

## FEEDBACK - WRITTEN EVIDENCE (FDO0097)

### Written Evidence to: House of Lords Select Committee on Food, Diet and Obesity by Krysia Woroniecka, Project Manager at Feedback

1. ABOUT FEEDBACK GLOBAL Feedback is an environmental campaign group based in the UK and the Netherlands working for food that is good for the planet and its people. To do this we challenge power, catalyse action and empower people to achieve positive change.

#### 2. Summary

The UK has an oversupply of sugar. An oversupply of sugar undermines public health policies to reduce sugar. Because sugar has such a vast amount of health and environmental externalities its oversupply can be accurately described as “[sugar pollution](#)”. Sugar pollution” is linked to obesity and other negative health outcomes including tooth decay, which both have particular impact on children. Demand-side policies to address the impact of sugar on child health is necessary but not sufficient; supply side policies are also required.

#### 3. Introduction

3.1 The UK sugar supply is nearly three times the maximum safe amount and this translates into overconsumption which is linked to obesity, liver disease, type 2 diabetes, high bad cholesterol, cardiovascular disease, gout, and hypertension.<sup>i</sup> Sugar consumption also causes tooth decay, the leading cause of hospital admissions in 5-9 year olds.<sup>ii</sup> According to the UK’s Scientific Advisory Committee on Nutrition, free sugars intake should be 5% of total energy intake, however supply levels show that consumption is nearly three times this level. Children aged 4+ and teenagers have especially high intake.<sup>iii</sup> Public Health England’s analysis found that reducing energy intake from sugar to 5% could prevent 3,500 deaths and 173,000 dental caries cases annually, whilst saving the NHS £396m each year.<sup>iv</sup>

3.2 The use of the UK’s highest-grade land to grow sugar is inappropriate, in the context of the current child health crisis, the UK’s fruit and vegetable deficit and the climate-sensitive land-use choices that will need to be made on areas of peatland where most UK sugar beet is grown. Reducing area of land used for sugar, and other ingredients for processed foods, would free up agricultural land to support crops with high nutritional value and less impact on soil health. The UK doesn’t have enough fruit and veg for everyone to have their 5-a-day, but if half the sugar beet fields were used to grow carrots for example, there would be enough carrots to make up half the shortfall of fruit and vegetables.<sup>v</sup> Sugar beet causes formidable soil loss of 200,000 to 500,000 tonnes per year.<sup>vi</sup> The UK already loses around 2.9 million tonnes of soil per year (excluding losses due to crop harvesting)<sup>33</sup>,

largely through the loss of silts and sands on arable and horticultural land, which, according to previous calculations by Feedback, means that sugar beet harvesting adds an additional 13–21% to the UK’s annual topsoil loss per year<sup>1</sup> While soil loss is out of scope of this consultation, its consequences on food security and in particular, nutrition, are not. Defra’s 2023 report “Agriculture in the United Kingdom 2022 (p.142)”: ‘The success of UK agriculture depends upon healthy soils ... In the face of a changing climate and increase in food demand, it is important to mitigate the risks to long term productive capacity and encourage farmers to manage their soils in a sustainable way.’

3.3 Sugar cane production in other countries is similarly problematic due to high land, chemical and water usage, and while the environmental impact is out of scope of this response, use of our domestic and overseas footprint should be focussed on increasing our fruit and vegetable supply in order to allow everybody in the UK to access their 5-a-day.

#### **4. Response to Question: The effectiveness of Government planning and policymaking processes in relation to food and drink policy and tackling obesity, including the impact of recent policy tools and legislative measures intended to prevent obesity.**

4.1 The Government’s 2016 Childhood Obesity: Plan for Action, set out a series of measures including the voluntary Sugar Reduction Program and the Soft Drinks Industry Levy. The Sugar Reduction programme, which aimed to reduce sugar in products contributing the most sugar to children’s diets by 20% by 2020, resulted in average sugar reductions by retailers and manufacturers within product categories of 3.5% but critically resulted in an overall INCREASE in Supermarkets’ total sugar sales across the product categories increased by 7.1% due to the increase in sales,<sup>vii</sup> showing that policies MUST account for their impact on total sugar sales if they are to positively impact consumption.

4.2 In contrast the mandatory Soft Drinks Industry Levy achieved a 34% reduction in total sugar sales from soft drinks (46,372 tonnes) between 2015 and 2020<sup>viii</sup> and was therefore successful at reduction consumption of sugar over that period.

