



Paper for information: Nutrient profiling

Agenda item: 3

Please see attached paper for information.

The Review of the Nutrient Profiling Model: Paper for Information

ISSUE

- 1) This information paper summarises the work which is underway to review the Food Standards Agency (FSA)'s Nutrient Profiling (NP) model. It describes the process of the Review including stakeholder and academic input, as well as the issues considered by the Review Panel and next steps.

BACKGROUND

- 2) The FSA's NP model is used as a tool by Ofcom to differentiate foods on the basis of their nutritional composition in the context of Ofcom's restrictions on food and drink advertising to children on TV. These restrictions aim to reduce the amount of high fat, salt or sugar (HFSS) product advertising directed at children.
- 3) The FSA Board committed to reviewing the model one year from its first date of use (1 April 2007) in order to assess the effectiveness of the NP model in differentiating foods on the basis of their nutritional composition in the context of Ofcom's UK broadcasting controls which seek to improve the balance of foods being advertised to children.
- 4) The Review is being managed by an independent group of experts chaired by Professor Mike Kelly (Public Health Excellence Centre Director, National Institute for Health and Clinical Excellence) and includes representation from SACN (Annie Anderson)¹.

KEY STAGES OF THE REVIEW TO DATE

- 5) The Review Panel commissioned a literature review² on NP models and their intended purpose to provide an update on developments both nationally and internationally over the past four years since the model was developed.
- 6) The Review Panel consulted stakeholders in September 2007³ to identify any practical and technical issues arising from use of the current NP model. A list of the main issues raised by stakeholders and considered by the Panel is given in Appendix 1.
- 7) The Panel has given consideration to whether any potential modifications are justified or necessary to improve the NP model's effectiveness.
- 8) The Review Panel has considered the appropriateness of the classification of dried fruit by the model and has agreed that dried fruit is appropriately classified by the current NP model. The Panel has also agreed that no modification is needed in respect of the dried fruit multiplier.

¹ The review remit and process can be found at: www.food.gov.uk/multimedia/pdfs/npreviewremit.pdf; membership of the Review Panel can be viewed at: www.food.gov.uk/multimedia/pdfs/npreviewpanel.pdf.

² The literature review can be viewed at: www.food.gov.uk/multimedia/pdfs/publication/nplitreviewupdate

³ A letter issued to interested parties can be viewed at: www.food.gov.uk/multimedia/worddocs/ipletter24sep.doc

- 9) The Review Panel has considered an exemption of foods served in small amounts and agrees that this is not appropriate since it might allow foods like butter, chocolate biscuits, pickle, sausage rolls, ham, mayonnaise, tomato ketchup and cream crackers to be advertised to children on TV.
- 10) The Panel convened an academic workshop in February 2008 which was chaired by Dr Tony Williams (SACN member). The aim of the workshop was to draw on a wider field of expertise in the areas of public health and nutrient profiling. The workshop was attended by independent academics from the EU and international community.
- 11) The Panel identified four main subjects for consideration at the academic workshop:
 - A. The base of the model (per 100g, per 100kJ, per portion);
 - B. Category based models;
 - C. Application of the NP model to adverts featuring recipes or meals;
 - D. The protein cap.

Base of the model

- 12) Workshop participants considered the tabled evidence on a potential modification to the base of the NP model⁴. Participants concluded that there was no advantage to be gained in changing the base of the NP model from 'per 100g' to 'per portion' with respect to the model's intended purpose and its classification of foods. Distinct disadvantages were identified in considering a 'per portion' base, such as the lack of agreement on portion sizes and that there is variability in amounts consumed by children of different ages.
- 13) The Panel agreed with the conclusions of the workshop and is not proposing to consider further the base of the model.

Category based models

- 14) Workshop participants considered the tabled evidence on 'category-based' versus 'across-the-board' models and the potential addition of food-specific categories⁵. In particular, consideration was given to the classification of dairy products, breakfast cereals and dried fruit. It was concluded there was no justifiable nutritional argument to include any additional categories within the NP model.
- 15) The Panel agreed with the conclusions of the workshop and is not proposing to consider further the addition of categories to the NP model.

