

The Government Buying Standards for Food and Catering Services (GBSF): updating the nutrition standards

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Summary

The Government is consulting on updating the nutrition standards in the Government Buying Standards for Food and Catering Services (GBSF). This was announced as part of <u>Childhood Obesity: a plan for action, chapter 2</u>. The aim of the policy is to ensure healthier food and drink options are available across the public sector. As part of the Department of Health and Social Care (DHSC) vision document 'Prevention is better than cure'¹, published on 5 November 2018, the Government recommitted to the work set out in Chapter 2 of the Childhood Obesity Plan and highlighted that the workplace is a great setting for encouraging healthy lifestyles - including on eating healthily.

This consultation sets out a proposal to update the nutritional standards in the GBSF to reflect the latest scientific dietary advice. We are seeking views on these updates, including implementation periods and how we can best capture future updates to the nutrition standards.

All central Government departments and their agencies are required to comply with the GBSF, as well as prisons, the armed forces, and the NHS. Schools must follow the school food standards legislation but may also choose to use the GBSF too. The wider public sector is encouraged to apply these standards, including to food and drink offered in vending machines (for example in leisure centres).

The GBSF currently includes mandatory nutrition standards to reduce the intake of salt, sugar and saturated fat and to increase consumption of fruit, vegetables, fish and fibre. It also includes voluntary best practice nutrition standards that cover availability and/or portion size of soft drinks, confectionery, savoury snacks, calorie/allergen labelling and menu analysis.

The nutrition standards in the GBSF need to be updated to reflect the latest scientific dietary advice, that includes the recommendations published in the Scientific Advisory Committee on Nutrition's (SACN) report on carbohydrates and health (July 2015) ². These were accepted by Government and incorporated into Government dietary recommendations.

These nutrition standards will be reviewed and updated as necessary to reflect any new guidelines or targets, or revisions to those already existing, including from the sugar reduction and wider reformulation programme.

This consultation seeks views on strengthening the GBSF nutrition standards to bring them into line with the latest scientific dietary advice. We welcome the views of any individual or organisation that has an interest, directly or indirectly.

1. Introduction

- 1.1 The Government Buying Standards for Food and Catering Services (GBSF)³ were introduced in 2011 as a means of meeting the Greening Government Commitments when buying and providing food and catering services. The current GBSF standards can be found in Annex 1.
- 1.2 All central Government departments and their agencies are required to comply with the GBSF, as well as prisons, the armed forces, and the NHS. Schools must follow the school food standards legislation but may also choose to use the GBSF too. The wider public sector is encouraged to apply these standards, including to food and drink offered in vending machines (for example, in leisure centres).
- Overall policy responsibility for the GBSF rests with the Department for Environment, Food and Rural Affairs. The Department of Health and Social Care (DHSC) has responsibility for the nutrition standards within the GBSF, taking into account advice from Public Health England (PHE). The GBSF standards are mandatory for UK Government Departments and NHS England hospitals. It is up to the Devolved Administrations whether or not they choose to follow the GBSF within their Government buildings.
- 1.4 The GBSF currently includes mandatory nutrition standards that reflect Government recommendations to reduce intakes of salt, sugar, and saturated fat and to increase consumption of fruit, vegetables, fish and fibre. It also includes voluntary best practice nutrition standards that cover the availability and/or portion size of soft drinks, confectionery, savoury snacks, calorie/allergen labelling and menu analysis.
- 1.5 The Government is consulting on updating the nutrition standards in the GBSF. This was announced as part of Childhood Obesity: a plan for action, chapter 2⁴. The nutrition standards in the GBSF need to be updated to reflect the latest scientific dietary advice, that includes the recommendations published in the SACN report on carbohydrates and health (July 2015)². These were accepted by Government and incorporated into Government dietary recommendations.
- 1.6 Current evidence-based dietary advice⁵ for intake of free sugars⁶ is that the average population intake should not exceed 5% of total dietary energy; and that consumption of sugar-sweetened beverages (SSBs) should be minimised in children and adults. PHE's 'Why 5%?' ⁷ report explains the science behind SACN's recommendations on sugar consumption and health, in the context of current intakes of sugars and other dietary recommendations. As a nation we are not consuming enough fibre⁸. There is strong evidence that increased intake of total

- dietary fibre is associated with a lower risk of cardio-metabolic disease and colorectal cancer².
- 1.7 It is important that the GBSF nutrition standards reflect the latest evidence-based dietary recommendations for all public premises that are required to use them. It also supports the many local authorities who want to apply a common evidence-based standard across their food and drink provision, including to vending machines.
- 1.8 GBSF are one of five required hospital food standards⁹. A report on "Compliance with hospital food standards in the NHS: two years on: a review of progress since the Hospital Food Standards Panel report in 2014" was published in January 2017¹⁰. This concluded that although overall performance had improved, there was still variation in service quality across the country, and more to do to ensure all patients, staff and visitors got the best possible food.
- 1.9 In July 2014, the Department for Environment, Food and Rural Affairs, introduced a Plan for Public Procurement 11; this includes a Balanced Scorecard approach to the procurement of food and catering services. In general, a balanced scorecard describes an evaluation approach where more straightforward criteria, such as cost, are 'balanced' against more complex criteria, such as health and wellbeing, resource efficiency and quality of service. The nutrition standards in the GBSF are one of the standards which underpin the Balanced Scorecard. We are not seeking views on the Balanced Scorecard itself but the nutrition standards which underpin it.
- 1.10 This consultation only applies to the mandatory and voluntary best practice nutrition standards in the GBSF, not to other aspects of procurement.
- 1.11 These nutrition standards will be reviewed and updated as necessary to reflect any new guidelines or targets, or revisions to those already existing, including from the sugar reduction and wider reformulation programme.

