

Drop the Salt! Food Industry Strategy

DRAFT FOR CONSULTATION JULY 2008



Australian Division of World Action on Salt and Health (AWASH)

Drop the Salt! Food Industry Strategy

Introduction

1. The Australian Division of World Action on Salt and Health (AWASH) aims to reduce the average salt intake of the Australian population to six grams per day by 2012. A priority objective is to work with the food ingredient, processing, retail, and food service industries to achieve an average 25% reduction in the salt content of foods over the next five years. To establish the best way to do this, AWASH has been consulting with key food companies and industry organisations in Australia to develop this strategy.

Purpose of this document

2. Following meetings with a range of food companies and industry organisations, a draft strategy was circulated to the AWASH advisory group and members of the Australian Food and Grocery Council (AFGC) working group of the Health, Nutrition and Scientific Affairs Committee and the Corporate Consumer Affairs Committee towards the end of 2007. A wide range of constructive comments were received and have been taken into account in this revised version as far as possible.
3. This document outlines the next steps in the AWASH approach to working with the food industry. It will be used as the basis for further consultation with the food industry and other stakeholders during August and September 2008. Following this, the revised strategy will be published on the AWASH website. Much work to implement the strategy is already underway. However, it is important that there is a clear understanding of the commitment and expectations of the different players as work to implement the strategy continues.

Who is this document for?

4. AWASH is keen to get feedback on this document from as wide a range of people as possible with an interest in reducing population salt intakes. This includes:
 - Members of the AWASH advisory group, supporters and interested parties
 - Food companies and food industry organisations
 - Food technologists
 - Federal and state government workers with an interest in improving nutrition and health
 - People working in health charities/NGOs and/or consumer organisations
 - Policy workers in other countries in relevant national or international organisations

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Questions which we would appreciate your views on

5. AWASH is keen to obtain views on any element of the strategy but in particular we would like responses to the following questions:

- Do you agree with the four main strands of the strategy? If not, are there any other key things that you think need to be done to support the food industry to reduce salt in foods in Australia?
- Do you agree that there needs to be targets for specific food categories? What are your views on using Heart Foundation Tick program nutrient criteria or UK Food Standards Agency (FSA) salt targets as the basis for establishing targets for salt levels in different foods in Australia?
- Are there key sectors that you think we should be targeting?
- Do you have any other general comments on the strategy or the approach?

Next Steps

6. Please send your responses to the questions above to jwebster@george.org.au as soon as possible, and no later than **30th September 2008**. If you have any specific queries please call Jacqui Webster to discuss on **+61 2 9993 4520**.

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AWASH aims and objectives

1. Early in 2007 the World Health Organisation (WHO) issued a technical report recommending that each of its member states implement a national salt reduction strategy.¹ On this basis AWASH established a network of representatives from the medical profession, scientific community, food industry, consumer associations, education and health promotion bodies that support the health benefits of a population-wide reduction in dietary salt for Australia. The primary goal of AWASH is to reduce the average salt intake of the Australian population to six grams per day by 2012. This is in line with advice from the National Health and Medical Research Council (NHMRC) and the National Heart Foundation of Australia (NHF).
2. AWASH launched its Drop the Salt! Campaign in the third quarter of 2007. It announced three key objectives:
 - Working collaboratively with the food ingredient, processing, retail, and food service industries to achieve an average 25% reduction in the salt content of foods
 - Increasing population knowledge of the benefits of low salt diets
 - Achieving clear labeling of foods such that the salt content is immediately apparent.
3. AWASH has been developing strategies in partnership with a broad range of organisations at all levels to achieve these objectives. These include:
 - The food industry strategy
 - A comprehensive media and communications strategy
 - A stakeholder and government engagement strategy
 - A research and monitoring program
4. Further details in relation to each of these strands of work are being made available on the AWASH website as they develop. This paper outlines the main strands proposed in the food industry strategy.

The four main strands of the AWASH food industry strategy

5. Taking into account a whole range of issues as detailed in the background paper at Annex I, and based on initial discussions with different food industry sectors and companies in Australia, the four main strands of the food industry strategy are:
 - I. High level commitment from the food ingredient, processing, retail and food service industries to reduce salt in foods by an average of 25% over five years
 - II. Individual company agreements and action plans agreed through a coordinated program of meetings with key players
 - III. Development of product-specific targets for salt levels in key food categories
 - IV. Promotion of good practice and innovation by food companies in reducing salt
6. These four main strands build on the progress already made by the food industry to reduce salt in foods and will be supported through the wider AWASH strategy. This includes a high profile media strategy and program of work to raise consumer awareness and a comprehensive monitoring program including the establishment of a database to monitor sodium levels in foods.
7. Details of the approach to each of these strands are as follows:

