

Action on Sugar & Action on Salt 2023 Budget Representation

Action on Sugar

Action on Sugar is a group of experts concerned with sugar and obesity and its effects on health. It is working to reach a consensus with the food industry and Government over the harmful effects of a high calorie diet, and bring about a reduction in the amount of sugar in processed foods to prevent obesity, type 2 diabetes and tooth decay.

Action on Salt

Action on Salt is a group of experts working to reduce the salt intake of the UK population to prevent deaths, and suffering, from heart disease, stroke, kidney disease, osteoporosis and stomach cancer. Action on Salt is supported by 22 expert members.

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Background

Suboptimal diets are the major risk factor for death and disability in the UK (1), characterised as high in salt, sugar and excess calories:

- High salt intake raises blood pressure, which in turn increases the risk of developing cardiovascular disease. High salt intake is also linked to kidney disease, osteoporosis and stomach cancer (2)
- High sugar intake is associated with type 2 diabetes and is the leading cause of dental caries (3)
- Excess calorie intake is associated with obesity, which affects 12 million people in the UK (4). Living with obesity increases the risk of developing type 2 diabetes, cardiovascular disease, non- alcohol related fatty liver disease and thirteen types of cancer. Treatment costs to the NHS are at least £6.1bn per year, with an estimated cost to the wider economy of £27bn (5).

In the UK, two thirds of calories consumed by families come from highly processed packaged foods, which are more likely to be high in fat, salt and/or sugar (HFSS) and low in fibre, fruit and vegetables. The diets of UK children are particularly worrying where 47% of primary school children's calories come from HFSS foods, 85% of secondary school children are not eating enough fruit and vegetables, more than 90% are not eating enough fibre and all are eating too much salt and sugar. Those on lower incomes are more likely to eat excess salt, sugar and calories due to the lack of availability, affordability and accessibility of healthy, nourishing food, which exacerbates prevalent health inequalities across the UK.

Reformulation to improve the nutritional profile of food and drink products in both retail and the out of home sectors - by reducing levels of excess salt, sugar and saturated fat, while ideally increasing healthier elements such as fibre and whole grains - is a key public health intervention to improve population diet and prevent ill health. Companies are constantly reformulating their products for a number of reasons, including adapting to consumer tastes and supply chain challenges, removing allergens, and launching new products. With guidance and leadership from the government, this ongoing process can benefit health, with gradual and sustained decreases in excess salt, sugar and calories.

However, the current voluntary reformulation programmes have seen mixed to poor progress, largely due to a lack of accountability. The sugar reduction programme resulted in a reduction of only 3.5% in sales weighted sugar per 100g between 2016 and 2020, against a target 20% reduction

(6). Similarly, the salt reduction programme saw initial, world-leading success when implemented in the early 2000's, with falls in population salt intake, average population blood pressure and mortality from CVD by 2011 (7). Despite this, progress has now stalled, leaving population salt intake 40% above the recommended 6g a day. Notably, products targeted to infants and toddlers are not currently subject to reformulation programmes, despite our research highlighting high sugar content in particular.

The Government should commit to comprehensive reformulation programmes, across sugar, salt and excess calories and introduce incentives to ensure progress. In the short term, there is potential for significant further health gains to be made through the reformulation of food and drink products with the use of fiscal measures, which would provide an effective incentive to the food industry.

Our Recommendations

Soft Drinks Industry Levy

The mandated Soft Drinks Industry Levy (SDIL) has been highly effective in reducing sugar levels in sugar-sweetened soft drinks, achieving a total reduction in the sales-weighted average sugar content of 46% between 2015 and 2020 (6). During this time, sales of soft drinks increased by 21.3% but total sugar sales from soft drinks fell by 34.3% – a win for health and industry.

We strongly recommend that the levy thresholds be adjusted, with a lower threshold of 4.5g/100ml to align with the NPM. This would bring the SDIL in line with the current nutrient profile model (NPM), as currently a drink with 4.5g of sugar per 100ml would be classed as 'less healthy' by the NPM, yet not be subject to the SDIL. Aligning the SDIL with the NPM would increase policy coherence and incentivise drinks manufacturers to further reduce sugar from their products, or raise additional revenue. This level is likely to be easily achievable by manufacturers, as median sugar content is estimated at 4.2g/100ml in sugar-sweetened soft drinks (8). While positive for health, this reduction would not lead to a large, sustained revenue. Therefore, to benefit both health and revenue, we also propose a new 'polluter pays' upper level of threshold of 10g/100ml to address the market-leaders (primarily Coca Cola and Pepsi) who have stated that they will never reformulate their highly popular classic cola drinks. This new threshold would ensure those manufacturers who refuse to reduce sugar levels do not have an unfair advantage in the continued sale of excessively sugary drinks while other companies choose to commit to sugar reduction measures.