2. The context

Evidence-based dietary recommendations

- 2.1 The public sector in England spends over £2 billion¹² on food and catering services annually, with just under half, £1 billion, being the cost of food and ingredients.
- 2.2 It is essential that public food procurement is underpinned by evidence-based dietary recommendations⁵ so that they can lead by example to ensure a healthy food environment for the public who live and work within the public sector. The recommendations on sugar intake, fibre intake and the consumption of sugars sweetened drinks published by the Scientific Advisory Committee on Nutrition (SACN) were subsequently accepted by Government and included in Government dietary recommendations. Core dietary messages and tools have been updated to reflect this.
- 2.3 Public Health England (PHE) have developed the national food model, 'the Eatwell Guide'¹³. This is consistent with the new dietary advice and promotes a more sustainable diet. The Eatwell Guide shows the proportions of the different types of foods and drinks for a healthy, balanced diet, together with supplementary messages related to key dietary recommendations.
- 2.4 It also includes updated advice on fruit juice and smoothies as part of a healthy balanced diet which limits consumption of both fruit/vegetable juices and/or smoothies to a combined total of 150ml (one portion) per day and to consume with meals to reduce the risk of tooth decay. This is based on revised, lower recommendations for sugar and reflects the potential for juice and smoothies to deliver large amounts of free sugars, while also acknowledging that they may also contribute fibre and other nutrients to the diet.
- 2.5 The sugar reduction programme, a deliverable from the Government's Childhood obesity: plan for action¹⁴, challenges all sectors of the food and drinks industry to reduce sugar by 20% by 2020 in the categories that contribute most to the intakes of children up to 18 years. A detailed assessment of progress by the food industry, towards meeting the 5% reduction target in the first year of the sugar reduction programme, was published in May 2018¹⁵.
- 2.6 Work on salt reduction began in the UK in 2004 following advice from the SACN that recommended population average salt intakes should be reduced to 6g per day to reduce the risk of high blood pressure and hence cardiovascular disease. Salt reduction has been achieved through a structured food reformulation

programme that has set the food industry a series of targets to meet. To date, four sets of voluntary salt reduction targets for individual categories of food have been published. An assessment of industry's progress towards meeting the 2017 salt targets was published in December 2018¹⁶.

3. Consultation proposals and questions

Summary of proposals

- 3.1 We are consulting on updating the nutrition standards in the GBSF so they reflect the latest scientific nutritional evidence, including the advice from SACN on recommended levels of sugar and fibre intake that has been accepted by Government and incorporated into Government policy and messages about a healthy balanced diet.
- 3.2 We are proposing updates to both the mandatory and the voluntary (best practice) nutrition standards within GBSF for the following categories:
 - Reducing salt intake
 - Increasing fruit and vegetable consumption
 - Meal deals
 - Reducing saturated fat
 - Increasing fibre
 - Reducing sugar intake
 - Breakfast cereals
 - Savoury snacks
 - Confectionery
 - Beverages
 - Menu cycle analysis
- 3.3 These proposals are outlined in 'Proposed updates to GBSF nutrition standards' section in this document.
- 3.4 The updates broadly focus on reducing salt, sugar and saturated fat in a selection of products; and increasing fibre within bread; along with reducing portion sizes amongst savoury snacks and confectionery. These standards have been developed based on advice from PHE.

- 3.5 This update will help ensure the availability of products to encourage the population to eat in line with these recommendations with the aim of reducing the risk of obesity and dietary related disease. The consultation also asks for any additional evidence to help inform the standards.
- 3.6 The updates to the voluntary best practice standards would allow those who want to go further to do so and demonstrate leadership in this area.

Invitation to respond

- 3.7 This is a technical consultation that is expected to be of greatest interest to food business operators, the food industry, Government agencies, local authorities, consumer groups and public bodies. The consultation seeks views on the proposed approach to update the existing nutrition standards in the GBSF (the existing standards can be found in Annex 1) to reflect new recommendations on sugar and fibre that has been incorporated into Government policy and messages about a healthy diet to reduce the risk of dietary related disease. We also welcome the views of any individual or organisation that has an interest, directly or indirectly.
- 3.8 Once we have had the opportunity to consider the answers to the consultation, we will publish a response.

Questions for consultation

- 1. Do you agree or disagree with the outlined proposals for the following updated mandatory and / or voluntary standards (as set out in table 1)? If you disagree, how do you think these should be amended and why?
 - Reducing salt intake
 - Increasing fruit and vegetable consumption
 - Meal deals
 - Reducing saturated fat
 - Increasing fibre
 - Reducing sugar intake
 - Breakfast cereals
 - Savoury snacks
 - Confectionery
 - Beverages
 - Menu cycle analysis
 - Calorie and allergen labelling
- 2. Are there any other categories, either mandatory or voluntary, that you think should be amended or added to be in line with Government dietary recommendations?

Implementation

- 3. Would 12 months be an appropriate amount of time for businesses to implement the updated GBSF nutrition standards?
- 4. Are there any categories that would be easier or more challenging to implement? If so, please provide details of why.
- 5. We will provide written technical guidance to help illustrate how the nutrition standards in GBSF will work in each food or drink category. Do you think businesses will need any additional support to comply with these? If so, can you provide examples of what would be particularly helpful?

