

Protecting and improving the nation's health

ERG/eatwell/15/13A

## Submission to eatwell plate external reference group correspondence and comments – addendum

Sector	ID No.	Key points for consideration	Other feedback or contributions
Voluntary	11	Portion size guidelines should be developed for all population groups, and reflect a range of diets consumed (allowing for common exclusions)	Portion size guideline development should be based both on a systematic review of the evidence, and the ability of modelled diets to meet all energy and nutrient requirements, independently of
		The section of the plate showing high fat, salt and sugar foods should be removed from the plate. A comment can be made that these foods are needed sparingly.	industry. All portion sizes should be tested in menu plans to ensure they are reasonable and acceptable.
		The plate should more clearly communicate the fact that the proportions reflect food choice over a period such as a day (or week) and is not a representation of consumption at every meal.	
		Fruit juices should be removed from the F&V category in light of their significant contributions to excess sugar intakes, particularly among children.	

		PHE should consider a new approach to providing national consumer advice on eating well that considers how people eat, as well as what people eat, and which includes issues relating to sustainable diets.	
Health	12	The format of the plate is well liked for its simple colourful design, which is appropriate for use with a very wide ranging audience and is suitable for most life stages.  There was a strong view that the plate should not be changed unless absolutely necessary as it is so well recognised and widely	For any changes that were made to the plate it would be important to get the views of lay people on the new approach. In order to change behaviour it is important to look at where we are aiming to and facilitating how to get clients there. There is a risk with alienating clients if it changed.
		used.  The eatwell plate tool should not be made more complicated.	It would be important to do a cost-benefit analysis in terms of the cost of updating the wide range of resources that use the eatwell plate and the benefit
		The potential to retain the current plate but change/strengthen the messages around it should be explored (eg around reducing sugar food and drinks and increasing the consumption of wholegrain starchy carbohydrates, salt, physical activity, hydration, composite foods).	to the population.
		Inclusion of specific guidance for younger age groups aged 2-5years would be beneficial.	
		A negative feature of the plate is the absence of portion sizes. The plate would benefit from a greater proportion of foods in the yellow section to be wholegrain.	
		The dairy section should include low fat options.	

		Some representation of alcohol in purple section would benefit the plate.  The placement of beans on the plate is difficult, as they can be in both the protein and fruit and vegetables sections, and this is a difficult message to communicate to consumers.  An alternative way of depicting the 'discretionary foods' could be explored, such as presenting them outside of the plate to highlight that they are not core or fundamental to a healthy diet but can be included in a small way.  The presence of the knife and fork are felt to be misleading and cause confusion regarding the timeframe of the plate that often has to be explained.  Composite foods were recognised as a big challenge to the plate but retaining a simple message would be preferable to including lots of composite foods on the plate.	
		It would be beneficial to relate the eatwell plate to actual meals, for example linking to the eatwelleveryday website.	
Health	13	The need for consistency of message outweighs the desire for a different model.	A pragmatic approach may have to be taken to develop portion sizes/frequency of servings as there is not the same scientific basis as for 5 A DAY
		Comments on the current plate:  It is a helpful starting point for discussion, but dependent on additional supporting resources, particularly for effective communication by those who are not specialists in nutrition  There is some confusion from clients about whether the graphic	

represents a single meal or a day's/week's intake (the knife and fork add to this confusion which might be reduced if we stopped calling it a plate).

The proportional concept is difficult to grasp for some clients – a pyramid model is seen by some as more helpful to clients than a plate.

The proportions align well with budgeting for a balanced diet, promoting more of the less expensive ingredients.

There is no reflection of the diverse range of cultures in the UK.

The similar sizes of the fruit and veg and starchy foods sections is potentially confusing because the 5 A DAY message has a well-known portion indicator and could be understood to be the same for starchy foods (5 portions).

Very few foods are eaten in isolation and clients are not able to identify how composites and combination foods fit into a healthy balanced diet using the eatwell plate.

Portion size and frequency of servings are needed, particularly for the starchy food section due to the current media around carbohydrates.

There is concern about legitimising foods high in fat, sugar and/or salt – inclusion of foods that are considered as non-essential are not seen as helpful.

