

Response from Action on Salt to Proposed Salt Targets – 2023 Salt Reduction Targets

Action on Salt (formerly Consensus Action on Salt & Health, CASH) is an organisation supported by 24 expert members and working to reduce the salt intake of the UK population to prevent deaths, and suffering, from heart disease, stroke, kidney disease, osteoporosis, stomach cancer and obesity.

We thank Public Health England for the opportunity to respond to this draft proposal. For more information on our response, please contact: Mhairi Brown, Policy and Public Affairs Coordinator Mhairi.brown@qmul.ac.uk

Our Position

Action on Salt strongly supports gradual, unobtrusive nutrient reformulation, without decreases in portion size or shifts in sales to healthier products, as a public health measure. Reformulation programmes, when properly implemented and monitored, improve the nutritional quality of food and beverages and therefore the diets of the entire population regardless of demographic or socio-economic status. We are pleased to see the fifth wave of salt targets being proposed, although we are disappointed not to have the most current population salt intake data (not due for release until 25th March) to inform our response. Based on current trends in salt reduction (0.8g reduction between 2005 and 2014) and assuming no salt reductions have been made since then, we estimate that 3,650 deaths per year would have occurred from stroke and heart attack which could have been prevented, over half of which would have been premature. This is a tragedy for public health.

Evidence for Salt Reduction

The Global Burden of Disease study shows that the high salt intake is a leading dietary risk factor for death and disease, linked to three million deaths in 2017 (1). A high salt intake raises blood pressure and raised blood pressure is the single biggest risk factor for cardiovascular disease, including stroke and heart disease (2). Furthermore, a high salt diet has been linked to kidney disease, osteoporosis, stomach cancer and obesity (3).

Reducing salt is by far the most simple and cost effective public health measure to improve health and reduce incidence of cardiovascular disease, as evidenced on a global scale (2, 4-6). The World Health Organisation have recommended population salt intake of less than 5g per day, whereas in the UK the current target maximum intake is 6g per day. However, high salt intake is still a public health issue worldwide, including the UK, where the current average intake is a third higher (8g/day) than the recommended maximum (7).

Despite this, awareness of salt and concern of salt levels in food is gradually falling, as demonstrated by the latest Food Standards Agency (FSA) Public Attitudes Tracker (8). The health effects of salt are frequently forgotten in healthy diet messaging but a high salt intake affects the health of the whole population and it is vital that the overwhelming evidence linking salt to health is considered when developing salt reduction policies. The National Institute for Health and Care Excellence (NICE) recommends salt intake should be reduced further, to 3g per day (9). With this in mind, strict measures should be explored, particularly when considering children. Dietary habits in childhood and adolescence influence eating patterns in later life. Liking salt and salty foods is a learned taste preference and the recommendation that the adult population reduce their salt intake will be more successful if children do not develop a preference for salt in the first place. This can only be achieved if children are given a diet which is low in salt (10,11).

UK's Salt Reduction Programme

On PHE's website, salt reduction appears to sit in PHE's wider reformulation programme, which itself is linked to the Childhood Obesity Plan (12). We are concerned that there is no mention of the

importance of salt reduction for cardiovascular health. Additionally, while we recognise that PHE has only had control of salt reduction since 2017 and salt reduction targets are a key component of a salt reduction programme, we are concerned that additional components have not been consulted on and are not stated as priorities anywhere on the PHE website, which we have summarised below.

- **Urinary Sodium Analysis**

Regular 24 hour urinary sodium analyses to measure population salt intake are required to evaluate the effectiveness of a salt reduction policy. Urinary sodium measurements took place in 2006, 2008, 2011 and 2014. While we are aware the next data set is due for release in March 2020, it has been six years since salt intake was measured. Measurements must take place at regular intervals (every 2-3 years) to track progress and inform policy.

- **Labelling**

We welcome the review of nutrition labelling due to take place later this year. Action on Salt recommends mandatory front-of-pack colour coded labelling but we also recommend a comprehensive review of labelling used in other countries. As part of the Chilean Food Labelling and Marketing Law, mandatory front of pack warning labels were implemented in June 2016 on all products with more than 0.75g of salt per portion, with corresponding limits also set for calories, sugar and saturated fat (13). While the impact evaluation of these labels is ongoing, initial results indicate that the labels are well known by mothers and children from different socioeconomic backgrounds and children in particular have positive attitudes towards the labels, acting as ambassadors for healthier products in their households (14). In 2017, Peru's Ministry of Health announced that they would also implement mandatory warning labels on products, following Chile's criteria, which were implemented in 2018 (15). Peru's labels differ from Chile's as they appear on advertisements in addition to packaging. Warning labels have additionally been proposed in Brazil and Uruguay and despite a legal challenge from industry, warning labels in Mexico are due to be implemented later in the year. If industry does not comply with voluntary measures, they should be subject to mandatory measures, including mandated labelling.

- **Public Awareness Campaign**

The FSA developed a successful public awareness programme featuring Jenny Éclair and 'Sid the Slug', which ran from 2004-2009. Within a year, the proportion of people expressing awareness of the need to not exceed 6g a day had risen from 3% to 34% (16). However, there have been no national messages on the importance of reducing salt in the diet since this. While behaviour change programmes have been shown to have varying levels of success in achieving impact, the FSA's public awareness programme created public demand for lower salt foods which acted as an added incentive for the food industry to comply.

Change4Life is the public health platform for messaging at PHE, designed to encourage the public to 'eat well, move more, live longer'. The campaign covers 6 main areas - sugar swaps, saturated fat, salt, snacks, '5 a day' and labelling. However, most Change4Life messages cover sugar and obesity, with a lack of focus on salt. We strongly urge PHE to include a focus on salt in Change4Life and we recommend the implementation of a separate public awareness campaign on salt and its effects on health, as an integral part of the salt reduction programme.

- **Monitoring**

We have previously highlighted the issues that arose with the transfer of the salt reduction programme from the independent FSA to the Public Health Responsibility Deal (17). Research has since highlighted that stalled salt reduction could be associated with an extra 9,900 cases of cardiovascular disease and 1,500 cases of stomach cancer between 2011 and 2017. It is also estimated that between 2011 and 2017, the relaxation of the salt reduction targets cost the



economy around £160 million. Without any further change or urgent action on salt reduction, an estimated further 26,000 cases of cardiovascular disease, and 3,800 cases of stomach cancer are likely to occur between 2019 and 2025, costing the economy an estimated additional £960 million (18).

Key to the success of the FSA's programme was their robust and public monitoring and evaluation of the programme, ensuring transparency. The Secretary of State for Health's Prevention Green Paper in 2019 stated that a monitoring report for the 2020 salt reduction targets would be released in 2024. We do not feel this evaluation report is sufficient to monitor progress, nor will it encourage the food industry to work on salt reduction effectively. Annual, transparent monitoring reports are required, as had been done under FSA management, to properly track food industry progress, inform policy and maintain momentum. We recommend annual reports which will identify any potential challenges towards achieving the targets and to inform the future direction of the targets. If monitoring shows that the voluntary approach to reformulation targets is not achieving results, we strongly recommend that the government regulate the targets. This also provides an opportunity to progressively reduce the targets if companies are already meeting them at each review.

Mandated Salt Targets

Given mixed progress across the food industry with the 2017 targets, and little way to assess progress made in the out of home sector, we were disappointed to see that mandated targets were not proposed as part of this draft proposal. Bread is the leading source of salt in the UK diet and PHE's 2018 progress report showed that 89% of retailer and manufacturer bread products met the targets set compared to just 41% of bread in the out of home sector. A mandated bread target would create a necessary level playing field and it is Action on Salt's position that mandated targets across the main contributors of salt to the diet would ensure a consistently low level of salt and the removal of unnecessary salt from the UK diet. Several countries around the world now have mandated targets for bread, including Portugal, Belgium, Netherlands, Paraguay, Bulgaria, Greece and Hungary (19). Argentina and South Africa have gone further and introduced several mandated targets across the leading contributors of salt to the diet, with success (20,21).

Draft Proposal Format

The framing of the draft proposal appears to solely invite comments on technical challenges rather than inviting comments relating to reformulation success. Action on Salt has consistently demonstrated over the past decade that there is a clear variation in the salt content of products within the same product category, even after four sets of salt reduction targets which demonstrates that further reformulation is possible. PHE's 2018 progress report also highlighted that overall retailers were making more progress in comparison to manufacturers. It is clear that reformulation is a priority for retailers but in the reporting of progress, their hard work is frequently lost.

Within the proposal, PHE state: 'PHE is already aware of some technical challenges of salt reduction and historical category concerns'. Historical category concerns should now be resolved, given advances in product innovation. As far as we are aware, there have been very few issues relating to consumer acceptability, the exception being a limited number of manufacturers who publicly announced reduced salt or sugar in their flagship products, causing widespread criticism on social media. Food manufacturers reformulate and alter their ingredients and recipes on a regular basis, and gradual, unobtrusive reductions in salt, fat or sugar are encouraged, without the need to announce it publicly. More often than not, consumers do not notice these small and subtle changes, and thus continue to buy and eat the same food. However, if PHE is aware of issues relating to consumer acceptability and a corresponding loss of sales then this should be made public. Many companies have made admirable progress with reformulation across both salt and sugar and this should be celebrated and upheld as the standard, not the exception.