6. In addition to updating the standards if you have any suggestions for how enforcement, monitoring and compliance could be improved, please provide details.

Impacts

- 7. Is your organisation compliant with the current nutritional standards contained in the GBSF? (1) Yes (2) Partly and (3) No.
- 8. Are there any of the current standards which you will find it difficult to comply with? If yes then please provide further details.
- 9. If you have any further evidence or data that you would like to submit specifically on the likely cost that may occur to your business as a result of the proposal, please provide it here.
- 10. Is there any other potential impact from updating the nutrition standards in the GBSF that you think we should consider?
- 11. How much impact do you think the proposed changes will have in terms of costs borne by your organisation? (1) Negligible (2) Moderate costs (3) Significant costs.
- 12. Will there be any one-off costs from altering products so they meet the proposed nutritional standards? If yes then please provide further details.
- 13. Will there be any ongoing costs from introducing the proposed nutritional standards? If yes please provide further details.
- 14. Are you aware of products which already comply with the proposed nutritional standards? If yes then please provide further details.
- 15. Will there be any additional costs to vending machine providers other than those outlined above from introducing these new standards? If yes then please provide further details.
- 16. Is there any additional evidence that would improve our understanding of the costs which would be faced by your organisation from implementing the proposed nutritional standards?
- 17. If you have any further evidence or data you wish to submit for us to consider for our final impact assessment, please provide it here.
- 18. Do you think that this proposal would be likely to have an impact on people on the basis of any of the following characteristics?

- Age
- Sex
- Race
- Religion
- Sexual orientation
- Pregnancy and maternity
- Disability
- Gender reassignment
- Marriage/civil partnership
- 19. Where applicable, please provide more detail on how you think the measure would impact on people who share these characteristics.
- 20. Do you think this proposal would help achieve any of the following aims?
 - Eliminating discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010.
 - Advancing equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
 - Fostering good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 21. Where applicable, please provide more detail on how you think the measure would achieve these aims. If you do not think this proposal would help achieve any of these aims, please explain why and whether the proposal could be changed to help achieve these aims.
- 22. Do you think that this proposal would be likely to have any impact on people from lower socio-economic backgrounds?
- 23. If there are any further matters that you would like to raise or any further information that you would like to provide in relation to this consultation, please give details here.

4. Proposed update to the GBSF nutrition standards

Proposed Mandatory Nutrition Standards

4.1 This section sets out the proposed mandatory nutrition standards for the GBSF update. For each standard, the key changes are highlighted in the green box.

Reducing Salt

- 4.2 Vegetables and boiled starchy foods such as rice, pasta and potatoes, shall be cooked without salt.
- 4.3 Salt shall not be available on tables.
- 4.4 At least 75% of meat products, breads, soups and cooking sauces and ready meals procured by volume, and 75% of breakfast cereals and pre-packed sandwiches available meet current core salt targets¹⁷ and all stock preparations shall be lower salt varieties (i.e. below 0.6g/100mls reconstituted). Note: The 75% applies individually to each food category described in the above specification, and not only to the combined availability / volume. The requirement relates to meeting maximum targets, or using an average target as a maximum where a maximum target is not set.

Change to current salt targets.

Increase from 50% to 75% of products with categories meeting targets and updated wording from procured by volume to available.

Increasing fruit and vegetable consumption

- 4.5 A portion of fruit shall be sold at a lower price than a portion of hot or cold dessert.
- 4.6 Half of desserts available should contain at least 50% of their weight as fruit which may be fresh, canned in fruit juice, dried or frozen. This excludes whole fresh fruit as a dessert option. Whole fresh fruit can be a dessert option but should not be included as an option when calculating whether half of dessert options should contain at least 50% of their weight as fruit.

4.7 Main meals within a meal deal should include a starchy carbohydrate which is not prepared with fats or oils, vegetables and 1 portion of fruit.

Excluding fresh fruit as a dessert for calculation purposes.

Change to the meal deal standard from the current: Meal deals include a starchy carbohydrate, vegetables and 1 portion of fruit.

Additional requirement of carbohydrate in meals not being prepared with fats or oils.

Meal Deals

- 4.8 Any pre-packaged food and drink products in a meal deal should not be high in fat, sugar or salt (HFSS) ¹⁸.
- 4.9 Any foods and drinks within a meal deal must also meet the relevant GBSF standards for the healthier options, e.g. healthier sandwiches¹⁹.

New mandatory standard to not include high fat, sugar or salt products in meal deals and to ensure food and drinks used within meal deals meet the healthier options in the GBSF standards.

Reducing saturated fat

- 4.10 Meat and meat products (procured by volume), biscuits, cakes and pastries (available) be lower in saturated fat, where available.
- 4.11 At least 50% of hard yellow cheese procured by volume shall have a maximum total fat content of 25g/100g;
- 4.12 At least 75% of ready meals procured by volume shall contain less than 6g saturated fat per portion;
- 4.13 At least 75% of milk procured by volume is lower fat (semi-skimmed, 1% or skimmed milk).
- 4.14 At least 75% of oils and 75% of spreads procured by volume are based on unsaturated fats.

4.15 At least 75% of pre-packed sandwiches (and other savoury pre-packed meals (wraps, salads, pasta salads) available contain 400kcal (1680 kJ) or less per serving and do not exceed 5.0g saturated fat per 100g.

Additional requirement around pre-packed sandwiches and other savoury pre-packed meals for decreasing saturated in pre-packed sandwiches.

