

HLSG 3 - PHASE 2 WORK PROGRAMME: CALORIE REDUCTION

1. Building on work undertaken previously by the Food Network to develop possible options for calorie reduction measures, and in particular taking account of the workshop held on 7 April, the attached paper details the current state of development of a calorie reduction programme and poses a number of questions for HLSG discussion.
2. A good deal of engagement work has taken place over the past month, including individual discussions with HLSG members, together with further analysis and policy development work within the Department of Health. HLSG members may be particularly interested in the proposal for a Ministerial announcement of a calorie reduction challenge intended to be launched as part of a broader document on obesity.
3. The accompanying document gives further details on the findings of an expert group which has helped to frame the scale of the challenge; lists the menu of options for contributions discussed at the stakeholder workshop, together with draft principles, including issues of monitoring and evaluation. Questions are listed throughout the document, on which the views of the HLSG are specifically sought.

**Food Network Secretariat
Department of Health**

CALORIE REDUCTION: OBJECTIVE, SUGGESTED APPROACH AND QUESTIONS

THE PUBLIC HEALTH CONTEXT AND THE PUBLIC HEALTH OBJECTIVE

1. Obesity is a major public health challenge for this country. The latest data indicates that 61.3% of adults and 28.3% of children in England are either overweight or obese. The annual estimated cost of obesity is in the region of £4.2 billion for the NHS, and £16 billion to the economy as a whole.
2. The causes of the increase in obesity levels in recent years were analysed and set out in detail in the Government Office for Science's Foresight Report on obesity in 2007.¹ In spite of the complex determinants of obesity, the key driver is the imbalance between average energy intake and energy use – “calories in, calories out”.
3. A number of complementary interventions are in place and being developed by a range of partners, including the Responsibility Deal Physical Activity Network, to support individuals in increasing energy expenditure through greater levels of physical activity. Increasing levels of physical activity would help in achieving and sustaining a healthy body weight, however, this paper, focuses on the contribution of ‘energy intake’ recognising that changes to energy intake are key to stopping weight gain and promoting weight loss.
4. A group of independent experts, chaired by Professor Ian MacDonald, has considered data on weight gain in England to estimate the excess calorie intake driving the overall energy imbalance. They also considered possible risks to the population of calorie reduction, including the potential of increasing the proportion of the population not achieving micronutrient requirements or increasing malnutrition, and potential risks to children and older adults. The Expert Group agreed that at a population level, a reduction in calorie intake of up to 100 calories per person per day, for people aged 1-75 years, would address energy imbalance associated with weight gain and also lead to a moderate degree of weight loss in some individuals. They also agreed that it was unlikely that this level of reduction would create a risk of nutritional deficiencies to the population. The figure serves to calibrate the scale of challenge we face which equates to 1.73 trillion calories per annum or close to 5 billion calories per day.

WHAT PART CAN BUSINESS PLAY?

5. The scope of the Food Network's activity is wide-ranging, and embraces four main areas:
 - information to consumers
 - content of food

¹ <http://www.bis.gov.uk/foresight/our-work/projects/published-projects/tackling-obesities>

- improving the availability of healthier food
 - promotion of healthier food choices
6. The Food Network's (Phase 1) existing pledge to introduce calorie labelling in out of home settings aims to empower consumers to better manage their calorie intake to aid weight control and falls under the pillar of 'information to consumers'. Phases 2 and 3 take us into key terrain of addressing calorie intake in the other 3 areas. It is important to note that alcohol consumption makes a significant contribution to energy intake, more than any other group of food or non-alcoholic drinks and speaks to the need for complementary work with the Alcohol Network.
7. Encouraging and enabling individuals to reduce their calorie intake calls for a range of interventions by a wide range of partners within and beyond the Responsibility Deal. It includes –
- social marketing campaigns - business is already working with Government on Change4Life, but there are further awareness raising opportunities which can be used to encourage consumers to choose healthier products;
 - providing information to individuals to help them make healthier dietary choices – for example, through front of pack nutritional labelling and the introduction of calorie labelling in out of home settings;
 - increasing skills to support a healthier diet - through a range of initiatives such as cookery schools.
8. These activities will continue to play an important part. In particular, consumer-facing messaging via Change4Life will need to dovetail effectively with a focus on calorie reduction. But information to consumers will only be fully effective in helping individuals reduce calorie intake if they are complemented by new, far-reaching action by business, so that the intention to change can be easily translated into tangible changes in behaviour. This is reinforced by evidence from behavioural science about the importance of the context within which choices are made – in this case the food environment – as a powerful influence on behaviour. The Public Health Responsibility Deal recognises not only that businesses have both the technical expertise to make healthier products and the marketing expertise to influence purchasing habits, but also that business and others can reach consumers in ways that Government cannot.
9. We need to achieve two things – reducing the number of calories supplied to the population – the responsibility of business – and encouraging consumers to change their behaviour - jointly the responsibility of business and a range of other parties and consumers themselves.
10. In simple terms, 'supply-side action' refers to measures by business that enable individuals to reduce their calorie intake without needing to make dramatic, or sometimes even conscious changes to their dietary habits. It entails actions which make it as easy as possible for individuals to reduce

