

# Voluntary - Salt Reduction Strategy Reformulation Targets

## Quick Summary

In 2004 the Food Standards Agency established a salt reduction programme which has reduced average population salt intakes by around 10%. Much of this reduction has been achieved through partnership with industry to set voluntary reformulation targets for key categories of processed foods.

Policy responsibility for the salt reduction programme will transfer to the Department of Health on 1<sup>st</sup> October 2010.

## What was the context?

In 2003 the Scientific Advisory Committee on Nutrition (SACN) published its report *Salt and Health* which concluded that the evidence of a link between salt and high blood pressure had strengthened since the issue had last been considered and recommended that work should be undertaken to reduce salt intakes in the UK to reduce this risk. The Government accepted SACN's recommendation to work towards reducing salt intakes to 6g for adults and lower levels for children.

The link between high salt intakes and high blood pressure is clear. High blood pressure is a major risk factor for cardiovascular disease (CVD) including heart disease and stroke. The risk of CVD from heightened blood pressure begins in the normotensive range; indeed the majority of people suffering CVD are within this group. As a result a whole population approach to salt reduction would reduce the overall population's risk of developing CVD.

More than one in three deaths (35%) are attributable to CVD each year; and CVD has significant personal and economic costs which were estimated at £30.7 billion in 2006 (health care costs, informal care costs and productivity losses).

Reducing salt intakes through voluntary reformulation and increasing public awareness has been a highly cost effective policy option. It is estimated that the 10% reduction in intakes achieved to date saves the economy £1.5 billion and prevents around 6,000 premature deaths annually. Approximately £18.6 million has been spent on the public awareness

campaign to date which supports the reformulation part of the programme.

Prescriptive regulation on reformulation would have:

- been overly complex due to the wide range of foods and additives which contain sodium,
- potentially delayed Government intervention whilst regulations were drafted and approved,
- placed significant burdens on industry; and,
- required a costly enforcement regime.

Additionally food law is an EU competence and developing national legislation in this area is difficult.

A number of businesses had taken steps to reformulate their products to reduce salt content and a voluntary scheme allowed the FSA to build on this. Voluntary recommendations also allowed the FSA to advocate for the highest reductions possible instead of setting only maximum targets which would have been the case if these were set in legislation.

In addition voluntary salt reduction targets provide the opportunity to review on a more regular basis, taking into account technological advances and developing targets based on what leading companies have achieved.



## What was delivered (mechanism)?

The salt reduction strategy has been delivered in 3 strands; a public health campaign, collaboration with industry on reformulation and the development of a single front-of-pack nutrition labelling scheme.

Voluntary salt reduction targets for a range of processed foods were established in collaboration with the food industry. These were published in 2006 and, following a review in 2008, the Agency published revised, more challenging targets for 2010 and 2012.

Significant take up of the scheme has been achieved through an effective partnership approach with industry, involving businesses in the development of the targets, working to understand and address technical barriers and helping participant businesses gain a competitive advantage by acting responsibly.

Competitive advantage has been facilitated through government promotion of positive behaviours; in the case of the Salt Reduction Strategy this has included the publication of the salt commitment table and press statements which specifically highlight successful businesses and brands as well as highlighting progressive companies in Ministerial and high level official speeches and presentations.

The role of the FSA has been to bring relevant stakeholders together, to establish targets and parameters for review, to monitor progress, to provide technical expertise where necessary including disseminating the results of relevant research, to report on progress and to develop further challenging recommendations to build on successes.

## How did we make this happen?

In November 2003 the then Public Health minister initiated a series of meetings with individual organisations and stakeholder groups to discuss salt reduction. In February 2005 FSA / DH published initial commitments to reduce salt by individual food businesses. Following a public consultation voluntary salt reduction targets were published in March 2006. This publication included a commitment to review progress in 2008 to establish what further reductions were necessary to maintain progress towards the 6g daily intake target. As a result of this review revised, more challenging salt reduction targets were published in May 2009.

The FSA also ran 4 phases of a public awareness campaign to make consumers aware of health issues associated with high salt intakes and highlight actions they can take. This supported reformulation as it made consumers aware of why products may change and provides an incentive to industry to take action as more consumers will be looking for lower salt products.

The greatest risk involved in a voluntary approach is designing a scheme which was overly onerous and caused businesses to disengage with the process or conversely establishing targets which are easily achievable but fail to deliver the policy objectives.

Engagement with this strategy has been maintained through publicity for successful businesses, accepting commercial difficulties faced by businesses and helping to address technical difficulties such as consumer acceptance,

technological barriers and microbial safety. To address some of these difficulties the FSA funded research into salt reduction in bread and produced guidance for small and medium sized businesses on salt reduction in meat products.

Stakeholders should be involved as early as possible to develop a partnership approach and share ownership of the targets set out. Early stakeholder engagement facilitates development of broad support in principle before finalising targets. Industry also bring technical knowledge which can be invaluable in determining achievable targets. Sector and company specific engagement allowed the FSA to establish effective one-to-one working relationships, better understand the needs of different sectors, consolidate initial progress, and negotiate specific measurable commitments. Industry has indicated that it welcomes an interactive approach and is generally positive about the potential for further reductions over time. However, disengagement may occur if businesses perceive that the policy is no longer on the Government's agenda and this risk will require ongoing management.

A further significant risk faced by the strategy has been the potential for responsible businesses to lose custom to those who do not take up the scheme, including companies exporting to the UK. To address this issue FSA policy makers engaged with international colleagues to demonstrate the value of government intervention and the success of the UK strategy. The initiative also allows multinational companies that are already taking action as a result of the UK programme to have an advantage when other countries require changes to be made to reduce levels of salt in products.

## Lessons learnt

A voluntary initiative will work where there is consensus as to the validity of the government's policy objectives. As such a voluntary scheme should be supported by an equivalent evidence base to a regulatory measure with sufficient research to support the policy and its cost effectiveness.

A mechanism designed in partnership is most likely to produce targets which are both effective and realistic. It is useful to establish a broad base of support in principle and work with these early adopters to develop targets which industry can buy into. An effective working relationship with industry is vital and will involve officials meeting regularly both with trade associations and individual companies and also highlighting and promoting the initiative regularly at trade conferences. It also requires ongoing political support.

Policy makers should accept that businesses will face barriers they have not considered and that any initiative will need to have the flexibility to adapt to these challenges. Drawing out these challenges is most effective early in the development stage. As a result engagement should be initiated as early as possible to develop a scheme which businesses can buy into.

In designing the scheme policy makers should understand the political, commercial and technical challenges facing businesses and be prepared to adapt appropriately. There will be businesses who believe targets go too far or cannot be achieved; however, effective engagement should inform targets which are challenging but achievable and a staged approach might usefully be considered.

Government should be aware that even in a voluntary scheme businesses may incur significant costs in participating. As a result there should be an opportunity for businesses to develop competitive advantage by signing up to the scheme particularly in the current economic climate. Early consideration of 'reward' for industry co-operation is advised; openly praise early adopters and those businesses making significant progress and recognise the costs they have incurred in complying.

Challenge inertia but accept the difficulties faced by some businesses and work with them to identify solutions. In addition keep the initiative 'live' by including references in speeches by the Minister and high level officials as well as engaging policy makers outside the UK where appropriate.

## The Team / Further information

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### Want to know more about alternatives?

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