Very slight rewording for clarity regarding milk.

Increasing Fibre

- 4.16 At least 50% of bread available contains at least 3g fibre per 100g (ie is a source of fibre), excluding pre-packed sandwiches.
- 4.17 At least 75% of pre-packed sandwiches (and other savoury pre-packed meals (wraps, salads, pasta salads) available contains bread with at least 3g fibre per 100g.

New mandatory standard for increasing fibre intake.

Additional requirement around bread available, and pre-packed sandwiches and other savoury pre-packed meals for increasing fibre.

Reducing sugar intake

- 4.18 At least 75% of products available that are included in the following categories covered by the sugar reduction programme to not exceed the following:
 - Biscuits 100kcals
 - Cakes 220 kcals
 - Morning goods 220 kcals
 - Puddings 220 kcals
 - Yogurts 120 kcals
 - Ice cream 220 kcals

Note: The 75% applies individually to each product category described in the above specification, and not only to the combined availability.

New mandatory standard for reducing sugar intake.

Breakfast Cereals

4.19 At least 50% of breakfast cereals available are higher in fibre (i.e. at least 6g/100g) and shall not exceed 12.3g/100g total sugars (10g additional allowance for dried fruit in cereal).

Update to maximum sugar content for at least 50% of breakfast cereals – to bring in line with sugar reduction guideline.

Updated wording from procured by volume to available.

Fish

If caterers serve lunch and an evening meal, fish is provided twice per week (2X 140g portion), one of which is oily. If caterers only serve lunch or an evening meal, oily fish (140g portion) is available at least once every three weeks.

No change

Savoury Snacks

4.20 Savoury snacks are only available in packet sizes of 35g or less.

Newly created mandatory standard, previously this was only voluntary, and has been set at 35q.

Confectionery

4.21 At least 75% of confectionery and packet sweet snacks are in the smallest standard single serve portion size available within the market and do not exceed

200 kcal (maximum) for chocolate and 125 kcal (maximum) for sugar confectionery.

Moved from voluntary best practice to mandatory with new calorie caps, bringing in line with sugar reduction guideline.

Beverages

- 4.22 No more than 10% beverages available can be sugar sweetened beverages (SSB). **Note:** SSBs are any drink, hot or cold, carbonated or non-carbonated, including milk based drinks and milk substitute drinks such as soya, almond, hemp, oat, hazelnut or rice, which contains more than 20kcal/100ml energy (i.e. is not 'low energy (calorie)') and also has had any sugar added to it as an ingredient (i.e. is not 'no added sugar'). Products sweetened with a combination of artificial/natural sweeteners and sugars would, if they contain more than 20kcal/100ml energy (i.e. are not 'low energy (calorie)'), fall within this definition.
- 4.23 At least 90% of beverages made available must be low calorie/no added sugar beverages. **Note:** Low calorie (low energy) beverages are products not containing more than 20kcal (80kJ)/100ml) energy for liquids. No added sugar means beverages that have not had sugar added to them as an ingredient. This includes beverages such a as coffee, tea and hot chocolate which should not contain sugar sweetened flavoured syrups or be sugar sweetened as sold or provided; fruit juice, vegetable juice, smoothies, 'juicy waters' and water.
- 4.24 All SSB to be no more than 330ml pack size. Any SSB that are hot or cold milk-based drinks including milk substitute drinks such as soya, almond, hemp, oat, hazelnut or rice need to meet 300kcal cap.
- 4.25 Any meal deals should not include any SSBs.
- 4.26 At least 75% fruit juice, vegetable juice and smoothies to be provided in single serve packs. These single serve packs should contain no more than 200ml for juice alone, and as close to 150ml per serving as possible. **Note:** This could include larger single serve packs containing a 150ml serving of juice diluted with water.

Moved from the 330ml pack size for SSB from voluntary best practice to mandatory.

Moved from voluntary best practice to mandatory and increased to 90% from 80% (now 10% of beverages can be SSBs).

Change of wording from 90% of beverages procured by volume to made available.

New standard for fruit juices and smoothies.

New standard for milk-based drinks (including milk substitute drinks).

No SSBs to be included within a meal deal.

Proposed voluntary (best practice) nutrition standards

4.27 This section sets out the proposed voluntary (best practice) nutrition standards for the GBSF update. For each standard, the key changes are highlighted in the green box.

Reducing Salt Intake

- 4.28 At least 75% of all products (procured by volume / available) that are covered by the current salt targets, meet this target.
- 4.29 Note: The 75% applies individually to each food category described in the above specification, and not only to the combined availability / volume. The requirement relates to meeting maximum targets, or using an average target as a maximum where a maximum target is not set.

New voluntary best practice standard for reducing salt intake.

Increasing Fibre

- 4.30 To ensure at least 50% of all bread available contains at least 3g fibre per 100g (ie is a source of fibre), as per the mandatory standard.
- **4.31** And, in addition to the mandatory standard at least 25% of all bread available contains at least 6g per 100g (ie high in fibre), excluding pre-packed sandwiches.

New voluntary best practice standard for increasing fibre intake.

Breakfast Cereals

- 4.32 To ensure at least 50% of all breakfast cereals available contain at least 6g per 100g of fibre (ie high in fibre) and shall not exceed 12.3g/100g (10g additional allowance for dried fruit in cereal), as per the mandatory standard.
- 4.33 And, in addition to the mandatory standard, at least 25% of all breakfast cereals available contain at least 6g per 100g (ie high in fibre) and shall not exceed 5g/100g (10g additional allowance for dried fruit in cereal).