There is also no indication or commitment of future action e.g. additional salt targets after 2023. The aim of the programme should be to guide all food manufacturers to lower levels of salt, not to reach a target population intake of 7g per day. Industry should be given an indication of the direction of the programme so that they are aware that once targets have been met, they will be reset to progressively lower targets. Bold, ambitious language was used within the Childhood Obesity Plan, including an indication that if progress with voluntary measures was poor then mandatory measures will be implemented. The framing of this engagement appears to have invited comments that could weaken it, rather than upholding salt reduction as a priority, as recommended by the World Health Organisation and more than 70 countries worldwide (22).

The UK was once leading the world in salt reduction but years of uncertainty and a lack of leadership have set us back. At a time when we should be doing all we can to reduce burden on the NHS, failing to take adequate action on salt would be disastrous for public health.

Consultation Questions

- 1. Do you agree with the draft proposed 2023 salt targets? Do you consider the targets to be broadly achievable? Do you have any alternative proposals?**

Retail and Manufacturer Targets

We have compared the proposed targets to data from our FoodSwitch database (products collected between 2017 and 2020). We conclude that 34 of the proposed average salt targets are appropriate. For a further 26 categories, we have proposed more ambitious targets, as we believe, based on the data available to us, they are too conservative. Furthermore, we conclude that 5 of the proposed maximum targets are appropriate, and have proposed more ambitious maximum targets where necessary.

We note that for some categories, with bacon and sausages being key examples, salt content is sometimes labelled on pack 'as consumed' or 'as grilled/prepared', whereas the target refers to the raw form of the product. This makes it very difficult to monitor and compare like for like products. Whilst we appreciate the salt content will vary depending on cooking method, having values for the raw form of food is meaningless to the public, and potentially misleads consumers into thinking they are eating less salt. We strongly recommend that PHE align targets with what is commonly and more appropriately printed on pack, and release guidelines to ensure that all products within a category display salt content in a consistent format to aid assessment of compliance with the salt targets.

The 2017 targets, set in 2014, were not as low as originally proposed, or were set at maximum targets that were higher than the average salt content of products in 2013, leaving industry unchallenged (23). This was most flagrant in meat and cheese products, both of which figure among the top 10 contributors to salt intake in the UK population. For most categories below, we have found examples of products that easily meet their targets - even categories where the proposed 2023 target has not changed from the 2017 target. This clearly shows there is a solution available and if companies are choosing not to lower salt levels in their products, then from a public health point of view this is irresponsible. Not decreasing the target is sending the wrong message and is excusing companies for not doing enough to lower salt levels. Even if targets were reset to be marginally lower in categories that have made little change since 2017, this would give a clear message to industry. Industry should be aware that if they do not meet voluntary targets then mandatory targets will be set.

We request more clarity on category definitions, which as they currently stand can be vague. Categorising products can be a challenge, especially for smaller companies without access to expert

knowledge, but even for those with the required resource, categorisation is open to interpretation and, therefore, error.

Specific comments by salt target

We do not have access to sales weighted data and so we cannot make definitive comments on SWAs. Instead, we have looked at the median content of products in our database. We have used the more descriptive median as opposed to the mean, to account for outliers that may skew the average. We have also included the median interquartile range (IQR), which describes the middle 50% of the data set.

1. Meat Products

1.1 Bacon

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 87 retail and manufacturer bacon products is 2.8g/100g (interquartile range IQR: 2.5-2.88), with 36.8% of products having less salt than the proposed average target of 2.59g/100g. However, bacon is the second biggest contributor of salt to the UK diet. Bacon should have a mandatory target, given its ubiquity in our diet - breakfast, sandwiches, ready meals and even pizza.

Based on the products below, the target could be lowered further:

- The Co-operative 8 Reduced Fat Unsmoked Bacon Medallions 200g - 1.45g/100g
- Waitrose & Partners Free Range Beech Smoked Back Bacon 200g - 1.51g/100g
- Waitrose & Partners Free Range Unsmoked Back Back Bacon 200g - 1.51g/100g
- Co-op Outdoor Bred 8 Reduced Fat Smoked Bacon Medallions 200g - 1.8g/100g
- Danepak 10 Smoked Back Bacon Rashers Reduced Salt 300g - 1.9g/100g
- Danepak 10 Unsmoked Back Bacon Rashers Reduced Salt 300g - 1.9g/100g

1.2 Ham/other cured meats

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 156 retail and manufacturer ham/other cured meats is 1.8g/100g (IQR: 1.6-2.16), with 38.5% of products having less salt than the proposed average target of 1.63g/100g.

There is clear scope for the targets to be lowered even further, as demonstrated by the following products:

- Co Op Irresistible Thick Cut Honey Roast Ham – 1.3g/100g
- Morrisons Wafer Thin Honey Cured Ham 400g – 1.47g/100g
- Morrisons Honey Cured Ham – 1.47g/100g
- Lidl Warren & Sons Cooked Ham – 1.48g/100g
- Marks & Spencer Roasted Ham with Pomegranate Molasses – 1.48g/100g
- Aldi Appleby's 13 Smoked Ham Slices – 1.5g/100g

1.3 Sausages

1.3.1 Sausages

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 73 retail and manufacturer sausage products is 1.23g/100g (IQR: 1.1-1.35), with 23.3% of products having less salt than the proposed average target of 1.08g/100g.

Maximum Target - Disagree



68.5% of products have less salt than the proposed maximum target of 1.31g/100g. Therefore, we feel the proposed maximum target is too high and recommend instead a maximum target of 1.25g/100g.

The targets could be lowered further, as demonstrated by the following products:

- The Co-operative Truly Irresistible 6 Sweet Chilli Sausages 400g - 0.75g/100g
- Co Op Reduced Fat 8 Pork Sausages 454g - 0.93g/100g
- Co Op 8 Cumberland Sausages 454g - 0.99g/100g
- Tesco Finest 12 British Pork Cumberland Chipolatas 375g - 1g/100g
- Tesco Finest 12 British Pork Chipolatas 375g - 1g/100g
- Tesco Finest 6 British Pork & Caramelised Onion Sausages 400g - 1g/100g

1.3.2 Cooked sausages and sausage meat

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 32 retail and manufacturer cooked sausages and sausage meat products is 1.38g/100g (IQR: 1.25-1.5), with 43.8% of products having less salt than the proposed average target of 1.3g/100g. Therefore this could be lowered to 1.34g/100g.

Maximum Target - Disagree

87.5% of products have less salt than the proposed maximum target of 1.53g/100g. Therefore, we feel the proposed maximum target is too high and recommend instead a maximum target of 1.45g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Sainsbury's 40 Pork Cocktail Sausages – 1.07g/100g
- Waitrose Cocktail Sausages – 1.08g/100g
- Sainsbury's 40 Pork Cocktail Sausages – 1.17g/100g
- Asda Pork Cocktail Sausages – 1.2g/100g
- M&S Food Cocktail Sausages – 1.2g/100g
- Sainsbury's Taste The Difference 18 Outdoor Bred British Pork Cocktail Sausages – 1.27g/100g
- Asda Pork Cocktail Sausages – 1.3g/100g

1.4 Meat pies

1.4.1 Delicatessen, pork pies and sausage rolls

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 193 retail and manufacturer delicatessen, pork pies and sausage roll products is 0.98g/100g (IQR: 0.89-1.08), with 41.5% of products having less salt than the proposed average target of 0.93g/100g. We feel the proposed average target is too conservative and recommend instead an average target of 0.91g/100g.

Maximum Target - Disagree

In addition, 61.1% of products have less salt than the proposed maximum target of 1.01g/100g. Therefore, we feel the proposed maximum target is too high and recommend instead a maximum target of 0.97g/100g.

It is worth noting that the majority of delicatessen products in the deli section of the supermarket do not have nutrition labelling on packaging and therefore these products could contain high levels of

salt without having to declare this. We strongly recommend that all delicatessen products be required to display nutrition labels.

The targets could be lowered further, as demonstrated by the following products:

- Aldi Specially Selected Pork & Chutney Sausage Rolls - 0.47g/100g
- Marks & Spencer 9 Lincolnshire Sausage Rolls – 0.5g/100g
- Aldi Everyday Essentials 8 Sausage Rolls – 0.53g/100g
- Crestwood 6 Mini Pork and Apple Pies – 0.54g/100g
- Waitrose 2 Moreish Ploughman's Pork Pies – 0.69g/100g
- Lidl Party Time 12 Cheddar & Spring Onion Sausage Rolls – 0.7g/100g
- Marks & Spencer Pork, Feta & Pine Kernel Sausage Rolls 18g – 0.7g/100g
- Tesco 2 Pork Sausage Rolls – 0.7g/100g

1.4.2 Cornish and meat-cased pasties

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 25 retail and manufacturer Cornish and meat-cased pastry products is 0.85g/100g (IQR: 0.75-0.95), with 40% of products having less salt than the proposed average target of 0.8g/100g. We feel the proposed average target is too conservative and recommend instead an average target of 0.79g/100g.

