Public Health England

Protecting and improving the nation's health

Appendix 1: Summary of development of 2024 salt reduction targets

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, research, 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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Development of 2024 salt reduction targets

2024 salt reduction targets have been developed based on the 2017 salt targets. These consisted of salt reduction targets set per 100g of food for all sectors – retailers, manufacturers and the eating out, takeaway and delivery sector – in 28 broad product categories comprising 76 sub-categories of food and drink (table 1 targets). There were also separate salt reduction targets set per serving specifically for businesses that provide the food and meals that we buy and eat out of the home, take away or have delivered to the home (the eating out, takeaway and delivery sector) which covered 11 product categories (24 sub-categories) (table 2 targets).

Compared with the 2017 targets, the 2024 targets include revised average and maximum targets, new targets for foods not previously covered by the salt reduction programme, and clarified or updated sub-category descriptions. These changes are summarised below.

Changes to table 1 salt targets

Compared with 2017, the changes made to the table 1 salt targets for 2024 are:

- average targets have been lowered in 50 sub-categories
- maximum targets have been lowered in 38 sub-categpories
- the '10.1 Pizzas' sub-categeory has been split into '10.1 Pizzas with cured meat toppings' and '10.2 Pizzas with all other toppings'; 2017 targets have been retained for 10.1 with lower targets set for 10.2
- 7 new sub-categories and targets have been added, for '8.2 Ready meal sides and accompaniments', '11.5 Savoury popcorn', '11.6 Sweet popcorn', '11.7 Flavoured nuts', '14.6 Chilli sauce', '14.7 Dips', '14.8 All other condiments'
- sub-category inclusions and exclusions - pizza bases are now included in '2.1 Bread and rolls' (they were previously included in 19.1 Other cereals'); breaded fish in '8.1 Ready meals and meal centres' excludes breaded shellfish; and '11.1 Standard potato crisps' includes vegetable crisps
- sub-category descriptions have been updated for sub-categories 1.2, 2.1, 5.1, 8.1, 10.1, 10.2, 11.1, 11.4, 14.1, 14.4.1, 14.4.2, 19.1 and 22.1.

Changes to table 2 salt targets

Compared with 2017, the changes made to the table 2 salt targets for 2024 are:

- maximum targets have been lowered in 17 sub-categories.

Overall, targets have been lowered in about 70% of salt target sub-categories. Targets have been lowered by up to 20%, with the extent of the reduction informed by:

- compliance with the 2017 salt targets

- the range and distribution of salt content of products in the sub-category (taking sales into account where data is available)
- technical function and food safety considerations
- stakeholder feedback.

Information on compliance with the 2017 salt targets, and the range and distribution of salt content of products can be found in PHE's Salt targets 2017: progress report. Equivalent information for new sub-categories, provided to stakeholders to inform their comments, can be found in Annexe 1.

The 2024 salt targets include values for average and maximum targets, as well as previous (2017) values, for reference.

The targets document also includes a statement on the use of sodium replacers.

Timeline

Calorie reduction guidelines, to be achieved by 2024, were published by PHE in September 2020. There is significant crossover between the salt and calorie reduction programmes, with nearly all products in the calorie reduction programme also having salt reduction targets. To support businesses to achieve the ambitions of both programmes, the timelines have been aligned, with both to be achieved by 2024.

Summary of stakeholder feedback

In February 2020 stakeholders were invited to share feedback on proposals for revised salt reduction targets. Comments were invited on the scope for product reformulation, technical considerations and challenges, as well as the opportunities in relation to the proposals.

Around 40 stakeholders (including retailers, manufacturers, trade associations and health non-governmental organisations (NGOs)) submitted their comments for consideration. A list of stakeholders who engaged with PHE through this process is provided in Annexe 2.

A summary of the main themes and key concerns raised within the feedback received from stakeholders is set out below.

Achievability of targets

Overall, stakeholders were broadly in agreement with the proposed revisions to the salt targets.

Food industry stakeholders felt that some targets were unrealistic due to commercial and/or technical challenges. They also commented that due to the extent of reductions already achieved, there was limited scope for further action. Some concern was expressed about the expectation that the targets should be achieved by mid-2023. This often related to the mention of commercial and/or technical challenges to reducing salt in products.

Health NGOs welcomed the setting of new targets, citing the importance of reducing salt intakes for reducing the risk of cardiovascular disease. They underlined the need for a comprehensive salt reduction programme across both the in-home and out of home sectors, with regular and transparent monitoring. They considered that revised salt targets should be ambitious, and cited the availability of products meeting 2017 salt targets in all categories as evidence that further salt reduction was possible.