their intake such as by changing defaults. Some work has been started, for example through recipes with less fat or portion-controlled packs.

11. The challenge and opportunity for business and others is to be much more ambitious than ever before within a framework of collective action to enable, encourage and support consumers in reducing their calorie intake and contributing to the wider strategy to tackle the risks that arise from excess weight.

A PUBLIC HEALTH CHALLENGE FOR BUSINESS ON CALORIE REDUCTION

12. Taking account of the advice on energy imbalance from the Expert Group, and building on the development work undertaken by the Food Network to date, including the workshop with partners held on 7 April, the Department of Health believes there is considerable merit in announcing an explicit public health-based challenge for the food industry and other to deliver. This will be positioned as part of a broader publication setting out a national framework to tackle obesity, following up on the public health white paper *Healthy Lives, Healthy People*.²
13. This 'challenge' would set the backdrop for a collective pledge and a basis for individual commitments. It is likely that the collective pledge would need to be worded quite broadly to accommodate the range of activity that might be expected.

WHAT RANGE OF ACTIONS BY BUSINESS MIGHT COUNT TOWARDS A CALORIE REDUCTION CHALLENGE?

14. Some of the activities that business might take are set out below in a 'menu of actions', informed by previous work undertaken by the Food Network's calorie working group. They are designed to deliver changes in product offerings whilst recognising that in taking action we must be careful to avoid:
 - increasing inequalities
 - increasing intake of particular nutrients that currently exceed public health recommendations, e.g. salt and sugar
 - increase the prevalence (or risk) of low micronutrient intake.
15. The actions below can broadly be categorised as either those that have a direct effect on products (for example reformulation and changes to the portion size of existing products), and those that rely on behavioural change by consumers (e.g. promotion of smaller portion sizes, or making healthier products available). Effect at population level will be dependent on uptake and any compensatory changes in behaviour. The list is unlikely to be exhaustive of all possible activities that could contribute to calorie reduction, which at one extreme might involve removing a

²http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_121941

particular product from the marketplace. This menu does however serve as a guide to action.

Action	Examples of activity	Other considerations
Reformulation	<ul style="list-style-type: none"> • Recipe changes to decrease energy density • Fat and sugar reduced in products, or substituted with other lower calorie ingredients • Addition of whole grains, pulses, fruit vegetables to products to improve their nutritional profile and energy content • At the same time could increase intake of fruit and vegetables through the addition to composite foods (eg ready meals, or inclusion in catered meals) 	Technical and food safety considerations Consumer acceptability Legal issues – compositional requirements Taste compromise. Implications of use of artificial sweeteners.
Portion size	<ul style="list-style-type: none"> • Reductions to portion sizes of existing products 	This should avoid stimulating compensatory behaviour eg consuming two products instead of one Legal issues – prescribed sales weights
Development of lower calorie options to substitute for high fat high sugar products	<ul style="list-style-type: none"> • Baked products replacing fried eg savoury snacks 	Consumer acceptability - many products remain niche and therefore impact at a population level is limited
Encouraging consumers to choose healthier options	<ul style="list-style-type: none"> • Promotion of smaller portion sizes to encourage down-sizing • Other 'substitution' promotions to favour lower calorie options. • Calorie restricted products eg 99 kcal chocolate bars 	Health by stealth vs 'diet' products.
Satiety enhancers	<ul style="list-style-type: none"> • Potential to increase the content of satiating ingredients to decrease overall energy intake eg fibre 	Need clear scientific evidence (eg approved health claim) of ability to lower energy intake over time
Balance of portfolio/menu /	<ul style="list-style-type: none"> • Companies may expand or change their offering to include 	Some companies may develop and use nutrient