Maximum Target - Disagree

72% of products have less salt than the proposed maximum target of 0.9g/100g. Therefore, we feel the proposed maximum target is too high and recommend instead a maximum target of 0.85g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Waitrose 1 Cornish Pasty – 0.58g/100g
- Ashfield Farm Ready to Cook Chicken En Croute – 0.59g/100g
- Tesco 10 Beef Pasties – 0.6g/100g
- Iceland No Cheese Pasties – 0.65g/100g
- Coop Ready to Eat Cornish Pasty – 0.7g/100g
- Aldi Crestwood Puff Pastry Traditional Pasty – 0.73g/100g
- Marks & Spencer 6 Dinky Cornish Pasties – 0.75g/100g
- Aldi Simply Bistro 2 Chicken Bakes – 0.76g/100g

1.4.3 Other meat-based pastry products

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 145 retail and manufacturer meat-based pastry products is 0.68g/100g (IQR: 0.57-0.81), with 34.5% of products having less salt than the proposed average target of 0.6g/100g.

Maximum Target - Disagree

60% of products have less salt than the proposed maximum target of 0.71g/100g. We feel the proposed maximum target could be lowered to 0.70g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Chef Select Steak & Onion Slices 2 Minced – 0.39g/100g
- Marks & Spencer 2 Steak & Kidney Suet Puddings – 0.45g/100g
- Crestwood Puff Pastry Chicken & Bacon Slice – 0.49g/100g
- Tesco 2 Chicken & Mushroom Slices – 0.5g/100g
- Tesco 2 Chicken Tikka Slices – 0.5g/100g
- Lidl Chef Select 2 Chicken Tikka Slices – 0.51g/100g

- Morrisons Chicken & Mushroom Slices – 0.53g/100g

1.5 Cooked uncured meat, includes all roast meat, sliced meat etc

1.5.1 Whole muscle cooked uncured meat

Maximum Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 130 retail and manufacturer whole muscle products is 0.66g/100g (IQR: 0.53-0.96), with 53.8% of products having less salt than the proposed maximum target of 0.68g/100g. We feel the proposed maximum target could be lowered to 0.66g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Iceland Ready Cooked British Roasted Chicken Thighs - 0.3g/100g
- Appleby's British Roast Chicken Thighs - 0.34g/100g
- Aldi Ashfield Farm Ready to Eat Roast Chicken Thighs - 0.34g/100g
- Lidl Warren & Sons Roast Chicken Thighs - 0.35g/100g
- The Co-operative Ready to Eat Roast Chicken Breast Fillets - 0.36g/100g
- Appleby's British Roast Chicken - 0.37g/100g
- Sainsbury's 2 Roast Chicken Breast Fillets - 0.39g/100g
- Waitrose British Cooked Chicken 2 Skinless Breast Fillets - 0.42g/100g

1.5.2 Reformed whole muscle cooked uncured meat

There are only 6 products in the FoodSwitch database that fall within this category. As such, we will not comment on these targets.

1.5.3 Comminuted or chopped reformed cooked uncured meat

There are limited products in the FoodSwitch database that fall within this category and as such we will not comment on these targets.

1.6 Burgers and grill steaks

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 125 retail and manufacturer burger and grill steak products is 0.85g/100g (IQR: 0.71-1), with 22.4% of products having less salt than the proposed average target of 0.68g/100g.

Maximum Target - Disagree

45.6% of products have less salt than the proposed maximum target of 0.84g/100g. We feel the proposed maximum target could be lowered to 0.82g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Aldi Specially Selected Caramelised Onion 2 Gourmet Burgers – 0.28g/100g
- Aldi Oakhurst Tikka 4 Marinated Chicken Kebabs – 0.38g/100g
- Marks & Spencer BBQ Grill 4 Chicken Tikka Kebabs – 0.38g/100g
- Oakhurst Marinated 4 Chicken & Chorizo Kebabs 30g – 0.38g/100g
- Marks & Spencer The Grill 4 Aberdeen Angus Beef Burgers – 0.43g/100g
- Marks & Spencer BBQ Grill 8 Mini Beef Burgers – 0.5g/100g
- Ashfield Farm Shawarma Chicken Kebabs – 0.5g/100g
- ASDA 10 Mini Chicken Breast Skewers – 0.52g/100g

1.7 Frankfurters, hotdogs and burgers

1.7.1 Canned frankfurters, canned hotdogs and canned burgers

There are only five products in the FoodSwitch database that fall within this category so we will not comment on this target.

1.7.2 Fresh chilled frankfurters

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 10 retail and manufacturer fresh chilled frankfurter products is 1.82g/100g (IQR: 1.6-1.88), with 20% of products having less salt than the proposed average target of 1.5g/100g.

Maximum Target - Disagree

80% of products have a salt content less than the proposed maximum target of 1.88g/100g. Therefore, we feel the target is conservative and could be lowered to 1.80g/100g.

Examples of products meeting the proposed maximum target:

- Asda Butcher's Selection 4 New York Pork Hot Dogs – 1.3g/100g
- Deli Continental 10 Classic Frankfurters – 1.6g/100g
- Herta The Original Frankfurter 10 Classics – 1.6g/100g

2. **Bread**

2.1 Bread and rolls

Bread is the main source of salt in the UK diet, providing 14% of daily intake. Bread makers have done well to lower levels of salt across all bread products, but there is still work to be done. To bring the out of home sector in line with retail/manufacturers, we recommend a mandatory target for bread.

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 550 retail and manufacturer bread and roll products is 0.9g/100g (IQR: 0.83-1), with 30.9% of products having less salt than the proposed average target of 0.85g/100g.

Maximum Target - Disagree

In addition, 61.8% of products have less salt than the proposed maximum target of 0.95g/100g. We feel the proposed maximum target could be lowered to 0.93g/100g.

The targets could be lowered further, as demonstrated by the following products:

- M&S The Bakery 5 Mediterranean Style Wraps - 0.28g/100g
- The Food Doctor 6 Multi-Seed & Cereal Pitta - 0.3g/100g
- Green Leaf Foods Spinach Raw Wraps - 0.4g/100g
- Waitrose Love Life 4 Wholemeal Seeded Rolls - 0.43g/100g
- Tesco 6 Wholemeal Pitta - 0.5g/100g
- Waitrose 1 Rye And Wheat Dark Sourdough Bread - 0.51g/100g
- Aldi The Village Bakery 12 Mini White Pittas - 0.51g/100g
- Weight Watchers Wholemeal Wraps - 0.51g/100g
- Waitrose 1 Spelt Sourdough Bread - 0.63g/100g
- Asda Extra Special Malted Farmhouse Sliced Loaf - 0.63g/100g
- Asda Extra Special Wholemeal & Rye Farmhouse Sliced Loaf - 0.7g/100g
- Co-op Irresistible Ancient Grains Sunflower & Honey Farmhouse Loaf - 0.7g/100g

2.2 Bread and rolls with additions

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 93 retail and manufacturer meat-based pastry products is 0.93g/100g (IQR: 0.83-1.03), with 41.9% of products having less salt than the proposed average target of 0.9g/100g.

Maximum Target - Disagree

In addition, 74.2% of products have less salt than the proposed maximum target of 1.01g/100g. We feel the proposed maximum target could be lowered to 0.99g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Carlos Takeaway 2 Garlic Baguettes - 0.63g/100g
- Lidl Chef Select 2 Garlic & Rosemary Focaccias - 0.65g/100g
- Aldi Italian Cuisine 12 All Butter Garlic Dough Balls - 0.67g/100g
- Lidl Simply Garlic Baguette - 0.7g/100g
- Iceland 2 Garlic & Coriander Naan Breads - 0.7g/100g
- Tesco 2 Garlic & Coriander Naan Breads - 0.7g/100g
- Living Seedful Organic Loaf Slices Green Olive - 0.7g/100g
- Kingmill Toasties 4 Cinnamon & Raisin - 0.73g/100g

2.3 Morning goods – yeast raised

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 159 retail and manufacturer yeast raised morning good products is 0.7g/100g (IQR: 0.6-0.8), with 40.9% of products having less salt than the proposed average target of 0.65g/100g.

Maximum Target - Disagree

78% of products have less salt than the proposed maximum target of 0.83g/100g. Therefore, we feel the proposed maximum target should be lowered to 0.80g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Aldi Specially Selected Hot Cross Bun Flavour Fudge – 0.17g/100g
- Marks & Spencer 2 Richly Fruited Teacakes – 0.25g/100g
- Essential Waitrose 4 Hot Cross Buns – 0.35g/100g
- Marks & Spencer 9 Mini Luxury Hot Cross Buns – 0.38g/100g
- ASDA Fruit Loaf – 0.4g/100g
- Lidl Rowan Hill Bakery 5 Hazelnut Creme Croissants – 0.43g/100g
- Asda Baker's Selection 6 Hot Cross Buns – 0.43g/100g
- Sainsbury's 6 Teacakes – 0.44g/100g
- M&S Luxury Fruited Loaf – 0.48g/100g
- Aldi The Village Bakery 6 Iced Finger Buns – 0.52g/100g
- Waitrose 6 Mini Pains Au Chocolat – 0.57g/100g

2.4 Morning goods – powder raised

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 147 retail and manufacturer powder raised morning good products is 0.9g/100g (IQR: 0.72-1.1), with 70.7% of products having less salt than the proposed average target of 1.01g/100g. We feel the proposed average target is too conservative and should be lowered to 0.98g/100g.



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Maximum Target - Disagree

In addition, 71.4% of products have less salt than the proposed maximum target of 1.06g/100g. Therefore, we feel the proposed maximum target should be lowered to 1.03g/100g.

