



British Heart
Foundation

British Heart Foundation submission to the Department for Environment, Food and Rural Affairs' Food White Paper

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Integrating health into the Food White Paper

The British Heart Foundation (BHF) welcomes the opportunity to provide our view on the forthcoming Food White Paper. The links between the manufacturing, purchasing and consumption of our food and our health are well-evidenced and multifaceted. It's estimated that 64 per cent of adults and 30 per cent of children in the UK have a BMI defined as overweight or obese.¹ Excess consumption of foods high in fat, salt and sugar (HFSS) is associated with obesity, which in turn is associated with an increased risk of developing type-2 diabetes and heart and circulatory disease. Consequently, there are around 31,000 heart and circulatory deaths attributable to excess weight and obesity every year- equivalent to around 85 each day.² Moreover, a high intake of salt is linked to high blood pressure, which is associated with around half of heart attacks and strokes in the UK.³ The National Institute for Health and Care Excellence estimated in 2010 that a 1g reduction in salt intake leads to 6000 fewer heart and circulatory disease deaths per year and annual healthcare savings of £1.5bn in the UK.⁴ Action in these areas could make substantial gains towards the NHS Long Term Plan's aims of improving health outcomes, including up to 150,000 fewer heart attacks, strokes and dementia cases over the next 10 years⁵, and the Government's broader pledge to achieve 5 extra healthy years of life for everyone by 2035.

The National Food Strategy (NFS) clearly sets out that the way food is manufactured, advertised and sold is part of a complex 'junk food cycle' which is exacerbating dietary problems and leading to more people living with obesity.⁶ The strategy is clear that both losing weight and preventing obesity is considerably more complex than the old adage of "eat less, move more", and that we need to shift the narrative from one of individual responsibility, to taking a whole environment approach. There is no silver bullet to 'solve obesity'; rather, a sustained, targeted programme of multiple interventions is required, which was rightly recognised in the recent Government obesity strategy and has been built on by the Obesity Health Alliance's recently published ten-year Healthy Weight Strategy, *Turning the Tide*.⁷ We need a food system that makes healthier choices the default, and this will require bold action from Government,

¹ British Heart Foundation analysis of UK health surveys (NHS Digital/Scottish Government/Welsh Government/DH Northern Ireland/NISRA).

² British Heart Foundation analysis of UK estimates from Global Health Data Exchange, 2019, Global Burden of Disease (GBD) Results Tool, <http://ghdx.healthdata.org/gbd-results-tool>

³ Wu CY, et al. High Blood Pressure and All-Cause and Cardiovascular Disease Mortalities in Community-Dwelling Older Adults. *Medicine (Baltimore)*. 2015;94(47):e2160. doi:10.1097/MD.0000000000002160, available from: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5059018/>

⁴ National Institute of Health and Care Excellence, *Cardiovascular disease prevention*, 2010, available from: <https://www.nice.org.uk/guidance/ph25>

⁵ NHS Long Term Plan, <https://www.longtermplan.nhs.uk/wp-content/uploads/2019/08/nhs-long-term-plan-version-1.2.pdf>

⁶ National Food Strategy, 2021, <https://www.nationalfoodstrategy.org/>

⁷ Obesity Health Alliance, *Turning the Tide: A 10-year Healthy Weight Strategy*, 2021, <http://obesityhealthalliance.org.uk/turningthetide/>

Beat heartbreak forever.

manufacturers, and retailers. A Food White Paper that did not give significant focus to improving health would be missing a key part of the picture and a vital opportunity to build on Government's recent progress and commitments in this area.

