and it's put in the context of a daily amount (GDA)."</i></p>

Some general comments on the impact of the commitments included:

- *“The key point in terms of reformulation is that it is very difficult to measure unless you have good data on the nutrient levels of foods that can be updated regularly. We have developed a database with the nutrient levels of all foods recorded for each brand so that we can track changes over time – this is for processed foods and the main fast food companies.”*
- *“There is a need for more work on whether we tell the consumer or not. This will depend on the product category, whether a healthy eater or not, demographics etc.”*
- *“We’re lacking the bigger picture.” For all three commitments it’s not clear “how they would demonstrate their achievements to a wider audience, how they would prove [any] improvements.” “It’s tricky to assess the impact of the commitments as what companies have as outputs is not really linked to any other information – any available information on food consumption in a certain country, specific nutrition research items etc.” “It’s tricky if you don’t know the starting, or the end point. This is a problem as there is only limited European information on the composition of manufacturing and processed food. There are increased labelling schemes so it is becoming more visible, but it’s difficult to have coherent data to go to bodies like the Platform or regional bodies.”*

In addition to this, not-for-profit and expert interviewees were asked whether the monitoring tools being used to judge the impact of the commitments were adequate to monitor (a) the composition of foods; (b) the food consumption of the population; and (c) the health impact. All three interviewees were of the opinion that the tools being used were not adequate to monitor these three aspects (see also Table 4 on the weaknesses of the commitments). In response to this question, one interviewee stated that they were not adequate as the information provided in the monitoring reports was not precise enough to allow for comparison – there is a need for specific targets and specific nutrient levels; to monitor composition you need a database on composition of foods; and to monitor consumption and health impact you need surveys. A further interviewee said: *“You would need to have more players, more commitments to measure and monitor, and then you would need governments to do a population assessment of nutrient intake and look at whether blood pressure etc. has gone down”*.

Industry's response

In response to this criticism, industry, during and after the interviews, was provided with the opportunity to provide further information (in addition to that included in the monitoring reports) on the impact of its commitments. The additional data provided is presented below. In some instances data on the baseline and market share was not provided (mainly because such information is sensitive due to competition issues), making a judgment of impact difficult.

Table 6: FERCO commitment impact factsheet (according to data provided by the industry)

Impact factsheet: FERCO's General Nutrition Recommendations	
Note	<i>The contract catering sector has two areas where reformulation is possible, first of all in terms of the products bought from their suppliers because "reformulation in products is something that contract catering companies negotiate with their suppliers", and secondly, in terms of the reformulation of the recipes themselves. Both of these areas are considered in this impact factsheet.</i>
The general scope	<i>The food service sector represents 6 billion meals a year. However, this accounts for only 30% of the total EU social catering market. 70% of catering sites (school canteens, workplace restaurants, hospitals...) are not out-sourced to a food service company but managed in-house. FERCO represents the out-sourced market only.</i> <i>On average, school meals represent 140 meals a year (less than 13%) out of the total amount of 1,095 meals consumed annually by an EU child eating 3 times a day, while workplace meals represent a maximum of 220 meals a year (20%) for a working adult in the case of an employee eating every working day at the workplace.</i>
The scale of the commitment	<i>FERCO members represent 92.5% of the contract catering market.</i> <i>145 companies signed up to the general commitment: 2 operate on a global scale, one on a European scale in 6 MS and 142 are local SMEs. The three main companies (Sodexo, Compass and Elios) endorsed the commitment directly, while the local companies did so through their national associations.</i>
The reformulation by suppliers of products purchased by contract catering companies	
Reformulation of the products bought by contract catering companies from suppliers	<i>The reformulated products are both existing and newly developed. Products are reformulated by the food manufacturing industry, following standards set by the food service companies. However, compared to the retail sector, food service operators have lower purchasing power. Therefore, food manufacturers tend to invest in reformulation only when pressure for reformulation comes from a majority of their food service clients. This is why an EU wide reformulation policy is important.</i> <i>Reformulation of the food supply is not only about buying reformulated products. It is also about replacing less healthy products by existing healthier products.</i> <i>The main products concerned are oils, margarines, vegetables, potato products, meat products, bread, soups, sauces, pizza bases, dressings, yoghourts, cheese and other dairy products, fish sticks, deserts, soda's/juices.</i> <i>The use of healthy products is promoted internally as standards, providing that client organisations approve this move to</i>

Impact factsheet: FERCO's General Nutrition Recommendations	
	<i>healthier options.</i>
Reduction in nutrient levels (%) in products bought by contract catering companies from suppliers	<p><i>No overall figures were provided</i></p> <p><i>The following examples are based on information provided, for the years 2007 and 2008, by one company in the Netherlands, two companies in the UK and two companies in France which have the most advanced and most documented reformulation policies. As such, this should be considered as "the best possible scenario". "Reformulated products" can be either newly developed products or existing healthier products replacing less healthy food supply. Quantitative information is not available for all food items.</i></p> <p><i>Individual added salt sachets - Reduction in weight from 1gr. to 0.8 gr. (20% reduction)</i></p> <p><i>Added salt - Sourcing of iodised salt</i></p> <p><i>Mashed potato - Salt content reduced by 51% against previous product</i></p> <p><i>Pizza bases - Salt content reduced by 21%</i></p> <p><i>Tinned mushy peas - Salt content reduced by 50%</i></p> <p><i>Soups/sauces - Reduction in salt content from 25% to 50%</i></p> <p><i>Cooking sauces - One company in the UK has worked with its suppliers in order to reduce the amount of saturated fats in its own label cooking sauces by 80%</i></p> <p><i>Vegetables - Use of glutamate free vegetable stock</i></p> <p><i>Tinned tuna in oil - Replaced by tuna in brine</i></p> <p><i>Bread, rice, pasta - Sourcing of whole grain products</i></p> <p><i>Sourcing of high fibre bread (minimum of 5.5gr. of fibre per 100 gr.)</i></p> <p><i>Milk - Sourcing of semi-skimmed or skimmed milk</i></p> <p><i>Yoghourt - Sourcing of low-fat yoghourts</i></p> <p><i>Deserts: yoghourts and milk products - Sourcing of products with not more than 20 gr. sugar per unit. Depending on the terms of reference set in the contract and depending on the client organisation preference, deserts high in sugar might be de-listed from the food supply list for a site.</i></p> <p><i>Margarines - Animal margarines replaced by vegetal alternatives</i></p> <p><i>Fish sticks - Sourcing of fish sticks that can be cooked in oven instead of deep-fried</i></p> <p><i>Dressings, mayonnaise - Fat content reduced by 20% to 60%</i></p>

Impact factsheet: FERCO's General Nutrition Recommendations	
	<p><i>Seasoning and frying oils - Oils containing too much trans-fats/saturated fat (like palm oil or solid fats) have been removed and replaced by poly-unsaturated fat like sunflower oil, rapeseed oil or olive oil.</i></p> <p><i>Sourcing of oils with a trans-fat content not higher than 2%. One company is using a new cooking oil that is virtually free of trans fatty acids in 71% of its sites in the UK.</i></p> <p><i>Ban on animal fat</i></p> <p><i>Meat products - Sourcing of innovative minced meat products containing maximum 14% to 10% fat against for instance 20% fat for beef mince</i></p> <p><i>Sourcing of beef with a fat content reduced by 40%</i></p>
Percentage of reformulated products (out of total purchases) purchased by contract catering companies from suppliers	<p><i>The proportions are based on information provided, for the years 2007 and 2008, by one company in the Netherlands, two companies in the UK and two companies in France which have the most advanced and most documented reformulation policies. As such, this should be considered as "the best possible scenario".</i></p> <p><i>Dairy products - 80%</i></p> <p><i>Vegetables - 80%</i></p> <p><i>Soups - 60%</i></p> <p><i>Oils - 60%</i></p> <p><i>Soda's/juices - 20%</i></p>
The reformulation of recipes	
Number of recipes reformulated	<p><i>The number of recipes is not disclosed by companies. Recipes are managed country by country and sometimes region by region, even in the case of international companies, as eating patterns and culinary traditions vary from one country to another. National nutritional standards are also country-specific. In countries with a federal organisation, standards are fixed by the regional authorities. Moreover, the food offer is not standardised and varies according to client organisations' requirements and consumers' profile (adults at the workplace, school children). Recipes may be adapted by cooks depending on the availability of the foreseen ingredients or following reactions from the daily consumers. Recipes are also adapted taking into account the number of meals served daily. Some sites prepare 30 meals a day, others 3,500. For all of these reasons, it is not possible to calculate the total amount of recipes.</i></p>
Types of recipes reformulated	<p><i>Both newly developed and existing recipes were revised.</i></p> <p><i>In many cases, reformulation of recipes is based not only on revised ingredients but on adapted cooking methods and new cooking technology based on poaching, steaming and the use of ovens and grills limiting or even eliminating the use of fat.</i></p> <p><i>Reformulation does not affect only recipes, but also menu planning (daily, weekly, monthly). For instance, a company elaborated</i></p>

Impact factsheet: FERCO's General Nutrition Recommendations	
	<i>a 500kcal menu including at least 80 gr. of vegetables, maximum 10-25 gr. fat, a low energy desert and balanced composition of carbohydrates, proteins and fibres.</i>
Percentage decrease of given nutrients in the reformulated recipes	<p>No overall figures were provided, but the following represent examples of reformulation outcomes:</p> <p><i>Example 1: A company in France is managing centrally more than 35,000 healthy recipes. It has introduced a range of 28 "slim recipes" under 350 kcal. In NL, the same company reduced salt content in 70% of its soup recipes and reached an overall reduction of calories of 40% in its soup recipes. In IT, the company has totally banned fried foods in 60% of the sites it operates.</i></p> <p><i>Example 2: Another company in the UK is serving 80% of the salad items without dressing. A range of low calories (300 calories maximum) sandwiches has also been introduced in the UK as well as a new range of low calories (900 calories maximum) menus in IT, BE and FR. The company is experimenting in Belgium with a vending machine with healthy snacks.</i></p> <p><i>Example 3: A company in NL has increased its number of healthy recipes by 200% since 2007.</i></p> <p><i>Example 4: With the agreement of its clients, a company has removed salt from tables in 52% of the sites it operates in, in the UK.</i></p> <p><i>Example 5: In general, reduced-fat mayonnaise is used as standard in sandwich fillings and salad dressings made on-site. Where full-fat milk is offered, semi-skimmed and/or skimmed milk is also available.</i></p> <p><i>Example 6: When reducing meat portions, amino acids from meat are replaced by a combination of amino acids present in vegetables, carbohydrates and leguminous.</i></p>
Percentage of the total that these reformulated recipes represent	<p><i>The estimate based on figures provided by large companies is that in 2007, 30% of the food offer was nutritionally analysed and reformulated if necessary. The annual increase is around 8%-10% in order to reach 100% around 2015.</i></p> <p><i>Reformulation schemes are implemented in the following countries: UK, DE, NL, BE, LU, Ireland, DE, Norway, Sweden, Finland, FR, IT, ES, PT, HU, Austria, CZ, PL, RO, Slovakia.</i></p> <p><i>Reformulation schemes and recipe databases are country-specific. They are not rolled out at the EU level or worldwide as eating patterns and culinary traditions vary from one country to another.</i></p>