New voluntary best practice standard for increasing fibre and decrease sugar intake.

Savoury Snacks

4.34 Savoury snacks are only available in packet sizes of 30g or less.

No change to standard.

Confectionery

4.35 All confectionery and packet sweet snacks available are in the smallest standard single serve portion size available within the market and do not exceed 200 kcal (maximum) for chocolate and 125 kcal (maximum) for sugar confectionery.

New voluntary best practice standard for reducing sugar intake.

Beverages

4.36 All beverages made available (100%) must be low calorie/no added sugar beverages, i.e. no SSBs are offered for sale.

New voluntary best practice standard for reducing sugar intake.

Menu Cycle Analysis

4.37 Menu cycles are analysed to meet nutrient based standards relevant for the majority of customers using the catering provision.

No change to standard, very slight rewording for clarity.

Calorie and allergen labelling

4.38 Removed category.

Removed the best practice requirement for menus for (food and beverages) to include calorie and allergen labelling.

The previous voluntary standard relating to calorie and allergen labelling on menus has been removed due to the progression of both policy areas since the GBSF nutrition standards were developed.

5. Annex A: Current GBSF nutrition standards

Mandatory nutrition standards

Reducing Salt

- 5.1 Vegetables and boiled starchy foods such as rice, pasta and potatoes, shall be cooked without salt.
- 5.2 Salt shall not be available on tables.
- 5.3 At least 50% of meat and meat products, breads, breakfast cereals, soups and cooking sauces, ready meals and pre-packed sandwiches (procured by volume) meet Responsibility Deal salt targets and all stock preparations are lower salt varieties (i.e. below 0.6g/100mls).

Increasing fruit and vegetable consumption

- 5.4 At least 50% of the volume of desserts available is based on fruit which can be fresh, canned in fruit juice, dried or frozen.
- A portion of fruit shall be sold at a lower price than a portion of hot or cold dessert.

 Meal deals include a starchy carbohydrate, vegetables and 1 portion of fruit.

Reducing saturated fat

- 5.6 Meat and meat products, biscuits, cakes and pastries (procured by volume) are lower in saturated fat where available.
- 5.7 At least:
 - 50% of hard yellow cheese shall have a maximum total fat content of 25g/100g;
 - 75% of ready meals shall contain less than 6g saturated fat per portion;
 - 75% of milk is reduced fat:
 - 75% of oils and spreads are based on unsaturated fats.

Cereals

5.8 At least 50% of breakfast cereals (procured by volume) are higher in fibre (i.e. more than 6g/100g) and do not exceed 22.5g/100g total sugars.

Fish

5.9 If caterers serve lunch and an evening meal, fish is provided twice a week, one of which is oily. If caterers only serve lunch or an evening meal, an oily fish is available at least once every 3 weeks.

Voluntary best practice nutrition standards

Snacks

5.10 Savoury snacks are only available in packet sizes of 30g or less.

Confectionery

5.11 Confectionery and packet sweet snacks are in the smallest standard single serve portion size available within the market and do not exceed 250 kcal.

Sugar Sweetened Beverages

5.12 All sugar sweetened beverages to be no more than 330ml pack size and no more than 20% of beverages (procured by volume) may be sugar sweetened. No less than 80% of beverages (procured by volume) may be low calorie/no added sugar beverages (including fruit juice and water).

Menu Cycle Analysis

5.13 Menu cycles are analysed to meet stated nutrient based standards relevant to the major population subgroup of the catering provision.

6. Annex B: Rationale and definitions for the nutrition standards

Overarching rationale

- The proposed nutrition standards within the Government Buying Standards for Food and Catering Services (GBSF) have been updated to help align with updated government dietary recommendations. These proposed updated standards will contribute to wider government activity to help tackle obesity and to reduce the risk of dietary-related diseases. As part of the DHSC vision document 'Prevention is better than cure' Error! Bookmark not defined., published on 5 November 2018, the Government recommitted to the work set out in Chapter 2 of the Childhood Obesity Plan and highlighted that the workplace is a great setting for encouraging healthy lifestyles including eating healthily.
- 6.2 In 2017, 64% of adults were overweight or obese²⁰. In the 2017/18 school year over a fifth (22.4%) of children aged 4-5 years, and over a third (34.3%) of children aged 10-11 years, were overweight or obese²¹. Data from the National Diet and Nutrition Survey⁸ ²² shows that on average the population consumes too much saturated fat, salt and sugar and not enough fibre. We also know that the diets of some groups of the population fail to meet recommendations for some vitamins and minerals, for example iron in teenage girls and young women.

Basis for definitions used

The definitions for the majority of the GBSF nutrition standards are based on the Department of Health's Healthier Food Mark (HFM)²³ project. This project was designed to improve the nutritional content and sustainability of food served in the public sector. This programme of work was not taken forward as a discrete scheme. Instead, the considerable body of evidence and learning was used to help develop the GBSF to help address areas of particular concern and reduce the risk of dietary-related diseases. This has been updated to incorporate additional guidelines and reflect wider activity to encourage provision of healthier food and drink options.

Reducing Salt

6.4 High intakes of salt are linked to increased blood pressure and this in turn is related to cardiovascular disease and stroke²⁴.