Current SDIL Thresholds	Suggested Thresholds
<5g/100ml: no levy	<4.5g/100ml: no levy
5-8g/100ml: Lower tier	4.5-7g/100ml: Lower tier
>8g/100ml: Upper tier	7-10g/100ml: Middle tier
	>10g/100ml: Upper tier

The levy itself should be increased, as a minimum, in line with inflation. The levy rate was first set in 2018, and has not risen in line with inflation as other rates have. All SDIL revenue should continue to be allocated to measures that contribute to the Government's target of halving child obesity by 2030.

SDIL Extension

- Alcoholic Drinks

Excessive alcohol consumption has a damaging impact on health. In addition to this harm, alcohol contains seven calories per gram, and many alcoholic drinks contain added sugar which further contributes to calorie intake. Many alcoholic drinks, such as fortified wines, sherries, liqueurs and

cider contain added sugar, plus many spirits are mixed with sugary soft drinks. There has been a notable rise in the number of premixed, often fruit flavoured and spirit based alcoholic soft drinks and pre-mixed cocktails on the UK market. Our research shows these pre-mixed spirits and cocktails can contain up to 9 teaspoons of sugar in just 250ml (9). However, while a sugar-sweetened lemonade is subject to the SDIL, a pre-mixed can of lemonade and vodka is exempt. Furthermore, most alcoholic drinks do not display nutrition information, leaving consumers in the dark when it comes to sugar and calorie levels in these drinks. All alcoholic beverages should be subject to the same sugar reduction criterion as other sugary drinks, as set out by the SDIL.

- **Milk-based Drinks**

The threat of extending SDIL to milk-based drinks (which are currently only subject to the voluntary sugar reduction programme) has resulted in a 29.7% reduction in sugar levels in retailer and manufacturer products - outperforming other categories and hitting the 20% target, but still lower than reduction achieved through the levy itself. However, sugar levels in milk-based drinks sold in the out of home sector have only been reduced by 12.7%, which is based on much more limited data than retailer/manufacturer products. We strongly recommend that the Government extend the SDIL to include milk-based drinks to ensure a level playing field between the retail and out of home sectors, and consistent sugar reduction in all milk-based drinks.

Other Fiscal Measures

Given the success of the SDIL in incentivising reformulation of unhealthy drinks while not impacting sales, we recommend that Government explores other fiscal measures that could have a similar impact on health.

- **Reformulation Levy**

Given overall poor progress with the voluntary reformulation programmes, the government should consider the introduction of levies and fines for companies who do not meet established salt, sugar and calorie reduction targets, and for infant/toddler products if they have more sugar/salt/calories than the World Health Organization's guidance (10). The devastating impact of excess salt on health in particular is clear - impacting blood pressure, overall cardiovascular health, kidney health and even bone health - and yet we still eat 40% more than the recommended maximum of 6g per day in the UK, which has not fallen for 10 years. Thousands of people in the UK die needlessly each year due to high salt intake; this is not a burden we need bear.

The National Food Strategy proposed a Sugar and Salt Reformulation Tax - a £3/kg tax on sugar and a £6/kg tax on salt sold for use in processed foods or in restaurants and catering businesses - which would create an incentive for manufacturers to reduce the levels of sugar and salt in their products, by reformulating their recipes or reducing their portion sizes (11). This concept should be explored and tested for feasibility.

- **Energy Density Levy**

We recommend the introduction of an energy density levy on all calorie dense processed foods that meet an agreed criteria set by the government. This would encourage product reformulation to reduce both fat, in particular saturated fat as recommended in the Scientific Advisory Committee on Nutrition's guidance, as well as sugar in unhealthy products. Fat is a bigger contributor to calories in unhealthy products than sugar and therefore essential that manufacturers are encouraged to reduce both to help prevent and reduce obesity in the UK. The levy would ensure companies are held to account if they make processed unhealthy food with excessive calories as part of a comprehensive set of measures to encourage them to develop healthier, lower calorie products.

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