

FOOD AND DRINK FEDERATION - WRITTEN EVIDENCE (FDO0121)

Introduction

1. The Food and Drink Federation (FDF) is the voice of the UK food and drink manufacturing industry, the largest manufacturing sector in the country, with a footprint in every parliamentary constituency. Our industry has a turnover of more than £112 billion, accounting for 20% of total UK manufacturing, and Gross Value Added (GVA) of more than £30 billion. Food and drink manufacturers directly employ over 468,000 people across every region and nation of the UK. 97% of the industry is small and medium-sized businesses.
2. We support the government's goal to improve health and reduce obesity across the UK, and understand we have an important role within this. Food and drink manufacturers are committed to playing their part to improve the nation's health, whether that's through the products we sell, supporting our workforce and communities, or how we can help communicate healthier choices.
3. The FDF and its members are committed to voluntary reformulation and innovation to develop products with an improved nutritional profile as well as offering appropriate portion sizes and have made considerable progress over the last few decades. This is thanks to substantial investment by companies - contributing towards the £21bn spent on capital, including R&D projects, in the last five years to 2022¹. As a result, FDF member products contribute 13% fewer calories, 15% fewer sugars, and 24% less salt to the average shopping basket than they did eight years ago². Our Action on Fibre initiative has successfully delivered an additional 7.2 billion servings of fibre to the UK population since 2021³.
4. Working in partnership with government and other stakeholders is key to delivering these outcomes. We are proud to work with the Scottish Government, Food Standards Scotland and a wide range of partners⁴ to deliver the [Reformulation for Health programme](#) which supports smaller businesses to develop healthier options in line with

¹ [Office for National Statistics Dataset - Annual gross fixed capital formation by industry and asset](#)

² Kantar Worldpanel Take Home data for FDF members, total nutrient volumes in 2022 vs 2015.

³ [The FDF Action on Fibre year 1 results](#)

⁴ [Reformul8 Partnership - Scotland's whole food system working together for a healthier future](#)

public health goals. This programme has had excellent success so far, funding 67 projects across Scotland to improve the health of their products and communities, removing hundreds of millions of calories from Scottish products. We believe we would see real value in expanding this best practice approach to small and medium sized businesses across the UK.

5. Beyond the products we produce, we believe a whole systems approach is essential to supporting healthier lifestyles in the UK – and with food and drink manufacturers in every local authority across the UK, we play a key part in this. To explore this further, the FDF is currently working in partnership with Leeds Beckett University, MoreLife and companies to co-design programmes in local communities and workplaces surrounding their factory sites in collaboration with local partners. This builds on the workplace and community health programmes already delivered by companies, to see how these can be expanded to broaden their reach and improve health outcomes.
6. Fundamentally, it is critical that government advice and policy is underpinned by robust advice from independent expert scientific committees. It is essential that all stakeholders have confidence in these committees, and that the conflicts of interest procedures are rigorous and transparent. This builds trust in the system and ensures that evidence is considered in the round and by the leading academics in the field, resulting in advice that is not subject to individual biases or commercial interests. Food manufacturers rely on the Food Standards Agency and the Department of Health and Social Care, and equivalent devolved Departments, to ensure that the ingredients we use are safe, and that the nutrition policies we follow are up to date and based on the best scientific evidence available.
7. Processing makes our food safe, affordable and convenient while protecting our food security. It enables us to respond to societal challenges, from ensuring food is allergen-free to helping consumers reduce meat and dairy by producing plant-based options. And it is of course, what has enabled our industry to provide healthier options and successfully reformulate over the decades.
8. We welcome the opportunity to provide evidence to support this inquiry. The FDF has focussed our response on our areas of expertise and have not responded to questions 1 – 4 on trends in

food, diet and obesity and evidence on drivers and impacts of obesity. In reference to these questions, evidence and data is critical and we consider these are best obtained from the National Diet and Nutrition Survey (NDNS), the Health Survey for England (and devolved equivalents), the National Child Measurement Programme alongside the various Scientific Advisory Committee on Nutrition (SACN) reviews and reports. Please find our responses to questions 5 – 12 below.