4.3 The SDIL is therefore necessary but not sufficient: an expansion of policies to address the oversupply of sugar are necessary in order to impact child health as it is estimated that we are around a hundred years away from recommended consumption levels, if the current trajectory continues.<sup>ix</sup>

4.4 Reducing the supply of sugar will involve reducing domestic production of sugar beet, but also ensuring that imports of refined and raw sugar do not increase as a result. This could be achieved by implementing environment- and nutrition-sensitive trade policies. It would also require ensuring that the co-products produced alongside sugar beet are not inadvertently subsidising its production. The following measures **address policies and gaps that**

### **currently work against public health policies by increasing sugar production:**

- Reintroduce a quota to cap domestic sugar beet production
- Maintain or increase tariffs on imports of raw cane sugar
- Increase tariffs on imports of refined sugar (or ban imports completely)
- Increase tariffs on imports of confectionary and other high-sugar products that are key contributors to sugar intake
- Require future free trade agreements to conduct adequate environmental, equality and health assessments
- Subsidise horticultural production
- Cease to provide derogations for the use of neonicotinoids on sugar beet crops
- Provide support for some growers of sugar beet to transition to organic production (leading to less and better beet)
- Implement fiscal measures to disincentivise sugar production and sale

4.5 The final policy in the above list, “implement fiscal measures to disincentivise sugar production and sale” is necessary because the true cost of sugar, accounting for its negative health and environmental externalities, is far higher than its market price. Sugar producers and manufacturers should be required to cover these costs to society, mirroring schemes the government is currently enacting to recoup costs on product packaging. In practice this could look like an expansion of the Soft Drinks Industry Levy, as advocated by the [Recipe for Change](#) alliance.

4.6 In summary there is so much we can do improve children’s health and safeguard our pollinators and soil for more nutritious food production. Firstly we can keep health in mind when the new trade quotas are agreed each year as well as when Defra decides whether to allow neonicotinoids for sugar beet, as both these policies impact total sugar supply volumes. Secondly we can ensure industry are removed from the policy making process, so that children’s health can be placed before profit. Thirdly we can ensure that farmers get proper incomes from growing fruit and vegetables by supporting access to markets, seasonal workers and supply chain fairness (currently sugar contracts are often more favourable than taking the risk that comes with supplying vegetables to supermarkets). And lastly we can build on the success of the sugary drinks industry levy, which reduced sugar intake and which could be expanded to cover sugar in food, incentivising companies to do their share by making food products healthier. In other words we can move towards a sugar policy framework that provides farmers and manufacturers incentives to provide good food, take away the risk from doing so, alter the relative affordability of that food and ensure that all families can access good food. This is simple and every single part of it has been done before in this country.

8 April 2024

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<sup>i</sup> EFSA Panel on Nutrition, Novel Foods and Food Allergens (NDA), Turck D, Bohn T, Castenmiller J, de Henauw S, Hirsch-Ernst KI, et al. Tolerable upper intake level for dietary sugars. EFSA J. 2022;20(2):e07074

<sup>ii</sup> NHS Digital. Hospital Admitted Patient Care Activity 2018-19. 2019. Available from: <https://digital.nhs.uk/data-and-information/publications/statistical/hospital-admitted-patient-careactivity/2018-19>

<sup>iii</sup> Public Health England. NDNS: 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>

<sup>iv</sup> Public Health England. Sugar Reduction: The evidence for action. 2015.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/470179/Sugar\\_reduction\\_The\\_evidence\\_for\\_action.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/470179/Sugar_reduction_The_evidence_for_action.pdf)

<sup>v</sup> <https://feedbackglobal.org/wp-content/uploads/2023/10/Feedback-Sugar-Pollution-23-Report-Final.pdf>

<sup>vi</sup> <https://feedbackglobal.org/wp-content/uploads/2023/10/Feedback-Sugar-Pollution-23-Report-Final.pdf>

<sup>vii</sup> Office for Health Improvements and Disparities. Sugar reduction – industry progress 2015 to 2020. 2022. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1121444/Sugar-reduction-and-reformulation-progressreport-2015-to-2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1121444/Sugar-reduction-and-reformulation-progressreport-2015-to-2020.pdf)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1121444/Sugar-reduction-and-reformulation-progressreport-2015-to-2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1121444/Sugar-reduction-and-reformulation-progressreport-2015-to-2020.pdf)

<sup>viii</sup> Office for Health Improvements and Disparities. Sugar reduction – industry progress 2015 to 2020. 2022. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1121444/Sugar-reduction-and-reformulation-progressreport-2015-to-2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1121444/Sugar-reduction-and-reformulation-progressreport-2015-to-2020.pdf)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1121444/Sugar-reduction-and-reformulation-progressreport-2015-to-2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1121444/Sugar-reduction-and-reformulation-progressreport-2015-to-2020.pdf)

<sup>ix</sup> Richardson, B., 2016, Sugar Shift: Six Ideas for a Healthier and Fairer Food System. 2016. Food Research Collaboration Policy Brief. <https://foodresearch.org.uk/publications/sugar-shift-six-ideas-for-a-healthier-and-fairer-food-system/>