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Food Standards Agency (FSA)  
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5<sup>th</sup> November 2009

**Re: Proposals to revise the Front-of-Pack nutrition labelling for pre-packed foods sold through retail outlets in the UK**

Consensus Action on Salt and Health's (CASH) expertise is in the area of salt so our specific comments are largely restricted to this area:

**Salt thresholds:** Because most salt consumed is already in the foods consumers buy it is important that labels are as helpful as possible in identifying lower salt products, again so that consumers can make healthier choices. We would welcome your views on whether the salt thresholds for an integrated FOP label should be revised and if so which approach should be used (paragraphs 39 -44):

- (a) changes to the per 100g criterion,
- (b) changes to the per portion criterion, or
- (c) both.

The overall aim of this programme is to reduce salt intake in the adult population to less than 6 g, from the current 8.6g. CASH recommends the Food Standards Agency revises the existing front of pack nutrition labelling for both per 100g and per portion criterion in line with the original proposals.

CASH recommend that the criteria for salt should be changed from:

- A) from 'a maximum of 1.50g/100g' to 1.25g/100g for Red (High) and
- B) from 'any food which contributes more than 40% salt per portion of an adult's daily recommended maximum intake', to 30% per portion as Red (High), in line with fat, saturates and sugars. (This would bring down the maximum salt/portion from 2.40g to 1.80g based on 6g/day).

**Supporting points:**

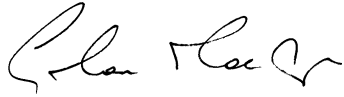
- The current traffic light labelling structure, whilst a fantastic innovation, has allowed erosion of the originally proposed criteria.
- The current nutrient profiling and rate of industry reductions will not be sufficient to hit the 6 g/day target by 2012.
- It is therefore essential that, wherever possible, labelling will be reflective of the dangers of eating high salt products, to achieve this 6 g/day level.
- Children should not be exposed to unnecessary high levels of salt and they are currently receiving very high amounts unbeknownst to them or their parents
- The FSA's recent consumer survey found that a quarter of those questioned (26%) would change from their usual brand if they knew a lower salt option was available. We feel this

stricter labelling criterion would therefore have a significant impact on salt reduction.  
<http://www.food.gov.uk/multimedia/pdfs/saltomnibussurveyaug09.pdf>

- The current FSA salt campaign encourages consumers to read the labels and avoid high salt foods. Not all high salt foods are currently exposed by the FOP labelling.

Yours sincerely,

Best wishes



Professor Graham MacGregor  
Professor of Cardiovascular Medicine  
Chairman of CASH



Katharine Jenner  
Nutritionist  
CASH Campaign Manager