5. The definition of a) ultra-processed food (UPF) and b) foods high in fat, sugar and salt (HFSS) and their usefulness as terminologies for describing and assessing such products

(a) Ultra processed food

9. The government's Scientific Advisory Committee on Nutrition (SACN) undertook a review⁵ and found 8 different systems of classifying foods according to the level of processing. This included the NOVA classification which SACN identified as the most common definition used within research, and which categorises food according to the number and type of ingredients used and purpose of processing.
10. This echoed findings by Sadler et al that the 'UPF' definition is often adapted for the purposes of research – it found that the criteria used are ambiguous, inconsistent, and use subjective terms⁶. This can lead to confusion and inconsistency in assigning foods to the NOVA categories, even amongst food and nutrition experts^{7,8}. This in turn makes it difficult to compare research as even when the same system is used, the classification of foods varies dependent on the individual researcher.
11. Beyond the ambiguities and subjectivity of the definition, we do not agree that 'UPF' is useful terminology for describing and assessing food and drink. First and foremost, this is not supported by the evidence, either on the safety of the ingredients permitted in food or on impact to disease risk factors.
12. The industry is rightly highly regulated by the Food Standards Agency (FSA) and Food Standards Scotland (FSS) who, supported

⁵ [SACN statement on processed foods and health](#)

⁶ [Processed food classification: Conceptualisation and challenges](#)

⁷ [Ultra-processed foods: how functional is the NOVA system?](#)

⁸ ["Even We Are Confused": A Thematic Analysis of Professionals' Perceptions of Processed Foods and Challenges for Communication](#)

by expert scientific committees, conduct thorough evidence reviews for the ingredients we use to ensure food is safe to eat. They determine the amount of an additive in food or drink that can be safely consumed without adverse health effects. Food and drink manufacturers ensure compliance with legislation on use and labelling of additives.

13. SACN considered the availability and quality of evidence associating different forms or levels of food processing with health outcomes and noted uncertainties with the quality of evidence available. They highlighted many important limitations with the evidence, including that this is almost exclusively observational, and that whilst adverse health associations were reported, these may be explained by established nutritional factors. Academic experts have shared similar concerns regarding the evidence⁹ – highlighting that observational studies do not determine cause and effect, and the need for good-quality randomised controlled trials that may help to identify potential mechanisms and establish whether they are independent of energy density or other dietary factors.
14. SACN concluded that the evidence to date needs to be treated with caution, and any future risk assessment would need to consider the full range of benefits of food processing on health to the UK population, for example, the benefits of food fortification or reformulation. They also noted concerns with practical application in the UK, including that classifying food in this way is contradictory with nutritional and other food-based classifications. The Nordic Nutrition Recommendations Committee considered whether to include 'UPF' when updating their nutrition recommendations but decided against this for similar reasons¹⁰.
15. This resonates with position statements from the British Nutrition Foundation (BNF)¹¹, the British Dietetic Association (BDA)¹² and the Academy of Nutrition Science (ANS)¹³. The ANS concluded that "*the risk of unintended dietary consequences of premature policy concerning UPFs is high, given that the classification system itself has been widely criticised for failure to discriminate foods that contribute beneficial nutrition from those that do not*".

⁹ [Science Media Centre - Expert reaction to study looking at ultra-processed foods and risk of different cancers](#)

¹⁰ [Nordic Nutrition Recommendations 2023](#)

¹¹ [The British Nutrition Foundation - The concept of UPF position statement April 2023](#)

¹² [The British Dietetic Association - Processed food position statement](#)

¹³ [The Academy of Nutrition Sciences - Understanding UPF and human health: a journey without a plan?](#)

16. We believe it is appropriate for us to follow the independent expert committee advice, and therefore consider that dietary advice and policy should be based on nutrition quality and that it would not be suitable to use 'UPF' terminology to describe and assess food and drinks.
17. Further, we consider categorising food and drink by level of processing is confusing for both consumers and businesses. For consumers, it conflicts with and confuses the government's clear advice on achieving a healthier and more sustainable diet depicted by the Eatwell Guide and is counterproductive to helping people to make healthier choices. The Eatwell Guide includes a wide range of foods - both fresh and processed - which support a healthy balanced diet and contribute valuable sources of micronutrients such as breakfast cereals, bread, yoghurts and pasta sauces. For example, a pasta sauce brand made by an FDF member company provides one of your five a day, a source of fibre, is low in saturated fat, and less than 100 calories per portion. As such, focussing on elements outside of nutritional content risks confusing consumers and could lead to perverse health outcomes – demonising a wide range of food that can support healthy and sustainable diets including reduced sugar/fat options, plant-based alternatives, or fortified options.
18. For companies a 'UPF' categorisation does not help to support or encourage work to improve the nutritional profile of food and drinks. It conflicts with government policies to support healthier choices, including on reformulation (to reduce sugars, calories and salt) and fortification (such as addition of folic acid to non-wholemeal flour). Focussing on level of processing, would be counterproductive to driving this important work forwards. It also overlooks the myriad of benefits of processing which ensures we have access to a wide range of nutritious and safe food and drink for families at a range of price points. Food processing is an essential part of how we can have a healthy and sustainable food system. It allows:
 - increased choice and availability of foods throughout the year.
 - increased shelf life and stability of foods, reducing waste.
 - more convenience.
 - reformulation to reduce fat, salt and sugar in foods.
 - fortification to help the population reach nutritional recommendations.

