

Briefing

Responsibility Deal: One Year On

An assessment of the Government's approach to healthier food choices

Obesity is a national emergency. Over a quarter of people are obese and excess weight is costing the National Health Service more than £5 billion every yearⁱ. Added to this, diet-related diseases such as cancers, heart disease and stroke are the major killers. But the Government's approach currently relies too much on voluntary deals rather than showing real leadership.

A new Which? surveyⁱⁱ shows that people don't think the Government is doing enough. Just 28 per cent of people are satisfied that it is taking enough action to help people eat healthily. One year on from the launch of the Responsibility Deal, Which? does not believe that the current approach is good enough to tackle the challenges we are facing. There has to be a radical change of pace that tackles the barriers to healthier eating in a more meaningful way. In the next six months, Which? is calling for the Government to:

- **Demand that all food companies use traffic light nutrition labelling:** this approach works best, is preferred and enables people to see what they are buying.
- **Establish 2014 salt reduction targets:** there has been progress made on salt, but further reductions are needed and more sign up - particularly from caterers.
- **Introduce a robust pledge for sugar and fat reductions:** the calorie reduction pledge is vague and should focus on products that contribute most fat and sugar.
- **Make saturated fat a priority:** given the rate of heart disease in the UK, incentives for saturated fat reductions and timelines for meeting them are needed.
- **Ban artificial trans fats:** there has been a lot of voluntary action but it's time to finish off the job and ensure trans fats are removed from all foods.
- **Require calorie labelling in chain restaurants:** if calories aren't displayed voluntarily in chain restaurants by September 2012, the Government must legislate.
- **Put pressure on companies to be responsible in their promotions:** commitments are needed to ensure that products high in fat, sugar and salt are not actively and aggressively promoted to children and that price promotions are balanced.
- **Improve food in public institutions:** standards are needed to improve food across public institutions, including hospitals.

We also need to see responsibilities for nutrition and food labelling put back in the Food Standards Agency to ensure that policy is independent, open and joined up with other food issues.

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What's the Deal?

In March 2011, the Government launched a Public Health Responsibility Deal for England “to tap into the potential for businesses and other organisations to improve public health and tackle health inequalities.” The Deal focuses on developing voluntary pledges to act.

Prior to the Responsibility Deal, the Food Standards Agency (FSA) had responsibility for nutrition policy. The FSA works at arm's length from government, has a specific remit to put consumers first and agrees its approach in open Board meetings. Issues that it was taking forward included work on salt reduction, saturated fat reduction, calorie labelling in restaurants and a front of pack traffic light labelling scheme. Its responsibilities for nutrition issues in England moved to the Department of Health in October 2010 and the Responsibility Deal became the main means of achieving change on these issues.

The Responsibility Deal is wider than food with networks also looking at alcohol, physical activity, workplace health and behavioural change in general. A Steering Group comprised of the main food industry trade associations and their members, as well as health charities and Which?, is involved during the development of the food pledges. Despite the membership, the nature of the Deal means that the focus is on drafting pledges that food companies will be willing to sign up to. Issues are dealt with one by one, rather than as part of a more comprehensive strategy that tackles the main barriers to healthier eating.

Assessment of the first three pledges

1. Calorie information in restaurants

Pledge: *“We will provide calorie information for food and non-alcoholic drink for our customers in out of home settings from 1 September 2011”.*

Relevance: It is estimated that around one in six meals is eaten outside the home, but it can be difficult to tell which options are healthier or not. Which? research has shown that two thirds of people want information about calories to be provided when eating outⁱⁱⁱ. Calorie information in chain restaurants with more than 20 outlets is now a legal requirement in the United States, following an example set by New York.

Take-up: 45 companies have signed up. These are not all providing information in all of their outlets yet.

Who's in, who's out: The following table shows which of the leading restaurant, pub, fast food and coffee shop chains have so far committed to providing calorie information. Only two of the top 10 restaurant and pub groups have signed up - and even then, not for all of their main brands.