Table 7: Mars commitment impact factsheet (according to data provided by the industry)

Impact factsheet: Mars' Reduction of salt levels in rice and sauce product	
The scale	<p><i>The reformulation efforts are taking place at global level.</i></p> <p><i>They concern both existing and new products and focus on salt reduction only "as that was the only thing that needed improving when [they] assessed the rice and sauce products".</i></p> <p><i>The total number of products concerned is over 1,200 in Europe.</i></p>
Total number of products sold in Europe that have been reformulated	<p><i>=> Our European portfolio - status Dec 2009 - comprised about 283 recipes and the combinations of recipes x pack formats is over 1,200.</i></p> <p><i>=> The reformulation activities have so far affected over 85% of this 'recipe' portfolio - whereby the focus of the activity was on the biggest sellers first and whereas plain rice items were not impacted at all.</i></p> <p><i>New products have been developed starting from an Innovation brief that stated the maximum salt. Where possible, reformulation for salt was combined with reformulations for integrity.</i></p>
Market share of the reformulated products in Europe	<p><i>=> The European market shares (Value - Dec 2009) of the main Food brands available :</i></p> <p><i>Uncle Ben's Rice : 29.9%</i></p> <p><i>Uncle Ben's Sauces : 4.9%</i></p> <p><i>Dolmio Sauces : 13.7 % (UK focus)</i></p> <p><i>=> The Sales weighted averages, however, are not easy to compute - as I do not dispose of the detailed figures by recipe.</i></p> <p><i>However, we can approximate the reality by stating that 50% of the rice share consists of flavoured rice and therefore has been participating in the reformulation effort. The other 50% is plain rice and has no added salt by default.</i></p> <p><i>For the sauces, both Uncle Ben's and Dolmio, circa 90% of all wet cooking sauces and concentrated sauces, have been looked at from a salt reformulation point of view or have been range extensions (new recipes) over the last three years.</i></p>
Total number of products sold worldwide that have been reformulated	<p><i>=> It is very difficult for me to give you precise numbers. However, I can make the following estimates:</i></p> <p><i>=> MARS Food Europe has over 65% of the turn-over of the Global MARS FOOD business. So the lead of the activity has been in Europe, other continents, however, are following, especially since the organisation has been changed from regional into global.</i></p> <p><i>=> As far as rice is concerned, the US started embarking on a salt reduction program at the end of last year and the Australian markets imports the European product, produced at reduced salt levels. That means that at least 75% of the rice products globally have been either salt reduced over the last three years, or is low anyway - because of the "plain" nature of the rice products. Of the remainder 25%, also 50% will be plain rice.</i></p>

Impact factsheet: Mars' Reduction of salt levels in rice and sauce product	
	<i>=> With respect to sauces, Australia is the second largest market, following the European market. Also here, the salt reduction campaign was initiated in the course of 2009.</i>
Market share of the reformulated products worldwide	<i>Mars was not able to provide these figures.</i>

Table 8: Unilever commitment impact factsheet (according to data provided by the industry)

Impact factsheet: Unilever's Product Reformulation and Innovations commitment	
The scale	<p><i>The reformulation efforts are taking place at global level.</i></p> <p><i>An assessment of the whole product portfolio (22,204 products) was carried out, but not all products have been reformulated. Lighter versions of certain products like Mayonnaise are offered and certain other "iconic, indulgence" products like Magnum ice creams will not be reformulated, though smaller versions and healthier options are being produced.</i></p> <p><i>The reformulation efforts have also included their innovation funnel since 2008.</i></p>
Baseline data – total number of tonnes of each nutrient present in the portfolio prior to reformulation	<p><i>Unilever was unable to provide baseline data</i></p>
Total number of tonnes of each nutrient removed from your products as at 2010	<p><i>As per the 2009 monitoring report, Unilever removed the following from its portfolio between 2005 - 2008: 30,370 tonnes of transfat, 18,000 tonnes of saturated fat, 3,640 tonnes of sodium and 37,000 tonnes of sugar.</i></p> <p><i>Unilever said that they continue to make changes on a regular basis, but no more recent data for 2009 was available.</i></p>
Total number of products sold in Europe that have been reformulated	<p><i>The actual level of reductions of saturated-fats, trans-fat, sugar and salt are very product specific. Sometimes reductions of up to around 70% are possible but we must ensure that these changes are being made without any compromises on the taste, texture, or other quality aspects of our foods and thus not leading to a loss of consumer preference. We cannot provide any aggregated percentage data, but we can provide you with a list of product examples showcasing reductions in specific nutrients. Some examples in Europe include:</i></p> <ul style="list-style-type: none"> <i>• In Belgium and The Netherlands, all three* varieties of Unilever Foodsolutions Knorr croutons now contain 70% less saturated fat and up to 40% less sodium -- and they now qualify for the Choices stamp. *There are three varieties only in NL. Belgium only launched two varieties: natural and bacon (not cheese)</i> <i>• Between 2006-2009 the average sodium content of Unilever Foodsolutions Knorr bouillons and soups (dry, paste, jelly) in Germany has dropped by 12%.</i> <i>• In Belgium and the Netherlands, eight new Unilever Foodsolutions Knorr Authentic powder bouillons have been launched, containing on average only 320 mg sodium per 100g -- and they qualify for the Choices stamp.</i> <i>• Blue Band wrapper light in the Netherlands and Solo wrapper light in Belgium were introduced with 30% fewer calories than the original.</i> <i>• Becel bread was introduced in the Netherlands with 40% less salt than standard wholemeal bread.</i> <i>• All varieties* of Knorr Cubitos (seasoning cubes) in Poland now contain contain 40% less salt. *Seven varieties of Knorr</i>

Impact factsheet: Unilever's Product Reformulation and Innovations commitment	
	<p><i>Cubitos (seasoning cubes) in Poland were reformulated in 2008 to contain 40% less salt. One new variety was introduced in 2009 with a similar salt content.</i></p> <ul style="list-style-type: none"> • <i>Cup a Soup was relaunched in The Netherlands 2009 with on average 18% less salt.</i>
Market share of the reformulated products in Europe	<i>Today, 44% of the Unilever product portfolio fulfills our internal nutrition criteria. We cannot provide any more detailed information on total market share.</i>
Total number of products sold worldwide that have been reformulated	<p><i>The actual level of reductions of saturated-fats, transfat, sugar and salt are very product specific. As indicated our list of examples in 2009, reductions ranging from 10 - 70% are possible, depending on product and nutrient. We must however ensure that these changes are being made without any compromises on the taste, texture, or other quality aspects of our foods and thus not leading to a loss of consumer preference. We cannot provide any aggregated percentage data, but we can provide you with a list of product examples showcasing reductions in specific nutrients. Some examples outside Europe include:</i></p> <ul style="list-style-type: none"> • <i>AdeS in Brazil was reformulated to contain 35% less added sugar.</i> • <i>Hellmann's/Calve/Amore Light mayonnaise contains half the calories of Real mayonnaise and is still a good natural source of essential omega 3 (ALA).</i> • <i>In Canada, Knorr Side Kicks now contain 25% less salt.</i>
Market share of the reformulated products worldwide	<i>Today, 44% of the Unilever product portfolio fulfills our internal nutrition criteria. We cannot provide any more detailed information on total market share.</i>

Exploring other potential impacts

Industry was asked to what extent they had changed their product labelling to reflect changes in the nutrient content of their products. For the two interviewees who use labels, they stated that back of pack nutritional tables and GDA labelling was changed to reflect any changes resulting from reformulation. Front of pack labelling was used on the 'Choices' logo which was originally a Unilever branding exercise, but has now been taken on by independent agencies; 'Choices' products meet all of Unilever's criteria in the four key nutrient areas of salt, sugar, fat and trans-fats. In addition, 'Light' versions of products are labelled as such. Another interviewee stated that they did not advertise lower salt content on the front of packs because people may perceive low salt as negatively impacting on the taste.

Not-for-profit and expert interviewees had mixed views on whether it was a good idea for companies to advertise such changes on the front of packs:

- *"Some of the front of pack labelling has to be assessed carefully [...]. You have to be careful with the information you get. You won't necessarily find all the information related to a balanced food choice on the label; it may feature the key components, but you can't always get a full nutrition education on the label."*
- *"Companies need to provide information about their products so that consumers have the information they need to make a healthier choice if they want to make a healthier choice."*
- *"There is a need to think about whether or not it's right to communicate to the consumer that products are now lower in a certain nutrient because of the perception on the consumer." "The ability to be able to say what you have done should be looked at more closely from the consumer acceptance perspective, but also in terms of the whole issue of nutrient profiles."*

One industry member, speaking from the confectionary perspective, said that *"if legislation comes in that bans the communication effort on reformulation, this will slow down the process of reformulation, especially for SMEs as they do not have the financial possibilities like us". "To change in one go to a salt reduction of 30% or 25% will leave the product unsellable. You need a step by step approach to educate the consumer."*

Industry was asked what impact reformulation had had on consumer preferences. One company said that there had been *"no impact because we spend a lot of effort to make sure there is no impact. The company president says they need to look at the 'sweet spot' between health and nutrition targets, sustainability, profitability, taste and enjoyment and convenience for the consumer."* A second interviewee was of a similar opinion: *"We have not assessed the impact of reformulation on consumer preference, but what is part of our process is a consumer test of the end product and the requirement is that it is appreciated by consumers"*. Moreover, when a product has the 'Choices' logo (see section above on labelling), then there is a consumer preference for that product.

Industry was also asked to express an opinion on the extent to which reformulation had affected the produce of their local subsidiaries in Europe and worldwide. One interviewee stated that it was a global programme that cut across all their categories, while another said that *"in Europe, 100% of the commitment is being implemented"*. For the catering industry, the issue is more complex, as suggests the section on implementation above.

Industry was asked to what extent a reduction in one nutrient in their food and/or drink products had led to an increase in other nutrients (e.g. salt, sugar, fats, trans-fats) or additives (e.g. sweeteners, salt alternatives). One company stated that: *"You can increase the amount of spices so more taste is generated or add more parsley and peppers for example. Salt is a taste enhancer so you need to bring more of the original taste. Replacing salt with sugar or fat is not the idea."* (see also the box on Mars' salt reduction process in Section 3.2.3). Another interviewee provided further examples of what these nutrients are replaced by:

- *“There is a general consideration that is when you lower trans-fat then you need to add saturated fat to keep the product consistency. If you do that then there is a limit and the limit is that it can never exceed the sum of the two nutrients you had. Even though have added saturated fat, still have a pub health advantage as trans-fat is considered less desirable than saturated-fats.”*
- *“Salt products have salt replacers, especially potassium.”*
- *“Another alternative is herbs and technology – we found that the smaller the salt crystals, the better the taste experience.”*
- *“Our only policy have is that the categories can use flavour enhancers, but if they choose not to use them then they can say that. If these enhancers are being used, it will be on the label.”*

On salt reduction in particular, one interviewee stated: *“If you go in for reformulation, you need to do it as an industry. Salt is the most critical for taste – if go down in salt and none of your competitors do it, you in effect put yourself out of the market.”* One company gave an example of this, stating that following an attempt at salt reduction in their pot noodles in a certain country, they had had to increase the level again as none of their competitors had done so and they were losing market share.

