

Action on Sugar and Action on Salt Response to Defra's proposed changes to public sector food and catering policy

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 and fat in processed foods to prevent obesity, type 2 diabetes and tooth decay.

Action on Salt is an organisation supported by 22 expert members and 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.

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Scope of the Standards

We support mandatory standards for food across the whole public sector. Public procurement is the government's most direct tool to shape the food system¹. Minimum required standards create a level playing field, improve the availability of compliant produce², create economies of scale and drive innovation.

Compliance with the current Government Buying Standards is very low³, and it must be clear at the outset that the standards are mandatory.

We support the proposed scope extension of the standards to include all "*food service environments (e.g. cafes or restaurants) on public sector premises*". The inclusion of schools and care services is an important step in ensuring food of a better nutritional standard is served to children and vulnerable adults in these settings.

Recommendation: As indicated in our questionnaire response the Standards should also be made mandatory (not voluntary) for "*food retail (e.g. convenience shops)*". It is important to create a level playing field with food service and retail outlets held to the same standard. We also note that there are no explicit references to products sold in vending machines being covered by the revised standards, and would welcome their explicit inclusion.

Recommendation: To make it explicitly clear that the standards are mandatory, change the wording: 'We strongly recommend that, wherever possible, the relevant standards and data requirements are

¹ National Food Strategy. 2021. https://www.nationalfoodstrategy.org/wp-content/uploads/2021/10/25585_1669_NFS_The_Plan_July21_S12_New-1.pdf

² Sustain. 2020. Submission to the Environment, Food and Rural Affairs Committee: Public Sector Procurement of Food

³ Sustain. 2020. Submission to the Environment, Food and Rural Affairs Committee: Public Sector Procurement of Food

included in contract specifications.’ to ‘The relevant standards and data requirements *must* be included in contract specifications’.

Reporting and Enforcement

We support the proposal to require caterers to report on sales and proportion of food that is local or sustainably produced. The list of reporting categories is comprehensive yet achievable. However, within the existing Mandatory and Best Practice Nutrition Standards, no reporting requirements are specified⁴, therefore we make the following recommendation:

Recommendation: Mandatory reporting requirements should also apply to both the Mandatory and Best Practice Nutrition Standards.

Meals reflecting the Eatwell Guide

Caterers should be required to provide meals that reflect the Eatwell Guide, to support a healthy diet. If our diets mirrored the Eatwell Guide, this would also significantly reduce their environment and climate impact, offering a more sustainable balance of carbohydrates, fruit and vegetables, and protein.

Importantly, this would include cutting down on the provision of foods that are high in fat, salt and/or sugar, which we should be eating less often and only in small amounts⁵. Eating too much salt leads to high blood pressure, which is associated with increased risk of cardiovascular disease⁶. Excess sugar consumption causes tooth decay and is associated with increased risk of obesity, type 2 diabetes, high blood pressure, high bad cholesterol, cardiovascular disease and gout⁷. Moreover, sugar production, of both cane and beet, has a detrimental impact on our environment. Sugar beet production, the UK’s domestic source of sugar, is causing irreversible damage to the soils in which it is grown^{8,9}. It is estimated that British Sugar, the UK’s sole processor of domestic sugar beet, is responsible for the removal of 600,000 tonnes of topsoil every year¹⁰. The annual soil erosion rate in the UK is at least 2.9

⁴ Department for Environment, Food and Rural Affairs. 2021. Guidance: Government Buying Standard for food and catering services <https://www.gov.uk/government/publications/sustainable-procurement-the-gbs-for-food-and-catering-services/government-buying-standard-for-food-and-catering-services>

⁵ Public Health England. Eatwell Guide. 2018. <https://www.gov.uk/government/publications/the-eatwell-guide>

⁶ Ma Y, He FJ, Sun Q, et al. 24-Hour urinary sodium and potassium excretion and cardiovascular risk. *N Engl J Med* 2022;386:252-63. doi:10.1056/NEJMoa2109794 pmid:34767706

⁷ European Food Standards Agency. Tolerable upper intake level for dietary sugars. 2021. <https://www.efsa.europa.eu/sites/default/files/2021-07/sugars-factsheet-en.pdf>

⁸ Ruyschaert, G., Poesen, J., Verstraeten, G. and Govers, G. (2005). Interannual variation of soil losses due to sugar beet harvesting in West Europe. *Agriculture, ecosystems & environment*, 107(4), 317-329

⁹ Parlak, M. (2019) ‘Kök ve yumru bitkilerin hasadıyla oluşan toprak erozyonunda kaybolan besin maddelerinin sera gazı ayak izi değerler (Greenhouse gas footprint of replacing nutrients lost through soil erosion due

¹⁰ Feedback (2019) Too much of a bad thing; the misuse of land and soils to grow sugar.

<https://feedbackglobal.org/wp-content/uploads/2019/11/Too-much-of-a-bad-thing-the-use-and-misuse-of-land-and-soils-to-grow-sugar-Feedback-2019.pdf>

million tonnes before accounting for soil loss during harvest, which means that sugar beet harvesting is adding at least another 7% to the UK's annual topsoil loss¹¹.

The proposed standards do not go far enough to require caterers to reflect the Eatwell Guide. The text (p.22) says: *'Food and drink choices on the menu must provide healthier options to encourage and support people to achieve a healthy balanced diet that is in line with the 'Eatwell Guide'*.

