

Dr Alison Tedstone
Public Health England
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25 November 2019

Dear Alison,

I was disappointed to hear of your comments at the Health and Social Care Select Committee evidence session on 29 October 2019 regarding data on sugar levels in products from Public Health England's 'Sugars Year 2' monitoring report and data on breaches to advertising codes. This overlooks the huge efforts underway by the UK's food and drink manufacturers to provide consumers and shoppers with healthier choices, as well as their commitment to responsible advertising, in line with strict advertising codes. I wanted to assure you how seriously we take the issue of obesity and diet-related disease. The enclosed report from 2018 highlights some of the work underway.

As you know, the Food and Drink Federation (FDF) leads an industry which embraces thousands of businesses of every size and type. The UK's food and drink manufacturers are committed to supporting the UK Government's ambition to halve childhood obesity by 2030. We have consistently delivered against voluntary health initiatives and demonstrated our commitment as a responsible partner. We know more needs to be done to transform the nation's diet, which is why we continue to take bold steps.

By affirming Committee member Andrew Selous' characterisation that a number of manufacturers and retailers had increased sugar in their products, we believe you have created a misleading impression that companies are adding more sugar to their products. As you know, the fact sales weighted averages have gone up, can reflect a change in consumer purchases. It does not necessarily represent a change in formulation and it gives no indication as to the total sugar sold by that manufacturer or retailer.

Whilst FDF does not represent the companies you named, all of whom were retailers, we nonetheless feel strongly that great care is needed when these numbers are quoted to ensure that the figures are properly understood.

Regarding the Advertising Standards Authority (ASA) data on child exposure to online advertising of food and drinks high in fat, salt or sugar (HFSS); we believe your statement "[...] *there were 1,000 breaches within a fortnight, including by big-named companies. The voluntary controls certainly do not feel as though they are working*" is highly misleading.

Whilst the Avatar online profiles mimic those of internet users of different ages, including child internet users, the monitoring exercise, which involved each Avatar visiting 250 web pages on both desktop and mobile, twice a day, is obviously not reflective of children's actual day-to-day browsing behaviour. The ASA report states 'it is not reasonable to extrapolate exposure levels from this data'. The exposure to HFSS adverts, the majority of which were not for products of appeal to children, was 2.4 per cent of all adverts shown and the ASA did not find 'any clear evidence of HFSS advertisers actively targeting child profile Avatars'.

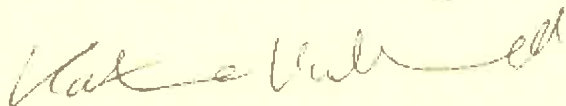
FDF members are committed to marketing their products in a responsible way. The UK food and drink industry has long shown this commitment through adherence to stringent advertising codes of practice that exist at global, regional and national levels. The industry also proactively responds to societal changes, as we know we cannot stand still. In 2016 FDF championed changing the digital advertising guidelines to under 16-year olds, to be brought into line with the strict guidelines already in existence for television. Clearly any breaches found by ASA need to be seriously examined and followed up to ensure the companies involved are aware of their responsibilities under these new rules, however we do not believe the evidence warrants such a blanket condemnation of the voluntary system.

To enable industry to further support Government in achieving its ambition, we need a proportionate, evidence-based policy framework that avoids costly new regulatory barriers or restrictions that threaten both future investments and the launch of the very products we're being encouraged to make.

The UK's food and drink manufacturers are committed to playing their part in reducing obesity, and our dedication in addressing this challenge will not waver.

I would appreciate it if you were able to clarify with the Committee, once it is re-established following the election, the evidence points we have referenced in this letter. I am copying this letter to Duncan Selbie and to Huw Yardley of the Commons Health and Social Care Committee.

Yours sincerely,



Kate Halliwell
Head of UK Diet and Health Policy

Enclosed Feeding Change

cc. Huw Yardley, Clerk, Health and Social Care Select Committee
Duncan Selbie, Chief Executive, PHE



Public Health
England

Protecting and improving the nation's health

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11 December 2019

Kate Halliwell
Food and Drink Federation
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Dear Kate

Thank you for your letter raising the FDF's concerns about how business's progress in reducing sugar in their products was portrayed in the recent Health Select Committee inquiry on obesity.