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I) High level commitment from the food industry

8. The AWASH Drop the Salt! Campaign has already received the support of key industry organisations. The AFGC supports the need to reduce population daily salt intakes to below six grams, and many major food companies have already developed salt reduction plans which are detailed at: http://www.awash.org.au/drop_thefoodindustry.html.
9. However, it is important that all sectors of the food industry (ingredient, processing, retail, and food service) are signed up and that, where possible, cross-industry initiatives are developed.
10. To ensure this, AWASH intends to work with the AFGC and other key food companies to develop a jointly agreed statement. This statement will highlight the commitments of AWASH and the food industry to work together to implement this strategy and ensure that salt in foods is reduced by an average of 25% over the next five years. This will include the development of individual company action plans to achieve product-specific targets negotiated through a series of meetings and the development of cross-industry agreements where appropriate.
11. AWASH will launch the statement in October 2008.

II) Individual company agreements and action plans

12. Key to the industry strategy will be one-on-one meetings with the main trade associations and individual companies to better understand how to support them to reduce salt in food products and negotiate individual company action plans to achieve product-specific targets. Meetings have already been held with many organisations and a number of companies have already developed and published action plans to reduce salt in their products by 25% over five years in line with the AWASH strategy.
13. AWASH will develop a template for companies to facilitate the development of action plans and provide a consistent approach to reporting on progress.
14. Further meetings will take place to support the development of individual company action plans which AWASH will then assess.
15. Companies will be asked to produce action plans by December 2008.

III) Development of product specific targets for salt levels in key food categories

16. In order to achieve an average 25% reduction in the salt content of processed foods overall, both AWASH and the AFGC agree that due to the different technical and other issues related to different food product types, as well as to the fact that substantial reductions have already been made in some areas, the extent to which salt can be reduced needs to be assessed on a product by product basis.
17. The NHF Tick Program in Australia has clear criteria for salt in selected products which some companies are already working to. The FSA in the UK has developed salt reduction targets for 85 different product categories. In either case the targets/criteria have been

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negotiated on the basis of what is technically achievable. Whilst it is accepted that some companies have already made substantial changes to some products and it may not be possible for them to reduce salt further, in other cases these targets should be used as guidance by the food industry to reduce salt across the whole range of products by as much as possible.

18. In the longer term, AWASH believes that the Australian government should lead a process to agree suitable salt targets for Australia with the food industry.
19. AWASH will be seeking further views on this idea through this consultation.

IV) Monitoring and promotion of good practice and innovation by food companies in reducing salt

20. AWASH will be monitoring progress and identifying opportunities to promote good practice and innovation by food companies in reducing salt including:
- Reporting annually on salt levels from the AWASH salt database
 - Disseminating relevant research findings, including in relation to technical innovation, in relation to salt
 - Issuing press releases about new company action plans or progress towards achieving targets
 - Producing analysis of salt levels in particular sectors (for example processed meats, breads and the fast food sector)

Key Milestones for the AWASH Food Industry Strategy

2008	Consultation on draft document	July - September
	2 nd round of meetings with key food companies and organisations	July - September
	Agreement of joint statement and publication of final strategy	October
	Development of template for company action plan (AWASH)	November
	Company salt reduction plans received	December
	Establishment of database (AWASH)	December
2009	Publication of salt levels/changes 2007-8	January
	3 rd round of meetings with key food companies and organisations	July-September
	Update on progress from company action plans	December
2010	Publication of salt levels/changes 2008-9	January
	4 th round of meetings with key food companies and organisations	July-September

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	Update on progress from company action plans	December
2011	Publication of salt levels/changes 2009-10	January
	5 th round of meetings with key food companies and organisations	July-September
	Update on progress from company action plans	December
2012	Publication of salt levels/changes 2010-11	January
	Continuation of meetings with key companies	July –September
	Update on progress from company action plans	December
	Final report	December

Next Steps

21. This document will be circulated as widely as possible asking for comments by 30th September 2008. Meetings will be held with a range of key organisations to obtain further feedback on the proposals from July to the end of September 2008. Meetings will be arranged with the AFGC and other key food companies to develop a joint statement to be published alongside the final strategy during October 2008.

