

Consultation response: Nutrient profiling

Food Standards Agency
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TO: Shifra Marikar
RESPONSE BY: Sue Davies, Chief Policy Adviser

GENERAL COMMENTS

Which? welcomes this opportunity to comment on the latest stage in the development of a nutrient profiling model. We fully support this work by the Food Standards Agency and believe that this work shows that it is possible to develop a model to distinguish between foods that are high in fat, sugar and salt and healthier options.

We support the use of this work for restrictions on broadcast advertising to be proposed by Ofcom. We also believe that this work will be important for the work of the Department of Health's Food and Drink Advertising and Promotion Forum as it comes forward with proposals for restrictions in the non-broadcast area.

SPECIFIC COMMENTS

We support the general approach to this work. However, there are some aspects of the model that we believe still need further refinement if it is to be used successfully for advertising restrictions.

We are concerned that the cut off point used by the FSA could mean that some foods that are being categorised as 'intermediate' foods are still foods that are high in fat, sugar or salt. This includes, for example, burgers which are high in fat when compared against the FSA's criteria for high, medium and low in fat.



We believe that, although this applies to very few foods it could indicate a broader problem given that the number of foods that have been compared against the model so far has been relatively limited.

We do not believe that this means that the whole model needs to be reviewed, but we do believe that some refinement is needed to ensure that it is truly robust. If this issue is not addressed, it could undermine the basis of any advertising restrictions. It could also undermine other initiatives set out in the government's Food and Health Action Plan, such as introducing school meal standards, by sending out mixed messages about what children should be encouraged to eat.

We therefore believe that it is necessary to:

- apply the model to a broader range of foods that are known to be targeted to children, based on the nutrition information for these products rather than McCance and Widdowson data.
- assess further whether or not portion size is an issue and is resulting in misclassification and inconsistency with the FSA's high/ medium/ low criteria.
- consider whether any refinement is needed to ensure that high protein foods which are high in fat, sugar and salt are being correctly classified.
- ensure that including energy and saturated fat in the model takes adequate account of total fat and trans fats when further 'real' foods known to be high in these nutrients are assessed against the model.

If further refinements cannot address this issue then we believe that it will be necessary to:

- consider whether a different cut off point is needed between intermediate foods and foods high in fat, sugar and salt to address the misclassification of certain products; or
- establish restrictions for advertising of foods to children based on only allowing healthier options to be promoted, rather than on the basis of not allowing foods high in fat, sugar and salt to be promoted.



CONCLUSION

Overall we believe that this is truly ground-breaking work that can clearly form a solid basis for advertising restrictions with some minor amendments to ensure it is truly robust.

We would be happy to discuss our comments with you in more detail if that would be helpful.

Which?
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