- Salt reduction targets for 76 categories of food were republished by Public Health England in 2017²⁵. These targets were first published by the Food Standards Agency, then incorporated through the Public Health Responsibility Deal in 2014 with the aim that they would be achieved by the food industry by the end of 2017. Both average and maximum targets were set. The foods covered by the salt targets are the main contributors to dietary salt intakes in adults in the UK and provide around 54% of salt in the diet.
- The salt reduction targets for the foods within the mandatory standard are those provided under the following product categories:
 - Category 1 Meat products
 - Category 2 Bread
 - Category 3 Breakfast cereals
 - Category 8 Ready meals and meal centres
 - Category 9 Soups
 - Category 13 Bought sandwiches
 - Category 15 Cook-in and pasta sauces, thick sauces and pastes
- 6.7 Meat products and bread have been selected as these are amongst the top contributors to overall salt intakes in the UK. Soups and cooking sauces, ready meals, breakfast cereals and pre-packed sandwiches are food categories, widely available in the catering sector, that can also make a large contribution to salt intake.
- A progress report, published by Public Health England in 2018¹⁶, showed that just over half (52%) of all the average salt reduction targets set were met by 2017. Retailers made more progress than manufacturers towards achieving average targets, meeting 73% of these compared with manufacturers meeting 37% although performance of individual food categories varied considerably.
- 6.9 For manufacturers and retailers combined, all average targets were met for 9 product categories (including for breakfast cereals that are included in the mandatory standard). Meat products (also included in the mandatory standard) did not meet any average targets, and had 43% of products with salt levels above the maximum target. Overall, where maximum targets were set, 81% of products had salt levels at or below their target.

- 6.10 Due to the varying performance of individual food categories the proposed mandatory and voluntary salt reduction standard has been set pragmatically at 75% to provide flexibility and to support compliance that may be affected by current product availability. The 75% applies individually to each food category described and not only to the combined availability / volume. The requirement relates to meeting maximum targets, or using an average target as a maximum where a maximum target is not set.
- 6.11 The proposed voluntary standard calls for 75% of all products (procured by volume / availability) that are covered by salt reduction targets, to meet these targets (rather than the specific food categories included for the mandatory standard), for those who wish to go further.
- The standards relate to meeting 'current' salt reduction targets. This means the 2017 targets and any subsequent revisions.
- 6.13 Stock is widely used in catering practice and can contribute considerably to salt intake. Lower salt varieties (i.e. below 0.6g/100mls reconstituted) are available and therefore it seems reasonable and achievable to help reduce intakes of salt by using these products. This standard aims to promote reformulation to this level over time so that lower salt stock becomes the norm.

Increasing fruit and vegetable consumption

- 6.14 Fruit and vegetables provide fibre, vitamins and minerals. There is evidence to suggest that people who eat more than 400g of fruit and vegetables per day are less likely to develop chronic diseases such as coronary heart disease and some cancers²⁶ ²⁷. It is recommended that people aim to eat at least 5 portions of a variety of fruit and vegetables every day. Latest data from the National Diet and Nutrition Survey (NDNS) shows that 31% of adults and 8% of 11-18 year olds met the 5 A Day recommendation⁸.
- 6.15 Incorporating fruit into the desserts and puddings on offer is an attractive way to add fruit to menus, enabling consumers that purchase desserts to consume more fruit. Ensuring a portion of fruit is cheaper than a portion of hot or cold dessert and including fruit and vegetables in meal deals can also help people meet the 5 A Day recommendation for consumption of fruit and vegetables.
- 6.16 The rationale for basing main meals within a meal deal on starchy carbohydrates that are not prepared with fats or oils, and including fruit and vegetables is to support healthier food and drink options that are in line with the national food guide, the Eatwell Guide¹³. The relevant aspects of the Eatwell Guide and supporting messages are:

- to base meals on starchy carbohydrates
- eat at least 5 portions of fruit and vegetables every day
- if consuming foods and drinks high in fat, salt or sugar have these less often and in small amounts

Meal deals

6.17 There is evidence that price promotions can be effective at encouraging purchases. Balancing the content of promotional meal deals so they contain healthier products could help improve people's diets and help move average population intakes towards dietary recommendations.

Reducing saturated fat

- 6.18 High intakes of saturated fat can raise blood cholesterol levels and, in turn, increase the risk of coronary heart disease and stroke²⁸.
- 6.19 The foods selected for inclusion in the proposed nutrition standards for the GBSF are those foods that are top contributors to saturated fat intakes. NDNS shows the main sources of saturated fat for adults are meat and meat products (24%) cereals and cereal products (21%) (half from biscuits, buns, cakes, pastries, fruit pies and puddings) and milk and milk products (21%) (about half from cheese). A further 10% comes from butter and other fat spreads. It should be noted that within NDNS saturated fat is not recorded from meals / sandwiches, instead their component ingredients are recorded separately. This standard has been set flexibly to encourage comparing of nutrition information within a range of like for like products to promote the procurement of products with lower total fat and saturated fat contents.
- 6.20 For cheese, the figure of 25g fat per 100g has been derived on the basis of catering use of hard, yellow cheeses and the market availability of reduced fat hard yellow cheeses. This figure is only applicable to these cheeses and is set to encourage buyers to consider the fat content of cheese in particular. Cheese is a big contributor to saturated fat intakes for the population⁸. The percentage provision has been determined to enable some products higher in fat in some dishes/certain cooking approaches based on industry comments on the functionality of reduced fat hard yellow cheeses.
- 6.21 For ready meals (i.e. pre-prepared complete meals and meal centres (such as chicken Kiev or beef stew with dumplings), the value of 6g saturated fat per portion