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Annex I: Background Paper

Salt and health

It is now widely accepted that excess salt consumed throughout life causes blood pressure to rise with age. Cardiovascular diseases (predominantly heart attack and stroke) are the leading causes of death in Australia and in 2004 accounted for some 48,000 deaths nationwide.² Cardiovascular diseases are also one of the leading causes of disability in Australia, with an estimated 1.4 million Australians (6.9% of the population) having disability associated with cardiovascular conditions. In terms of direct health care expenditure, cardiovascular disease is the most expensive disease costing \$5.5 billion - 11% of Australia's total allocated health system expenditure in 2000–01.³ There is overwhelming evidence from both large-scale observational studies^{4,5} and randomised trials^{6,7} as to the adverse effect of elevated blood pressure on the risk of cardiovascular disease. It is now widely accepted that excess dietary salt causes blood pressure to rise.^{8,9} Salt has also been implicated in a number of other major health problems.¹⁰

Health gains and cost-effectiveness of salt reduction strategies

There is consensus that reductions in the amount of salt consumed will have population-wide effects on blood pressure levels and the incidence of serious complications that result from elevated blood pressure.¹¹⁻¹⁵ A recent report has highlighted the enormous benefits that a plausible reduction in salt consumption might achieve, with numbers of deaths averted projected to be at least as great as those that might be achieved by feasible reductions in population smoking rates.¹⁶ People only need very small amounts of salt to be healthy and people in most countries are eating much more salt than they need. Reducing dietary salt intake lowers blood pressure for most people. Even healthy people with normal blood pressure can lower their risk of future hypertension and associated poor health outcomes by cutting down their salt intake to recommended levels.¹⁷ It has been estimated that reducing population salt intakes in Australia to below the currently recommended maximum would avert more than one fifth of all vascular disease in Australia as a consequence of the population-wide blood pressure reduction that would be achieved. Comparable estimates of effects have been made for the UK which experiences broadly similar patterns of salt-related diseases to those in Australia.^{18,19}

In addition to being highly effective at averting serious disease outcomes, salt reduction strategies are also projected to be highly cost-effective.^{1,16,20} These analyses have identified national salt reduction strategies as highly cost-effective, irrespective of the socio-economic setting in which they are implemented. The annual cost for a comprehensive national salt reduction strategy for Australia was estimated at less than A\$15 million, with the cost per DALY averted being less than one tenth of that for a number of drug therapies recently approved for subsidy under the Pharmaceutical Benefits Scheme.¹

Progress on salt reduction in other countries

Several other countries now have some sort of program to work with the food industry to reduce salt in foods. The most comprehensive and well-established is in the UK, which is as part of a comprehensive government population salt reduction strategy coordinated by the Food Standards Agency (FSA).²¹ In France, where white bread is the main contributor to salt in the diet, the French Food Agency is leading a program of work to reduce salt in bread.²² The NHF in New Zealand is also working with the food industry to support changes to improve the nutritional composition of foods including by reducing the salt content. A brief review of programs in different countries was undertaken for the WHO as background to the Forum and Technical Meeting organised in Paris in October 2006.¹ In addition to the European programs mentioned above, it highlighted nutritional recommendations in four countries in Asia as well as specific recommendations for Canada and the USA. It concluded that efforts and commitments to reduce

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salt intake are still not a reality in many countries and that recommendations must result in action, which should be tailored to the national context.

More recently the European Commission has established a high level political groupⁱ to put pressure on European Member States to commit to national salt reduction policies. This is going to be supported at a working level by the WHO Europe Regional Office which is establishing a program to support the exchange of technical expertise between countries.

From this initial analysis of the international situation, it seems that, whilst the momentum to address high salt intakes is clearly increasing throughout the world, the UK is currently the only country which has a comprehensive program in place. What's more, it has actually demonstrated an impact, not only in terms of salt levels in food products being successfully reduced, but also by demonstrating an increase in consumer awareness²³ and a subsequent reduction in population salt intakes.^{24,25}

The current picture in Australia

Salt consumption in Australia

The best objective measure of salt consumption in populations or individuals is achieved through 24-hour urinary sodium collections. In the last few years, there have been seven studies done that provide estimates of 24-hour urinary sodium excretion in Australian adults.²⁶⁻³² None are representative of the population and extrapolation to Australia as a whole is difficult. The Australian government's Nutrient Reference Values for Australian Adults estimates average adult consumption of 9 grams/day against a recommended upper level of intake of 6 grams/day and a suggested dietary target of 4 grams/day for the prevention of hypertension.^{17,33}

The Federal government should ensure that reliable estimates of salt intake are achievable through the National Diet and Physical Activity Survey that is planned for 2009.

Which foods contribute to salt in the diet?