Experts and the not-for-profit interviewee were asked about nutrients as well and whether the removal of one nutrient had led to an increase in other nutrients in foods/drinks. Some of their comments were as follows:

- *“At one stage there was pressure for a reduction in trans-fat which led to an increase in saturated fat.”*
- *“Governments need to be clear when they introduce targets that there is a need to reduce all nutrients and not reduce one at the expense of the other; there is no reason why one has to lead to an increase in another.”*
- Sodium could be replaced by potassium or other sorts of salt replacers.
- There are a lot of R&D innovations for some of these aspects, for example, there is the potential of having a salt taste, but with minute particles of it, it would give you the same taste.
- Trans-fats and saturated-fats are being replaced by poly-unsaturated fats.
- Sugars being replaced by polyols, fibres, poly-dextrose, fructo-oligosaccharides, inulin etc.

Industry was asked whether reformulation had had an impact on the price of their products, while one interviewee was unable to answer this question for competition reasons, one stated that it had had an impact in both directions: *“Our decision to use iodised salt costs more, but we as a company are absorbing that cost, using more fresh fruit and vegetables is also more expensive”*. However, reducing the size of portions can also lead to cost reductions. *“There are nutritional and economic considerations and it’s up to us to find a balance between the two.”* Another interviewee said that: *“In most cases no, as we took the cost into account in the product development and through the consumer surveys that we did.”*

Not-for-profit and expert interviewees were also asked whether the commitments in this area had had a wider impact on EU or national regulatory initiatives. One interviewee stated that there is *“a link between reformulation and nutrition profiling, front of pack labelling, marketing to children, requirements for food in schools etc, but it may also be the other way round, that they all have an impact on reformulation”*. Another possible link is that relating to trade policy, but perhaps not so much at EU level. For example, the interviewee is currently doing research on how some island countries can use nutrient levels to restrict the entry of certain products by, for example, arguing that food with only certain levels of nutrients can be imported. Another interviewee said: *“For the food industry it could all be done by self-regulation initiatives, but the problem is getting all the SMEs on board. The largest companies cover 50% of what people eat, but represent only 1% of the total number of companies.”*

How best to assess the impact of the commitments

The specific targets and indicators that could be defined to identify the impacts of the food / drink reformulation commitments included:

- Sales
- Consumer preference
- Linking a consumption/nutrition survey to sodium levels in urine samples
- Linking industry's data to consumption data to identify nutrient consumption levels at population level. Then you could go further and go to different indicators and look whether there is a link between specific nutrition and intervention studies etc.

One company stated: *"This is really based on sales – by no means is Unilever in a position to measure the public health impact or improvements in the health of the consumer."*

Interviewees were asked what the best way to monitor the public health impact of product reformulation was. One expert interviewee said: *"There is a need to be practical about it – at the end of the day, there are a lot of public health initiatives under way and we will never know if the fact that products have been reformulated has led to people's blood pressure going down as there may be a whole load of factors leading to such a reduction. You need to think that if you reduce nutrients, that this will have a beneficial effect on health – you need to use prediction models to claim that impact and then do health monitoring."* Surveys were seen as a good way by interviewees, these could be done at national and EU level. An industry interviewee stated: *"I know only of one example where a problem was identified, action taken, monitoring done over a long period and a positive effect was seen; this was the study in the Karelia region in Finland."* He further opined, that this was *"probably the only way to get reliable data, but it is extremely time consuming and expensive"*.

Interviewees from both sectors agreed that government has a role to play in the monitoring of impact. One not-for-profit platform member stated that it was government's role to carry out impact assessments and evaluate the effectiveness of reformulation as: *"individual companies can show how much less they have of the nutrients, but they can't show in the population that overall intake has decreased or what the end point health impact is on individuals and populations"*. They *"need to show how it fits into the end game"*. Modelling, while theoretical, was seen as one means to do this by looking at what impact a reduction in nutrients in given product categories, combined with the consumption of a certain amount of these products, could have. It was felt that the monitoring of the health impact needed *"to be done at national level because there will be variations between different countries and you need to be able to break it down by country and see that some increase and some decrease, but you can have it at European level too"*. One interviewee further commented that there is a need for *"broader European studies with consistent methodologies so you can properly measure impacts and this is an EU role"*.

To conclude on impact, one expert interviewee said when asked whether it was the role of business to promote healthy eating that:

"The basic requirement towards industry is certainly to provide food. But they should also have a certain commitment to produce food that will not have immense negative impacts on health [...]. Then it comes down to whether it's healthy for the consumer – the responsibility for this lies partly with industry and partly with the consumer. Any reformulation effort will have certain limits to someone sooner or later: if the consumer will take no advice and not listen in terms of healthy eating, how could industry change all that?"

3.3 A detailed review of some key issues

The following section discusses further the key issues related to the self-regulation commitments' effectiveness, taking key findings from the interviews as a starting point, and then expanding on these by looking at what other evidence is available from scientific and other sources.

3.3.1 Setting the standards

Table 9: Setting standards – key arguments

Pros of blanket standards and/or legislation (as per the interviews)
<ul style="list-style-type: none"> • NGOs/experts argue that with legislation at least you know where you stand – easy/straightforward. • Legislation guarantees more buy-in/compliance
Cons of blanket standards and/or legislation (as per the interviews)
<ul style="list-style-type: none"> • Setting blanket/nutrient-wide standards was also seen by industry and experts alike as unrealistic as nutrition is not black and white and products and the technology behind them varies greatly • Industry argues that it knows its products best so it is best placed to set the standards • NGOs/experts/industry argue that setting blanket standards is a very complicated affair that takes time • Industry argues that self-regulation is more efficient/faster • Experts/industry argue that it's difficult for SMEs in particular – legislation could risk changing the face of the industry with large industries with R&D resources taking over the market, or leading to companies looking for the grey areas in legislation

It appears necessary to define standards in order to have references and a goal. But at the same time, it will be difficult for all Member States to agree on standards at European level. According to the experts and not-for-profit organisation interviewed, it is up to national governments to set the standards for processed foods, setting upper limits (see Section 2). This is in agreement with the World Health Organisation's (WHO) recommendation to take into account national eating patterns when developing food-based dietary guidelines. The same recommendation can be made for the definition of blanket standards.

According to the WHO, governments should set the maximum levels of salt, sugar and fat in the different types of processed foods through regulation or legislation⁷. However, in the U.S., the Food and Drug Administration (FDA) pointed to the risk of legally binding standards, as they have to be phrased in very definite terms in order to stand up in court.⁸

Until now, governments have focussed their interest and efforts on salt because this nutrient's links with health, particularly through an increase in blood pressure, are the most obvious and concern the population as a whole. People who consume lots of salt are more likely to see their blood pressure rise as they get older, with a corresponding increase in their heart disease risk⁹. A medico-economic

⁷ WHO. Less salt, less risk of heart disease and stroke. Reducing salt intakes in populations. Report of a WHO Forum and Technical Meeting. 2006.

⁸ <http://www.fda.gov/downloads/ScienceResearch/FieldScience/UCM092252.pdf>

⁹ Alderman M, Cohen H, Madhavan S (1998). Dietary sodium intake and mortality: the National Health and Nutrition Examination Survey (NHANES I). *Lancet*, 351:781-785.

study conducted in the United States models the impact of the reduction in salt intake¹⁰. It concludes that even modest reductions in dietary salt intake (1g per day) could substantially reduce cardiovascular events and medical costs. The authors of this study recommend a national regulatory effort which could save costs even if only a modest salt reduction were achieved. In the US, the FDA is in charge of setting national standards for salt added to processed foods and prepared meals in an effort to reduce Americans' consumption of sodium.

At the moment, a few European countries have defined blanket standards:

- The UK Food Standards Agency (UK-FSA) has defined recommendations to the food industry on levels of reduction in saturated fat for biscuits, cake, buns and chocolate confectionery, added sugar for soft drinks, and increased availability of smaller single-portion sizes for chocolate confectionery and soft drinks¹¹. These recommendations are voluntary and food companies are encouraged to showcase their achievements on the FSA website. Further recommendations are planned on dairy and meat products. The aim is to encourage reformulation of mainstream products and not only “healthy options” products.
- The UK FSA also published in May 2009 revised salt reduction targets for 2012, for 80 categories of foods, with challenging targets. This follows a project of reductions of salt in cooking and pasta sauces, and in soups (Neptune Project)¹².
- Some companies developed their own standards, such as Unilever with the Nutrition Enhancement Programme (NEP), which defines nutritional quality benchmarks for trans fat, saturated fat, sodium and sugar, based on national and international dietary guidelines¹³. They also developed a nutrition score to evaluate the nutrition composition of their products, which could be used to communicate on the front-of-packs¹⁴.

The evidence presented above leads to the conclusion that there is consensus on the need to define national standards for recommended levels of salt, sugar, trans-fats and saturated fats in consumer products, taking into account national eating patterns. However, there is no real consensus on whether these should be mandatory or simply recommended standards.

¹⁰ Bibbins-Domingo K, Chertow GM, Coxson PG et al. Projected Effect of Dietary Salt Reductions on Future Cardiovascular Disease. *N Engl J Med* 2010;362:590-9.

¹¹ UK FSA. Food Standards Agency voluntary recommendations on saturated fat reductions for biscuits, cakes, buns and chocolate confectionery added sugar reductions in soft drinks, and portion size availability, for chocolate confectionery and soft drinks. <http://www.food.gov.uk/multimedia/pdfs/satfatrecommendations> (7th may 2010)

¹² UK FSA. Salt reduction targets. <http://wwwfood.gov.uk/healthiereating/salt/saltreduction> (7th may 2010)

¹³ Unilever. The EU Pledge Unilever Commitment. www.eu-pledge.eu/downloader.php (7th may 2010)

¹⁴ Nijman CA, Zijl IM, Sierksma A, et al. A method to improve the nutritional quality of foods and beverages based on dietary recommendations. *Eur J Clin Nutr* 2007;61:461-71.

3.3.2 Monitoring the implementation and health impact of commitments

Table 10: Monitoring implementation and impact – key arguments

Monitoring of the implementation and health impact of commitments (as per the interviews)
<ul style="list-style-type: none">• In terms of the commitments under review themselves, NGO/expert interviewees opined that industry could provide more of the general context/wider picture and a baseline when reporting on their commitments• It was widely argued that it was the role of governments/the EU to look at the wider health impact of reformulation efforts and other efforts in the fight against obesity• Industry said they were unable to monitor the health impact as there are so many factors out there that can influence this, making it near impossible to pinpoint reformulation as the cause

The impact of the commitments can be measured at three different levels:

- the impact on the nutrient contents of processed foods,
- the impact on dietary intakes in the population,
- the impact on the epidemiology of the diseases related to the nutrient concerned.

Impact on the nutrient contents of processed foods

Monitoring the impact on the nutrient contents of processed foods and dietary intakes supposes having guidelines, objectives and baseline data.

However, in terms of the commitments under review themselves, not-for-profit/expert interviewees opined that industry could provide more of the general context/wider picture and a baseline when reporting on their commitments (see Section 2). In fact, the current method of reporting on reformulation commitments does not allow for a clear assessment of how the nutrient levels have changed over time. This could be obtained by a systematic log of the composition of processed foods, at least in terms of the nutrients of concern in the different commitments. This cannot be done at a European level and has to be carried out by each country individually.