19. We welcome that SACN continues to monitor the evidence on this topic to ensure that UK dietary recommendations continue to be based on up to date, robust science.

(b) Foods high in fat, sugar or salt (HFSS)

20. Food and drink high in fat, sugar or salt (HFSS) are defined by the Nutrient Profile Model (NPM) developed by the Food Standards Agency (FSA) in 2004-2005. The model, and the underpinning evidence for it, has subsequently been assessed and used to inform a variety of approaches globally, including the European Nutriscore label and the [Australia and New Zealand Health Star Rating approach](#).

21. The NPM was initially developed as a tool to reduce the exposure of children to TV advertising of less healthy food and drink, and it is written into this legislation. It is now also used to underpin government policies on restricting the store placement of certain products in England and will be used to restrict a variety of in-store promotional mechanisms in England, Scotland and Wales, and further advertising restrictions, due to come into force in October 2025.

22. The NPM is in essence a scoring system, using nutrient information per 100g of a product to assign a score to determine whether a product is considered 'healthy' or 'less healthy' (food scoring 4 or more and drinks scoring 1 or more are considered 'less healthy'). The model includes seven components: energy, saturated fat, sugars, salt, fruit, vegetables and nuts, fibre and protein. Each individual component has underpinning nutrition science linking it to health outcomes, with protein included as a marker for a variety of micronutrients.

23. There are limitations to any nutrient profile, and ongoing debates as to the most effective ways to use them, for example whether to use per portion or per 100g information, whether to have one profile for all food and drink, or different profiles depending on the category (to help differentiate healthier options). None the less, a nutrient profile provides a consistent standard based on robust and established science. Using one NPM consistently – as the UK has done – provides companies with confidence in the parameters they are working towards, helping to encourage investment in long term changes. Food and drink manufacturers can work towards improving the nutritional profile of products in many

categories to reduce the NPM score. They have made substantial investments over the last few decades both to reformulate current products and, more recently, to introduce new non-HFSS products.

6. How consumers can recognise UPF and HFSS foods, including the role of labelling, packaging and advertising.

24. It is important that consumers are provided with clear and accessible information to help them make informed choices about the role of foods in their diet. It is particularly important that government dietary advice is underpinned by science, is easy to follow and enabling. The healthfulness of all foods – whether fresh, processed in the home, or processed in a factory – should be evaluated on evidence-based factors such as nutrient density and the role they play in the diet. A clear nutrition label should help a consumer understand how any food can fit into an overarching balanced diet, including what's an appropriate portion size.
25. The current UK government public facing advice and labelling strategy does not consider 'UPF' or HFSS. However both the Eatwell Guide and labelling approaches are underpinned by nutrient guidelines and therefore closely align to HFSS.
26. The [Eatwell Guide](#) was developed by the UK government to depict food based dietary guidelines, to help people understand what a balanced diet looks like and the types and proportion of food they should be eating¹⁴. It does not consider use of additives or level of processing other than the recommendation to limit consumption of processed meat. The Eatwell Guide is developed as a simple depiction of the types of food people should eat, and as such takes away the requirement to understand the underpinning nutrition science. It has been shown that this dietary advice to the public is broadly aligned with the NPM i.e. people who meet more of the Eatwell Guide recommendations, also eat more foods with a lower HFSS score¹⁵.
27. The Eatwell Guide was last reviewed in 2016, using optimisation modelling to develop a depiction which met all the UK nutrient guidelines whilst minimising the changes the population would

¹⁴ For example, the UK government advises that adults who regularly consume more than 90g per day of red and processed meat should reduce their consumption to no more than the population average of 70g per day of red and processed meat.

¹⁵ [Pinho-Gomes et al \(2021\) Are the Eatwell Guide and Nutrient Profiling Models Consistent in the UK?](#)

need to make to meet it, based on data from the NDNS¹⁶. With less than 0.1% of the UK population meeting all the underpinning nutrient recommendations in the Eatwell Guide¹⁷, we support the need for a public health campaign to champion positive, practical messaging to encourage and empower people to achieve these recommendations.