In relation to the sales weighted average (SWA) measurement, Public Health England (PHE) acknowledge that there are numerous reasons why the SWA sugar content per 100g could increase for a specific business. For example, it could be due to higher sugar products being promoted more than lower sugar products within a specific category, higher sales of particular products, expansion of sugary products within a portfolio, the technical feasibility of lowering sugar in certain products or a combination of all these factors. PHE is careful to present as much of the context as is possible as part of monitoring and reporting commercial data each year. However, it is not always possible to fully set out the detail behind such results when answering committee questioning.

Members of the committee were very clear that they expected PHE to name businesses who had not made as much progress as expected, therefore, we were committed to providing transparent information, while continuing to take a proportionate approach in report publication. PHE regularly supports businesses who achieve good progress in reducing sugar in their products.

The reference made to the Committee of Advertising Practice (CAP)'s voluntary controls of non-broadcast advertising reflects the findings of the Advertising Standards Authority (ASA) monitoring report, which showed that 947 of all advertising served to Child Avatars were for HFSS products. Unfortunately, I was not able to provide the committee with a review of the methodology and limitations of the monitoring exercise in the time available. You will be aware that the limitations also include the exclusion of certain online marketing environments from this particular monitoring exercise, which may also fall under the remit of the CAP code. We will ensure the committee is provided with a link to the full ASA report, so they have all the necessary information when they reconvene. In the meantime, PHE looks forward to seeing the results when the 2020 monitoring report is published.

PHE is committed to engaging and working with businesses on the reduction and reformulation programme and we are aware that many businesses are taking action to reduce sugar in their products, however, it is also clear from the second-year progress report that overall progress has been slow and that faster action across the whole sector is needed. We are glad to hear that FDF members remain committed in playing their part on addressing the obesity agenda and look forward to seeing what further progress will be achieved in this area.

Yours sincerely

A handwritten signature in black ink that reads "A. Tedstone". The signature is written in a cursive, flowing style.

Alison Tedstone
Chief Nutritionist
Public Health England

cc. Duncan Selbie, Chief Executive, Public Health England



FEEDING CHANGE



fdf food & drink
federation
passionate about food & drink

CHANGING FOR RECIPES FOR HEALTH

A Producer's
Reformulation Journey



Reformulation



McCain

As a responsible food manufacturer, McCain Foods is committed to ensuring their products can be enjoyed as part of a healthy, balanced diet. Through reformulation, they have reduced salt in products by 22%, and saturated fat by 70% since 2001, and they remain committed to future reformulation work.



Good Food, Good Life

NESTLÉ UK & IRELAND

As a major food and drink business in the UK and Ireland with more than 80 brands, Nestlé have a huge responsibility to help improve public health. They have an ongoing programme of research and development to improve their products in both taste and nutrition over time. Nestlé UK and Ireland has cut 2.6 billion teaspoons of sugar and removed more than 60 billion calories from products since 2015 whilst maintaining the great taste. Some of the biggest examples of reformulation to reduce sugar and calories in its famous brands over the last three years include KitKat®, Milkybar®, Cheerios® and Sanpellegrino®.



WEETABIX FOOD COMPANY

With sugar levels already 30% lower than the category average and below Public Health England's 2020 guidelines, Weetabix Food Company have successfully decreased their low levels of sugar further. Even for Weetabix Original, already one of the lowest sugar cereals available, they have reduced sugar by 5% to just 4.2%; this is now less than half a teaspoon of sugar per two biscuit serving, a quarter of this due to naturally occurring sugars in their British grown wheat. They have also reduced sugar across their growing Weetabix On The Go drinks range by 44%, now less than 5g of sugar per 100ml.



MONDELÉZ INTERNATIONAL

Mondelēz International has been heavily invested in wellbeing strategies since the company's inception in 2012. Their work is supported by over 40 internal Mondelēz International Nutritionists, Dietitians and Food Scientists including public health professionals who partner with external experts. In 2016, Mondelēz International Reformulated Cadbury Highlights, achieving a 8.5% sugar reduction which is 9% reduction per portion with milk.