This data are also necessary to establish food composition tables, which are used to analyse the data from food consumption surveys in a given population in order to monitor dietary intakes¹⁷. The most effective way of measuring the direct effectiveness of commitments in the area of food/drink reformulation would probably be to develop a food composition databank, but this implies doing periodic surveys, costs time and money, particularly if one does not want to rely solely on data provided by industry.

Food composition tables or databases (FCDBs) are resources providing detailed information on the nutritional composition of foods, usually from a particular country. Originally, these resources existed only in print form, with the oldest tables dating back to the early 1800s. Nowadays, a trend towards electronic FCDBs can be observed. They can hold large amounts of data and allow easy access to data, as well as its manipulation. More recently, many European FCDBs have become available online on the Internet (EuroFIR)¹⁵. A variety of methods are used to compile food composition data (FCD) at a national level by a number of countries, including: chemical analysis of food samples, calculation of values using yield and nutrient retention factors, 'Borrowing' values from one food composition database (FCDB) to another, adopting values from other sources, e.g. scientific literature for analysed values or food labels for branded foods. The data are thoroughly documented for best

¹⁵ EuroFIR. http://www.eurofir.net/eurofir_knowledge/food_composition_databases (7th May 2010)

possible transparency, aggregated, validated and compiled following strict and standardised quality evaluation procedures before they can be published in the FCDBs and be made available for all data users.

Some European countries have been implementing large databanks for a long time, such as Denmark, with the Danish Food Composition Databank¹⁶, Sweden, the Netherlands and the UK¹⁷.

In Australia, a systematic survey of the sodium contents in processed foods is conducted by the Australian Division of World Action on Salt and Health.¹⁸ It consists in a data collection of sodium concentrations of the main food categories that contribute salt to the diet and provides a baseline against which it will be possible to objectively quantify progress.

EuroFIR is working on the harmonisation and standardisation of work on food composition data in Europe¹⁹. Development of the EuroFIR databank platform requires that databases are established according to common principles and are presented in a uniform way. Following a successful proposal to the European Committee for Standardisation (CEN), a CEN/TC 387 project committee on Food Composition Data was launched in 2008. The proposed standard is a technical specification that will cover data structure of food composition databases and interchange of food composition data, including:

- Identification, description, classification and labelling of foods and ingredients,
- Values for the amounts of measurable, estimated or calculated nutrients and other components,
- Specifications of methods used for obtaining these values,
- References to sources for the information reported.

Impact on dietary intakes

Most industrialised countries have developed dietary intake guidelines intended for the general public and health professionals. The US Dietary Guidelines for Americans 2005 have replaced the Dietary Reference Intake (DRI). In 2002, the WHO European region conducted a survey on food based dietary guidelines. Of 48 participating countries, 25 reported having national, government-endorsed food-based dietary guidelines, 8 reported having food-based dietary guidelines that were either in preparation and/or not yet endorsed by the government, 6 reported having no food-based dietary guidelines²⁰. The report concluded that national dietary guidelines are an important part of creating nutrition policies and disseminating consistent information about healthy diet and lifestyle. It underlines that national eating patterns must be considered when developing food based dietary guidelines.

In Europe, food-based dietary guidelines (FBDG) provided by the European Food Information Council (EUFIC) are simple messages on healthy eating aimed at the general public. They give an indication of what a person should be eating in terms of foods rather than nutrients, and provide a basic framework to use when planning meals or daily menus. In 2007, the European Food Safety Authority (EFSA) also defined the "Tolerable upper intake levels for vitamins and minerals", including

¹⁶ http://www.foodcomp.dk/v7/fcdb_default.asp (7th may 2010)

¹⁷ Church SM. The history of food composition databases. British Nutrition Foundation Nutrition Bulletin 2006 ; 31 : 15–20.

¹⁸ Webster JL, Dunford EK, Neal BC. A systematic survey of the sodium contents of processed foods. Am J Clin Nutr doi: 10.3945/ajcn.2009.28688.

¹⁹ Eurofir. Harmonisation and standardisation. <http://www.eurofir.net/policies/activities/standards> (7th may 2010)

²⁰ Food based dietary guidelines in the WHO European Region. WHO regional Office for Europe. 2003.

recommendations related to salt intake²¹. And in 2010, EFSA sets European dietary reference values for nutrient intakes²². In 2006, the WHO produced special recommendations for reducing salt intake²³.

Following the dietary intake guidelines, some countries have established a monitoring of their food based dietary guidelines, based on surveys of food consumption in the population. A workshop on food-based dietary guidelines (FBDG), organised by the European Food Information Council (EUFIC) in conjunction with the Food and Agricultural Organization of the United Nations' (FAO) Regional Office for Europe and Central Asia (REU) in May 2009, showed that six countries out of the 14 present at the workshop had evaluated and monitored their food-based dietary guidelines, and four out of these six stated their monitoring and evaluation happens on a regular basis²⁴. The monitoring and evaluation was mostly done by the Ministry of Health, a Public Health Authority, Statistical Office or Institute for Food/Nutrition Sciences. Predominantly the countries collect data on changes in food/nutrient consumption as part of their evaluation and monitoring (5 out of 6 countries). About half of the countries that evaluate and monitor their FBDG also collect data on changes in health status (four countries), food sales and food composition (two countries).

These studies require a lot of time in terms of collecting and processing data (i.e. studies are carried out on large samples with several collections of food consumption data, as well as calculations of consumption by type of food and nutrients from food composition tables). There is a lack of hindsight to assess the impact of Platform commitments in terms of the actual food intake measured among populations. Moreover, changes in food intake also depend on the entire national nutritional prevention policy and also on economic conditions, beyond the measures taken on the composition of processed foods.

Some countries, such as Ireland²⁵, have also implemented population-based surveys on the distribution, use, understanding and the perceived impact of dietary intake guidelines.

Impact on the epidemiology of the diseases

Monitoring the impact on diseases linked to food means having a permanent record of epidemiological data on these diseases, at least in terms of incidence, prevalence and mortality. However, the changing epidemiology of these diseases depends on many other factors relating to national nutrition policy and prevention policies in general, as well as the healthcare system.

Furthermore, measurement of impact requires sufficient time, both to make the necessary epidemiological data available and for the measures to have enough time to have an effect on the diseases. Currently, the epidemiological data does not show the changing epidemiology of these diseases before and after the implementation of EU Platform commitments.

Among the European Community Health Indicators (ECHI)²⁶, only death rates are available for almost all countries and the most recent available data concern the years 2006 or 2007, depending on the

²¹ EFSA. Tolerable Upper Intake Levels for Vitamins and Minerals. February 2006.

²² EFSA. <http://www.efsa.europa.eu/en/press/news/nda100326.htm> (6th may 2010).

²³ WHO. Less salt, less risk of heart disease and stroke. Reducing salt intakes in populations. Report of a WHO Forum and Technical Meeting. 2006.

²⁴ Food-based dietary guidelines. EUFIC/FAO. May 2009.
<http://www.fao.org/ag/humannutrition/nutritioneducation/18894-1-0.pdf>

²⁵ Ibid.

²⁶ European commission. Strategy on European Community Health Indicators (ECHI) = the "Short List". Network of Competent Authorities on Health Information Luxembourg, 5-6 July 2004.
http://ec.europa.eu/health/ph_information/documents/ev20040705_rd09_en.pdf

country. There are no indicators on the prevalence or incidence of cardiovascular disease or overweight and obesity.

The indicators monitored by the Organisation for Economic Co-operation and Development (OECD) include indicators on cardiovascular mortality, indicators on overweight and obesity among children and adults²⁷. Nineteen out of the 27 countries of the European Community are members of the OECD. As in the case of the ECHI, the most recent available data for mortality are predominantly for the year 2006. Overweight and obesity data in children are available for the years 2005-2006, and in adults mostly for 2007.

The above serves to demonstrate that data are only available for the first few years of the implementation of the Platform and are unlikely to reflect an impact of the Platform's reformulation activities on health indicators. It will be interesting to continue monitoring these indicators and other indicators, including the prevalence and incidence of diseases, to observe any changes that may be the result of a number of public health measures, and not only the Platform's commitments on reformulation.

The evidence presented above suggests that monitoring the implementation of the Platform commitments to reduce salt, sugar and fat by companies or by independent third parties in a consistent way cross-industry and cross-products, and then compiling all this data into a databank is necessary in order to be able to evaluate government and/or industry programmes to improve food composition and to enable the development of regularly updated food composition tables. This, in turn, will allow public bodies to assess the dietary food intake of populations.

3.3.3 Should companies communicate on reformulation? If so, what form should this take?

Table 11: Communicating reformulation – key arguments

The pros of communicating reformulation efforts (as per the interviews)
<ul style="list-style-type: none"> • Industry argues that this way the consumer knows what they are eating, i.e. a light version or not • NGOs/experts argue that nutritional labelling is best (versus promotional labelling) as it provides the consumer with full product information
The cons of communicating reformulation efforts (as per the interviews)
<ul style="list-style-type: none"> • NGOs/experts argue that front-of-pack promotional labels do not necessarily tell the whole nutritional story of a product • NGOs/experts argue that promotional labelling can be misleading as a reduction in fat can hide a high level of sugar etc • Industry is not sure whether reporting on salt reduction is viewed positively by the consumer – salt reduction may be associated with less taste

²⁷ Health at a Glance 2009. OECD Indicators.

Governments and food companies increasingly promote nutrition labelling to help the consumer make healthy, informed food choices. The EU-funded project FLABEL²⁸ (Food Labelling to Advance Better Education for Life) will assess the state of play and develop best practice guidelines for future research and policies. The aim of the project is to answer the question whether nutrition information on food labels helps consumers make healthier choices²⁹.

Preliminary data provided by EUFIC show that the evolution of the prevalence of nutrition labelling has increased over the last years in four countries (UK, Germany, Poland and Spain) and compared to the European Advisory Services (EAS) recommendations for the introduction of mandatory nutrition labelling in the European Union, published in 2004³⁰. While the methods of data collection were not the same, the figures might still indicate a higher prevalence of nutrition labelling today (see Table 12).

Table 12: Nutrition table prevalence back-of-pack (FLABEL) compared to EAS 2004 data

	Biscuits	Breakfast cereals	Ready meals	Carbonated soft drinks	Yoghurts	Average
Germany	65%	93%	97%	86%	89%	86%
Poland	84%	72%	100%	67%	93%	83%
Spain	90%	98%	94%	88%	97%	93%
UK	98%	99%	99%	97%	90%	97%
Average	84%	90%	98%	84%	92%	90%
EAS	45%	96%	70%	58%	57%	

Source: EUFIC

Nutrition information was widely available in the five food product categories, giving key information to consumers on the nutritional value of these foods. On average 85% of the products audited contained nutrition information on the back of pack, ranging from 70% in Slovenia to more than 95% in Ireland, the UK and The Netherlands. Front-of-pack nutrition information was found on average on 48% of products, ranging from 24% in Turkey to as high as 82% in the UK.