Application of the model to adverts featuring recipes and meals

- 16) Participants considered the tabled evidence on current methods used to assess advertisements that feature recipes or whole meals⁶ and noted that application of the model in this area was complicated and warranted further consideration.

⁴ Evidence on testing an alternative base of the NP model is presented in the workshop report found at: www.food.gov.uk/multimedia/pdfs/npworkshop080228.pdf

⁵ Evidence on 'category specific' versus 'across the board' NP models is presented in the workshop report found at: www.food.gov.uk/multimedia/pdfs/npworkshop080228.pdf

⁶ Evidence on assessment of advertisements featuring recipes and whole meals is presented in the workshop report found at: www.food.gov.uk/multimedia/pdfs/npworkshop080228.pdf

- 17) The Panel agreed with this outcome and will be giving this subject further consideration at its next meeting.

The protein cap

- 18) Workshop participants considered the tabled evidence which included background to the protein cap and why it was added (to prevent foods that score 11 or more 'A' points for energy, saturated fat, total sugar and sodium, from being able to score 'C' points for protein unless they contain greater than 80% fruit, vegetable or nut content) and the testing of potential modifications. This can be viewed in the workshop report⁷. Workshop participants concluded that the protein cap warranted further consideration, recognising that removal of the protein cap would simplify the application of the model, but that careful consideration would be needed to look at the wider impact of removing the protein cap for misclassification of foods.
- 19) The Review Panel agreed with the conclusions of the workshop and has been considering potential modifications to the protein cap of the NP model including the raising of the threshold at which it applies and its complete removal. The implications of raising or removing the protein cap on a wide range of foods were considered by the Panel at its May meeting, including the potential for manufacturers to add proteins to foods to improve their NP scores, should a protein cap modification be made.

(A full report of the workshop, including associated presentations and tabled evidence documents, can be found on the Agency website:
<http://www.food.gov.uk/multimedia/pdfs/npworkshop080228.pdf>.)

NEXT STEPS

- 20) The Review Panel's draft recommendations will be subject to a full 12 week public consultation in the summer (planned for July 2008).
- 21) The Review Panel will consider comments and views received during the consultation at its meeting in October 2008, based on which the Panel will agree its final recommendation on the NP model.
- 22) A meeting of SACN members will be convened late in 2008 (date to be confirmed) to discuss and comment on the outcomes of the consultation and the Panel's final recommendation on the NP model. Agreement to any proposed modification to the model will be sought from SACN.
- 23) The Review Panel's final recommendations on the Agency's NP model will be presented to the Agency's Board early in 2009.

⁷ The workshop report can be found at: www.food.gov.uk/multimedia/pdfs/npworkshop080228.pdf

APPENDIX 1: A SUMMARY OF ISSUES RAISED BY STAKEHOLDERS

The following summarises the main issues raised during the September/ October consultation exercise which were considered by the Review Panel:

- The choice of base of the model (100g)
- Foods served in small portion sizes (e.g. chewing gum, marmite, honey)
- Food categories rather than across the board (e.g. cheese, fats and oils should be a separate category)
- One model should be used for all purposes (e.g. TV restrictions and health claims)
- Balancing negative nutrients with positive nutrients is inappropriate
- Consideration of brand advertising e.g. McDonald's Happy Meal
- Non milk extrinsic sugars (NMES) rather than total sugars
- Lactose should be excluded from total sugars
- Energy density score should be less dominant
- Recipes and menus unfairly dealt with
- Breakfast cereals – issues with the dried fruit, veg and nut (FVN) multiplier, sugars, portion sizes and protein cap
- Cheese – vitamins and minerals not taken into account, should be scored based on portion size
- Dry products (snacks and crisps) - cannot meet threshold based on 100g, should be based on portion size
- Dried fruit – multiplier is not effective
- Whole milk should be classified as a food
- Foods for particular nutritional uses (PARNUTS) should be exempt

A complete list of issues raised and the Panel's responses can be found on the Agency website: www.food.gov.uk/healthiereating/advertisingtochildren/nutlab/nutprofilereview/panelresponse.