



Public Health  
England

Protecting and improving the nation's health

# **Consultation on the UK Nutrient Profiling Model 2018 review Summary of consultation responses**

## About Public Health England

Public Health England exists to protect and improve the nation's health and wellbeing, and reduce health inequalities. We do this through world-leading science, knowledge and intelligence, advocacy, partnerships and the delivery of specialist public health services. We are an executive agency of the Department of Health and Social Care, and a distinct delivery organisation with operational autonomy. We provide government, local government, the NHS, Parliament, industry and the public with evidence-based professional, scientific and delivery expertise and support.

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## Summary of responses

In August 2016, government set out its approach to tackle child obesity in Childhood Obesity, A Plan for Action<sup>a</sup>. One of the commitments in the plan was to review the existing UK Nutrient Profiling Model (NPM) 2004/5<sup>b</sup>, and develop and test options for a new model that reflects current UK dietary recommendations.

The UK NPM 2004/5 was developed by the Food Standards Agency (FSA) as a tool to enable the Office of Communications (Ofcom), the UK broadcast regulator, to identify 'less healthy'<sup>c</sup> foods and drinks that were to be subject to restrictions during children's television programming. Ofcom has been using this model for broadcast media since the restrictions came into force in April 2007<sup>d</sup> and for non-broadcast media (including print, cinema, online and in social media) since July 2017<sup>e</sup>.

The UK NPM 2004/5 is over 10 years old and no longer reflects current UK dietary recommendations, in particular those for free sugars and fibre<sup>f</sup>.

The UK NPM 2004/5 covers foods and non-alcoholic drinks, utilising a scoring system for 7 nutrient/food components based on per 100g as sold<sup>1</sup>. Points are allocated based on 4 'negative' nutrients/food components (ie energy; total sugars; saturated fat and sodium) and 3 'beneficial' nutrients/ food components (ie fruit, vegetables and nuts; fibre and protein). Protein is used as a marker of iron, calcium and n-3 fatty acids.

A public consultation was held between 15 March 2018 and 15 June 2018 on the 2018 review of the UK NPM 2004/5. The review included developing a modified NPM (draft 2018 NPM). The consultation sought views on the modifications made to the UK NPM 2004/5, specifically its alignment with current UK dietary recommendations.

A total of 42 responses were received via email to a dedicated NPM mailbox. A list of respondents can be found in **Table 1**. This document sets out a summary of the consultation responses which have been themed at a high level. The full responses are being used to help inform any further refining of the 2018 review of the UK NPM 2004/5 before a recommendation is presented to ministers.

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<sup>1</sup> Reconstituted foods and drinks are calculated based on 100g of the product as reconstituted according to the manufacturer's instructions.

**Table 1: List of respondent to the 2018 review of the UK Nutrient Profiling Model**

<b>Respondents</b>
Action on Salt and Action on Sugar
Advertising Association
AIJN European Fruit Juice Association
Association for Nutrition
British Dietetic Association
British Dietetic Association – Obesity Group
British Fruit Juice Association
British Retail Consortium
British Soft Drinks Association
British Specialist Nutrition Association Ltd
Committee of Advertising Practice
Dairy UK
Danone
European Specialist Sport Nutrition Alliance
Food Active - Cheshire West and Chester Council and Halton Borough Council
Food and Drink Federation
General Mills and Yoplait
Hampshire County Council
Incorporated Society of British Advertisers
Individual 1
Individual 2
Individual 3
Individual 4
Innocent Limited
ITV plc
ITV plc + NP critique from Prof Tom Sanders
Jamie Oliver Limited
Karen Tonks Consultancy Limited
Lucozade Ribena Suntory
Nestle UK
Obesity Action Scotland
Obesity Health Alliance
Pepsico
Porter Nutrition
Provision Trade Federation
Specialist Cheesemakers Association
The Institute of Food Science and Technology
Total Diet and Meal Replacements Europe
UK Health Forum
Urban Fresh Foods
Waitrose
Weetabix Limited
Which?

# Key themes of the consultation responses

## General views on the modification made to the UK NPM 2004/5

There were a range of comments received about the 2018 review of the UK NPM 2004/5. The majority were in relation to:

- the approach taken, scope and methodology
- free sugars and total sugars
- fibre
- fruit, vegetables and nuts
- protein and the protein cap

Some comments were also made in relation to sodium/salt, saturated fat, and energy.

The consultation responses summarised by theme, where more than one response was received, are presented below.

## Responses about the approach taken, scope and methodology used in the 2018 review of the UK NPM 2004/5

Comments related to:

- conducting a full review of the UK NPM 2004/5
- further testing of the modified models using out of home food and drink products
- including a performance measure for fruit, vegetables and nuts
- introducing a portion size cap
- comparing the modifications made to the UK NPM 2004/5 with other nutrition policy tools

## Responses about proposed changes to the nutrient/food components within the UK NPM 2004/5

### Free sugars/total sugars

Responses included comments on the:

- modifications made to the UK NPM 2004/5 to include free sugars in line with UK dietary recommendations

- complexity and practicality of calculating free sugars, including
  - proposals to reconsider the use of the total sugars value as a proxy for free sugars
  - the development of standardised tools or supporting technical guidance (including the clarification on the processing of fruit and vegetables) on calculating free sugars
- performance measure which allows fewer foods that are high in free sugars to pass the modified NPM

## Fibre

Respondents commented on:

- modifications made to the UK NPM 2004/5 to reflect the UK dietary recommendations for fibre
- the proposed changes to the fibre scoring from 5 points to 8 points
- Extending and re-balancing fibre scoring to 10 points for further testing

## Fruit, vegetables and nuts

Respondents commented on:

- extending and re-balancing the fruit, vegetables and nuts scoring to 10 points for further testing

## Protein

Respondents commented on the:

- validity of the protein criterion as a marker for certain nutrients (calcium, iron and n-3 fatty acids)

## Protein cap

Respondents commented on:

- including a protein cap based on fibre which allows foods that score 11 or more 'A' points to only score points for protein if they also score the maximum points for fibre
- reviewing the impact of removing the protein cap

## Salt/Sodium

Respondents commented on the:

- proposed changes to use salt instead of sodium as the criterion in the model

## Saturated fat

Respondents commented on the:

- reference value of 11% of food energy in the model, in line with the current UK dietary recommendations
- modified model being unable to differentiate other fatty acids (eg monounsaturated and polyunsaturated fatty acids)

## Comments beyond the scope of the review

The NPM Expert Group's remit is to consider comments relating to the scientific validity of the model for its intended purpose. A number of comments were received around exemption requests for specific foods/drinks or food/drink categories; the wider application of the NPM; potential inconsistency and conflict with the broader policy environment (for example, with other policy tools in the area of nutrition); and further restrictions for the regulation of food and drink advertising. These comments were noted but considered beyond the scope of this review.

## Next steps

Due to the technical nature of the 2018 review of the UK NPM 2004/5, the full consultation responses published alongside this summary document are still being considered by the NPM Expert and Reference Groups.

After further consideration of the responses by the NPM Expert and Reference Groups, PHE will present the outcome of the 2018 review of the UK NPM 2004/5 to ministers.

Responses outside the remit or beyond the scope of the review will be communicated as appropriate.

## References

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