Among the five categories of products audited, nutrition labels were most abundant on breakfast cereals: 94% of these products had back-of pack nutrition labelling and 70% showed front-of-pack nutrition information. Again, the back-of-pack tabular or linear listing of nutrition content was most common, stating either the Big 8 (78%) or the Big 4 (15%). GDA, which had a wider penetration on carbonated soft drinks, reached a maximum of 71% of breakfast cereal products in the UK. Nutrition claims peaked on breakfast cereals at 82% (back-of-pack) in France and at 76% (front-of-pack) in Portugal. Health logo penetration was highest at 47% of breakfast cereals in Sweden and at 27% of yoghurts in The Netherlands, both front-of-packs.³¹ However, a recent study in six European countries shows that only 17% of customers look at the nutritional information when shopping.³²

However, such labelling efforts can be differentiated from promotional front-of-pack labelling where the question is more: where the products have been subject to a reduction in some nutrients, how this

²⁸ www.FLABEL.org

²⁹ EUFIC. <http://www.eufic.org/article/en/page/FTARCHIVE/artid/Nutrition-labels-everywhere-Europe>

³⁰ European Advisory Services. The introduction of mandatory nutrition labelling in the European Union: An impact assessment. (Belgium DG SANCO, 2004).

³¹ EUFIC. <http://www.eufic.org/article/en/page/FTARCHIVE/artid/Nutrition-labels-everywhere-Europe/>

³² Grunert KG, Fernandez-Celemin L, Wills JM et al. Use and understanding of nutrition information on food labels in six European countries. *J Public Health* 2010; DOI 10.1007/s10389-009-0307-0. <http://www.eufic.org/upl/1/default/doc/GDApaperJPubHealth.pdf> (10th may 2010)

has been carried out? The problem raised by the expert/not-for-profit interviewees (see Section 2) was that of indicating a decrease of a given nutrient on the front of pack, while hiding high levels of another important nutrient (e.g. advertising less fat, but the product including high levels of sugar, or more sugar than prior to reformulation).

In France, in order to counter this potential problem, companies signed a charter³³ to reduce levels of salt, sugar or fat by a certain percentage in their mainstream products are not authorised to communicate on the decrease. They can only note that the company adheres to the charter. Mention of a reduced nutrient content can affect only those products where the drop is over 25%. It is also specified in the French charter that any decreases in nutrient content in mainstream products should not lead to excessive price increases. Moreover, the European Commission's Regulation on Nutrition and Health Claims on Foods requires that foods bearing nutrition and health claim meet certain nutritional requirements or so-called "nutrient profiles"; the European Food Safety Authority (EFSA) is in charge of giving scientific advice to members³⁴.

To conclude, there is a consensus on the need to present the composition of foods on the packaging of products and preliminary research shows that practices in this area have greatly improved and exceed the 2004 recommendations of the EAS. Moreover, national governments / the EU appear to be moving in the direction of regulating the front-of-pack promotional labelling of any reformulation efforts that do not meet certain criteria.

3.3.4 What are nutrients being replaced by: are these healthy alternatives?

Current recommendations for reducing salt, sugar or fat do not specify what other nutrients these nutrients may or may not be replaced by. The risk would be to replace these nutrients with more toxic compounds, but whose toxicity is not yet known.

The issue has already arisen in relation to sweeteners used in low-sugar products. There is a polemical debate on the Internet on the use of sweeteners, but according to current literature, the possible risk of artificial sweeteners inducing cancer seems to be negligible³⁵. For new generation sweeteners, it is too early to establish any epidemiological evidence about possible carcinogenic risks or other risks. As many artificial sweeteners are combined in today's products, the carcinogenic risk of a single substance is difficult to assess.

Regarding fats, particularly saturated fats or trans fatty acids, the logic seems to be try to replace them with polyunsaturated fats. However it is unclear whether this is actually the case. While a recent meta-analysis of prospective epidemiologic studies showed that there is no significant evidence for concluding that dietary saturated fat is associated with an increased risk of coronary heart disease (CHD) or coronary vascular disease (CVD), a letter to be published in response to this study in the American Journal for Clinical Nutrition found that there may be flaws in the methodology used to

³³ French Ministry of Health. Second National Nutrition and Health Programme – 2006-2010. Worksheet: acting on the food supply. September 2006.
http://www.sante.gouv.fr/htm/pointsur/nutrition/documents_english/pnns2.pdf

³⁴ EFSA. Nutrition and Health Claims. <http://www.efsa.europa.eu/en/faqs/faqnutrition.htm> (10th May 2010)

³⁵ [Weihrauch MR, Diehl V](#). Artificial sweeteners--do they bear a carcinogenic risk? [Ann Oncol](#). 2004 Oct;15(10):1460-5.

come to this conclusion³⁶. More data are therefore needed to elucidate whether CVD risks are likely to be influenced by the specific nutrients used to replace saturated fat³⁷.

Research is also examining the use of nanotechnology to reduce the salt content in foods, with the possibility of developing low sodium foods that still taste salty due to interactions with the tongue³⁸.

There is no consensus or sufficient data on the toxicity of given nutrients and the extent to which a given nutrient is being replaced by an equally unhealthy or potentially harmful substitute. The question of the possible substitution of certain nutrients subject to a reduction with a potentially more harmful nutrient in processed foods is an important one that warrants further investigation.

³⁶ Dr Peter Scarborough, Dr Mike Rayner, Ineke van Dis MSc, Prof Kaare Norum. Letter entitled 'Meta-analysis of effect of saturated fat intake on cardiovascular disease: over adjustment obscures true associations' (to be published in the American Journal of Clinical Nutrition).

³⁷ Siri-Tarino PW, Sun Q, Hu FB and Krauss RM. Meta-analysis of prospective cohort studies evaluating the association of saturated fat with cardiovascular disease. Am J Clin Nutr 2010;91:535-546,. First published January 13, 2010; doi:10.3945/ajcn.2009.27725

³⁸ EUFIC <http://www.eufic.org/article/en/food-technology/food-processing/artid/nanotechnology/>

4 KEY CONCLUSIONS

The main objective of this case study was to establish how well self-regulation in the area of food / drink reformulation is being implemented and what effect it is having.

4.1 Implementation and monitoring

A number of factors were mentioned by expert / not-for-profit interviewees as potential barriers to wider reformulation, ranging from clear evidence of the impact of nutrients on health (which exists e.g. for salt, but not for sugar), to countries' emphasis on certain nutrients over others, to cost, technological and technical barriers.

As the section above on the implementation of the three commitments under review suggests, there was a clear difference in the ease of implementation between the food manufacturers interviewed and the contract catering industry. The standardised offer of food manufacturers, combined with their 'top down' structure favoured implementation and compliance cross-company. The contract catering sector, on the other hand, is much more subject to divergence due to the lack of standardised food offer, number of individual canteens and cultural / sectoral sensitivities. All three companies used a stepwise approach, some focussing on the products with the highest level of a given nutrient, some on different product lines. The main impediments to the implementation of the commitments ranged from getting buy-in to on-site training.

Trade associations, while not playing a key role in the design of the commitments, were seen by industry as essential in their coordinating role to create greater industry buy-in and consensus. Having a level playing field was seen as particularly important within the area of product reformulation as if only one company reduces salt in a given product, the consumer risks moving to another product, thereby not only affecting a company's market share, but also harming the potential benefits of the reformulation effort.

Not-for-profit, expert and industry interviewees were generally of the opinion that industry and the public sector should work together in the implementation of the reformulation effort. While some interviewees favoured a stronger role for government than others, most interviewees opined that setting blanket/nutrient-wide standards was not feasible in such a diverse sector and that what was needed was for the public sector to provide guidance to industry, taking into account the diverse nature of the food/drink manufacturing and contract catering industry. Moreover, PPPs were generally seen as a good idea, with the public sector not only providing guidance on reformulation, but also encouraging research into reformulation and communication and education *vis a vis* consumers. The desk research exercise showed that there is a consensus on the need to define national standards for recommended levels of salt, sugar, trans-fats and saturated fats in consumer products, taking into account national eating patterns. However, there is no real consensus on whether these should be mandatory or simply recommended standards (i.e. guidance).

The monitoring of the commitments tends to be carried out internally by companies and not by independent third parties. The food/drink manufacturing industry did not experience any differences in the quality of the monitoring due to the centralised nature of the system. The contract catering industry, on the other hand, experienced differences due to regional and cultural sensitivities, but has a three pronged monitoring system in place to attempt to limit divergence. However, expert/not-for-profit interviewees were of the opinion that the systems were not as transparent as they could be in terms of the targets set and the measurability of the commitments.

While expert / not-for-profit interviewees saw a role for government and/or independent third parties in the monitoring of the commitments, a more general need was also identified for industrial product information to be made more widely and consistently available at national and EU level in order for this to be possible. Industry had mixed views on having independent third-party monitoring, such as in the form of an SRO: while one industry interviewee was not against the idea as it could increase industry's credibility, two others stated respectively that it was the role of companies to carry out the monitoring and that the consumer himself ensures compliance through his buying behaviour.

4.2 Impact

The descriptive analysis of all the self-regulation Platform commitments in the area of food/drink reformulation, allows for an establishment of the potential impact of the commitments in this area. Their geographical coverage, the number of actors, number of nutrients etc. allow for the preliminary conclusion that Platform commitments in this area have the potential to have a significant impact if well and widely implemented and monitored for compliance.

As Table 4 suggests, many of the weaknesses of the commitments according to expert / not-for profit interviewees lie in the difficulty in judging the actual impact of the commitments due to the lack of a clear baseline, targets and comparable data on sales, market share etc. Industry was asked, during and after the interviews, to provide further information on the impact of their commitments. While the additional information provided in the 'Impact factsheets' in Section 3.2.4 is diverse and incomplete in parts, this information, combined with the opinions of expert / not-for-profit interviewees on the impact of these commitments (see Section 3.2.1) help conclude that the commitments in this area are having an impact. In fact:

- The commitments have been undertaken by MNCs with a wide range of products / large market share in given product areas:
 - Unilever is a company that operates worldwide and has a wide range of products (22,204 in total) used for daily, regular consumption.
 - The FERCO commitment covers 92.5% of the contract catering market, even if this market only represents 30% of the total EU social catering market.
 - Mars is a company that operates worldwide, and even though the commitment under review focuses only on rice and sauce products (over 1,200 products in total in Europe), some of its reformulated products have up to 30% market share in Europe. Mars Food Europe has over 65% of the turn-over of the Global Mars Food business, so the lead of the reformulation activity has been in Europe, though other regions are following suit. Moreover, there is another Platform commitment that involves the reformulation of its snackfoods.
- The reformulation effort has affected both existing and new products/recipes in all three cases.
 - For Unilever, 44% of its product portfolio (9,670 products) fulfils its nutritional criteria, though this does not mean that all of these products have necessarily been reformulated.
 - For FERCO, in 2007, it was estimated (based on figures provided by larger contract catering companies) that 30% of the food offer was nutritionally analysed and reformulated if necessary. The annual increase is around 8-10% in order to reach 100% around 2015.
 - For five large contract catering companies operating in Europe, the purchase of reformulated products from their suppliers represents: Dairy products - 80%, Vegetables - 80%, Soups - 60%, Oils - 60%, Soda's/juices - 20%.
- The number of products/recipes that have been reformulated via these three commitments is:

- Maximum 9,670 products for Unilever as it is not clear what proportion of the 44% of products that meet the nutritional criteria have been reformulated
- 241 out of 283 recipes for rice and sauces (i.e. 85% of the total number of recipes) for Mars
- For FERCO, no figure was provided.
- Reductions in nutrients in given products have ranged between 5% and 80%, with most reductions (for which examples were provided) turning around the 25% to 50% mark (see Table 3 and the 'Impact factsheets' in Section 3.2.4).
- Figures for market share/sales weighted averages were only provided by Mars and they suggest the following:
 - Based on 2009 figures, the market share in Europe of Mars's sauce and rice products that have been reformulated ranged between 5% and 30% (UK focus).
 - Approximately 50% of Mars' rice products Europe are flavoured rice and have been involved in the reformulation effort. The other 50% is plain rice so does not contain salt.
 - Approximately 90% of all wet cooking sauces and concentrated sauces, have been looked at from a salt reformulation point of view.