The BHF's calls for the Food White Paper

1) A fiscal measure to encourage reformulation of products high in fat, sugar and salt

Sugar and salt consumption in the UK is consistently above the recommended levels, which has long-term health implications, as outlined above. The most recent figures show that average daily salt intake in UK adults is 8.4g,⁸ 40% above the guideline level of 6g per day, set by the Scientific Advisory Committee on Nutrition (SACN) in 2003.⁹ And although adults should consume no more than 30g of sugar a day, on average we eat 50g per day, while teenagers aged 11–18yrs eat an average of 55g of sugar per day- almost double what is recommended.¹⁰

While voluntary Government salt reduction programmes have had significant benefit since the early 2000s, progress has recently stalled. Only half (52%) of all the average in-home salt reduction targets set in 2014 were met by 2017.¹¹ Similarly, the UK's voluntary sugar reduction programme has had limited success. An Autumn 2020 progress report showed that, despite a sugar reduction target of 20% by 2020, a reduction of only 3% was achieved three years into the programme, while sales of sugary products such as chocolate confectionery have increased.¹² Contrastingly, the mandatory Soft Drinks Industry Levy has led to a 35% reduction in sugar sales from soft drinks between 2015 and 2019, despite increased sales of soft drinks.¹³ Analysis has shown that the SDIL could lead to 36,000 fewer cases of obesity in children and teenagers in England.¹⁴

A mandatory approach to reformulation can meaningfully drive progress and deliver health benefits. The National Food Strategy proposes the introduction of a tax of £3/kg on sugar and £6/kg on salt at wholesale level, to incentivise manufacturers to reduce the salt and sugar content of their products. Modelling of this policy showed significant potential benefits, saving up to 97,000 years of healthy life lost in the UK each year, and raising £2.9bn-£3.4bn per year for the Treasury.¹⁵ The strategy proposes that the revenue should be spent on initiatives to increase the affordability of a healthy, balanced diet for families on low incomes, including expanding eligibility for free school meals and Healthy Start vouchers, and providing greater access to fruit and vegetables. Combined with the reformulation which a levy such as this could drive, these measures will help make it easier for everyone to access healthier food.

⁸ Public Health England, *National Diet and Nutrition Survey*, 2020. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/876624/Report_England_Sodium_Survey_2018-to-2019.pdf

⁹ Public Health England, *Reducing Salt to tackle preventable diseases*, 2018. <https://ukhsa.blog.gov.uk/2018/12/19/reducing-salt-to-tackle-preventable-diseases/>

¹⁰ Public Health England, *National Diet and Nutrition Survey: results from years 9 to 11 (2016 to 2017 and 2018 to 2019)*, 2020. <https://www.gov.uk/government/statistics/ndns-results-from-years-9-to-11-2016-to-2017-and-2018-to-2019>

¹¹ Public Health England, *Salt reduction targets 2017: Progress Report*, 2018. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765571/Salt_targets_2017_progress_report.pdf

¹² N. Coyle et al. for Public Health England, *Sugar Reduction Report on Progress 2015 to 2019*, 2020. Available from <https://www.gov.uk/government/publications/sugar-reduction-report-on-progress-between-2015-and-2019>

¹³ *ibid*

¹⁴ National Food Strategy, 2021, <https://www.nationalfoodstrategy.org/>, page 194

¹⁵ National Food Strategy, 2021, <https://www.nationalfoodstrategy.org/>, page 146

2) Mandatory front-of-pack nutrition labelling

The Food White Paper should recognise the need for mandatory front-of pack nutrition labelling. There is good evidence to show that this can improve knowledge and encourage consumers to make healthier purchases at the point-of-sale,¹⁶ contributing to an empowering and healthy environment. However, we know that currently it is not always possible for consumers seeking to use front-of-pack nutrition labelling to do so. A significant proportion of products still do not use the full traffic-light system, whilst a third of products in the UK in-home sector have no front-of-pack nutrition labelling.¹⁷ This could potentially lead to confusion for consumers when trying to compare the nutritional content of different products.