28. We believe it's important to help people to understand where they are consuming too much food that's high in fat, salt and sugar, and not enough fruit, vegetables and fibre. To support this, food and drink manufacturers play an important role in providing clear nutrition information on food labels and digital channels to help consumers make informed decisions at point of choice. In addition to mandatory nutrition information on the back of pack, the vast majority of packaged food also carry the voluntary 'traffic light' front of pack nutrition labelling, and portion size guidance.
29. The 'traffic light' label colour codes on a 100g basis, whether the food contains a high, medium or low amount of fat, saturated fat, sugar and salt. It also gives information on the amount of energy the food provides. The levels for high and low are set by government. Whilst these labels do not directly link to the NPM score, they provide context for consumers as to the amount of each nutrient. There are other labelling approaches globally which link directly to a nutrient profile, most notably the European Nutri-Score approach.
30. We are not aware of any labelling approach existing in market which considers the level of processing of a product or uses a 'UPF' definition. Whilst the Chile 'Warning Label' scheme is sometimes mentioned in this context, it actually labels products that are high in sugar, saturated fat or salt i.e. taking a nutrient approach. With respect to the nomenclature of 'warning labels', we consider it is fundamentally wrong to present food as harmful and in need of a 'warning'; all food is safe to eat. This is also contrary to Codex Alimentarius (CAC/GL 1-1979), which establishes that "Claims that induce doubt about the safety or can lead to fear in the consumers, are not allowed".
31. Consumer surveys investigating attitudes to the concept of 'UPF'

¹⁶ [The Eatwell Guide: Modelling the Health Implications of Incorporating New Sugar and Fibre Guidelines](#)

¹⁷ [Health impacts and environmental footprints of diets that meet the Eatwell Guide recommendations: analyses of multiple UK studies](#)

demonstrate that, whilst more consumers are becoming aware of the terminology¹⁸, they struggle to understand and classify foods according to the level of processing¹⁹. For example, the BNF found that consumers incorrectly classified products like baked beans, low- fat fruit yogurts, ice cream and sliced bread.

32. Given the uncertainties with the quality of evidence on the association between processing and adverse health outcomes as noted by the SACN, we do not believe labelling approaches or messaging focussed on 'UPF' would not be appropriate or helpful to consumers in achieving a healthier diet.
33. In addition to nutrition labelling, food and drink manufacturers also work in partnership with retailers to test and identify helpful ways to nudge consumers to healthier and more sustainable diets in supermarket settings²⁰, and have supported initiatives such as [Peas Please](#) to help make it easier for everyone in the UK to eat more vegetables.
34. Our members use advertising responsibly and have extremely high levels of compliance with the UK advertising codes, some of the strictest codes in the world. The FDF are working with our members and regulators to prepare for the further advertising restrictions (underpinned by HFSS criteria), due to come into force in October 2025. To help ensure that companies are clear about the new rules, we are asking the UK government for guidance and secondary legislation to be published by mid-2024 to ensure that businesses have time to prepare ahead of implementation.

¹⁸ [British Nutrition Foundation Survey on consumer attitudes to UPFs](#)

¹⁹ [IGD – Ultra processed foods: a consumer perspective](#)

²⁰ [IGD healthy sustainable diets: driving change Oct 22](#)

7. The cost and availability of a) UPF and b) HFSS foods and their impact on health outcomes.

35. Food prices are impacted by multiple factors. Food manufacturers buy a range of ingredients produced in the UK and around the world. Some of these are key agricultural commodities which are internationally traded, and their prices are set globally. Wherever they are sourced, ingredient prices can be highly variable, dependent on seasonality, weather patterns, and energy prices to name a few.
36. The UK retail market is highly concentrated, and the presence of discounters means that the big four supermarkets are under intense pressure to keep their prices competitive, so as not to lose market share. This means that UK households can be confident that food products are competitively priced. The Competition and Markets Authority's investigations²¹ of competition into the UK's grocery sector in 2023 found that food prices are competitive for the wide majority of products, and that's helped by the presence of own-label products. Food and non-alcoholic drink are generally cheaper in the UK than in many European countries, even if UK prices have risen recently at faster pace. In February, prices of food and non-alcoholic drink in the EU were 5.3% higher than UK prices.
37. Food manufacturing and processing is an essential element of keeping food competitively priced. It enables manufacturers to deliver economies of scale and provides consumers with access to a wide variety of safe and nutritious food at a range of price points. Without processing, food would not last on the shelf, leading to increases in food waste, which means production volumes and costs will grow as a result. This would have a significant impact both on food prices and on businesses' ability to reach their environmental targets.
38. The British Nutritional Foundation has raised concern that demonising processed foods could foster feelings of guilt and stigma around food choices, adversely impacting intake of more affordable sources of nutrients²². A recent article in The Times²³ demonstrated this – the substitutions it suggests to avoid 'UPF'

²¹ [Competition and Markets Authority: Competition, choice and rising prices in groceries](#)

²² [The British Nutrition Foundation - The concept of UPF position statement April 2023](#)

²³ [The Times - 'How much ultra-processed food is in your basket'](#)

options would lead to an increase of £33.50 (63%) in cost, for smaller quantities of food that are broadly nutritionally equivalent.