That said, this impact is very difficult to quantify and compare across the board, and more of an effort needs to be made on the part of industry to make this data publically available, and by governments to gather and compare the data.

Some other areas were explored to help ascertain the impact of the commitments under review:

Labelling: Industry will change back of pack labels to reflect any changes to the content of its products further to reformulation. There were mixed opinions on whether industry should advertise its reformulation efforts on the front of packs. While industry and one not-for-profit member saw this as important both to continue to encourage industry to reformulate and inform the consumer so that he can make informed choices, an expert was of the opinion that what was put on the front of pack label did not necessarily tell the full nutritional story of that product. It was felt that more research needed to be done on whether the consumer should be told about reformulation efforts or not. The desk research showed that there is a consensus on the need to present the composition of foods on the packaging of products and preliminary research shows that practices in this area have greatly improved and exceed the 2004 recommendations of the EAS. Moreover, governments / the EU appear to be moving in the direction of regulating the front-of-pack promotional labelling where reformulation efforts that do not meet certain criteria.

Price: Reformulation efforts were said to impact on the price of products, both by reducing and increasing it, though companies also absorb some of the additional costs through their product innovation budgets.

Nutrients: Interviewees explained that the reformulation of products could result in one nutrient being replaced by another, though industry stated that they tried to use the stealth approach for salt, more natural substitutes where possible, such as herbs, or had proportion rules when replacing trans-fats by saturated-fats to ensure the products were healthier. According to the desk research, there is no consensus and insufficient data on the toxicity of given nutrients and the extent to which a given nutrient is being replaced by an equally unhealthy or potentially harmful substitute. The question of the possible substitution of certain nutrients subject to a reduction with a potentially more harmful nutrient in processed foods is an important one that warrants further investigation.

In terms of judging the impact of the commitments on health, it was widely opined that government, not industry, had to play the key role in this through modelling and surveys. This prevalent view is best illustrated by the statement of one interviewee: *"There is a need to be practical about it – at the end of the day, there are a lot of public health initiatives under way and we will never know if the fact*

that products have been reformulated has led to people's blood pressure going down, as such a reduction is likely to be the result of a combination of many factors. You need to think that if you reduce certain nutrients, that this will have a beneficial effect on health – you need to use prediction models to claim that impact and then do health monitoring." In line with this, the desk research showed that the impact of the commitments can be measured at three different levels:

- the impact on the nutrient contents of processed foods,
- the impact on dietary intakes in the population,
- the impact on the epidemiology of the diseases related to the nutrient concerned.

However, in order for governments to be able to perform such impact assessments, the monitoring of the implementation of the Platform commitments to reduce salt, sugar and fat in a consistent way, by industry or by independent third parties, is necessary. Having consistent, comparable cross-industry and cross-product data to hand on food composition will help government and/or industry evaluate programmes to improve food composition and enable the development of regularly updated food composition tables to allow public bodies to assess the dietary food intake of populations.

5 ANNEX 1: DESCRIPTION OF THE METHODOLOGY AND TASKS CARRIED OUT

5.1 Food / drink reformulation commitments

All of the commitments in the area of food/drink reformulation were considered as part of the case study, but a more in-depth review was undertaken of three which are considered to be most significant in terms of their potential reach and impact.

30 commitments were considered as part of this case study (based on the database provided by the Commission in January 2010 and additional information provided in April 2010), 26 of which can be classified as self-regulation commitments. These are listed in Table 1 in this report.

5.2 In-depth study of selected commitments

5.2.1 Commitments for the in-depth study

In addition to conducting a descriptive analysis of the relevant commitments (i.e. the 26 relevant commitments detailed in the table above), the in-depth interviews and research carried out focussed on three of the most significant commitments in terms of reach and impact in the area of food/drink reformulation to children.

The methodology outlined below was reviewed and approved by the Steering Group. In particular, the criteria used for the selection of these three commitments and the selection itself were reviewed by the Steering Group and amendments were made to the proposed methodology by the evaluation team in response to the comments received. The Steering Group also reviewed and approved the selection criteria used to select the Not-for-profit Platform members and experts that were interviewed.

The selection criteria:

The evaluators selected the commitments to focus on based on the following six criteria³⁹ which were chosen to ensure that commitments with the widest possible reach, in terms of number of actors and countries concerned, and therefore potential impact, were selected:

- Self-regulation commitment – a pre-condition of the case study as stipulated in the terms of reference
- Actors – a mix of multi- and single-actor commitments
- Sectors - actors that are representative of different sectors
- Geographical scope – the broadest range of countries
- Timeframe – longer running or ended⁴⁰
- A mix of multifaceted, e.g. salt, sugar and fat reduction, and single issue (e.g. salt) commitments for comparison purposes⁴¹

³⁹ The six criteria were given equal weighting.

⁴⁰ It is important to note that more progress in reformulation is likely to have been made where a commitment started earlier or has already ended, making impact easier to judge in these instances.

⁴¹ While in order to select commitments with the widest reach and impact, it would be best to focus on commitments which involve more than one actor and are multi-faceted (i.e. look at salt, fat, trans-fat and sugar reduction), interviewing a company whose commitment is broad in geographical reach and longer running, but focussed on a single issue will be good for comparison purposes. The evaluation team feels that the issue of whether or not to focus on a single issue rather than taking a more holistic approach is topical and worth exploring; the specific questions asked of the Platform member (Mars) in this respect are detailed in the industry interview guide below.

The commitments which were focussed on in particular:

Based on the criteria outlined above, it is proposed that the following commitments be focussed on in particular:

Actor	No. of actors	Commitment	Action no.	Timeframe	Geogr. scope	Commitment area to look at
European Federation of Contracting Catering Organizations (FERCO) ⁴²	Multiple	General Nutrition Recommendations	505	2006 to 2010	27 countries	Multi-faceted: Fat, sugar
Unilever ⁴³	One	Product reformulation and innovations	834	2006 to 2008	29 countries	Multi-faceted: Fat, sugar, salt
Mars Co ⁴⁴	One	Reduction of salt levels in rice and sauce products	1016	2007 to 2010	29 countries	Single: Salt

The specific reasons for choosing each of these commitments are provided in the related footnotes.

⁴² This is a multi-actor commitment which meets all of the criteria set out to ensure commitments with the widest scope and impact are assessed in more depth. This FERCO commitment is diverse, covering a number of different areas, but what is of interest for this case study is the following part of the commitment: 'Promoting the use of less fat, sugar, salt. Working with clients to promote the use of vegetable fat/oil, a daily offer of low-fat and fat reduced food, and to limit the offer of fried food.'

⁴³ This is a single actor commitment which meets all of the criteria set out to ensure commitments with the widest scope and impact are assessed in more depth. This commitment was selected in particular over other commitments that fit the criteria (e.g. Ferrero Group commitment 807, EMRA commitment 535 and PepsiCo commitment 619) because it represents an industry other than confectionary or catering / restoration (each already represented via the selection of the commitments made by Mars and FERCO), and is likely to have a wider impact as it produces a wide range of food products, i.e. not only one type of product, such as beverages, or snack food. This commitment was selected further to comments received by the Steering Group on the proposed case study methodology. UNESDA's commitment 583 was the commitment originally selected by the evaluation team in the inception note, but has been replaced to avoid, where possible, interviewing the same actors as for the advertising/marketing to children case study.

⁴⁴ While the evaluation team realise that it is not ideal to interview Mars for this case study, as well as for the advertising/marketing to children case study, it is the only company with a commitment which remains wide in scope (geographical coverage and time-length), while focussing on one single issue; no multi-actor commitments that are wide in geographical scope focus on one single issue (e.g. salt). The evaluation team feels that it is best to interview someone at Mars again (while trying to interview different people to those for the advertising/marketing case to children study), rather focussing on a commitment whose potential impact is limited to one country.

5.2.2 Interviews for the in-depth study

3 interviews with associations/industry linked to the selected commitments:

Based on the proposed commitments to focus on in particular for the in-depth study, the evaluation team spoke to:

- A FERCO representative and a company member of this trade association that is a signatory of the commitment;
- Two representatives at Unilever;
- Two representatives at Mars;

The aim of these interviews was to:

- Ascertain industry's views on self-regulation
- Delve into the background to a given commitment – scope, implementation etc.
- Ascertain the extent to which compliance is being monitored (and the appropriateness of the monitoring methodology)
- Assess the impact of the commitment
- Discuss some of the questions and criticism identified in the Working Papers on the subject and raised in previous Platform meetings

These three interviews were carried out and the findings are presented in Section 3.2 of this report. They followed a semi-structured format, so were adapted according to the background and expertise of the interviewee to form the basis of a discussion. As such, not all the questions listed in the interview guides were necessarily asked of each interviewee and additional questions may have been asked during the interview to further explore specific points or issues the interview partner may raise. The Steering Group's comments on the questions which they view as being the most important were taken on board by the evaluation team (see highlighted questions in Annex 3), who ensured that these questions were asked of interviewees where time was of the essence. The interview guides were not sent out to industry prior to the interview to encourage a free-flowing, rather than scripted conversation. The data on the questions concerning impact were collected by e-mail following the interviews.

3 interviews with not-for-profit Platform members /experts:

In light of the context of the evaluation and aim of the interviews, the evaluation team interviewed people based on the following selection criteria:

- 1 not-for-profit Platform member with knowledge of/a particular interest in the subject area of food/drink reformulation
- 2 experts in the area of food/drink reformulation with knowledge of the Platform

Please note: The evaluation team reviewed Working Papers, presentations, Platform plenary meeting minutes etc. where food/drink reformulation was discussed/presented to try to select relevant experts with knowledge of the Platform and not-for-profit members which had carried out work in the area. The rationale for the selection of each potential interviewee is explained in more detail in the footnotes.

A brief, anonymous description of the three people interviewed is provided below:

Interviewee type	Role	Relevant experience
Not-for-profit Platform member	Director General of a not-for-profit organisation	Involved in the Platform as a member. Has worked in the food industry since 1988. The organisation provides information on food safety and quality and health and nutrition to the general public, such as information on the nutrients included in food. It also carries out scientific studies on related issues such as food labelling.
Expert	Coordinator/Senior Project Manager at a Health Institute	Carried out independent research for the Platform and presented at two Platform meetings. Currently working with the food industry to reduce salt in foods, but also more recently looking at widening out the remit to fat, sugar etc. Previously worked in two MS on the subject area, including for one public body to develop a forward action strategy looking at fat and sugar, and in another MS looking at the relationship between government, stakeholders and the food industry.
Expert	Team Leader Bio Process Engineering/Food Technology for an independent research company	Involved in reviewing a working paper for the Platform, but not attended a meeting. Food technologist and nutritionist. The organisation is a research provider for industry which works on reformulation issues.