Lack of consistency in labelling is also a problem, and there are high levels of public support for greater consistency in front-of-pack nutrition labelling across the in-home and out-of-home sectors. Polling conducted by Censuswide in September 2020 on behalf of the BHF found that only 12% of those surveyed would not find it helpful if more products displayed the same front-of-pack nutrition label.¹⁸ Consumer research conducted by Which? in December 2018 also established broad consensus on the need for more consistent front-of-pack nutrition labelling- 4 in 5 (80%) participants agreed traffic light labelling should look the same on all food products¹⁹

Equally strong public support exists for making front-of-pack nutrition labelling mandatory. Three quarters of those polled (76%) by ComRes for Diabetes UK in October 2019 agreed that the UK government should require by law that the food and drink industry include traffic light labelling on all food and drink packaging.²⁰

A consistent, mandatory scheme would mean that wherever people shopped they would see the same front-of-pack labelling, making it easier to choose healthier options.²¹

Front-of-pack nutrition labelling has also been shown to drive manufacturers to reformulate products, reducing levels of sugar, salt and fat, as demonstrated in a meta-analysis of 11 countries with front-of-pack nutrition labelling.²² This could therefore complement a levy in encouraging food manufacturers to innovate and improve the availability and accessibility of healthier options.

¹⁶ Crocker et al, Front of pack nutritional labelling schemes, 2020, <https://onlinelibrary.wiley.com/doi/full/10.1111/jhn.12758>

¹⁷ Consumer research from the Institute of Grocery Distribution, 'Shopper insights- Front of Pack Nutrition Labelling', 2020

¹⁸ Censuswide polling on behalf of the British Heart Foundation, 1911 respondents to this question, from a nationally representative sample

¹⁹ Which?, Front of pack nutrition labelling The UK experience: Lessons, opportunities and barriers, 2019, available from: <http://s3-eu-west-1.amazonaws.com/wof-files/FOPL.pdf>, a sample of 2385 over 18s in the UK were interviewed online between 10th – 11th December 2018. The data has been weighted to be representative.

²⁰ Savanta ComRes polling on behalf of Diabetes UK, interviewed 2,093 UK adults online between the 18th and 20th October 2019. Data were weighted to be representative of all UK adults aged 18+.

²¹ Food Standards Agency, *Guide to creating a front of pack (FoP) nutrition label for pre-packed products sold through retail outlets*, 2016, https://www.food.gov.uk/sites/default/files/media/document/fop-guidance_0.pdf

²² Shangquan et al. *A Meta-Analysis of Food Labeling Effects on Consumer Diet Behaviors and Industry Practices - ScienceDirect*, American Journal of Preventative Medicine, 2019

3) Mandatory reporting of data

The BHF supports the recommendation made in the National Food Strategy to place a legal duty on food businesses with over 250 employees to publish data on sales of HFSS foods (reported as a percentage of total food and drink sales).²³ Data on HFSS food sales can be used to accurately understand how less healthy food is being sold in store and out of home and to enable any changes to be tracked over time, so that the impact of legislative measures on sales of HFFS can be effectively evaluated, and adaptations to policies made if required. Moreover, such reporting is aimed at incentivising businesses to instigate positive change themselves, with transparency engendering encouragement from the public and investors to make bold change.

As with reformulation and front-of-pack labelling, it is key that data reporting is mandatory. A voluntary scheme could result in not all companies participating, and inconsistent methodology amongst those that did, leading to difficulties in making comparisons or understanding the full picture. This information should be harmonised, with a common set of definitions, and made publicly available for maximum transparency and accountability.

4) A comprehensive and sustained approach to reducing obesity levels

There is no quick fix to reducing obesity prevalence and improving dietary health, but by combining a series of measures which each make an incremental difference, the Government has a real opportunity to drive significant change. This has been clearly highlighted in the recent report by the Obesity Health Alliance (OHA), *Turning the Tide: A 10-year Healthy Weight Strategy*.²⁴ The BHF is proud to have contributed to the strategy and endorses the calls within it (on top of those outlined in more detail above). These include the need to update food and buying standards, and to legislate against promotional techniques for targeting unhealthy food at children, such as the use of cartoon characters on packaging. By committing to a range of measures such as these, the Food White Paper can be a landmark moment in improving public health.

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²³ National Food Strategy, 2021, <https://www.nationalfoodstrategy.org/>, Chapter 16, Recommendation 2

²⁴ Obesity Health Alliance, *Turning the Tide: A 10-year Healthy Weight Strategy*, 2021, <http://obesityhealthalliance.org.uk/turningthetide/>