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		The foods and drinks high in fat/and or sugar section should
		contain fats and sugars used commonly (oils, spreads and sugar),
		rather than coke and chocolate.
		Fluid, salt and alcohol are missing from the plate.
		Traid, sait and alcohorare missing from the plate.
		It is important to be able to inform consumers on the differences
		in fats, but all fats are considered equally in the model.
		Other issues to address
		Greater emphasis on plant-based foods is needed – alternative
		sources of protein are not given sufficient emphasis for disease
		prevention and sustainability.
		Higher fibre feeds should feeture more in the starchy feeds
		Higher fibre foods should feature more in the starchy foods section.
Health	14	
пеаш	14	Comments on the positive aspects of the plate:
		the illustration of the meaning of a 'balanced' diet
		the variety of foods shown within each food group  the different colours and lied to each continue.
		the different colours applied to each section
		<ul> <li>it applies to the majority of the population over five years of age</li> </ul>
		it can be adapted to suit various foods and ethnic minority
		groups
		it can be easy to understand
		it can be explained to show 'ingredients' in a meal, which can
		lead to discussions about the merits of shop-bought versus
		homemade foods, and the merits or otherwise of using
		processed food or buying food outside the home

## Comments on the negative aspects of the plate:

- the absence of portion sizes for both the four main food groups and those 'foods high in fat and/or sugar' (the terms 'eat plenty' or 'base meals' are vague; people require more specific advice)
- the proportional concept used in the model can be difficult for clients to grasp
- · the model doesn't take into account cooking methods
- some clients have difficulty understanding that the model is not a template for each meal; perhaps because of, or exacerbated by, the knife and fork' graphic at the sides of plate
- fluid, salt and alcohol are not represented
- the differences in fats and oils are not represented.
- that the model seems to imply that processed meats are 'as good as' unprocessed meats
- lack of clarity as to where high salt foods 'belong' on the eatwell plate
- graphics in the fruit and veg section all look 'fresh' the tinned and frozen varieties don't stand out
- the cross-over of some foods between groups is not clear, for example chips (yellow/purple) or processed meats like burgers, sausages, chicken products (pink/purple)
- the fruit and veg proportion is the same as the starchy carbs
- the model is different to the Republic of Ireland's Food Pyramid
- facilitators who do not have a qualification in nutrition or dietetics, but who use the eatwell plate in a variety of settings, often find it very difficult to explain the model to their groups – dieticians need to provide explanations

## **Key suggestions for improvement:**

- · remove the knife and fork graphic
- include water and alcohol
- amend the graphic to place more emphasis on fish, nuts and pulses (as distinct from other protein sources)
- illustrate fats and oils separately from other high fat/high sugar foods as has been done on the Irish food pyramid.
- include guidance on salt (suggestion: include foods that are high in salt along with the high fat/sugar section)
- graphics could be amended to show the actual portion or serving sizes of foods, such as a matchbox size piece of cheese (rather than full blocks)
- include more or clearer graphics of frozen, canned and dried fruit options
- provide supplementary information on how composite foods or meals relate to the eatwell plate
- include portion and/or serving size information (mixed views as
  to whether best done as supplementary information or
  incorporated into the model), with clarification on the
  definitions of 'a serving' and 'a portion' as these are not always
  well understood and can be misinterpreted to mean the same

Suggestions on how the relative proportions of the food groups within the eatwell plate could be updated to reflect any change in SACN's recommendations on carbohydrate and sugar:

- include additional higher fibre options in the yellow food group
- show additional examples of high sugar options in the purple section (eg sports drinks, cereal bars)
- consider whether "carbohydrate counting" would help

Health	15	We urge PHE to develop portion size guidelines.	Portion size guidelines should be based on a
		PHE should consider developing portion sizes for children – given	systematic review of the evidence and the ability of modelled diets to meet all energy and nutrient
		the different energy and nutrient requirements.	requirements. This should take place independently
		the different energy and nutrient requirements.	of industry.
		Food portion guidelines would also help address current problem	·
		where manufactures use unrealistic serving sizes on packets,	Overall, it would be good for this review to clarify
		including when presenting FOP labelling.	whether the plate is intended to demonstrate the relative proportions of different foods when a person
		The plate should more clearly communicate the fact that the	is 'eating well'. In which case, the foods should all
		proportions reflect food choice over a period such as a day (or	be foods which lead towards a healthful diet and it
		week) and is not a representation of consumption at every meal.	is a model example. If however, the plate is
		These and other issues which should be considered as part of the	intended to indicate healthy proportions when a
		eatwell review were recently outlined by Wickramasinghe and	person is eating a 'normal' diet, then it might include
		Rayner (2014) 'Official healthy food guide hasn't changed in 20	some of the items that can detract from a healthy
		years: five things that need updating':	diet, eg fruit juices and HFSS foods when eaten in
		http://theconversation.com/official-healthy-food-guide-hasnt-	the 'wrong' proportions. The current lack of clarity
		changed-in-20-years-five-things-that-need-updating-33265, and	on this among experts and the general public is
		include:	unhelpful
		a) Clearer advice on what foods each food group depicted in	
		the plate contains (eg whether the fruit and vegetable	
		group or plate includes fruit juice).	
		b) Whether to include a depiction of a 'fatty and sugary foods'	
		group within the diagram.	
		c) Whether to identify healthier and less healthy foods within	
		food groups	
		d) The issue of what the angles of the segments of the plate	
		represent, whether they remain appropriate (eg in light of	
		SACN's new advice on sugar and fibre) and in particular a	