39. Importantly, healthier product innovation and reformulation cannot sit alongside an agenda which demonises food processing. The food industry needs the support of government and others to drive this forward, helping companies to innovate and in turn helping consumers to achieve dietary goals. Please see our response to question 12 which details how government can support industry with this.

8. The role of the food and drink industry in driving food and diet trends and on the policymaking process.

40. Food and drink manufacturers are dedicated to playing their part to improve the nation's health. Companies continue to take steps to provide healthier options by changing recipes, creating new healthier products, and adjusting portion sizes to offer a variety of tasty and nutritious food. As a result, we are seeing demonstrable progress. The average shopping basket in the UK has become healthier²⁴ and FDF member products contribute 13% fewer calories, 15% fewer sugars, and 24% less salt than they did eight years ago²⁵. Our Action on Fibre initiative has successfully delivered an additional 7.2 billion servings of fibre to the UK population since 2021²⁶. Our work with the Scottish Government, Food Standards Scotland and a wide range of partners²⁷ to deliver the [Reformulation for Health programme](#) has removed hundreds of millions of calories from Scottish products. Our [report](#) provides a snapshot of these healthier innovations.

41. Processing makes our food safe, affordable and convenient while protecting our food security. It enables us to respond to societal challenges, from ensuring food is allergen-free and to helping consumers reduce meat and dairy by producing plant-based options. And it is of course, what has enabled our industry to provide healthier options and successfully reformulate over the decades.

²⁴ Kantar Worldpanel Take Home data for Total Food and Drink market, Nutrient Profile Model Score 2022 vs 2018

²⁵ Kantar Worldpanel Take Home data for FDF members, total nutrient volumes in 2022 vs 2015

²⁶ [The FDF Action on Fibre year 1 results](#)

²⁷ [Reformul8 Partnership - Scotland's whole food system working together for a healthier future](#)

42. The food and drink industry is highly regulated. We value the work of our regulators in ensuring the safety of food and drink, whether approving ingredients and additives, introducing new packaging or helping companies understand how to apply nutrition and allergen labelling.
43. A fundamental part of this is ensuring that government advice is underpinned by robust and independent advice from expert scientific committees alongside evidence of impact on health. It is for government to use that advice to develop its policies, and to widely consult to review policy proposals with key stakeholders. Consultation is key to consider whether proposed policies will achieve the stated outcomes, whether they are viable and practical, including economically, and if other means could achieve the same outcome.
44. We believe it is important for government to consult widely, including industry and NGOs, and that this should be transparent, with all declaring conflicts of interest where these are not apparent. Food and drink manufacturers employ food scientists, technologists, and nutritionists amongst other experts to ensure a safe, secure supply chain. This industry expertise is key to developing effective policies, offering an informed understanding of how proposed policies will impact the food that is sold, as well as more broadly impact on this vital sector of the UK's economy.
45. The FDF works hard to support our members and the wider industry with implementation of government policy by providing a range of toolkits, guidance and webinars/training. For example [allergen guidance for smaller business](#), [HFSS Toolkit](#), and [reformulation guidance](#).

9. Lessons learned from international policy and practice, and from the devolved administrations, on diet-related obesity prevention.

46. The Scottish Government [Reformulation for Health programme](#) and the [Danish Wholegrain partnership](#) provide best practice examples of government and industry working in partnership to improve the nutritional profile of products and measurable public health outcomes.

47. We are proud to work with the Scottish Government, Food Standards Scotland and a wide range of partners²⁸ to deliver the [Reformulation for Health programme](#), supporting smaller businesses to develop healthier options in line with public health goals. This programme has had excellent success so far, funding 67 projects across Scotland to improve the health of their products and communities, removing hundreds of millions of calories from Scottish products. The programme delivers a range of resources, such as an advice tool offering bespoke advice and support, the Reformul8! programme engaging food businesses across all 32 local authorities in Scotland, supported by funds offering small grants to financially support businesses with the costs of reformulation. As an example, the programme recently worked with Bells Food Group to remove 50% of the salt in their pie shells, equating to approximately 15 tonnes less salt each year.
48. The [Danish Whole Grain Partnership](#) is an excellent example of a public-private partnership that has had a significant effect on consumption and public health²⁹. The partnership was established in 2008 to promote whole grain intake in the Danish population. The success of this programme includes:
- A significant increase in the average daily intake of whole grains from 36 grams per 10 MJ before the campaign started to 82 grams per 10 MJ in 2019.
 - A significant increase in the number of products labelled with the whole grain logo, from 190 in 2010 to 1097 products in 2019.
 - 68% of all Danes are familiar with the whole grain logo, and out of them, 80% say they also shop according to the logo.
 - Awarded the EU Best Case certificate for achieving extraordinary results in the last 10 years.
49. International examples, such as the Amsterdam Healthy Weight programme and EPODE ('Ensemble Prévenons l'Obésité Des Enfants' - Together Let's Prevent Childhood Obesity) demonstrate the importance of a holistic whole systems approach.
50. The Amsterdam Health Weight programme is a widely recognised example where they successfully reduced the prevalence of obesity rates in all children by 12%, and the most deprived children by 18%, between 2012 and 2015. They achieved this through several