Portion Size

British Nutrition Foundation

To tackle obesity, we've got to think about how it's been estimated that reducing our exposure up to 16%. This has been clearly recognised by feature of its sugars reformulation strategy for r

For the food industry, it's important to unders might react to different sizes when choosing be the high in salt, fat and/or sugar which we the portion size provided can represent a 'no

Some countries include portion size inform but in the UK we only have portion size gui developing a resource on portion sizes, wh healthy eating advice into practice. This sh

Portion size is a growing priority for public he



As part of a responsible approach, HARIBO takes great care to ensure they



offer a variety of pack sizes and provide clear porti nutritional information on pack to help consumers right choices for themselves and their families. HA best-selling mini-bags have been standardised to and 25g (86kcal), meaning that all mini-bags are v Public Health England's target for single serve item than 150kcal. HARIBO has also made a number c labelling changes in order to provide further porti

Healthier Options



BREYERS DELIGHTS

Launched in January 2018, Breyers Delights is churning up the ice cream aisle with its four deliciously creamy ice cream flavours. With a third fewer calories than other ice creams, it's lower in sugar, high in protein and big in taste. Tapping into the wellness trend, the Breyers Delights range contains between 290kcal and 350kcal and up to 20 grams of protein* per tub. Made with a purified extract of the Stevia rebaudiana leaf and less sugar than standard ice cream, those who choose a healthy lifestyle can limit their calorie intake whilst still treating themselves. *protein contributes to the maintenance of normal bones.



THE HEALTHY FOOD DEVELOPMENT

The Healthy Food Development Ltd have launched two new products: "LowGicFood Cakes" Lemon Almond and Cherry Bakewell Slices. The two products have 7

benefits in every slice:
no added sugar, under 200kcal per 85g slice, high in protein, high in fibre, low in carbohydrates, low in GI, and reduced fat.



Beyond Foo



LUCOZADE RIBENA SUNTORY

Lucozade Ribena Suntory (LRS) is investing £30m in Move campaign. Fronted by unified world heavyweight Anthony Joshua, the campaign seeks to inspire one to move more over a three year period. LRS employ taking an active part in the campaign, including an international walking competition last summer where 69.6 million clocked up in a month - nearly 1.5 times around the world to its success, the company is doing the competition spring and it has been adopted as a global walking campaign between Suntory companies across the world.



COCA-COLA GREAT BRITAIN

Coca-Cola's Parklives programme helps to address loneliness and isolation by offering members of the ability to take part in free activities such as zumba tai chi, hosted in their local parks. Parklives operates in cities with an additional 35 locations through a partnership with charity StreetGames. The programme brings communities together and allows people to use green



PLADIS

pladis has recently launched a range of sugar-reduced go ahead! products as part of its Health and Wellbeing programme.

The recipe changes will remove 347 tonnes of sugar each year, with reductions of 10% in Crispy Fruit Slices & Yoghurt Bakes, and between 22-40% in Fruit Bakes. The revised recipes contain fewer calories, and Fruit Bakes have been renamed Fruit and Oat Bakes because of the addition of more oats to the snacks. The changes have been extended across the go ahead! portfolio, with the launch of a range of no added sugar Goodness bars.



GENERAL MILLS

Product innovation is another key way General Mills are helping to reduce sugar from children's diets. In 2016 they launched My Petit Filous, a vanilla fromage fraise for babies from six months. With just 4.5g of sugar per portion, it is the lowest sugar flavoured fromage fraise on the market.



THE JORDANS & RYVITA COMPANY

The current focus of the Jordans & Ryvita Company is on using less added sugar, which plays an important role in the texture and structure of 'cluster' based baked cereals in particular. Over the past twelve months the business has launched a range of low sugar cereals available





About FDF

The Food and Drink Federation (FDF) is the voice of the UK food and drink manufacturing industry, the largest manufacturing sector in the country. Our industry has a turnover of £97.3 billion, which is 19 per cent of total UK manufacturing, with Gross Value Added (GVA) of £28.8 billion. Food and drink manufacturers directly employ over 400,000 people in every corner of the country. Exports of food and drink make an increasingly important contribution to the economy, exceeding £22 billion in 2017, an increase of 9.7% on the previous year. The UK's 7,000 food and drink manufacturers sit at the heart of a food and drink supply chain which is worth £112 billion to the economy and employs four million people.

Our membership comprises manufacturers of all sizes as well as trade associations dealing with specific sectors of the industry. In representing the interests of our members, we focus on the following core priorities:

- **Food Safety & Science**
- **Diet & Health**
- **Sustainability**
- **Competitiveness**
- **Brexit**

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