Table 1: Progress made on provision of calorie information by restaurant chains

Group	Approximate Number of outlets in 2011	Main brands	Signed up to pledge?
Top 10 Restaurant and pub groups			
Mitchells and Butlers	940	Harvester Browns Toby Vintage Inns Sizzling Pub Co All Bar One	Yes No No No No No
J D Wetherspoon	823	Wetherspoon Lloyds No 1 Bar	Yes No
Gondola	655	Pizza Express Ask Zizzi	No No No
Restaurant Group	389	Frankie & Benny's Garfunkels Chiquito	No No No
Whitbread	383	Beefeater Brewer's Fayre Table Table	No No No
Nando's	303	Nando's Gourmet Burger Kitchen	No No
Tragus	295	Bella Italia Café Rouge Strada	No No No
Spirit Pub Company	261	Chef and Brewer Flaming Grill Fayre and Square	No No No
Greene King	216	Loch Fyne Eating Inn Hungry Horse	No No No
Prezzo	172	Prezzo Ultimate Burger Chimichanga	No No No
Top 10 Quick Service Restaurants and Takeaways			
Greggs plc	1500	Greggs	Yes
Subway International	1399	Subway	Yes
McDonald's Restaurants Ltd	1200	McDonald's	Yes
Yum! Brands	810	KFC Pizza Hut	Yes Yes
Burger King	660	Burger King	Yes - but not national yet
SSP	650	Upper Crust Millie's Cookies	No No

Domino's Pizza Group Ltd	619	Domino's	No
Bridgepoint	226	Prêt a Manger	Yes
Jatinder Wasu	110	Perfect Pizza	No
EAT	117	EAT	Yes
Top 5 Coffee Shops			
Whitbread	1257	Costa Coffee	No
Starbucks	730	Starbucks	Yes
Rome Bidco	450	Caffe Nero	No
Marks and Spencer	160	The Café	Yes - during 2012
SSP	118	Café Ritazza	No

Sources: Company websites and annual reports, BHA Trends & Developments 2011, Department of Health for pledge signatories.

Many of the major chain restaurants have not signed the pledge. Although Harvester and JD Wetherspoons have pledged, Mitchells and Butlers who own Harvester are not yet doing this for their other brands and neither are other major pub chains. The fast food chains stand out for relatively quick action and national roll out across the sector. When it comes to coffee chains, Starbucks has pledged - but not Costa or Café Nero.

Other companies that have committed to provide information include some of the “behind the scenes” contract caterers such as Sodexo and Compass Group. These supply a lot of workplaces and public institutions and will be steadily rolling out the information. More familiar high street names who have also said they will provide calorie information include Greggs, Eat, Merlin Entertainment, who run tourist attractions, and Odeon cinemas.

Next steps: If there is still not take-up by the major chains by September 2012, the Government should legislate to require them to provide calorie information.

2. Salt reduction

Pledge: “We commit to the salt targets for the end of 2012 agreed by the Responsibility Deal, which collectively will deliver a further 15% reduction on 2010 targets. For some products this will require acceptable technical solutions which we are working to achieve. These targets will give a total salt reduction of nearly 1g per person per day compared to 2007 levels in food. We recognise that achieving the public health goal of consuming no more than 6g salt per person per day will necessitate action across the whole food industry, Government, NGOs and individuals.”

Relevance: The Department of Health has estimated that reducing salt intakes by 1g will save over 4000 preventable deaths and £288 million to the NHS across the UK every year. A programme of work combining gradual behind the scenes salt reductions, consumer awareness raising and clear labelling of salt levels in foods was begun by the FSA. This included setting 2010 and 2012 salt targets and aimed to gradually shift our tastes by ensuring action was taken across product sectors. The Pledge is based on the FSA 2012 salt targets.



Take-up: 77 companies have signed up to the pledge.