²⁸ [Reformul8 Partnership - Scotland's whole food system working together for a healthier future](#)

²⁹ [Boyle et al \(2023\) Increasing fibre intake in the UK: lessons from the Danish Whole Grain Partnership](#)

different measures including, healthy cooking classes in communities, focus on pregnant women and the first 1000 days of a child's life and a focus on targeting those of lower income and experiencing poverty.

51. EPODE³⁰ is a large scale coordinated approach for communities to implement effective and sustainable strategies to prevent childhood obesity. It is based on the results of a study implemented in two towns in France in 1992 (long term school- based intervention followed by community programmes). The results showed that progress was made when implementing community-based programmes to support targeted school initiatives. The pilot launched in 8 towns in France and found a significant decrease of 9.12 % in overweight and obesity between 2005 and 2009 for school children aged 5-12. EPODE methodology was also launched in 2007 and 2008 in two towns in Belgium. The prevalence of overweight in nursery school children showed a decrease of 22% which provides evidence of transferability.
52. We believe the whole systems approach set out within the above examples are key to supporting healthier lifestyles in the UK. Collaboration across the whole system is vital – and with food and drink manufacturers in every local authority across the UK, we play a key part in this. The FDF is currently working in partnership with Leeds Beckett University, MoreLife and companies to facilitate whole systems approach pilots. As part of this, companies are co-designing programmes in local communities and workplaces surrounding their factory sites in partnership with local partners. This builds on the workplace and community health programmes already delivered by companies, to see how these can be expanded to broaden their reach and improve health outcomes.
53. We are not aware of any policies globally based on the concept of 'UPF'. In countries where it is discussed, for example Chile, policies are underpinned by specific nutrient criteria.

³⁰ [Borys et al \(2012\) EPODE approach for childhood obesity prevention: methods, progress and international development](#)

10. The effectiveness of government planning and policymaking processes in relation to food and drink policy and tackling obesity.

54. A recent review found that in the last thirty years there have been 14 government obesity strategies containing 689 policies³¹. The review found that policies were set up in a way that led to minimal implementation, and that successive governments have rarely commissioned evaluations of previous strategies to consider the effectiveness of policies or learn from previous approaches. As such, we do not believe government approaches to obesity to date have been effective.
55. Where government has progressed policy implementation, this has tended to be on policies linked to the food and drink industry and we have worked with companies to support implementation. This includes voluntary traffic light labelling, the reduction and reformulation programmes (calories, salt and sugar), the Soft Drinks Industry Levy (SDIL), restrictions for promotion of HFSS food and drinks in store and online, and further HFSS advertising restrictions.
56. We are not clear on progress by government on policy implementation in other areas, such as its commitment to review the digital weight management offer on the NHS apps library or to expand weight management services through the NHS.
57. We understand the importance of policies for the food industry to improve the nutritional profile of food and drink and to increase the accessibility and availability of healthy choices for the nation. We believe it is critical that government policies support and incentivise ongoing reformulation and healthier product innovation by companies. However, these will never be enough in isolation - a range of policies need to be implemented across multiple areas.
58. For policies aimed at food companies, they need to be implemented in a timely manner, taking into consideration practicalities for industry. Delay to publication of regulations and guidance cause challenges for companies in preparing for regulations. For example, we are yet to see the publication of the secondary legislation and guidance for the further HFSS advertising regulations, due to come

³¹ [Theis \(2021\) Is Obesity Policy in England Fit for Purpose? Analysis of Government Strategies and Policies, 1992-2020](#)

into force from October 2025. To help ensure that companies are clear about the new rules we are asking the UK government for guidance and secondary legislation to be published by mid-2024 to ensure that businesses have time to prepare ahead of implementation.

59. It is essential that the government works on delivering effective, joined-up regulation through efficient collaboration and communication between Whitehall departments, the Devolved Administrations and regulators, to ensure that the regulatory environment does not impose unnecessary complications or burdens, and promotes investment.