The aim of these interviews was to:

- Ascertain their views on self-regulation
- Delve into their view on the commitments adopted by industry in this area, in terms of the issues they address, their implementation etc.
- Gather their views on the impact of Platform commitments in this area
- Discuss some of the questions and criticism identified in the Working Papers on the subject and raised in previous Platform meetings

The interviews with not-for-profit Platform members and experts followed a semi-structured format, so were adapted according to the background and expertise of the interviewee to form the basis of a discussion. As such, not all the questions listed in the interview guides were necessarily asked of each interviewee and additional questions may have been asked during the interview to further explore specific points or issues the interview partner raised. The Steering Group's comments on the questions which they viewed as being the most important were taken on board by the evaluation team (see highlighted questions in Annex 2), who ensured that these questions were asked of interviewees where time was of the essence.

A brief description of each of the three commitments under review was sent to the not-for-profit Platform members/experts prior to the interview in order for them to familiarise themselves with the three selected commitments and be better prepared to answer questions on them. Four open questions were sent along with these descriptions in preparation for the interview. Additional questions, not sent to the interviewees prior to interview, were also asked during the interviews. The full interview guides were sent prior to interview in order to ensure a free-flowing discussion on the issue.

Please see Annexes 2, 3 and 4 for the interview guides and brief description of the commitments under review.

6 ANNEX 2: INTERVIEW GUIDE FOR NOT-FOR-PROFIT / EXPERTS

Date and location of interview	
Interviewee name(s), organisation and position	
Interviewer name	

N.B. The questions highlighted in grey are those which the Steering Group judged to be important for the interviewer to focus on in particular if under time pressure.

Introduction

1. Please briefly summarise your own position and role and that of your organisation, and outline the nature and extent of your involvement in/with the EU Platform
2. Please outline your experience in the area of food/drink reformulation.

Views on the commitments under review

Note: A brief description of the three commitments under review will be sent to the interviewees prior to interview with the **four** questions listed below so that they can form an opinion of these commitments in their own time, prior to interview. Links to further information on each commitment will also be included.

1. Do you have any general comments/views of the commitments we sent you a brief description of prior to this interview?
2. What do you perceive as the main strengths and weaknesses of each of these commitments?
3. To what extent do you think they have had/will have an impact on food/drink reformulation?
4. To what extent do you think they have had/will have an impact on people's eating habits?

Further questions relating to the scope of commitments in this area

Note: Not all of these questions need to be asked as the interviewee may already have covered the issue while expressing views on the commitments themselves

5. Why have some nutrients been subject to more reformulation than others?
6. What would encourage more public-health oriented action in product reformulation by companies?
 - a. Why are some companies acting and others not?
 - b. What are the main barriers to wider reformulation and how might they be overcome?
7. What would be the best way to ensure a global, nutrient-wide approach to product reformulation?
 - a. Are individual companies best placed to develop strategies or is there a need for a more generic approach such as that developed through trade associations?
 - b. Is setting blanket standards, such as maximum recommended levels of nutrients in given categories of food (such as has done the FSA in the UK), the way forward? Why? Why not?

- c. What would be the advantages and disadvantages of a legislative approach? At EU and/or national level?
- d. What role should governments/the EU play in product reformulation? Are Private Public Partnerships (PPPs) an option? What characterises an effective PPP in your view?

Further questions on the implementation and monitoring of commitments in this area

Note: Not all of these questions need to be asked as the interviewee may already have covered the issue while expressing views on the commitments themselves

- 8. What form should the monitoring of compliance take? What would you see as the benefits and drawbacks of having an independent body to monitor compliance, e.g. a Self-Regulatory Organisation (SRO)?

Note: At the moment compliance tends to be monitored internally or by external auditors.

- 9. If you are familiar with the monitoring of the commitments, to what extent is the methodology used for their monitoring pertinent and to what extent is the data in the monitoring reports presented transparently?
 - a. Are the monitoring tools being used to judge the impact of these commitments adequate to:
 - i. Monitor the composition of foods?
 - ii. Monitor the food consumption of the population?
 - iii. Monitor the health impact?

Further questions on measuring the impact of the commitments in this area

Note: Not all of these questions need to be asked as the interviewee may already have covered the issue while expressing views on the commitments themselves

- 10. What specific targets and indicators could be/have been defined to identify the impacts of food / drink reformulation?
- 11. What is the best way to monitor the public health impact of product reformulation?
 - a. Carrying out individual dietary survey? Why, why not?
 - b. Should this be done at national or European level? Why?
- 12. To what extent has a reduction in one nutrient in companies' food and/or drink products led to an increase in other nutrients (e.g. salt, sugar, fats, trans-fats) or additives (e.g. sweeteners, salt alternatives)? Do you have any data to substantiate this?
- 13. To what extent have companies changed their product labelling to reflect changes in the nutrient content of their products (e.g. front of pack promotion as a healthier product)? Have they done so for products where the change in nutrient content is lower than 30% (25% for salt)? Do you have any data to substantiate this?
- 14. To what extent is reformulation affecting the produce of local company affiliates? Do you have any data to substantiate this?
- 15. Has the reformulation of products had an impact on their price? If so, in what way? Do you have any data to substantiate this?
- 16. To your knowledge, have commitments in this area had a wider impact on EU or national regulatory initiatives?

Critical questions for discussion

- 17. Do you feel that introducing stricter standards, such as blanket standards on the need to reduce nutrient content or on the publicising of such reductions, is the way forward?
Possible prompts: Could there be a risk that by so doing, fewer companies would voluntarily sign up to a given code? By being more flexible and allowing room for manoeuvre, does self-regulation have a better chance of getting more industry buy-in?

18. It is often said that industry is not doing enough in this area, but is it really the role of business to promote healthy eating?

Possible prompt: It could be argued that business is there to make money, while governments and the not-for-profit sector are there to educate people on the dangers of obesity.

Concluding questions

19. Is there any documentation in particular that you think we should consult in relation to this case study?

20. Do you have any further comments/information that you would like to share with us on the subject?

7 ANNEX 3: INTERVIEW GUIDE FOR INDUSTRY

Date and location of interview	
Interviewee name(s), organisation and position	
Interviewer name	

This interview is being conducted in relation to the following Platform commitment:

Platform member	
Commitment name	
Brief description (focus area, geo spread etc)	

N.B. The questions highlighted in grey are those which the Steering Group judged to be important for the interviewer to focus on in particular if under time pressure.

Introduction

1. Please briefly summarise your own position and role and that of your company.
2. Please outline the nature and extent of your involvement in the above commitment.

The commitment(s) – the facts ⁴⁵

3. Have you used a stepwise, i.e. product by product, or a comprehensive approach to food / drink reformulation? Why?
4. What role did your trade association play in this commitment? How did its involvement change the way the commitment was implemented? How would things have differed had it not been involved and you had acted alone?
5. What costs have the implementation and the monitoring of this commitment incurred for your company (past, current and future costs)? Please specify costs for both.
6. Please outline what steps you take to encourage your members/company as a whole (including subsidiaries) to comply with this commitment.
 - a. Have any of your member companies/affiliates been more (or less) compliant? If yes, why do you think this the case? To your knowledge, could the existence of regulatory frameworks on advertising have played a role in such a difference?

⁴⁵ The FERCO commitment is diverse, covering a number of different areas, but what is of interest for the case study is the following part of the commitment: 'Promoting the use of less fat, sugar, salt. Working with clients to promote the use of vegetable fat/oil, a daily offer of low-fat and fat reduced food, and to limit the offer of fried food.'

7. What do you perceive as having been the main impediments to the implementation and monitoring (where applicable) of this commitment?
 - b. Have you noted any difference in the quality of the monitoring (where applicable), based on the type of member/subsidiary (e.g. size of the company/subsidiary, sector of the company/subsidiary...)?

The impact of the commitment(s)⁴⁶

8. What specific targets and indicators could be/have been defined to identify the impacts of the food /drink reformulation commitments? Why would you select these in particular?
9. How many of your/your members' total number of food / drink products sold in Europe have been reformulated in line with this commitments' terms? (N.B. ask for number of reformulated products and total number of products produced). What types of products have been reformulated (i.e. newly developed or existing products)? On average, by what percentage have the following nutrient levels decreased in your reformulated products sold in Europe?
 - c. Salt (including sodium calculated as salt equivalents)
 - d. Sugars (saccharose, glucose sirup etc)
 - e. Total fat
 - f. Saturated fat
 - g. Trans-fats

N.B. A smaller decrease, but concerning a significant proportion of the products, has more impact on the population.
10. What market share do these reformulated products sold in Europe represent in terms of the total market share for given product types and the market share in company sales for given product types? (N.B. ask for the 'sales weighted averages').
11. How many of your/your members' total number of food / drink products sold worldwide have been reformulated in line with this commitments' terms? (N.B. ask for number of reformulated products and total number of products produced). What types of products have been reformulated (i.e. newly developed or existing products)? On average, by what percentage have the following nutrient levels decreased in your reformulated products sold worldwide?
 - h. Salt (including sodium calculated as salt equivalents)
 - i. Sugars (saccharose, glucose sirup etc)
 - j. Total fat
 - k. Saturated fat
 - l. Trans-fats

N.B. A smaller decrease, but concerning a significant proportion of the products, has more impact on the population.
12. What market share do these reformulated products sold worldwide represent in terms of the total market share for given product types and the market share in company sales for given product types? (N.B. ask for the 'sales weighted averages').
13. What impact has reformulation had on consumer preferences? How has this been assessed? Can you provide some concrete examples?

⁴⁶ **Note on compliance/impact monitoring for the commitments under review:**

FERCO included process output indicators and some impact indicators for some of its members in its 2006, 2007 and 2008 monitoring reports for commitment 505.

Ferrero did not produce any impact indicators, aside from testing the level of sugar (monitoring report 2007) and salt reduction (to be included in monitoring report 2009) possible in order not to impact on taste for commitment 807. All of its products are free from hydrogenated fats.

Mars provided details of process output and impact indicators (levels of salt reduction over brands, comparisons in salt levels in products over time) in its 2006, 2007 and 2008 monitoring reports for commitment 1016.

14. To what extent has this reformulation affected the produce of your local subsidiaries in Europe and worldwide? Do you have any figures to substantiate this?
15. To what extent has a reduction in one nutrient in your food and/or drink products led to an increase in other nutrients (e.g. salt, sugar, fats, trans-fats) or additives (e.g. sweeteners, salt alternatives)? Do you have any figures to substantiate this?
16. To what extent have you changed your product labeling to reflect changes in the nutrient content of your products (e.g. front of pack promotion as a healthier product)? Have you done so for products where the change in nutrient content is lower than 30% (25% for salt)? Do you have any figures to substantiate this?
17. Has the reformulation of your products had an impact on their price? If so, in what way?