etc	<p>more 'healthier' products.</p> <ul style="list-style-type: none"> • Procurement and default options offered to customers are the healthy options eg coffee shops use of lower fat milks, caterers and retailers use of reduced fat cheeses, spreads and lower fat meats etc 	<p>profiles to develop healthier nutritionally balanced products, portfolios or menus. Effect at population level dependent upon uptake.</p>
-----	---	--

HOW MIGHT THE RESPONSIBILITY DEAL BRING THESE ACTIONS TOGETHER?

16. The challenge before us is to make a demonstrable contribution to help reduce energy intake across the population. For this to have credibility we will need to ensure the various actions that organisations offer can be aggregated so far as possible into a coherent whole. Following an announcement of the overall challenge, the task would then be rapidly to work up a finalised list of options; some principles or criteria to govern contributions, and appropriate arrangements for monitoring and evaluation.
17. The workshop held on 7 April highlighted a number of issues about how pledges might be developed, which included a preference for work across all foods rather than targeting certain categories, and that there should not be a minimum contribution requirement. We think there is merit in seeking contributions from the different sectors (retail, manufacturing and catering), in approximately the proportions these sectors make to our diets and the marketplace. Our understanding is that currently the catering sector supplies roughly 20% of calories, with the remaining 80% split equally between retail private label and branded products. It is important that efforts to reduce calorie intake span the entire food industry and are shared equitably.
18. We recognise that some sectors will be able to move further and faster than others initially. Individual businesses will be best placed to determine contributions to calorie reduction which are suitable to their business type, food and drink products, their customers' expectations and technical considerations.
19. Therefore in broad outline, the model we are proposing would be one in which individual businesses respond to a calorie reduction challenge by committing themselves to the broad objective and to undertake actions that collectively constitute a substantial and sustained contribution to calorie reduction from each respective sector.

Question 1: Does the HLSG support the concept of a sectoral approach as a guide to action? Are there any additional constraints on action to those outlined in paragraph 18?

20. Timing issues will be a key factor determining industry's response to the calorie reduction challenge. We recognise that there can be considerable lead-in time before changes in production processes can take effect. Similarly in terms of 'start date' there are several possibilities, of which one might be to use the date when the Responsibility Deal was launched, which would go some way to recognising any work which is already underway which would have the effect of delivering calorie reductions.

Question 2: Over what timescale can contributions to calorie reduction by businesses be expected to materialise in product offerings to the public? If driven at scale and pace, what would be a realistic date by which to have met the calorie reduction challenge?

PRINCIPLES FOR VALID CONTRIBUTIONS

21. As with all pledges across the Responsibility Deal, it has been recognised that some principles or criteria will be necessary in order to guide contributions and reduce the risk of unintended consequences. The list below comprises an initial outline of potential principles that could be used. It draws on the principles evolved for individual pledges per se, and also on the outputs of the 7 April workshop. Proposed actions:

- should be new or significantly enhance existing activity. (It would of course be open to businesses to publicise their past achievements when making new pledges)
- should preserve or improve overall nutritional profile
- should not contribute to inequalities
- should be typically long term and sustained, unless part of a planned pilot
- should be carried out on a sufficient scale to make a population-level impact (e.g. should not be so small as to invite criticism or ridicule), unless part of a planned pilot
- should complement and not substitute for a collective pledge (e.g. undertaken in place of out of home calorie labelling)
- should be developed in a way which is responsible and seeks to avoid potential for perverse consequences (e.g. risk of consumers buying a larger quantity of a reduced portion).

22. In addition, the Chairs of the Food and Alcohol Networks met on 20 April and agreed (*inter alia*) that there should be a 'calorie test' for proposed pledges relating to alcohol reduction, and vice versa. In other words it would not be desirable for pledges aiming to reduce alcohol consumption to have the effect of increasing calorie intake, or for pledges aiming to reduce calorie intake to have the effect of increasing alcohol consumption.