- is based on the figure used for 'high' saturated fat 30% of the of the Reference Intake (Reference Intake found in EU FIC annex XIII part B)²⁹. Application of this standard to 75% of ready meals procured has been set to allow flexibility and to accommodate different types of ready meals available.
- Milk can be a significant contributor of saturated fat to the diet due the amount consumed and milk is used as ingredient for many of the dishes served within catering settings. There are a range of lower fat milks available on the market: semi-skimmed (approximately 2% total fat), 1% total fat milk, and skimmed (approximately 0.3% total fat)³⁰. Substituting lower fat milks for whole milk (4%) for at least 75% of the milk procured can help to reduce the saturated fat content of menus overall. This also enables some provision of whole milk in settings where whole milk may be appropriate for some individuals and maintains choice for customers.
- 6.23 Careful choice of the main fats, oils and spreads used within a catering setting can make a large difference to the saturated fat content of the menu. Ensuring at least 75% of cooking oils and 75% of fat spreads are based on unsaturated fats³¹ will reduce the saturated fat content of menus whilst not affecting the quality of certain products and maintain choice for customers.
- 6.24 For pre-packed sandwiches (and other savoury pre-packed meals (wraps, salads, pasta salads), the mandatory standard (for energy and saturated fat content) is consistent with that set for the 2018/19 Commissioning for Quality and Innovation (CQUIN) scheme³². Compliance with GBSF mandatory nutrition-related standards are included in the NHS standard contract³³.

Increasing fibre

- 6.25 New, higher recommendations for fibre intake have been published². A diet higher in dietary fibre is associated with a reduced risk of heart disease, stroke, type 2 diabetes and bowel cancer². Eating wholegrain breakfast cereals and higher fibre breads (including bread that is used in pre-packed sandwiches) is an easy way to increase fibre intake.
- 6.26 The standards set to help increase fibre intakes reflect permitted nutrition claims³⁴. A "high fibre" claim can be made where the product contains at least 6g of fibre per 100g or at least 3g of fibre per 100kcal. A "source of fibre" claim can be made where the product contains at least 3g of fibre per 100g or at least 1.5g of fibre per 100 kcal.
- 6.27 The proposed mandatory standard, set to ensure at least half (50%) of bread available, and 75% of bread in pre-packed sandwiches available, are a source of

fibre (at least 3g per 100g), aims to increase fibre intakes whilst maintaining customer choice. The voluntary standard builds on this for those that wish to go further, with a further 25% of all bread available (excluding bread in pre-packed sandwiches) 'high in fibre' (at least 6g fibre per 100g).

Decreasing sugar intake

- 6.28 New, lower recommendations for sugar intake (defined as 'free sugars') have been published². Consuming too many foods and drinks high in sugar can lead to weight gain, obesity and related health problems, as well as tooth decay. Consumption of sugars-sweetened drinks has been associated with an increased risk of type 2 diabetes mellitus².
- 6.29 The standards to reduce sugar intake for the products listed (i.e. biscuits, cakes, morning goods, puddings, yogurts and ice cream) have been sourced from PHE's first technical report for the sugar reduction programme, published in March 2017³⁵. In May 2018 PHE published an initial progress report³⁶ providing an early assessment of progress of sugar reduction by industry. It was recognised that availability of reformulated products would take time although there had been reductions in sugar levels in 5 out of the 8 food categories where progress had been measured. With this in mind, the proposed GBSF standard has been set at 75% of products meeting these energy caps to allow flexibility and to support compliance that may be affected by current product availability.

Breakfast Cereals

- 6.30 The standard set for higher fibre breakfast cereals (at least 6g/100g) reflects permitted nutrition claim for "high fibre"³⁷. The standard set to reduce sugar intake from breakfast cereals has been sourced from PHE's first technical report for the sugar reduction programme, published in March 2017³⁵.
- 6.31 A mandatory standard of 50% of products available to be higher fibre (at least 6g/100g) and lower sugar (maximum 12.3g/100g with an additional 10g allowance for dried fruit) has been proposed to allow flexibility and maintain choice for consumers. The voluntary standard builds on this for those that wish to go further; with a further 25% of breakfast cereals available that are both 'high in fibre' (at least 6g fibre per 100g) but also meet a lower sugar standard (no more than 5g/100g).

Fish

- 6.32 Government recommends eating 2 portions of fish per week (approximately 140g each), one of which is oily. Eating oily fish can reduce the risk of heart disease³⁸.
- 6.33 Oily fish includes salmon, trout, mackerel and sardines.

Savoury snacks

- 6.34 A new mandatory standard to limit portion size of savoury snacks to 35g has been set pragmatically to allow a range of products currently available while avoiding availability of larger individual or sharing pack sizes. The portion size of 30g is existing GBSF best practice criteria. This pack size was originally based on a Food Standards Agency consultation published as part of their programme to reduce saturated fat and energy intakes³⁹ and has been set to support reduction of current energy, fat and salt intakes.
- 6.35 Savoury snacks include crisps and any product made from small pieces of potato, wheat, rice, corn or other base ingredient, which have been baked, extruded, cooked or processed in any way other than frying. Crisps are defined in this instance as products that comprise sliced, whole, fried potato.