60. We believe to be most effective any government policy should:

- Be evidence based to have a demonstrable impact on improving health outcomes, with clear and measurable objectives.
- Engage with industry to ensure new obligations are practical to implement, including appropriate implementation timeframes and timely provision of guidance.
- Include a commitment to review after 5 years and a sunset clause to remove regulation that proves to be ineffective.

61. It is also key for any policies and regulations to be supported by resources for implementation and managing compliance and enforcement, including timely publication of guidance for industry 12 – 18 months ahead of regulations coming into force.

11. The impact of recent policy tools and legislative measures intended to prevent obesity.

62. The food industry recognises the important role we play in helping to improve the nation's health. With respect to action the food industry can adopt, it is recognised that reformulation and portion sizing are two measures that could have the greatest impact³². As such, companies have been working hard to provide healthier options for many years, to support the government reformulation programmes and their own nutrition targets. As a result, FDF member products contribute 13% fewer calories, 15% fewer sugars, and 24% less salt than they did eight years ago³³.

³² [McKinsey Global Institute - Overcoming obesity: an initial economic analysis](#)

³³ Kantar Worldpanel Take Home data for FDF members, total nutrient volumes in 2022 vs

63. The successful reduction of salt, sugars and calories in food and drink is a result of years of innovative, voluntary reformulation. The sector continues to seek solutions to meet this challenge, however, it is often technically and scientifically challenging to reformulate recipes. As such, we value the work of the Food Standards Agency in reviewing the science and safety of ingredients (such as sweeteners and emulsifiers) often needed for the successful implementation of reformulation programmes.
64. The soft drinks industry is rightly praised for the enormous amount of work they have undertaken to remove sugar from drinks, starting many years before the introduction of the Soft Drinks Industry Levy (SDIL). Whilst the SDIL is often praised for successfully driving reformulation – and it undoubtedly sped up delivery of some of the ongoing innovation - we have seen similar progress in pre-packed milk-based drinks (approximately 30% sales weighted average reduction over 3 years). This was achieved through a voluntary programme, not a levy, demonstrating that voluntary measures can also deliver results.³⁴
65. It is important to note that the difference in reformulation progress between food and drinks, and between different food categories (such as chocolate and sweets or breakfast cereals and yoghurts) is driven by the feasibility of reformulation and the availability of technical solutions, rather whether government takes a voluntary or mandatory approach. It is also important to realise that due to these differences, sometimes it may be appropriate to consider portion size alongside nutrient profile per 100g, as the government's sugar reformulation programme does.

12. Policy tools that could prove effective in preventing obesity amongst the general population, including those focussed on the role of the food and drink industry in tackling obesity.

66. We do not believe there is a silver bullet to tackling obesity; we believe that a holistic, whole systems approach is needed if the UK is to achieve public health goals. As mentioned in our response to question 10, where government has progressed policy implementation, this has tended to be on policies and regulations linked to the food and drink industry. We are less clear on the progress of government in delivering other areas for example, public health campaigns that promote positive healthy lifestyles; funding nutrition education in schools; or in supporting treatment and services for those living with obesity – and it is critical that government takes a multifaceted approach to tackling obesity.

67. As food and drink manufacturers, we see a focus for us in three broad areas: innovating to provide healthier products; supporting workplace and community health through a whole systems approach; and clear and consistent messaging.

68. The FDF and its members are committed to voluntary reformulation and innovation to develop products with an improved nutritional profile as well as offering appropriate portion sizes and have made considerable progress over the last few decades. We are committed to working with DHSC, along with NGOs and consumers, to drive further progress and ensuring the programmes are both ambitious and practical for industry. It will help these programmes if the government supports the message about the importance of processing for product reformulation and innovation to improve the nutritional profile of products.

69. A healthy diet is not all about cutting back on certain foods or nutrients. Most of the top dietary risk factors in the UK are linked to the elements of the diet that we do not get enough of including whole grains, fruit, legumes, nuts, seeds and fibre. To address this, in 2021 we launched our 'Action on Fibre' initiative, working with 25 brands to help make higher fibre diets more appealing, normal and easy for the population. This has already made a demonstrable difference - delivering an additional 7.2 billion servings of fibre to the population in the first year³⁵.