Who's in, who's out: A lot of companies have signed up, but exceptions among the retailers are Lidl and Iceland. Among the manufacturers, companies that have not pledged include Findus, Princes and Birds Eye. Some chain restaurants and caterers have signed up but a lot more action is needed from this sector. Examples of those who have already signed up include Costa, Eat, Pret a Manger, Greene King, Marstons, Wetherspoon and Whitbread pubs, Strada, Pizza Express and Subway.

Next steps: We are now in 2012 but the Government has no plans to set further targets. It is essential that the approach based on gradual reductions continues. Some product categories will be more difficult (eg. bacon and cheese) but this should not prevent 2014 targets being set and delay action for other food categories.

3. Removal of trans fats

Pledge: *"We have already removed, or will remove, artificial trans fats from our products by the end of 2011"*.

Relevance: Trans fats are not required in the diet, but increase people's risk of coronary heart disease^{iv}. Government nutrition surveys show that average intake levels are not that high, but it is likely that some people could still be eating a lot of trans fats. A lot of action has already been taken by the mainstream food industry to remove fats and so the pledge is intended to finish off the work. Sainsbury's was the first retailer to commit to do this in its own-brand products on a voluntary basis by January 2007.

Take up: 90 companies have signed up to the pledge.

Who's in, who's out: The Pledge has caught most of the main companies. All of the supermarkets have signed up, except for Lidl. Starbucks and Costa are on the list of companies that have pledged, but not Café Nero. The problem is now likely to be more with smaller producers and caterers who are not engaged with the Deal.

Next steps: The Government should ban artificial trans fats so that action has to be taken across the board, ensuring that smaller brands, take-aways and other caterers have also taken out trans fats.

New initiatives under the Deal:

4. Calorie reduction

The fourth pledge that was highlighted when the Government launched a Call to Action on Obesity in September focuses on reducing calorie consumption. This is being launched to coincide with the first anniversary of the Responsibility Deal.

Pledge: *"Recognising that the Call to Action on Obesity in England set out the importance of action on obesity, and issued a challenge to the population to reduce its total calorie consumption by 5 billion calories (kcal) a day, we will support and enable our customers to eat and drink fewer calories through actions such as product/ menu reformulation, reviewing*



portion sizes, education and information, and actions to shift the marketing mix towards lower calorie options. We will monitor and report on our actions on an annual basis”.

Relevance: Sixty one per cent of people in England are overweight or obese and 30 per cent of children and so calorie reduction is important. But wider diet-related disease such as cancers, heart disease and stroke also have to be addressed - so the issue is not only about reducing calories, but also about reductions in saturated fat, a risk factor for heart disease.

Take-up: It is too early to tell, but the pledge is vague and leaves food companies flexibility over how they respond. The Government has not made it clear what level of action is needed from different sectors. Success will depend on whether there is much action on the foods that are major sources of calories in the diet, such as soft drinks, confectionery and snack foods.

What’s missing?

Other issues that are on the Responsibility Deal agenda to be looked at over the coming years include increasing fruit and vegetable consumption, saturated fat reduction and food promotions. But the nature of the Deal means that it will take a long time before the Government even starts talking with food companies about the issues our survey shows people think it is most important for them to act on.

A clear role for the Government

Which? consumer research shows that people think that the Government does have a role encouraging action from the food industry - but many are not satisfied that they, or many of the companies they want to take voluntary action, are doing enough.

Table 3: Percentage of people satisfied that the following sectors are taking enough action to help people eat healthily

	% satisfied	% neither satisfied nor dissatisfied	% dissatisfied	Don't know	N/A- I don't think [organisation] should take action to help people eat healthily
Supermarkets	39%	30%	26%	1%	5%
Government	28%	33%	28%	2%	8%
Food manufacturers	20%	28%	46%	1%	4%
Restaurants/ take-aways/ sandwich shops	18%	30%	44%	2%	7%

To what extent are you satisfied that the [Government/ food manufacturers/ restaurants, take-aways, sandwich shops] is taking enough action to help people eat healthily? Base: all who responded to survey (1995). Online survey of 1995 UK adults Feb 2012.

