

Consultation on the 2018 review of the UK Nutrient Profiling Model

Response and Comments from Institute of Food Science and Technology (IFST)

Who are IFST?

The Institute of Food Science and Technology (IFST) is the leading qualifying body for food professionals in Europe and the only professional food body in the UK concerned with all aspects of food science and technology.

We are passionate about engaging food professionals, recognising standards, growing skills and informing debate. Our members cover all aspects of food from manufacturing, retailing, and R&D to academia and enforcement.

IFST is a registered charity with individual members working across all points of the food chain. We are independent of government, industry, and lobby or special interest groups.

IFST is submitting this response because the advancement and application of food science and technology are in the objectives of the organisation as well as improving public knowledge and awareness of important issues related to the production, safety and quality of food.

IFST understand the reasoning for the review of the previous Nutrient Profiling Model (NPM) in the light of the significant changes from the SACN reviews notably for free sugars and fibre. We recognise the extensive work carried out to try to formulate the new Model and we are grateful for the opportunity to provide comments on the proposals.

The primary focus for IFST is the use of sound science in food issues and this forms the basis of our comments.

Terminology

It is disappointing to see that throughout the whole of the consultation document the terms sugar and sugars are used interchangeably and indiscriminately. The correct term should always be sugars (plural). Sugar should only be used when referring to sucrose – which is in line with The Specified Sugar Products (England) Regulation 2003 (SI 2003 No 1563) where the term ‘sugar’ is a Reserved Description only to be used for white crystalline sucrose.

Potential confusion arising from the use of Free Sugars

The majority of the nutrients (eg salt, fibre, saturated fat, protein) included in the NPM are quantitative parameters determined using the approved analytical procedures routinely used for labelling and compositional standards. The notable exception is Free Sugars, which is based on estimates, not sound science. The usual method for declaring sugars is total sugars ie all mono and disaccharides which appears on a nutritional declaration under ‘carbohydrates -of which sugars’. In Section 5.15 of this review it is reported that UK NPM 2004/05 which was based on

Non Milk Extrinsic Sugars (NMES) was changed back to total sugars due to the practical difficulties associated with estimating NMES. There is no evidence provided to indicate that this system will be any more successful. It will only add to the confusion surrounding the use of the term free sugars and would be unenforceable if challenged as there is no agreed, reproducible analytical method to quantify free sugars. Any profiling system should be based on the same tested and reproducible analytical methods used for labelling and compositional standards.

Disparity between Systems

The NPM aims to provide a classification to identify 'less healthy' foods. However the parameters proposed are at odds to currently used systems and even recent tax systems set up to penalise 'less healthy' foods. This is highlighted in the table below which compares the NPM with the Nutrition and Health Claims Regulations and the Soft Drinks Industry Levy.

System/Regulation	Sugars g/100g (or 100 ml)
Draft 2018 NPM	0.9
EU Regulation 1924/2006 on Nutrition and Health claims made on foods -Low Sugars	2.5g (per 100ml)
Soft Drinks Industry levy No Tax Threshold	4.9

This could result in a soft drink being seen as 'healthy' ie Low Sugars according to the EU regulations and not subject to the Soft Drinks Industry Levy in the UK (aimed at promoting healthier choices for children) but would be defined as less healthy by the NPM and not allowed to be advertised or promoted. This is confusing for the consumer and might be considered misleading. It also potentially decreases the incentive for the producer to reformulate products.

Halo Effect distorting diets

The classification of 'less healthy' results in the remaining products being classified as 'more healthy'. This over simplification may result in a 'halo effect' for the more healthy product resulting in more, and possibly over consumption. With some products this may produce unintended consequences. For example with breakfast cereals – the more healthy option may have less free sugars and more fibre, however it is highly probable that this product will have the same energy content as the healthy product (exchanging sugars with starch which have the same energy content) and may also have a higher glycaemic response due to the higher starch content, which is not a healthier product. Similarly the less healthy products may have higher levels of fat soluble vitamins, fibre and/or other micronutrients but fail to be classified as more healthy thus distorting the diet. These unintended consequences are highly likely with the NPM as proposed.