A salt modeling exercise recently completed by Food Standards Australia New Zealand (FSANZ) as part of an investigation into strategies for iodine fortification identified the chief sources of salt in processed foods (Table 1) While these estimates are based upon consumption patterns determined from a dietary survey done more than ten years ago, FSANZ believes that they broadly represent the main sources of dietary salt in processed foods consumed in 2008.

Table 1: Contribution to salt intake of processed foods

Food Category	Percent contribution to salt intake from processed foods
Cereal and cereal products	32
Cereal-based products and dishes	17
Meat, poultry and game products and dishes	21
Milk products and dishes	5
Savoury sauces and condiments	8
All other foods	17

Industry actions to reduce salt in Australia to date

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Work to reduce salt in foods in Australia has been going on for some years now. As far back as 1982 the NHMRC Working Party on Sodium recommended that food manufacturers reduce salt in foods such as bread, cheese, butter, margarine, processed meats and snack foods.³⁴ This resulted in a range of “reduced” and “low-salt” alternatives being made available. A survey undertaken by the NHF in 1995 showed that, based on 63 brands, there had been a 10% reduction in salt concentration compared with 15 years previously.³⁵

The Australian Food and Grocery Council (AFGC) says³⁶ that the Australian industry has been providing low salt or no added salt options for some time, and reducing the levels in other foods. “Many companies have been working with the NHF to steadily reduce salt levels as part of the Tick Program, which has been in place for almost 20 years. We have examples of products that today have far less salt than they did twenty or thirty years ago”, said CEO Dick Wells.

Current salt levels in Australian products

Many people point out that salt levels in Australian products are now already lower than in other countries but whilst this is true for some brands, it is not true across the board. This inconsistency is something that seems to occur in many different countries. Whilst a company may have the lowest salt contents for some products, it may have higher salt contents for others and, whilst Australian products are sometimes lower than other countries, this is certainly not always the case.

A survey undertaken by World Action on Salt and Health (WASH) into salt levels in different countries in different products highlighted this fact.³⁷ For example, whilst the salt levels in some cereal products (e.g. All Bran, Just Right, Special K and Frosties) were lower in Australia than in most other countries, for other cereal products (e.g. Cornflakes, Cocopops, Rice Krispies and Froot Loops) the salt levels in Australia were higher than many other countries. This was the same for the range of different companies surveyed including Burger King, Kentucky Fried Chicken, McDonald’s, Nestle and Subway.

AWASH is establishing a database to enable consistent monitoring of salt levels in foods in Australia.

Current labeling requirements

Unlike the UK, all retail food products in Australia (not just those making health claims) have to include sodium content as part of the mandatory nutrition information panel. However, consumers do not necessarily understand what sodium is and how it translates into salt, or what they should be looking for in terms of a low salt food. As part of the salt reduction strategy in the UK, retailers and manufacturers have been asked to label salt as well as sodium. This is because consumers understand what salt is. Many companies have already indicated that they would be happy to do this. The AFGC has also indicated that they would consider providing optional salt labeling following consultation with its members and if the food standard requirement for the nutrition information panel was altered.

Discussions are currently underway at Federal government level about different sorts of front of pack labeling schemes drawing on research from other countries, most notably the UK. AWASH believes that any front of pack labeling scheme should clearly highlight the amount of salt (rather than or in addition to sodium) in a product.

The Heart Foundation Tick Program

Since 1989 the Tick has been challenging food companies to reformulate and produce healthier products for the supermarket shelves and highlighting those healthier choices using the Tick so

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that they are quick and easy for shoppers to spot without being a nutrition expert. Today, there are more than 1, 000 Tick approved foods sold across the range of foods Australians eat. There are over 50 categories with criteria specific to these categories' nutrition priorities which are reviewed continually. Independent unannounced audits ensure food companies and food service/catering outlets continue to meet the Tick standards. The Heart Foundation Tick is a public health program funded on a cost recovery basis by license fees. It has already had a significant impact on salt levels in food products.³⁸ One independent published study credits the Tick criteria as the benchmark which led to the removal of 235 tonnes of salt from the food supply in just one year when just one manufacturer reformulated 12 of its breakfast cereals even though only 5 qualified for the Tick.³⁹

In August 2006, the Tick Program was introduced to everyday meals eaten out for lunch or dinner. Only outlets with a HACCP based food safety program in place are eligible to apply. Outlets have to provide nutrition information panels at point of sale for their Tick approved meals so customers know exactly what they're eating. In just over 12 months, Tick has been the incentive for foods outlets to remove almost 20 tonnes of salt from the foodservice industry so far. Just as it applies to the retail sector, random auditing in foodservice is essential to ensure Tick standards are being maintained and is the most rigorous independent auditing currently conducted in Australia.⁴⁰

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