Technical or other challenges associated with achieving the proposed revised targets

Specific technical or other challenges raised by businesses and trade associations as a barrier to achieveing revised targets included:

1.1. Bacon. Feedback raised that ongoing work to reduce nitrates/nitrites within these products would, alongside reductions in salt content, exacerbate issues relating to product quality and safety.
2. Bread. Industry stakeholders conveyed that further reductions in salt – an essential ingredient critical to dough formation and fermentation rate, and as a preservative – would negatively affect product quality and safety.
4.1 Cheddar and other 'hard-pressed' cheeses. Industry feedback focused on the need to maintain the correct salt in moisture ratio, and that the current (2017) target was the minimum level needed for stability (product quality) and microbiological safety. A reduction on the target would be particularly challenging to achieve for lower-fat products.
10.1 All pizzas (as consumed). The feasibility of reducing targets was questioned given the technical function of salt in pizza bases, and the use of generally high salt toppings. There was therefore concern about the potential negative impact of salt reduction on product quality and safety.
11. Crisps and snacks. A number of comments highlighted the technical properties of salt across the category. It was noted that for some product sub-categories salt was fundamental to product development, including its requirement for the puffing process and the expansion of pellets. It was also suggested that reductions in salt would negatively affect product quality.
23. Canned fish. Feedback was that products within this category are naturally high in salt and that potential reductions were limited due to how products are procured, harvested and processed.

28. Stocks and gravies. Concerns were raised regarding the feasibility of further salt reduction, noting that salt is crucial to the quality and safety of products identified within the category.

Health NGOs felt that few technical barriers remained given advances in product innovation over the course of the salt reduction programme. They also highlighted the food industry's success in reducing salt gradually, resulting in few issues related to consumer acceptability. They provided examples of lower salt products in the majority of sub-categories as evidence that further salt reduction was possible in most instances.

Proposals for targets for foods not previously covered by salt reduction targets and inclusion of additional products in existing sub-categories

Overall, stakeholders were broadly in agreement with the proposals.

Concerns raised in relation to new targets included the breadth of products identified within some sub-categories, and the timeline for achieving the new targets.

Additional clarifications were requested for some sub-categories.

Use of sodium replacers

Industry feedback suggested that potassium-based or other sodium replacers were currently used in a limited capacity (for example in pelleted snacks and soup). A number of businesses commented that trials of the use of sodium replacers had been generally unsuccessful due to the impact on product quality and taste/flavour (for example in cheese, cakes and biscuits). Increased cost was also mentioned as a barrier. Some businesses were continuing to explore the use of sodium replacers (for example as a raising agent in bread).

Consumer acceptability concerns were cited as a particular barrier, relating to the taste of products (the use of sodium replacers can result in a metallic taste), and incompatibility with a 'clean label'.

Suppliers of sodium replacers highlighted the acceptable use of their products in categories such as bread, meat and cheese, and indicated that work with businesses to explore the use of sodium replacers was ongoing.

Health NGOs considered that for food categories where salt reduction still proves to be challenging, replacing their salt content with potassium-based or other sodium replacers should be encouraged as a short-term measure, and where sodium replacers are an appropriate substitute, their use should be promoted.

Annexe 1: Number of products, average sodium content and ranges of sodium content for new salt reduction target sub-categories

1g sodium is equivalent to 2.5g salt.

The data in the table below is taken from Kantar Worldpanel's take home consumer panel matched with nutrition information (derived from food labels) collected by Kantar Worldpanel fieldworkers and from Brandbank. The dataset used in this analysis covers a 52-week period ending 10 September 2017.

Sub-category	Number of products in the sub-category included in analysis			Average sodium content (mg/100g)			Range of sodium content across the sub-category (mg/100g)	Manufacturer and retailer sales weighted average sodium content (mg/100g)
	Retailers	Manufacturers	Manufacturers and retailers combined	Retailers	Manufacturers	Manufacturers and retailers combined		
8.2 Ready meal sides and accompaniments	130	26	156	393	311	325	116-920	304
11.5 Savoury popcorn	21	73	94	527	598	582	200-1460	590
11.6 Sweet popcorn	21	50	71	299	259	271	4-680	368
11.7 Flavoured nuts	189	162	351	441	533	484	12-1240	493
14.6 Chilli sauce	17	58	75	771	1025	967	240-1720	1014
14.7 Dips	304	58	362	323	399	335	24-840	334
14.8 All other condiments	158	96	254	589	635	606	0-1500	725

Annexe 2: stakeholder engagement on proposed revised salt reduction targets

Proposals for revised salt reduction targets were circulated to reduction and reformulation programme stakeholders (retailers, manufacturers, eating out, takeaway and delivery businesses, trade associations and health non-governmental associations) in February 2020. The table below lists those who provided feedback on the proposals.

Retailers
Asda Stores Limited
J Sainsbury plc
Tesco Stores Limited
Manufacturers
2 Sisters Food Group
Creative Foods Europe
Dr. Oetker (UK) Limited
General Mills
Kraft Heinz
Mars Food UK
Mizkan
Moy Park
Nestle UK and Ireland
PepsiCo UK and Ireland
pladis (formerly United Biscuits)
Premier Foods
Princes
Smart Salt Oy
Whitby Seafoods Limited
Out of Home Businesses
Bidfood
Greencore Prepared Meals Limited
Greencore Grocery Limited
Greene King plc
Greggs plc
Marston's
McDonald's Restaurants Limited
Nando's
Trade Associations
Breakfast Cereal UK Limited
British Frozen Food Federation
British Meat Industry
British Retail Consortium (BRC)
British Sandwich & Food to Go Association
Craft Bakers Association
Dairy UK
Federation of Bakers
Food & Drink Federation

Pizza, Pasta and Italian Food Association (PAPA)
Provision Trade Federations
Snack, Nut & Crisp Manufacturers (SNACMA)
Non-Governmental Organisations
Action on Salt
British Heart Foundation