The actions that people think that the Government should be taking are set out in Table 4:

Table 4: Actions wanted from Government to make it easier to choose healthier options

Action that can be taken by the Government	%
Actively encourage industry to lower fat, sugar and salt content in foods	54%
Ensure that food companies do not use child appealing tactics to promote less healthy foods to children	52%
Require consistent labelling of fat, sugar and salt levels on front of pack on products in supermarkets	52%
Ensure that supermarkets include healthier options in special offers	47%
Encourage food companies to offer more healthier options	46%
Actively encourage industry to lower calories in food	40%
Require chain cafes, take-aways and restaurants to provide calorie labelling at point of sale (eg. menus/shelf-labels)	39%
Use taxes to lower the price of healthier foods	35%
More government advertising campaigns about healthier eating	26%
Encourage food companies to offer a wider range of smaller portions	21%
Use taxes to make foods high in fat, sugar or salt more expensive	17%
Nothing	5%
Other	3%
Don't know	3%

What if, anything, do you think the government should do to make it easier to choose healthier options? Please mention all that apply. Base: all who responded to survey (1995). Ibid.

Greater leadership is now needed by the Government to drive action on the following issues:

- **Consistent front of pack nutrition labelling that includes traffic light colour coding** (and ideally high, medium or low in words) so you can easily see nutrient levels at a glance. The table below shows the different schemes that retailers currently use. Tesco, Morrisons, Aldi and Lidl are not yet using traffic lights on front of pack.

Table 5: Supermarket use of front of pack nutrition labelling schemes

Supermarket	Using Traffic Lights?	Using % GDAs?	Text 'High', 'Medium', 'Low'?
Tesco	No	Yes	No
Asda	Yes	Yes	Yes
Sainsbury's	Yes	No	No
Morrisons	No	Yes	No
The Cooperative	Yes	Yes	No
Marks and Spencer	Yes	Yes	No
Waitrose	Yes	Yes	No
Aldi	No	Yes	No
Lidl	No	Yes	No

- **More co-ordinated work to reduce saturated fat, sugar and salt levels**, as well as calories. This includes setting clearer targets and setting out actions to be taken by key food categories contributing most of these nutrients to our diets.



- **Further action to ensure responsible food promotions**, including the way that unhealthy foods dominate the foods marketed to children and the balance of choices included in price promotions.
- **Government standards** for food in hospitals and other key institutions, such as nurseries and care homes, so that people can be sure of a healthier choice. Recent analysis by Which? found that England is generally lagging behind other parts of the UK^v.

Conclusion

The Responsibility Deal has meant some additional progress has been made on issues such as salt reduction and calorie labelling in restaurants. But the scale of the problem of obesity and diet-related disease requires much greater leadership from the Government to ensure that there is meaningful action across the whole food industry.

In order to ensure a more pro-active response, nutrition and food labelling should be dealt with at arms' length from politics. Policy responsibility should be given back to the Food Standards Agency to ensure that there is an independent, transparent approach and that consumer interests are put first.

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March 2012

ⁱ Healthy Lives, Healthy People: A Call to Action on Obesity in England, Department of Health 2011.

ⁱⁱ An online survey of 1995 UK adults between 16-23 February 2012. The data was weighted to be representative of the UK population.

ⁱⁱⁱ An online survey of 1009 members of the GB public, between 14th- 15th June 2011. Weighted to be representative of the GB population ('How important do you think it is that information about calorie content of food is provided in the following food outlets?' Base: all who eat out (967) Chain coffee/ sandwich shops (65%), chain pubs (65%), chain restaurants (67%), chain take-aways (68%).)

^{iv} Scientific Opinion on Dietary reference Values for Fats, European Food Safety Authority, EFSA Journal 2010;8(3):1461.

^v The State of our Plates: Progress report on food in public institutions, Which? policy report, September 2011.