³⁵ [The FDF Action on Fibre year 1 results](#)

70. The UK's food and drink sector operates to the highest standards, consistently using the latest science and data to ensure food is delicious and safe to eat. We are always at the forefront, utilising cutting-edge technologies and processes such as AI to support the development of new products. We are renowned for our strength in science, research and innovation. We want to continue working in partnership with the UK's research community to draw on our world-leading expertise and translate research into applications on the factory floor. But investment has fallen in our sector over recent years, so in the next Parliament we need to work with government to unlock it again.
71. To support this, the government should create a formal food and drink innovation partnership, such as those with other manufacturing sectors, to work collaboratively and invest in outreach to engage food and drink manufacturers and fully understand their unique processes and challenges. They should also ensure that UK Research and Innovation investment prioritises food and drink manufacturing as an advanced manufacturing sector that is strategically vital for UK food security. This will involve creating partnerships between the industry and the UK's world leading academic base to deliver higher returns on investment and maintain food safety, while tackling key environmental and social challenges that are important to the UK economy.
72. Healthier product innovation is a complex, scientific and technical process requiring time and substantial investment by companies – contributing towards the £21bn spent on capital, including R&D projects, in the last five years to 2022³⁶. Costs for innovation are impacted by diverse factors such as ingredients, food technologies, R&D investments, testing, and communication approaches. In general, new innovations will incur increased costs – for example ingredient solutions can be more expensive (such as salt alternatives) and new innovations often require shorter production runs compared to existing established products, which can lead to higher labour costs.
73. In 2023, we surveyed our members to find out what would support them in this space. Above all it is important for all companies to have regulatory certainty, so that they can be confident the

³⁶ [Office for National Statistics Dataset - Annual gross fixed capital formation by industry and asset](#)

parameters they are working towards will still be in place, helping them to launch new and reformulated products successfully when they are ready. Larger companies also called for broader and more accessible financial support for reformulation and healthier product innovation, through existing R&D tax credits, grants and capital allowance schemes. This should include bringing capital within the scope of R&D tax credits, thus allowing companies to offset the significant upfront costs that can often prevent further investment in product reformulation and innovation.

74. Smaller businesses highlighted the need for a holistic programme to help them kick start and deliver healthier product innovation. The [FDF Scotland Reformulation for Health Programme](#), core funded by Scottish Government and supported by Food Standards Scotland, delivers a wide range of support for SMEs including funding, training and advice, and has delivered impactful results (see our response to question 9 for further details). We believe we would see real value in expanding this best practice approach to small and medium sized businesses across the UK. We estimate a scheme could be established across the whole of the UK for c£4m per annum, or c£3m per annum for England alone.

75. Working alongside partner organisations, our members also have a proud history of supporting communities, providing healthy options to breakfast clubs and redistributing surplus food to those who need it, as well as delivering extensive workplace health initiatives. We want to work with government to partner on ways to tackle obesity and health inequalities in communities throughout the UK. To explore this, several of our member companies are working in partnership with MoreLife and Leeds Beckett University to pilot a whole-systems approach focused on the health of their workforce at specific factory sites, co-designing programmes with local partners that address specific health needs. To support this, we believe the government should ensure a whole-systems approach is central to any government strategy to enable healthier lifestyles for everyone. Government should work with industry (not just the food and drink industry) to help build and amplify community programmes, to explore the potential scope for expansion and deliver meaningful change in communities.

76. Food and drink manufacturers continue to provide nutrition information on food labels and digital channels to help consumers make informed choices. We are also working closely with regulators to support companies to prepare for the advertising restrictions of

food and drink high in fat, sugar or salt due to come into force in October 2025. However, we believe that more can be done to encourage and empower people to make healthier choices, and that government should deliver a public health campaign —supported and amplified by the industry — using positive, practical messaging to help people make healthier choices in their everyday lives.

The UK Food and Drink Manufacturing Industry

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 more than £139 billion, accounting for 23 per cent of total UK manufacturing, and Gross Value Added (GVA) of more than £38 billion. Food and drink manufacturers directly employ over 472,000 people across every region and nation of the UK. Exports of food and drink make an increasingly important contribution to the economy, approaching £25 billion in 2022, and going to over 220 countries worldwide. The UK's 12,515 food and drink manufacturers sit at the heart of a food and drink supply chain which is worth £162 billion to the economy and employs 4.2 million people.

The following Associations actively work with the Food and

Drink Federation: ABIM Association of Bakery Ingredient

Manufacturers

BCA	British Coffee Association
BOBMA	British Oats and Barley Millers Association
BSIA	British Starch Industry Association
BSNA	British Specialist Nutrition Association
CIMA	Cereal Ingredient Manufacturers' Association
EMMA	European Malt Product Manufacturers' Association
FCPPA	Frozen and Chilled Potato Processors Association
FOB	Federation of Bakers
GFIA	Gluten Free Industry Association
PPA	Potato Processors Association
SNACMA	Snack, Nut and Crisp Manufacturers' Association
SSA	Seasoning and Spice Association
UKAPY	UK Association of Producers of Yeast
UKTIA	United Kingdom Tea & Infusions

Association Ltd FDF also delivers specialist sector

groups for members:

Ice Cream Group

Organic Group

Seafood Industry

Alliance CBD Group

5 April 2024