23. There might also be a set of principles to be developed around responsible promotion/ information activity - with the intention of ensuring that efforts to promote healthier choices are not simply overridden by promotions on less healthy products. This clearly has potential to be highly contentious and views on how to address this aspect would be welcome.

Question 3: Do these principles broadly capture the sort of criteria that individual businesses contributions should meet? Does the HLSG think that principles on responsible promotions/ information should be worked up? If so what aspects should they cover?

HOW MIGHT PROGRESS BE MONITORED AND IMPACT EVALUATED?

24. Monitoring progress will be key to establishing accountability by confirming that the actions organisations have pledged to take have been carried out. Similarly, evaluation has an important role to play in showing the impact of pledges on business practices, consumer behaviour, and ultimately the likely benefit to public health. In signing up to a Responsibility Deal pledge, partners have agreed to fulfil relevant monitoring and evaluation requirements.
25. A common theme of the workshop held on 7 April was that any monitoring arrangements should be as simple as possible and not incur disproportionate cost. It was also evident that provision of certain information is likely to bring into play commercial sensitivities and could be a barrier to achieving widespread engagement.
26. We recognise that different information may be required by business and Government for different purposes. This may include: what information businesses need to inform their own plans; how we capture what businesses have done and its effect on peoples' diets, and what might be the key measures which demonstrate progress and success of the initiative against our overall objective. With this in mind we need to determine:
- what calorie information do businesses need to inform their plans and help them identify what they need to do as their contribution. Examples might include individual companies' share of energy contribution in the marketplace; the relative contribution of their sector (e.g. manufacturer, retailer, caterer); any other sectoral data, and relative contribution of groups of foods and drinks to energy intake to allow prioritisation of activities
 - what information can businesses provide to monitor progress of changes to product offerings, and the effects of demand side activity, and how frequently might this be provided (and whether categorisation along the lines of Kantar sub-groups or NDNS categories a possibility)
 - what metrics might be used to measure progress against the calorie challenge figure – e.g. overall calorie reduction for the market; calorie reduction by the 3 main food sectors (manufacturing, retail and catering), and/ or a more sectoral approach such as by trade sectors e.g. cereal and dairy producers, or broad food groupings.
27. With regard to overall measurement of progress, it is recognised that changes that may be relatively small in market terms may be difficult to track with accuracy and moreover imputing cause and effect is notoriously

difficult. Nonetheless we believe it is important to have at least proxy measures that can show the positive impact of calorie reduction activity (e.g. percentage of food promotion spend on 'healthier products').

Question 4: What calorie information do businesses need to inform their plans and help them identify what they need to do as their contribution? What information can businesses provide to monitor progress of changes to product offerings and the effects of demand side activity, and how frequently might this be provided? What metrics might be used to measure progress against the calorie challenge figure?

NEXT STEPS

28. This paper gives an outline of a proposed calorie reduction challenge; suggests a sectoral approach as a guide to action; lists draft principles to guide contributions, and seeks the views of the HLSG including on the key issue of arrangements for monitoring and evaluation. We anticipate making further progress to the following timetable:

- announcement of a challenge - soon, as part of a broader obesity framework
- detailed development of options and associated principles etc – over the Summer
- invitation to sign up – as soon as possible - in Autumn.

29. Work strands within this timescale will need to include:

- finalising the menu of options, and ensuring that there are appropriate options for each sector
- further development and finalising principles/ rules for valid contributions
- determining information requirements for business in designing their contributions, and information requirements for monitoring and verifying businesses' contributions, and measurement of progress.

We are keen to test further thinking on these issues and would be grateful for the HLSG's views on who might be involved.

Question 5: Does the HLSG wish to appoint one or more working groups to develop the further detail of proposals? If so, how should the membership be determined? Should the HLSG arrange a presentation on the issue to the wider Food Network at a further calorie reduction workshop.

30. It will be important to continue to work closely as we head towards making public a calorie reduction challenge in order that business is well prepared and able to respond positively.

Question 6: What arrangements need to be put in place to ensure that there is a co-ordinated run-up and response to a calorie reduction

challenge being made public?

Question 7: Finally, are there any other significant factors to consider, or aspects that we have missed?