The targets can be lowered further, as demonstrated by the following products:

- Lidl Rowan Hill Bakery 7 Sugar Waffles – 0.41g
- Essential Waitrose 6 Sultana Scones – 0.5g/100g
- The Original Waffle Co. 5 Belgian Choc' Waffles – 0.5g/100g
- Sainsbury's Taste the Difference Light & Fluffy 4 Luxury Buttermilk Pancakes - 0.51g/100g
- Schar Gluten Free Waffles – 0.59g/100g
- Morrisons Lemon & Raisin Scotch Pancakes 8 Pack – 0.82g/100g
- Simply M&S 4 All Butter Muffins – 0.85g/100g

3. Breakfast cereals

3.1 Breakfast cereals

Average Target - Agree

The reformulation of breakfast cereals to reduce salt content has been a key success story of this programme. Based on data from the FoodSwitch database, the median salt content of 883 retail and manufacturer breakfast cereal products is 0.2g/100g (IQR: 0.04-0.55), with 69% of products having less salt than the proposed average target of 0.48g/100g. However, as this is a 19% reduction from the 2017 target, we agree with the proposed target.

Maximum Target - Disagree

93.5% of products have less salt than the proposed maximum target of 0.85g/100g. We feel the proposed maximum target could be lowered to 0.81g/100g, a similar 19% reduction.

The targets could be lowered further, as demonstrated by the following products:

- Examples of Popped cereal
 - Kallo Gluten Free Organic Wholegrain Puffed Rice Cereal - 0g/100g
 - Kellogg's Coco Pops Crispy Granola with Wholegrains - 0.08g/100g
 - Morrisons Free From Rice Pops - 0.2g/100g
 - Sainsbury's Deliciously Free From Choco Rice Pops - 0.28g
- Other Examples
 - Bear Cocoa Alpha Bites - 0g/100g
 - Quaker Oat So Simple Strawberry, Raspberry & Cranberry Flavour - 0g/100g
- Example of Cornflakes
 - Asda Smart Price Corn Flakes - 0.2g/100g
 - Sainsburys Deliciously Free From Cornflakes - 0.3g/100g
- Examples of Hooped Cereals
 - Sainsbury's Choco Hoops - 0.15g/100g
 - Lidl Crownfield Honey Hoops - 0.19g/100g
 - Sainsbury's Multigrain Hoops - 0.42g/100g
- Examples of Flakes
 - Weetabix Oatibix Flakes - 0.28g/100g
 - Morrisons Free From Gluten Free Milk Free Cornflakes - 0.3g/100g
 - Sainsburys Deliciously Free From Cornflakes - 0.3g/100g
 - Lidl Crownfield Special Flakes Chocolate - 0.31g/100g

4. Cheese

4.1 Cheddar and other 'hard pressed cheese

Across the board, progress with salt reduction in cheese has been poor, despite being technically possible. As a leading contributor of salt to the UK diet, if cheese manufacturers cannot comply with voluntary targets then they should be subject to mandatory targets.

Average and Maximum Targets - Agree

Based on data from the FoodSwitch database, the median salt content of 285 retail and manufacturer cheddar and other hard cheese products is 1.8g/100g (IQR: 1.68-1.8), with 15.4% of products having less salt than the proposed average target of 1.58g/100g. In addition, 34.4% of products have less salt than the proposed maximum target of 1.7g/100g.

However, it is entirely possible to produce hard cheese with less salt, as demonstrated by the following products:

- Marks & Spencer Wensleydale With Blueberries - 0.7g/100g
- Aldi Emporium Yorkshire Wensleydale and Apricot - 0.79g/100g
- Aldi Emporium Wensleydale With Apricot - 0.79g/100g
- Deluxe Wensleydale With Cranberries and Blueberries - 0.91g/100g
- Aldi Emporium Double Gloucester with Onion & Chive - 0.97g/100g
- Aldi Emporium Spicy Cheddar with Chilli - 1.1g/100g
- Lidl Valley Spire Crumbly Wensleydale Cheese - 1.1g/100g
- Morrisons Extra Mature Cheddar - 1.3g/100g
- Aldi Emporium Oak Smoked Cheddar - 1.4g/100g

4.2 Fresh cheeses

4.2.1 Soft white cheese

Average and Maximum Targets - Agree

Based on data from the FoodSwitch database, the median salt content of 70 retail and manufacturer soft white cheese products is 1.25g/100g (IQR: 1-1.78), with 20% of products having less salt than the proposed average target of 0.5g/100g. In addition, 21.4% of products have less salt than the proposed maximum target of 0.68g/100g.

However, the targets could be lowered further, as demonstrated by the following products:

- Lidl Lovilio Mascarpone – 0.08g/100g
- Marks & Spencer Mascarpone – 0.08g/100g
- M&S Quark – 0.08g/100g
- Biotiful Dairy Kefir Quark – 0.1g/100g
- Valley Spire British Quark – 0.1g/100g
- Morrisons Italian Mascarpone – 0.17g/100g
- Aldi Emporium Italian Ricotta – 0.3g/100g
- Marks & Spencer Ricotta – 0.43g/100g

4.2.2 Cottage cheese

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 42 retail and manufacturer cottage cheese products is 0.42g/100g (IQR: 0.35-0.49), with 66.7% of products having less salt than the proposed average target of 0.45g/100g. Therefore we feel this target could be lowered to 0.43g/100g.



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Maximum Target - Disagree

In addition, 73.8% of products have less salt than the proposed maximum target of 0.48g/100g. We feel the proposed maximum target could be lowered to 0.45g/100g.

The targets could be lowered further, as demonstrated by the following products:

- M&S Just Add Cottage Cheese Protein Pot with Pineapple - 0.1g/100g
- Iceland Cottage Cheese with Pineapple - 0.2g/100g
- Marks & Spencer Reduced Fat Natural Cottage Cheese - 0.2g/100g
- Simply M&S Natural Cottage Cheese Reduced Fat - 0.2g/100g
- Lidl Valley Spire Fat Free Pineapple Cottage Cheese - 0.2g/100g
- Lidl Valley Spire Fat Free Onion & Chive Cottage Cheese - 0.26g/100g
- Aldi The Cheese Emporium Low Fat Pineapple Cottage Cheese - 0.3g/100g
- M&S Creamy Cottage Cheese With Pineapple - 0.33g/100g

4.3 Mozzarella

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 10 retail and manufacturer mozzarella products is 1.23g/100g (IQR: 1.12-1.39), with 60% of products having less salt than the proposed average target of 1.35g/100g. Therefore we feel this could be lowered to 1.33g/100g.

The target could be lowered further, as demonstrated by the following products:

- Morrisons Grated Mozzarella - 0.8g/100g
- Mary Ann's Dairy Grated Mozzarella - 0.94g/100g
- Waitrose Grated Mozzarella Strength 1 - 1.23g/100g

4.4 Blue cheese

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 24 retail and manufacturer blue cheese products is 2g/100g (IQR: 1.98-2.08), with 4.2% of products having less salt than the proposed average target of 1.8g/100g.

Across the board, progress with salt reduction in cheese is poor, despite being possible as evidenced by the following non-UK produced blue cheese products:

- Asda Castello Creamy Blue Soft Cheese - 1.6g/100g
- Tesco Finest Gorgonzola Piccante - 1.6g/100g
- Morrisons German Cambozola - 1.51g/100g
- Saint Agur Creme - 1.5g/100g
- Sainsbury's Taste the Difference Morbier Cheese - 1.6g/100g

4.5 Processed cheese

4.5.1 Cheese spreads

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 100 retail and manufacturer cheese spread products is 0.92g/100g (IQR: 0.59-1.5), with 83% of products having less salt than the proposed average target of 1.55g/100g. Therefore we feel the proposed average target is too conservative and recommend instead a target of 1.50g/100g.



Action on Salt

Maximum Target - Disagree

In addition, 91% of products have less salt than the proposed maximum target of 1.8g/100g. The proposed maximum target is too conservative and we recommend instead a maximum target of 1.7g/100g.

The targets can be lowered further, as demonstrated by the following products:

- Everyday Essentials Full Fat Soft Cheese – 0.39g/100g
- M&S Creamy Full Fat Soft Cheese – 0.4g/100g
- Tesco Soft Cheese – 0.5g/100g
- Simply M&S Full Fat Soft Cheese – 0.53g/100g
- Essential Waitrose Creamy Soft Cheese – 0.53g/100g
- Marks & Spencer Lighter Soft Cheese With Garlic and Herbs – 0.53g/100g
- Aldi Emporium Mini Roule with Pineapple & Almond – 0.54g/100g
- Marks & Spencer Whipped Soft Creamy Cheese – 0.55g/100g

4.5.2 Other processed cheese

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 29 retail and manufacturer other processed cheese products is 1.9g/100g (IQR: 1.7-2), with 20.7% of products having less salt than the proposed average target of 1.63g/100g.