Critical questions for discussion

18. Why have some nutrients been subject to more reformulation than others?
19. What would encourage more public-health oriented action in product reformulation by companies?
 - a. Why are some companies acting and others not?
 - b. What are the main barriers to wider reformulation and how might they be overcome?
20. What would be the best way to ensure a global, nutrient-wide approach to product reformulation?
 - a. Are individual companies best placed to develop strategies or is there a need for a more generic approach such as that developed through trade associations?
 - b. Is setting blanket standards, such as maximum recommended levels of nutrients in given categories of food (such as has done the FSA in the UK⁴⁷), the way forward? Why? Why not?
 - c. What would you see as the benefits and drawbacks of having an independent body to monitor compliance, e.g. a Self-Regulatory Organisation (SRO)?

Note: At the moment compliance tends to be monitored internally or by external auditors.
 - d. What would be the advantages and disadvantages of a legislative approach? At EU and/or national level?
 - e. What role should governments/the EU play in product reformulation? Are Private Public Partnerships (PPPs) an option? What characterises an effective in PPP in your view?
21. Is focussing on the reduction of a single nutrient, like sugar, rather than multiple nutrients (i.e. salt, fat and trans-fats too) in a given product and then publicising this on the product packaging not a means of deceiving the consumer into believing that it is a healthy product?
22. What is the best way to monitor the public health impact of product reformulation?
 - a. Carrying out individual dietary surveys? Why, why not?
 - b. Should this be done at national or European level? Why?
23. Commitment-specific questions:
 - a. Unilever: How do you set the benchmarks/nutritional guidelines for what products are better for you? In your monitoring reports, you express your outcome impact indicators in terms of the number of tonnes of given nutrients having been removed from your products as a whole, but what exactly does this tell us? What market share do these reformulated products represent? Why do your nutrient reductions seem to be country- rather than product-specific, as per your monitoring report (e.g. 'Between 2006-2009 the average sodium content of Unilever Foodsolutions Knorr bouillons and

⁴⁷ Mars follows FSA guidelines on salt levels.

soups (dry, paste, jelly) in Germany has dropped by 12%' and 'All varieties of Knorr Cubitos (seasoning cubes) in Poland now contain 40% less salt)?

- b. FERCO member(s): To what extent do you pick a chose what elements of FERCO's nutritional guidelines you adhere to? Which parts of the guidelines does your company do you comply with most and why? Would it be easier if the emphasis was placed by your trade association on one or two of these elements in particular, rather than on so many at once?
- c. Mars: In this commitment, why did you decide to focus solely on salt? Why did you decide to focus on specific products, i.e. rice and sauce products? Have you made any efforts to reduce the levels of other nutrients (e.g. sugar, fats, trans-fats) in these products?

Concluding questions

- 24. Do you have any further comments/information that you would like to share with us on the subject?

8 ANNEX 4: BRIEF DESCRIPTION OF THE COMMITMENTS

The following brief description of the commitments under review was sent to the Not-for-profit Platform members / experts who were interviewed, prior to the interview:

Below you will find a brief description of the three commitments in the area of food/drink reformulation that this evaluation is focussing on in greater depth. Further information on each of these can be found via the links below each table. The commitments are:

1. FERCO's General Nutrition Recommendations
2. Unilever's Product Reformulation and Innovations commitment
3. Mars Corporation's Reduction of salt levels in rice and sauce products commitment

In preparation for our conversation, we would be grateful if you could familiarise yourself with these commitments. Some of the questions you may want to keep in mind are:

1. Do you have any general comments/views of the commitments we sent you a brief description of prior to this interview?
2. What do you perceive as the main strengths and weaknesses of each of these commitments?
3. To what extent do you think they have had/will have an impact on food/drink reformulation?
4. To what extent do you think they have had/will have an impact on people's eating habits?

1. FERCO's General Nutrition Recommendations

Please note: Within the context of this case study on food/drink reformulation, principle number 2 is the one which is to be considered in particular. Some of the outputs related to reformulation in particular are also highlighted below.

Commitment title	General Nutrition Recommendations
From - To	2006 – 2010
Actor names	European Federation of Contracting Catering Organizations (FERCO)'s members
Country	27 countries
Brief summary	<p>FERCO encourages its members and Contract Catering companies to adopt and implement general nutrition recommendations based on 8 principles:</p> <ol style="list-style-type: none"> 1. Serving varied food and increasing clients' awareness of the need to offer varied food to the end consumers as part of a well-balanced diet. Rotating menus and diversifying the food offer as often as possible. 2. <u>Promoting the use of less fat, sugar, salt. Working with clients to promote the use of vegetable fat/oil, a daily offer of low-fat and fat reduced food, and to limit the offer of fried food.</u> Limiting promotion and communication about sugar added products and beverages, and promoting products and beverages with no or less sugar added. 3. Encouraging smaller servings. Proposing to clients an offer of smaller helpings on a daily basis. 4. Promoting the daily consumption of vegetables and fruit. Proposing to clients to serve more fresh and diversified vegetables and fruit to the end consumer. 5. Encouraging the consumption of high fibre products. Proposing to clients to develop a daily offer of high fibre products. 6. Offering a well balanced, varied choice of protein and calcium source products. Developing a daily offer of a varied assortment of milk and dairy products and a reasonable offer of products such as meat and eggs. Increasing the offer of fish, if possible from sustainable sources. 7. Plenty of liquid: ensuring a fair availability of plain water and proposing to their clients a more diversified sources of liquids to the end consumer. 8. Time to enjoy food in an appropriate environment: working with clients to improve consumption conditions and to offer their advice about the setting of dining areas, time constraints, etc.
Objectives	The overall objective is to implement a general framework common to all FERCO members and Contract Catering companies. This framework was officially endorsed in December 2005 by the national associations member of FERCO and individually by the large contract catering companies operating in several member states.
Key outputs (as per the monitoring reports):	<p>Implementation of FERCO recommendations by national contract catering companies:</p> <ul style="list-style-type: none"> • 2006: Awareness raising among staff • 2007: Development of a Health Charter, a Nutrition Protocol for school menus, and training sessions • 2008: Specific emphasis on salt reduction and reformulation;

	<p>outputs include central management of healthy recipes; <u>reductions in calories and salt content by members Sodexo and Compass</u>; creation of "Health by Stealth" menus; new concept FOOD4U in secondary schools with a loyalty programme to make healthy food trendy; etc.</p> <ul style="list-style-type: none"> • 2009: All FERCO member companies now have a healthy eating programme (which means 92,5% of the contract catering market); further increase in number of units providing "Balanced Choices" programmes; reduction of saturated fats in cooking sauces; etc. <u>Elior achieved a significant reduction in the fat content (nearly 50%) of its recipes.</u>
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For further information on this particular commitment (action 505), please consult the European Platform's commitments' database at:

http://ec.europa.eu/health/ph_determinants/life_style/nutrition/platform/database/dsp_search.cfm?CFID=173385&CFTOKEN=994406708cd66da2-175F769F-E00C-CBA5-D052896C318A05FC&jsessionid=35102ea672c85aeb304bTR

Then type in action number 505 (bottom right) and click on 'View detail' under the actor name (left hand-side of table).

2. Unilever's Product Reformulation and Innovations commitment

Commitment title	Product Reformulation and Innovations
From - To	2006-2009
Actor name	Unilever
Country	29 countries
Brief summary	In 2005 and 2006 Unilever Food and Health Research Institute has reviewed over 16,000 products for their levels of trans-fat, saturated fat, sodium and sugars. As a result of these reformulation changes we have eliminated thousands of tons of these nutrients from our portfolio. Our stance is to continue these changes over the coming years hence for 2007 and 2008 we have made further commitments increasingly focussing on our innovation portfolio.
Objectives	Every product in our entire global food and beverage portfolio is being assessed under the NEP to ensure that it reflects our vitality mission and our commitments to make it easy for consumers to select healthier products. As part of the process we are reducing levels of saturated fats, trans fat, sugars and salt wherever possible.
Key outputs (as per the monitoring reports):	<ul style="list-style-type: none"> • 2007: Assessment of the nutritional composition of all products; a total of 22,204 products, of which 12,921 products are in Europe. • End 2007: In addition to the 2005/2006 achievements, removal of a further 2750 tonnes of saturated fat, 170 tonnes salt and 5000 tonnes sugar. • 2005 to 2008: Removed a total of 30,370 tonnes of transfat, 18,000 tonnes of saturated fat, 3,640 tonnes of sodium and 37,000 tonnes of sugar. • 2009: More than 50% of innovations are compliant with their 'better for you' benchmarks, 20% higher than their existing portfolio.

For further information on this particular commitment (action 834), please consult the European Platform's commitments' database at:

http://ec.europa.eu/health/ph_determinants/life_style/nutrition/platform/database/dsp_search.cfm?CFID=173385&CFTOKEN=994406708cd66da2-175F769F-E00C-CBA5-D052896C318A05FC&jsessionid=35102ea672c85aeb304bTR

Then type in action number **834** (bottom right) and click on 'View detail' under the actor name (left hand-side of table).

3. Mars Corporation's Reduction of salt levels in rice and sauce products commitment

Commitment title	Reduction of salt levels in rice and sauce products
From - To	2007 – 2010
Actor name	Mars Corporation
Country	29 countries
Brief summary	<p>The project aims at a reduction of the salt levels in the portfolio of rice, cooking sauces and soups without affecting the taste superiority of our products against competition. Different strategies are deployed to reach this objective.</p> <p>During the programme, the implementation of the salt reductions will cautiously be monitored for consumer acceptance and competitive edge. As salt is such an important contributor to the flavour profile of food products, and as consumers need to adapt gradually to lower salt, reductions need to happen in a coordinated way, throughout the segment.</p> <p>In terms of approach, different strategies are being followed, such as:</p> <ol style="list-style-type: none"> a gradual stepwise reduction in the levels of salt, without significant change in taste perception by the consumer, compensation of salt by increasing the levels of the other natural ingredients already in the product, optimisation of process conditions, to optimise the perception of the salt in the mouth and to minimise the "hidden salt"; the use of natural salt enhancers and replacers. <p>As to the latter, a word of caution is justified, because a simple replacement by the entire food industry of sodium chloride with potassium salts could potentially generate new issues. Therefore, replacers are considered as a last resort to achieve our goals.</p>
Objectives	<p>The overall objective for Mars is to reduce the salt levels of the products in accordance with the guidelines. Rather than using a linear reduction for all food categories, the FSA (Food Standards Agency) in the UK, in collaboration with the food industry, has proposed specific targets for 2010, per category.</p> <p>In the current project, these FSA targets are used as the reference point for all geographies, and become embedded in all efforts to reformulate existing products as well as new product development (NPD). It is clear that work has already started and that the focus is on the products with highest salt level in the portfolio.</p>
Key outputs (as per the monitoring reports):	<ul style="list-style-type: none"> • 2007: Research on salt levels in seven product categories, and work on new recipes for a certain number of these products (to be rolled-out in 2008) • 2008: Reductions in salt levels of between 20 and 35% across a range of products. No use of salt alternatives • 2009: Further reductions in salt levels (relative to 2008 levels) of between 10 and 20% across a range of products

For further information on this particular commitment (action 1016), please consult the European Platform's commitments' database at:

http://ec.europa.eu/health/ph_determinants/life_style/nutrition/platform/database/dsp_search.cfm?CFID=173385&CFTOKEN=994406708cd66da2-175F769F-E00C-CBA5-D052896C318A05FC&jsessionid=35102ea672c85aeb304bTR

Then type in action number 1016 (bottom right) and click on 'View detail' under the actor name (left hand-side of table).