Confectionery

- 6.36 The standards to reduce sugar intake from confectionery and packet sweet snacks have been sourced from PHE's first technical report for the sugar reduction programme, published in March 2017³⁵. In May 2018 PHE published an initial progress report providing an early assessment of progress of sugar reduction by industry³⁶. It was recognised that availability of reformulated products would take time although there had been reductions in sugar levels in 5 out of the 8 food categories where progress had been measured. With this in mind, the proposed GBSF mandatory standard has been set at 75% of confectionery products meeting these energy caps to allow flexibility and to support compliance that may be affected by current product availability.
- 6.37 The voluntary GBSF standard has been set at 100% of confectionery products meeting these energy caps for those who wish to go further.

Beverages

- 6.38 Sugar sweetened beverages, as a definition for GBSF, incorporates any drink, hot or cold, carbonated or non-carbonated, including milk based drinks and milk substitute drinks such as soya, almond, hemp, oat, hazelnut or rice, which contains more than 20kcal/100ml energy (ie is not 'low energy [calorie]') and also has had any sugar added to it as an ingredient (ie is not 'no added sugar'). Products sweetened with a combination of artificial/natural sweeteners and sugars would, if they contain more than 20kcal/100ml energy (ie are not 'low energy [calorie]'), fall within this definition.
- 6.39 The definitions for 'low calorie (low energy)' beverages and 'no added sugar' beverages reflect permitted nutrition claims⁴⁰.
- 6.40 'Low calorie (low energy)' beverages are products not containing more than 20kcal (80kJ)/100ml) energy for liquids.
- 6.41 'No added sugar' means beverages that have not had sugar added to them as an ingredient. This would include pure fruit and vegetable juices and smoothies.
- 6.42 For the purposes of this definition, added sugars:
 - include sugars added to pre-packaged drinks or added to made-to-order drinks (including without limitation sugar syrup, hot chocolate powder, sweetened milk substitutes and sweetened whipped cream)
 - do not include sugars naturally occurring in fruit juices, vegetable juices and smoothies
 - do not include sugars naturally occurring in milk
 - do not include sugar added by the customer after the point of sale
- 6.43 The 300kcal cap for hot or cold milk-based drinks including milk substitute drinks such as soya, almond, hemp, oat, hazelnut or rice has been sourced from PHE's sugar reduction: juice and milk based drinks report, published in May 2018⁴¹.
- 6.44 Portion size "No more than 330ml pack size" applies to sugar sweetened beverages, as defined above, for which no more than 10% of beverages should be made available. This proportion of sugar sweetened beverages aligns with NHS England where all 227 trusts across England have pledged to reduce sales of sugar-sweetened drinks to 10% or less of their total drinks sales. The latest data shows that the proportion of drinks sold on NHS premises that contain added

- sugar has reduced for seven months in a row falling to just 7.4% in participating Trusts in June 2018⁴².
- 6.45 Government advice is to limit consumption of fruit/vegetable juices and smoothies to a combined total of 150ml a day (one portion) and to consume with meals to reduce the risk of tooth decay. 75% of fruit and vegetable juice and smoothies available should be provided in single serve pack sizes as close to this volume as possible (but not exceeding 200mls pending sufficient availability of product sizes that meet the 150ml requirement). This is in acknowledgement of the potential for both fruit juice and smoothies to provide large amounts of free sugars⁶ whilst providing flexibility and noting that compliance with smaller serving sizes may be affected by current product availability.
- The voluntary standard has been set for all beverages made available (100%) to be non-sugar sweetened beverages for those who wish to go further.

Menu Analysis

Analysis of menus can inform menu development, provision of healthier options and help move population nutrient intakes towards government dietary recommendations. For some smaller organisations that do not have access to inhouse expertise to achieve this standard, costs may be involved. This therefore remains a voluntary, rather than a mandatory, standard.

Calorie and allergen labelling

- The previous voluntary standard relating to calorie and allergen labelling on menus has been removed due to the progression of both policy areas since the GBSF nutrition standards were developed.
- 6.49 The legislative framework around the provision of food allergen information has evolved over many years. In 2011 the Food Information to Consumers Regulation (FIC) introduced new rules for Food Business Operators (FBOs) relating to the labelling and provision of allergen information. FBOs are under a duty to ensure that all mandatory food allergen information is accurate, available and easily accessible to the consumer. FIC allows for Member States to introduce national measures as to how information is to be made available for non-prepacked foods. The Food Information Regulations 2014 (FIR) and equivalent regulations in Wales, Scotland and Northern Ireland, are the domestic regulations that establish the enforcement measures for the FIC in the UK.

- In the UK, in recognition of the wide variety of out-of-home eating establishments and following consultation with stakeholders including business and patient groups, FIR introduced a flexible approach for allergen information for non-prepacked foods to be made available by any means the food business chooses, including orally by a member of staff. Where the FBO chooses not to provide food allergen ingredients information on a menu, for example, there must be an indication to speak to a member of staff either on a label attached to the food itself or on a notice, menu, ticket or label that is readily discernible to the customer where the customer chooses the food.
- 6.51 The Government ran a consultation on 'mandating calorie labelling in the out of home sector'⁴³, which closed on 7 December 2018. Any future GBSF standard relating to calorie labelling will be considered once the outcome from the consultation on 'mandating calorie labelling in the out of home sector' has been finalised.

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⁶ Free sugars' includes all monosaccharides and disaccharides added to foods by the manufacturer, cook or consumer, plus sugars naturally present in honey, syrups and unsweetened fruit juices. Under this definition lactose (milk sugar) when naturally present in milk and milk products and sugars contained within the cellular structure of foods (particularly fruits and vegetables) are excluded. See also: Swan et al., 2018, available at: https://www.cambridge.org/core/services/aop-cambridge-

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