Maximum Target - Disagree

79.3% of products have less salt than the proposed maximum target of 2g/100g. It is therefore important that manufacturers producing processed cheese products with excessive levels of salt, be encouraged to reformulate, as it is clearly possible. We feel the proposed maximum target, which has not changed since the 2017 targets, is too high and recommend instead a maximum target of 1.9g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Aldi Emporium Kids Lighter 8 Cheese Slices – 1.4g/100g
- Dairy Lea Cheese Slices – 1.45g/100g
- Dairy Lea Cheese Spread – 1.51g/100g
- Aldi Emporium German Smoked Cheese Plain – 1.6g/100g

5. Butter

5.1 Salted butters and buttery spreads

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 29 retail and manufacturer meat-based pastry products is 1.7g/100g (IQR: 1.5-1.75), with 17.2% of products having less salt than the proposed average target of 1.33g/100g.

Maximum Target - Disagree

48.3% of products have less salt than the proposed maximum target of 1.6g/100g. We feel the proposed maximum target could be lowered to 1.58g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Marks & Spencer Salted Farmhouse Goat's Butter - 1g/100g
- Kerrygold Softer Butter - 1.2g/100g
- Marks & Spencer Salted Jersey Butter - 1.25g/100g

5.2 Lightly salted butter

There are just 7 products in the FoodSwitch database that fall within this category, therefore we will not comment on this target.

6. **Fat spreads**

6.1 Margarines/other spreads

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 82 retail and manufacturer margarine products is 1.17g/100g (IQR: 0.9-1.4), with 30.5% of products having less salt than the proposed average target of 0.95g/100g.

Maximum Target - Disagree

54.9% of products have less salt than the proposed maximum target of 1.24g/100g. We feel the proposed maximum target could be lowered to 1.22g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Biona Organic Sunflower Vegetable Spread - 0.1g/100g
- Vita D'or Avocado Oil Spread - 0.7g/100g
- Tesco Avocado Spread - 0.7g/100g
- Pure Dairy Free Sunflower Spread - 0.74g/100g
- Greenvale Coconut & Rapeseed Oil Spread - 0.75g/100g
- Vita D'or Coconut & Rapeseed Oil Spread - 0.75g/100g
- M&S Made Without Dairy Avocado Oil Spread - 0.75g/100g
- Benecol light - 0.8g/100g

7. **Baked beans**

7.1 Baked beans in tomato sauce without accompaniments

Maximum Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 50 retail and manufacturer baked beans without accompaniments is 0.5g/100g (IQR: 0.41-0.6), with 58% of products having less salt than the proposed maximum target of 0.56g/100g. Therefore, we feel the proposed maximum target, which has remained unchanged since 2017, is too high and recommend instead a maximum target of 0.53g/100g.

The target can be lowered further, as demonstrated by the products below:

- Asda Baked Beans Reduced Sugar & Salt – 0.35g/100g
- Heinz 50% Less Sugar Banz in a Rich Tomato Sauce - 0.4g/100g
- Asda Mixed Beans in Tomato Sauce – 0.43g/100g
- Sainsbury's Baked Beans in Tomato Sauce Reduced Salt & Sugar – 0.44g/100g
- Lidl Newgate Baked Beans – 0.45g/100g
- Asda Baked Beans in Tomato Sauce 40g – 0.47g/100g
- Morrisons Eat Smart Counted Baked Beans – 0.48g/100g
- The Co-operative Loved By Us Baked Beans in Tomato Sauce – 0.49g/100g
- Branston Reduced Sugar and Salt Baked Beans – 0.5g/100g

7.2 Baked beans and canned pasta with accompaniments

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 53 retail and manufacturer meat-based pastry products is 0.6g/100g (IQR: 0.5-0.7), with 64.2% of products having less salt than the proposed average target of 0.6g/100g. Therefore we feel this could be lowered to 0.58g/100g.

Maximum Target - Disagree

In addition, 73.6% of products have less salt than the proposed maximum target of 0.65g/100g. We feel the proposed maximum target could be lowered to 0.63g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Aldi Cucina Tortelloni Ham and Sausage - 0.18g/100g
- Tesco Goodness Baked Beans & Pork Sausages In Tomato Sauce - 0.3g/100g
- M&S Balanced For You Bolognese Pasta Bowl - 0.38g/100g
- Eat&Go Tuna and Sweetcorn Pasta Pot - 0.39g/100g
- Tesco Goodness Macaroni Cheese - 0.4g/100g
- Crosse & Blackwell 4Kids Pasta Shapes in Tomato Sauce with Sausages - 0.47g/100g
- Asda Baked Beans & Vegetarian Sausages - 0.49g/100g
- Asda Spaghetti Bolognese - 0.5g/100g

8. Ready meals

8.1 Ready meals and meal centres

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 2268 retail and manufacturer ready meal products is 0.58g/100g (IQR: 0.43-0.73), with 59.5% of products having less salt than the proposed average target of 0.6g/100g. Therefore we feel this could be lowered to 0.59g/100g.

Maximum Target - Disagree

86.1% of products have less salt than the proposed maximum target of 0.85g/100g. We feel the proposed maximum target could be lowered to 0.82g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Marks & Spencer Herby Pork Chops with Bramley Apple Butter - 0.15g/100g
- Co-operative Sweet Chilli Chicken - 0.17g/100g
- Marks & Spencer Sirloin Steaks With Shallot & Bone Marrow Butter - 0.18g/100g
- Chef Select Cajun Chicken - 0.18g/100g
- Sainsbury's Love your Veg Sweet Potato Katsu Curry - 0.19g/100g
- Tesco Plant Chef Thai Inspired Green Curry - 0.2g/100g
- Pollen + Grace Black Rice + Kale Immunity Box - 0.2g/100g

8.2 Ready meal sides and accompaniments

Average Target - Agree

We welcome the addition of this new target for 2023. Based on data from the FoodSwitch database, the median salt content of 129 retail and manufacturer sides and accompaniments is 0.93g/100g (IQR: 0.69-1.12), with 25.6% of products having less salt than the proposed average target of 0.69g/100g.

Maximum Target - Disagree

47.3% of products have less salt than the proposed maximum target of 0.88g/100g. We feel the proposed maximum target could be lowered to 0.86g/100g.

The targets could be lowered further, as demonstrated by the following products (though we appreciate this target covers a broad range of dishes):

- Marks & Spencer Garlic Mushrooms - 0.23g/100g



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- Coop Vegetable Spring Rolls - 0.36g/100g
- Tesco 14 Mini Duck Spring Rolls - 0.4g/100g
- Sainsbury's Butternut Squash & Spinach Croquettes 25g - 0.43g/100g
- Asda 6 Spinach & Feta Parcels - 0.44g/100g
- Morrisons Chinese Takeaway Vegetable Spring Rolls - 0.56g/100g
- Marks & Spencer Chunky Onion Rings - 0.58g/100g
- Tesco Finest Garlic Mushrooms - 0.6g/100g
- Tesco Indian 6 Onion Bhajis - 0.6g/100g
- Cauldron Indian Koftas - 0.6g/100g
- Morrisons Red Thai Chicken Steamed Buns - 0.61g/100g

9. Soups

9.1 Soups (as consumed)

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 326 retail and manufacturer soup products is 0.5g/100g (IQR: 0.43-0.6), with 54.9% of products having less salt than the proposed average target of 0.5g/100g. Therefore we feel this could be lowered to 0.48g/100g.

Maximum Target - Disagree

66.9% of products have less salt than the proposed maximum target of 0.56g/100g. We feel the proposed maximum target could be lowered to 0.54g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Glorious! Super Soups Super Greene Primavera Peas, Beans & Spinach - 0.18g/100g
- Soupologie Turmeric, Carrot & Coconut - 0.19g/100g
- New Covent Garden Soup Co. Skinny Vegetable Arrabbiata 60g - 0.2g/100g
- Soupologie Spinach & Kale With Garlic 00g - 0.26g/100g
- New Covent Garden Soup Co. Skinny Chicken & Chickpea Tagine - 0.27g/100g
- New Covent Garden Soup Co Skinny Creamy Chicken & Vegetable - 0.29g/100g
- Tideford Organic Minestrone Soup with Gluten Free Pasta - 0.29g/100g
- Lidl Newgate Chunky Soup Chicken & Vegetable - 0.3g/100g
- Baxters Super Good Tomato Orange And Ginger - 0.3g/100g
- Aldi Specially Selected Tomato & Chorizo Soup - 0.3g/100g

10. Pizzas

10.1 All pizzas (as consumed)

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 311 retail and manufacturer pizza products is 1g/100g (IQR: 0.9-1.2), with 27.7% of products having less salt than the proposed average target of 0.9g/100g.

Maximum Target - Disagree

68.2% of products have less salt than the proposed maximum target of 1.13g/100g. We feel the proposed maximum target could be lowered to 1.1g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Aldi Carlos Wood Fired Italian Sloppy Joe Pizza - 0.57g/100g
- Asda Extra Special Spanish Chorizo & Manchego Pizza - 0.57g/100g



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- Aldi Specially Selected Hand Stretched Mexican-Inspired Fajita Steak Sourdough Pizza - 0.58g/100g
- Morrisons Mini Cheese & Tomato Pizza - 0.58g/100g
- Lidl Alfredo Take Away BBQ Chicken Pizza - 0.6g/100g
- Lidl Simply Cheese & Tomato Pizza - 0.6g/100g
- Aldi Everyday Essentials Cheese & Tomato Pizza - 0.65g/100g
- Morrisons Thin & Crispy Spinach & Ricotta - 0.65g/100g
- Carlos Thin and Crispy Cheese and Tomato Pizza - 0.66g/100g

11. Crisps and snacks

11.1 Standard potato crisps

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 226 retail and manufacturer potato crisp products is 1.2g/100g (IQR: 1-1.4), with 43.8% of products having less salt than the proposed average target of 1.18g/100g. This could be lowered to 1.16g/100g.