		re-consideration of whether the angle for the meat group needs to be made smaller  e) Take into account environmental and sustainability considerations alongside health considerations	
Voluntary	16	We urge Public Health England to build on the body of work including the Livewell Plate and the peer reviewed DEFRA-coordinated work (DEFRA Sustainable Food Consumption Report) to define principles for healthy sustainable eating to implement sustainability within the eatwell plate. The DEFRA-coordinated work to define principles for healthy sustainable eating include advice to:  • eat a varied balanced diet to maintain a healthy body weight • eat more plant based foods, including at least five portions of fruit and vegetables per day • value your food. Ask about where it comes from and how it is produced. Don't waste it • moderate your meat consumption and enjoy more peas, beans, nuts and other sources of protein • choose fish sourced from sustainable stocks. Seasonality and capture methods are important here too • include milk and dairy products in your diet or seek out plant based alternatives, including those that are fortified with additional vitamins and minerals • drink tap water • eat fewer foods high in fat, sugar and salt  We urge PHE to update the eatwell plate in line with scientific evidence on sustainable diets.  Updating the eatwell plate for sustainability would also support	Other countries including The Netherlands, Sweden, Nordic Countries, France and Germany have produced their own nutrition guidelines incorporating sustainability advice for their citizens and stakeholders. The US Dietary Guidelines Advisory Committee is recommending the inclusion of environmental criteria within the 2015 US dietary guidelines.  Reducing meat consumption in high meat consuming countries, such as the UK, will help reduce heart disease, obesity and cancer.
		Topuating the eatwell plate for sustainability would also support	

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		PHE's own prioritisation of sustainable food procurement at the
		local level. Failing to include sustainability recommendations
		within the eatwell plate would be a missed opportunity to reinforce
		the important message to local authorities and the wider audience
		of stakeholders who use the eatwell guidelines.
Voluntary	17	The eatwell plate has gained recognition as a simple way of
_		communicating the principle of a balanced diet. However there is
		a lack of clarity among the public and among professionals as to
		whether it constitutes a healthier version of a normal diet or if this
		is a diet, including the components listed, that we should be
		eating.
		The encouragement to restrict the use of salt in the diet should be
		highlighted clearly within the eatwell plate. Salt consumption is
		still above the recommendation of 6g/day set by government and
		it is imperative that people are made more aware of the dangers
		of excessive salt in the diet.
		There is no place for the government to be promoting anything
		that does not support a balanced diet. As such the segment of
		'foods and drinks high in fat and/or sugar (HFSS) could be
		reduced, and referenced in accompanying text as treats that
		should be eaten in moderation.
		The usefulness of the eatwell plate would be further enhanced
		with clear messaging about the period of time the 'plate'
		encompasses, and whether the portions reflect the size or weight
		of the respective foods. PHE and the next government should
		also conduct a wider piece of work updating the list of
		recommended food portion sizes for both adults and children.
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Voluntary	18	The eatwell plate has gained recognition as a simple way of communicating the principle of a balanced diet. However, there is a lack of clarity among the public and among professionals as to whether it constitutes a healthier version of a normal diet or if this is a diet, including the components listed, that we should be eating.	
		We also believe that there is no place for the government to be promoting anything that does not support a balanced diet. As such, the segment of 'foods and drinks high in fat and/or sugar (HFSS) could be reduced, and referenced in accompanying text as treats that should be eaten in moderation.	
		The usefulness of the eatwell Plate would be further enhanced with clear messaging about the period of time the 'plate' encompasses, and whether the portions reflect the size or weight of the respective foods. PHE and the next government should also conduct a wider piece of work updating the list of recommended food portion sizes for both adults and children.	
Academic	19	Using models such as the eatwell plate to provide dietary messages for the general public do not provide adequate information and are not helpful in providing healthy eating guidance. Other models such as food pyramids are little better in providing meaningful public health messages.	
Voluntary	20	The eatwell plate is recognised as a useful tool to explain the value of a balanced diet but we are concerned that it may not be fully understood by the public. We would like PHE to consider the following:  1. Reducing the percentage of the plate given to foods high in fat and/or sugar to ensure that the public understand that	We recognise the view that the eatwell plate should represent a healthier, realistic diet rather than an ideal one.