Recommendation: This language should be clearer and stronger, for example *'All meals must reflect the 'Eatwell Guide' to ensure a balanced, healthy and sustainable diet'*

We support the existing mandatory standard to ensure that meal deals do not include products that are high in fat, sugar or salt (HFSS), including sugar sweetened beverages. However, the standards should go further:

Recommendation: No products high in (saturated) fat, salt or sugar, according to the Government's Nutrient Profile Model, be served or sold in these settings.

Recommendation: 100% of fruit juice, vegetable juice and smoothie products should be available in 150ml bottles. This will align with the Eatwell Guide and will help encourage industry to review pack size.

Training and Support from Registered Nutritionists or Dieticians

To support the implementation of meals reflecting the Eatwell Guide, caterers should have access to evidence-based courses on how to develop and prepare meals that reflect the Eatwell Guide.

Recommendation: Defra to provide guidance to caterers on how to develop and prepare meals that reflect the Eatwell Guide. This could be done by commissioning an organisation to develop tailored guidance or a training package, or using Association for Nutrition certified courses¹².

Some companies are doing well in offering healthy and sustainable options, often larger companies who are able to afford a team of Registered Nutritionists or Dietitians¹³. Smaller and medium sized companies, on the other hand, often do not have the resources available to employ Registered

¹¹ Feedback (2019) Too much of a bad thing; the misuse of land and soils to grow sugar.

<https://feedbackglobal.org/wp-content/uploads/2019/11/Too-much-of-a-bad-thing-the-use-and-misuse-of-land-and-soils-to-grow-sugar-Feedback-2019.pdf>

¹² Association for Nutrition. AfN Certified Courses. <https://www.associationfornutrition.org/careers-nutrition/wider-workforce/wider-workforce-certification/afn-certified-courses>

¹³ Department for Environment, Food and Rural Affairs Council of Food Policy Advisors, 2009

https://webarchive.nationalarchives.gov.uk/20130403095409/http://archive.defra.gov.uk/foodfarm/food/policy/council/pdf/cf_pa-090512-note.pdf

Dietitians or Registered Nutritionists, and are therefore at a disadvantage in understanding and implementing the Standards, and winning public sector contracts¹⁴.

Recommendation: Defra to provide access to Registered Nutritionists and Registered Dietitians to advise on training, buying, writing tenders, speaking to suppliers and strategic decision-making to support small and medium sized companies to understand and deliver on the requirements in the Standards related to the Eatwell Guide and nutrition.

Gap in provisions for ‘early years’ catering

As you are no doubt aware, infants (aged 0-12 months) and young children (aged 1-<5 years) can receive publicly procured foods whilst attending hospital, through maintained early years settings, whilst staying with their mothers in women’s prisons and young offender institutions, and through asylum centres, immigration and detention centres and hotels. In our opinion, each of these settings has a duty to ensure that the food and drink provided meets the child’s dietary preferences and nutritional requirements for optimal health and development, as per government recommendations^{15,16}.

However, whilst the public sector food and catering policy recommend use of the School Food Standards for children, and voluntary food standards for early years settings are available for use, we are concerned that there is a lack of standards to guide food and drink procurement for infants and young children in other settings.

Infants and young children are going through a period of rapid growth and require a nutrient-dense diet to protect them from malnutrition and to promote the development of healthy dietary patterns that will impact on their nutritional status and health into later life. A lack of food standards covering these age groups leaves children vulnerable to inadequate food provision, which may compromise their health and development in the short and long term. We feel this is unacceptable in the current context in which more than 1 in 4 children in England are already living with overweight or obesity by their first year at school (and among those in the most deprived households, more than 1 in 3)¹⁷, and in which 99% of

¹⁴ Department for Environment, Food and Rural Affairs Council of Food Policy Advisors, 2009
https://webarchive.nationalarchives.gov.uk/20130403095409/http://archive.defra.gov.uk/foodfarm/food/policy/council/pdf/cf_pa-090512-note.pdf

¹⁵ Scientific Advisory Committee on Nutrition, 2018. Feeding in the First Year of Life. [Online] Available at:
<https://www.gov.uk/government/publications/feeding-in-the-first-year-of-life-sacn-report>

¹⁶ Scientific Advisory Committee on Nutrition, 2022. Draft report for consultation: Feeding young children aged 1 to 5 years. [Online] Available at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1092477/draft-report-feeding-young-children-aged-1-to-5-years.pdf

¹⁷ NHS Digital. 2021. National Child Measurement Programme, England, Provisional 2021/22 School Year Outputs. [Online] Available at: <https://digital.nhs.uk/data-and-information/publications/statistical/national-child-measurement-programme>

children aged 4-5 years are consuming more sugar than recommended by the Department of Health and Social Care¹⁸.

For these reasons, we request that Defra, in coordination and collaborating with other relevant government departments, develops and puts in to place a public sector food and catering policy which reflects available government guidance for infants and young children.

Recommendation: The standards should be extended to early years' settings, which are not protected by the School Food Standards, where infants and young children access publicly procured food and drink.

¹⁸ Scientific Advisory Committee on Nutrition, 2022. Draft report for consultation: Feeding young children aged 1 to 5 years. [Online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1092477/draft-report-feeding-young-children-aged-1-to-5-years.pdf