Maximum Target - Disagree

68.6% of products have less salt than the proposed maximum target of 1.3g/100g. We feel the proposed maximum target could be lowered to 1.1g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Tyrrells Hand Cooked English Crisps Naked (No Salt) - 0g/100g
- Lidl Snaktastic Salt Your Own Delicious British Potatoes Cooked in Sunflower Oil - 0.03g/100g
- Aldi Snackrite Salt Your Own Potato Crisps - 0.03g/100g
- Tesco Crunchy Sweet Potato Slices - 0.1g/100g
- Aldi Specially Selected Hand Cooked Cosmopolitan Flavoured Crisps - 0.35g/100g
- Smiths Cheese and Onion Crisps - 0.41g/100g
- Aldi Specially Selected Potato Crisps Sea Salt - 0.45g/100g

11.2 Extruded and sheeted snacks

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 320 retail and manufacturer extruded snack products is 1.4g/100g (IQR: 1.06-1.8), with 59.7% of products having less salt than the proposed average target of 1.53g/100g. Therefore we feel this could be lowered to 1.51g/100g.

Maximum Target - Disagree

77.2% of products have less salt than the proposed maximum target of 1.8g/100g. We feel the proposed maximum target could be lowered to 1.6g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Old El Paso Crunchy Nachips Original - 0.49g/100g
- Doritos Bits BBQ Flavour Corn Snacks - 0.49g/100g
- Mister Freed Vegan Cheezie - 0.5g/100g
- Snackrite Tortilla Chips Lightly Salted Corn Snacks - 0.67g/100g
- Aldi Specially Selected Tortilla Chips Sea Salt & Lime - 0.7g/100g
- Marks & Spencer Lime Salsa Tortilla Scoops - 0.7g/100g
- Passions Deli Pea Snacks Malaysian Sweet Curry - 0.72g/100g

11.3 Pelleted snacks

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 52 retail and manufacturer pelleted snack products is 1.94g/100g (IQR: 1.78-2.16), with 48.1% of products having less salt than the proposed average target of 1.91g/100g. This could be lowered to 1.90g/100g.

Maximum Target - Disagree

In addition, 86.5% of products have less salt than the proposed maximum target of 2.59g/100g. We feel the proposed maximum target could be lowered to 2.55g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Ella's Kitchen Cheese and Leek Crunchy Wheels - 0.38g/100g
- Tesco Salted Caramel & Cocoa Tortilla Curls Sweet & Savoury - 0.7g/100g
- Aldi Specially Selected Indian Chilli & Lime Naan Chips - 0.73g/100g
- Marks and Spencer Macon Bacon Tortilla Rolls - 0.85g/100g
- ASDA Ready Salted Potato Sticks - 1g/100g
- Cofresh Hot Paprika Grills - 1g/100g
- Walkers Sunbites Multigrain Crispy Snacks Honey Glazed Barbecue - 1.03g/100g
- Marks and Spencer Houmous and Lime Flavour Popped Potato - 1.13g/100g

11.4 Salt and vinegar products

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 75 retail and manufacturer salt and vinegar products is 1.9g/100g (IQR: 1.66-2.3), with 34.7% of products having less salt than the proposed average target of 1.78g/100g.

Maximum Target - Disagree

In addition, 73.3% of products have less salt than the proposed maximum target of 2.25g/100g. We feel the proposed maximum target could be lowered to 2.2g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Walkers Baked Salt & Vinegar Flavour - 0.88g/100g
- Aldi Specially Selected Potato Crisps Sea Salt and Balsamic Vinegar - 0.9g/100g
- Asda Salt & Vinegar Flavour Sticks - 1.2g/100g
- Tesco Salt & Vinegar Flavoured Peanuts - 1.2g/100g
- Sainsbury's Sea Salt & Cider Vinegar Flavour Peanuts - 1.39g/100g
- Kettle Handcooked Potato Chips Sea Salt & Balsamic Vinegar - 1.4/100g
- Tesco Finest Sea Salt & Cider Vinegar Crinkle Cut - 1.5g/100g

11.5 Savoury popcorn

Average Target - Agree

We welcome the addition of this new target for 2023. Based on data from the FoodSwitch database, the median salt content of 58 retail and manufacturer savoury popcorn products is 1.3g/100g (IQR: 1.05-1.5), with 37.9% of products having less salt than the proposed average target of 1.23g/100g.

Maximum Target - Disagree

In addition, 69% of products have less salt than the proposed maximum target of 1.44g/100g. We feel the proposed maximum target could be lowered to 1.41g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Metcalfe's Skinny Popcorn Sweet n Salt -0.52g/100g



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- ASDA Sweet & Salted Popcorn - 0.7g/100g
- ASDA Salted Popcorn - 0.95g/100g
- Marks and Spencer Sweet & Salty Popcorn - 1.05g/100g
- Marks and Spencer Maple Bacon Flavour - 1.1g/100g
- Butterkist Salted Popcorn - 1.2g/100g

11.6 Sweet popcorn

Average Target - Disagree

We welcome the addition of this new target for 2023. Based on data from the FoodSwitch database, the median salt content of 29 retail and manufacturer sweet popcorn products is 0.45g/100g (IQR: 0.03-1), with 62.1% of products having less salt than the proposed average target of 0.76g/100g. Therefore we feel this could be lowered to 0.73g/100g.

Maximum Target - Disagree

In addition, 75.9% of products have less salt than the proposed maximum target of 1g/100g. We feel the proposed maximum target could be lowered to 0.95g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Butterkist Popcorn - 0g/100g
- Lidl Snaktastic Sweet Popcorn - 0.01g/100g
- Aldi Snackrite Popcorn Sweet - 0.03g/100g
- Marks & Spencer Sweet Popcorn - 0.1g/100g
- Propercorn Sweet Coconut & Vanilla - 0.23g/100g
- Marks & Spencer Popcorn Hazelnut & Cinnamon Latte - 0.43g/100g
- Krispy Kreme Original Glazed Popcorn - 0.6g/100g

11.7 Flavoured nuts

Average Target - Disagree

We welcome the addition of this new target for 2023. Based on data from the FoodSwitch database, the median salt content of 182 retail and manufacturer flavoured nuts products is 1g/100g (IQR: 0.8-1.6), with 51.6% of products having less salt than the proposed average target of 1g/100g. Therefore we feel this could be lowered to 0.97g/100g.

Maximum Target - Disagree

In addition, 61.5% of products have less salt than the proposed maximum target of 1.2g/100g. We feel the proposed maximum target could be lowered to 1.15g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Aldi The Pantry Buttery Pecans - 0.01g/100g
- Tesco Wasabi Bean Mix - 0.2g/100g
- Marks & Spencer Seed & Nut Mix - 0.35g/100g
- Marks & Spencer Honey Roasted Cashews & Peanuts - 0.38g/100g
- Marks & Spencer Honey Roasted Cashews - 0.48g/100g
- Holland & Barrett Roasted & Lesser Salted Cashews - 0.5g/100g
- Lidl Alesto Honey Roasted Peanuts, Cashews & Almonds - 0.58g/100g



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12. Cakes, pastries, fruit pies and other pastry-based desserts

12.1 Cakes

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 571 retail and manufacturer cake products is 0.42g/100g (IQR: 0.3-0.56), with 41.5% of products having less salt than the proposed average target of 0.38g/100g.

Maximum Target - Disagree

In addition, 83.4% of products have less salt than the proposed maximum target of 0.6g/100g. We feel the proposed maximum target could be lowered to 0.55g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Iceland 6 Fruit and Nut Flapjacks - 0g/100g
- Waitrose Love Life 4 Flapjacks Gluten Free - 0.04g/100g
- Lidl Deluxe Handcrafted Winter Wonderland Christmas Cake - 0.07g/100g
- Morrisons Belgian Chocolate & Salted Caramel Brownie Heart - 0.08g/100g
- Holland & Barrett Flapjack Bakewell - 0.09g/100g
- Tesco Victoria Sponge - 0.1g/100g
- Lidl Deluxe Luxury Rich Fruit Cake - 0.11g/100g
- Sainsbury's Free From 4 Cherry & Almond Slices - 0.11g/100g

12.2 Pastries

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 12 retail and manufacturer pastry products is 0.3g/100g (IQR: 0.25-0.4), with 50% of products having less salt than the proposed average target of 0.33g/100g. This could be lowered to 0.32g/100g.

Maximum Target - Disagree

75% of products have less salt than the proposed maximum target of 0.45g/100g. We feel the proposed maximum target could be lowered to 0.43g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Sainsbury's Danish Pastry Cinnamon Whirls – 0.36g/100g
- Asda 6 Danish Pastries – 0.33g/100g
- Tesco Maple and Pecan Plait – 0.4g/100g
- Tesco Vanilla Crème Crown – 0.3g/100g

12.3 Sweet pies and other shortcrust or choux pastry based desserts

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 145 retail and manufacturer sweet pie products is 0.25g/100g (IQR: 0.19-0.38), with 41.4% of products having less salt than the proposed average target of 0.23g/100g.