		many of these products should only be consumed infrequently and in moderation  2. Including a glass of water with the plate  3. Provide specific guidance on reducing meat and processed meats in the context of a healthy diet  4. Include advice on how to limit salt intakes within the diet  5. Provide better information on portion size/weight of foods consumed and how frequently these foods should be consumed as part of a balanced diet	
Academic	21	The eatwell plate is a positive intervention to change eating behaviour and bring about tangible public health benefits.  However, it might allow simple messages to be compromised by some stakeholders. The eatwell plate does not sufficiently emphasise the importance of nutrition for optimal brain function. Recommendations in the eatwell plate should make clear differences between reducing saturated fat intakes and swapping to unsaturated fats otherwise recommendations could do more harm than good if total fat is reduced, meaning a reducing in omega 3 fatty acids. Unsaturated oils should not be placed in the same section as junk food items. The consumption of oily fish to provide omega 3 should be encouraged within the model.	Mental ill health is a huge cost to society and nutrition plays an important role in laying the foundations and maintaining healthy brains.
Voluntary	22	The eatwell plate is a simple way of communicating the principle of a balanced diet, but there is a lack of clarity among the public and professionals as to whether it constitutes a healthier version of a normal diet or if it is the 'ideal diet' we should be eating. The government should not be promoting anything that does not support a balanced diet and as such the 'foods high in fat and/or sugar' segment should be much reduced and referenced in accompanying text to be eaten in moderation. An encouragement to reduce salt intake should be included. Clear messaging about	PHE and the next government should also conduct a wider piece of work updating the list of recommended food portion sizes for both adults and children.

		the portion sizes and the period of time the plate encompasses should be included.  PHE should take into account environmental and sustainability considerations and messaging within the model such as 'moderate your meat consumption, and enjoy more peas, beans, nuts and other sources of protein' and 'choose fish from sustainable stocks' and messaging about eating a variety of different foods (different fruits, vegetables, grains, pulses or types of meat and fish) across the week with sustainable and local sourcing in mind.	
		PHE should ensure the plate reinforces healthier and sustainable food messages already made from within PHE, but also from	
		other government departments to provide consistent messaging	
		and joined up policy across government.	
Voluntary	23	The current eatwell plate promotes a diet that is rich in starchy carbohydrates like bread, rice, potatoes and pasta along with plenty of fruit and vegetables and less of all fats. It has been suggested that a low fat diet may be linked with the current epidemic of obesity and type 2 diabetes. PHE should consider a plate nearer to the recommendations of the 'Food4Health' plate. This model splits out fruit and vegetables (unprocessed only), eating more protein, only high fat healthy foods and only some complex whole grain and gluten free grains. This model also includes messaging about a range of different coloured fruit and vegetables, drinking water and leaving gaps between meals with no snacks allowed.	

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Voluntary	24	The model should show the relative proportions of different foods
1		for healthy diet. Currently it is unclear if the model is to show the
		proportions of a healthy diet or the healthy proportions of an
		unhealthy one, making it confusing for health professionals and
		consumers alike.
		PHE should develop portion sizes for both adults and children
		based a systemic review of the evidence and modelled diets
		which meet nutrient and energy requirements. The time frame to
		which the plate is related to should be clear communicated. The
		sustainability of the diet should be reviewed and the foods shown
		should be healthy and clearly depicted. Fruit juice should not be
		included within fruit and vegetable groups, and fatty and sugary
		foods should not be included in the diagram. Segment size should
		be reviewed, with meat being reduced in size and fish separated
		out from the meat section.
Health	25	the proportions/size of the sections should be revised to be
		representative of any changes to official guidelines
		the depiction of the knife and fork at the side of the plate
		reiterates a public misbelief that the plate represents what
		each meal should look like. Removal of these along with clear
		and concise information would provide clarity of what the plate
		represents
		review the names of the sections – in particular the milk and
		dairy section. This could be revised to 'Milk, Yoghurt &
		Cheese', as in practice members of the public are confused as
		to whether cream and butter are in this group or fats, or both
		there should be inclusion of fluids within the graphic – maybe
		indicated for example by a glass next to the plate
		<ul> <li>all images should be representative of appropriate portion</li> </ul>
	1	- an images should be representative of appropriate portion

- sizes and should include foods representative of the cultural mix of the UK and diversity of the UK diet
- the fruit and vegetable images could depict the 5-a-day portion sizes and should indicate clearly that these can be from fresh, frozen or canned sources
- an indication of the number of portion in each section and/or portion sizes could aid understanding of application of official intake guidelines to individuals' diets
- there was mixed opinion as to the place for foods high in fat, sugar and salt, in particular in respect to registrants' experience of members of the public thinking that these should, rather than could, be included within the diet.
   Consensus was that this group should remain as it shows that no foods should be excluded, but that maybe they could be in a separate circle to the side of the main plate to reiterate that they are food items for occasional consumption however caution must be exhibited so that it could not be perceived as this representing the dessert within a meal context.
- an indication of the importance of/relationship with physical activity should also be included

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