Maximum Target - Disagree

66.9% of products have less salt than the proposed maximum target of 0.3g/100g. We feel the proposed maximum target could be lowered to 0.28g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Aldi Specially Selected 4 Cherry & Plum Fruit Pies - 0.05g/100g
- M&S Dessert Menu Tarte Aux Abricots - 0.05g/100g



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- M&S Dessert Menu 2 Cherry & Pistachio Tarts - 0.05g/100g
- Waitrose 1 2 Pear & chocolate Tarts - 0.05g/100g
- Lidl Deluxe 12 Luxury Mini Mince Pies - 0.06g/100g
- Aldi Specially Selected Continental Shortcrust Apple Tart - 0.1g/100g
- Iceland 2 Egg Custards - 0.1g/100g
- Lidl Deluxe Apple Continental Tart - 0.1g/100g
- M&S 2 Dessert Menu 2 Tarte Au Citron Slices - 0.1g/100g

13. Sandwiches

13.1 Sandwiches with high salt fillings

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 148 retail and manufacturer high salt sandwich products is 0.98g/100g (IQR: 0.83-1.13), with 23.6% of products having less salt than the proposed average target of 0.81g/100g.

Maximum Target - Disagree

92.6% of products have less salt than the proposed maximum target of 1.35g/100g. We feel the proposed maximum target could be lowered to 1.30g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Marks and Spencer Poached Salmon & Watercress Sandwich - 0.38g/100g
- Marks and Spencer Count on Us.. Tuna & Cucumber - 0.55g/100g
- Marks and Spencer Spirit of Summer Lamb Shawarma Wrap - 0.6g/100g
- Sainsbury's On the Go Tuna and Sweetcorn - 0.63g/100g
- Aldi Eat & Go Pulled Pork Stuffing & Bramley Apple Sauce - 0.64g/100g
- Lidl Tuna & Sweetcorn Deep Fill Sandwich - 0.66g/100g
- Lidl Meadow Fresh Chicken & Bacon Caesar Wrap - 0.68g/100g

13.2 Sandwiches without high salt fillings

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 111 retail and manufacturer sandwich products is 0.7g/100g (IQR: 0.62-0.8), with 25.2% of products having less salt than the proposed average target of 0.6g/100g.

Maximum Target - Disagree

72.1% of products have less salt than the proposed maximum target of 0.79g/100g. We feel the proposed maximum target could be lowered to 0.75g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Planet Organic Grown To Go Walnut Meat Sprouted Grain Wrap - 0.38g/100g
- Tesco Plant Chef Coronation Cauliflower - 0.4g/100g
- Marks and Spencer Vietnamese Style Chicken Wrap - 0.45g/100g
- Marks and Spencer Moroccan Style Chicken - 0.45g/100g
- ASDA Plant Based Falafel and Houmous - 0.46g/100g
- Marks and Spencer Plant Kitchen Sweet Potato Biryani - 0.48g/100g
- Aldi Just Tasty Chicken & Pesto wrap with Tomato, Red, Yellow Peppers - 0.55g/100g

14. Table sauces and condiments

14.1 Tomato ketchup

Maximum Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 78 retail and manufacturer tomato ketchup products is 1.3g/100g (IQR: 0.9-1.7), with 66.7% of products having less salt than the proposed maximum target of 1.63g/100g. Therefore, we feel the proposed maximum target is too high and recommend instead a maximum target of 1.55g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Wonderchup – 0.1g/100g
- Asda No Added Sugar & Salt Tomato Ketchup – 0.15g/100g
- Tesco Reduced Sugar & Salt Tomato Ketchup – 0.2g/100g
- Morrisons Reduced Sugar & Salt Tomato Ketchup – 0.28g/100g
- Heinz Tomato Ketchup 50% Less Sugar & Salt – 0.5g/100g
- Sainsbury's Reduced Sugar & Salt Tomato Ketchup – 0.56g/100g
- Tesco Organic Tomato Ketchup – 0.6g/100g
- The Co-Operative Tomato Ketchup – 0.73g/100g
- Morrisons Tomato Ketchup – 0.76g/100g

14.2 Brown sauce

Maximum Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 91 retail and manufacturer brown sauce products is 1.2g/100g (IQR: 0.95-1.9), with 54.9% of products having less salt than the proposed maximum target of 1.2g/100g. Therefore, we feel the proposed maximum target, which has not changed since 2017, is too high and recommend instead a maximum target of 1.15g/100g.

The targets could be reduced further, as demonstrated by the products below:

- Tesco Brown Sauce – 0.5g/100g
- Sainsbury's Reduced Sugar & Salt Brown Sauce – 0.73g/100g
- Co-operative Brown Sauce – 0.95g/100g
- Bramwells Brown Sauce – 0.95g/100g
- Sainsbury's Basics Brown Sauce – 0.98g/100g
- Asda Smart Price Brown Sauce – 1g/100g
- Sainsbury's Brown Sauce – 1.06g/100g

14.3 Salad cream

Maximum Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 38 retail and manufacturer salad cream products is 1.4g/100g (IQR: 1.12-1.5), with 78.9% of products having less salt than the proposed maximum target of 1.5g/100g. Therefore we feel the target could be lowered to 1.45g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Sainsbury's Be Good to Yourself Salad Cream - 0.9g/100g
- Morrisons Savers Salad Cream - 1g/100g
- Marks and Spencer Salad Cream 50g - 1.05g/100g
- Tesco 50% Less Fat Salad Cream - 1.1g/100g
- Morrisons Salad Cream - 1.1g/100g
- Sainsbury's Basics Salad Cream - 1.1g/100g
- Tesco Everyday Value Salad Cream - 1.2/100g



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14.4 Mayonnaise

14.4.1 Mayonnaise (not reduced fat/calorie)

Maximum Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 116 retail and manufacturer mayonnaise products is 1.1g/100g (IQR: 1-1.38), with 66.4% of products having less salt than the proposed maximum target of 1.25g/100g. Therefore, we feel the proposed maximum target, which has not changed since 2017, is too high and recommend instead a maximum target of 1.22g/100g.

The targets could be reduced further, as demonstrated by the products below:

- Waitrose Duchy Organic Mayonnaise – 0.75g/100g
- Marks & Spencer Mayo – 0.78g/100g
- Tesco Plant Chef Vegan Mayo – 0.8g/100g
- Sainsbury's SO Organic Mayonnaise – 0.83g/100g
- Marks & Spencer American Mustard Mayo – 0.85g/100g
- Bramwells Peri-Peri Mayonnaise – 0.86g/100g
- Aldi Specially Selected Mayonnaise with Extra Virgin Olive Oil – 0.87g/100g
- Bramwells Real Mayonnaise – 0.9g/100g

14.4.2 Mayonnaise (reduced fat/calorie only)

Maximum Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 41 retail and manufacturer reduced fat/calorie mayonnaise products is 1.6g/100g (IQR: 1.45-1.68), with 95.1% of products having less salt than the proposed maximum target of 1.7g/100g. Therefore, we feel the proposed maximum target, which has not changed since 2017, is too high and recommend instead a maximum target of 1.6g/100g.

Given these products are seen as a 'healthier' choice due to their reduced fat/calorie content, we do not believe they should be allowed to contain higher levels of salt than the full fat version. People looking to make a healthier choice should not have to consume higher levels of salt. In the sixth wave, the targets for both types of mayonnaise should be aligned.

The targets could easily be reduced, as demonstrated by the products below:

- Hellmann's Light Mayonnaise – 0.7g/100g
- Simply M&S Mayonnaise Reduced Fat – 0.95g/100g
- Essential Waitrose Half Fat Mayonnaise – 0.95g/100g
- The Co-Operative Reduced Fat Mayonnaise - 0.96g/100g
- Tesco Light Mayonnaise – 1g/100g
- Asda Light Mayonnaise – 1.2g/100g
- Tesco Light Mayonnaise – 1.3g/100g
- Sainsbury's Lighter Mayonnaise – 1.45g/100g

14.5 Salad dressing

Maximum Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 120 retail and manufacturer salad products is 1.3g/100g (IQR: 1.03-1.5), with 66.7% of products having less salt than the proposed maximum target of 1.43g/100g. Therefore we feel this can be lowered to 1.40g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Waitrose Glaze With Balsamic Vinegar of Modena - 0g/100g



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- Tesco Healthy Living Balsamic Dressing - 0.2g/100g
- Aldi Bramwells Vinaigrette - 0.66g/100g
- Sainsbury's Be Good to yourself Honey and Mustard Dressing - 0.68g/100g
- The Co-operative Loved By Us Low Fat Honey and Mustard Dressing - 0.7g/100g
- ASDA Light Italian Dressing - 0.75g/100g
- ASDA Creamy Thousand Island Dressing - 0.75g/100g

14.6 Chilli sauce

Maximum Target - Agree

We welcome the addition of this new target for 2023, which was highlighted as a problem category in our sauces survey in 2019 (24). Based on data from the FoodSwitch database, the median salt content of 144 retail and manufacturer chilli sauce products is 3g/100g (IQR: 1.98-5), with 44.4% of products having less salt than the proposed maximum target of 2.88g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Dunn's River Jamaican Style Hot Sauce - 0.09g/100g
- Morrisons Chilli Cheese Sauce - 0.89g/100g
- Tesco Sweet Chilli Dipping Sauce - 0.9g/100g
- Morrisons Sriracha Chilli Sauce - 0.97g/100g
- Sainsbury's Sweet Spicy Jerk Marinade - 0.99g/100g
- Tesco Sweet Chilli Sauce - 1g/100g
- Asda Guajillo & Chipotle Chilli Sauce - 1.2g/100g

14.7 Dips

Average Target - Agree

We welcome the addition of this new target for 2023. Based on data from the FoodSwitch database, the median salt content of 175 retail and manufacturer dip products is 0.89g/100g (IQR: 0.63-1.13), with 36% of products having less salt than the proposed average target of 0.75g/100g.

Maximum Target - Disagree

In addition, 55.4% of products have less salt than the proposed maximum target of 0.9g/100g. We feel the proposed maximum target could be lowered to 0.85g/100g.

The targets could be lowered further, as demonstrated by the following products:

- ASDA Sour Cream Sauce - 0.06g/100g
- Lidl Batts Soured Cream Topping - 0.1g/100g
- Tesco Smoked Houmous - 0.3g/100g
- The Co-operative Salsa - 0.3g/100g
- Tesco Guacamole - 0.4g/100g
- Lidl Beetroot & Cannelini Bean Dip Pot - 0.4g/100g

14.8 All other condiments

Average and Maximum Targets - Agree

We welcome the addition of this new target for 2023, some of which were highlighted as problem categories in our sauces survey in 2019 (24). Based on data from the FoodSwitch database, the median salt content of 189 retail and manufacturer condiment products is 1.4g/100g (IQR: 1-2.7), with 14.8% of products having less salt than the proposed average target of 0.75g/100g. In addition, 21.7% of products have less salt than the proposed maximum target of 0.9g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Aldi Habanero Chilli Relish - 0.01g/100g



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- Tesco Finest Chilli Relish - 0.1g/100g
- Marks and Spencer Plum Pudding Chutney - 0.1g/100g
- Aldi Bramwells Simply Sensational Sweet Tomato Relish - 0.23/100g
- Lidl Deluxe Horseradish Sauce - 0.26g/100g
- Waitrose Essential Mint Sauce - 0.38g/100g

15. Cook-in and pasta sauces, thick sauces and pastes

15.1 All cook in and pasta sauces

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 557 retail and manufacturer pasta sauce products is 0.7g/100g (IQR: 0.61-0.8), with 42.5% of products having less salt than the proposed average target of 0.68g/100g. Therefore we feel this could be lowered to 0.67g/100g.

Maximum Target - Disagree

79.9% of products have less salt than the proposed maximum target of 0.83g/100g. We feel the proposed maximum target could be lowered to 0.8g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Homepride Kids Cooking Sauce Chinese Sweet & Sour - 0.03g/100g
- Asda Extra Special Soffritto Passata Traditional - 0.05g/100g
- Homepride Kids Pasta Sauce Classic Bolognese - 0.05g/100g
- Lidl Freshona Tomato Passata - 0.1g/100g
- Heinz Smooth Tomato Pasta Sauce Minions 0% added salt or added sugar - 0.1g/100g
- Napolina Passata Sauce Italian Tomato Garlic & Basil - 0.14g/100g

15.2 Pesto and other thick sauces

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 184 retail and manufacturer pesto products is 1.3g/100g (IQR: 1.1-1.5), with 54.9% of products having less salt than the proposed average target of 1.3g/100g. Therefore we feel this could be lowered to 1.1g/100g.

Maximum Target - Disagree

77.2% of products have less salt than the proposed maximum target of 1.55g/100g. We feel the proposed maximum target could be lowered to 1.4g/100g.

The targets could be lowered further, as demonstrated by the following products:

- ASDA Satay Stir-Fry Sauce - 0.56g/100g
- ASDA Stir-fry sauce Hoisin - 0.65g/100g
- ASDA Stir-fry Sauce Sweet Chilli & Garlic - 0.66g/100g
- Marks & Spencer Olive & Tomato Stir Through Sauce - 0.7g/100g
- Tesco Reduced Fat Red Pesto - 0.7g/100g
- Aldi Specially Selected Italian Pesto Genovese - 0.88g/100g

15.3 Thick pastes

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 42 retail and manufacturer thick paste products is 2.21g/100g (IQR: 1.26-4.18), with 61.9% of products having less salt than the proposed average target of 3.09g/100g. Therefore we feel this could be lowered to 3.07g/100g.

Maximum Target - Disagree

64.3% of products have less salt than the proposed maximum target of 3.56g/100g. We feel the proposed maximum target could be lowered to 3.52g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Barts Thai Green Curry Paste - 0.06g/100g
- Lidl Taste of Thailand Thai Green Curry Paste - 0.58g/100g
- Sainsbury's Rich Rogan Josh Curry Paste - 0.95g/100g
- Marks and Spencer Tikka Paste - 1g/100g
- Tesco Gujarati Curry Paste - 1g/100g
- Waitrose Cooks' Ingredients Thai Red Curry Paste - 1.02g/100g
- Marks and Spencer Korma Paste - 1.08g/100g

16. Biscuits

16.1 Sweet biscuits

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 1104 retail and manufacturer sweet biscuit products is 0.53g/100g (IQR: 0.3-0.75), with 48% of products having less salt than the proposed average target of 0.55g/100g. Therefore we feel this target, which has not changed since 2017, could be lowered to 0.54g/100g.

Maximum Target - Disagree

In addition, 82.6% of products have less salt than the proposed maximum target of 0.8g/100g. We feel the proposed maximum target could be lowered to 0.75g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Morrisons Free From 5 Fruit & Nut Snack Bars - 0g/100g
- Lidl Deluxe Organic Wafer Oats - 0g/100g
- Maryland Creations Soft Centres Crunchy Cookies with a Smooth Milk Chocolatey Filling - 0g/100g
- Kallo Belgian Milk Chocolate Organic RiceCake Thins - 0g/100g
- Lidl Rivercote Rice Cakes with Dark Chocolate Coating - 0.01g/100g
- Go Ahead! GoodnessBar Cocoa and Orange - 0.02g/100g

16.2 Savoury biscuits

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 370 retail and manufacturer savoury biscuit products is 1.33g/100g (IQR: 1-1.75), with 48.9% of products having less salt than the proposed average target of 1.3g/100g. Therefore we feel this target, which has not changed since 2017, could be lowered to 1.28g/100g.

Maximum Target - Disagree

75.4% of products have less salt than the proposed maximum target of 1.75g/100g. Therefore, we feel the proposed maximum target, which has not changed since 2017, is too high and recommend instead a maximum target of 1.70g/100g.

The targets could be lowered, as demonstrated by the products below:

- Tesco Cream Crackers Crisp & Crunchy – 0.7g/100g
- Asda Sweet Chilli Bruschetta – 0.91g/100g
- Sainsbury's So Organic Pumpkin & Sunflower Seed Oatcakes – 0.98g/100g
- Lidl Rivercote 3 Grain & 3 Seed Crispbreads – 1.03g/100g



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- Aldi Savour Bakes Seeded Oatcakes – 1.1g/100g
- Marks & Spencer Seeded Oatcakes – 1.2g/100g
- Asda Chosen by You Perfect for Cheese Cracker Selection – 1.2g/100g
- Waitrose Love Life Fine Oatcakes – 1.21g/100g

17. Pasta

17.1 Pasta and noodles, plain and flavoured

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 186 retail and manufacturer pasta and noodle products is 0.4g/100g (IQR: 0.31-0.57), with 53.8% of products having less salt than the proposed average target of 0.43g/100g. Therefore we feel this could be lowered to 0.41g/100g.

Maximum Target - Disagree

96.2% of products have less salt than the proposed maximum target of 0.75g/100g. We feel the proposed maximum target could be lowered to 0.70g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Morrisons Market St Egg Noodles - 0g/100g
- Sainsbury's Rice Noodles - 0.01g/100g
- Marks & Spencer Rice Noodles - 0.03g/100g
- The Co-operative Rice Noodles - 0.04g/100g
- The Co-operative Egg Noodles - 0.06g/100g
- ASDA Grower's Selection Egg Noodles - 0.08/100g

18. Rice

18.1 Rice (unflavoured), as consumed

Maximum Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 78 retail and manufacturer unflavoured rice products is 0.09g/100g (IQR: 0.01-0.12), with 79.5% of products having less salt than the proposed maximum target of 0.16g/100g. Therefore we feel this could be lowered to 0.14g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Lidl Easy Cook Long Grain Brown Rice - 0.01g/100g
- Aldi Worldwide Foods Boil in Bag Long Grain Rice - 0.01g/100g
- Aldi Everyday Essentials Long Grain Rice - 0.01g/100g
- Aldi Worldwide Foods Rice Long Grain - 0.01g/100g
- Aldi Worldwide Foods Basmati Rice - 0.01g/100g
- Lidl Basmati Rice - 0.01g/100g
- Lidl Long Grain Easy Cook Rice - 0.01g/100g

18.2 Flavoured rice, as consumed

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 163 retail and manufacturer flavoured rice products is g/100g (IQR: 0.38-0.55), with 42.3% of products having less salt than the proposed average target of 0.43g/100g. We feel the average target is conservative and could be reduced to 0.42g/100g.



Action on Salt

Maximum Target - Disagree

77.3% of products have less salt than the proposed maximum target of 0.58g/100g. Therefore, we feel the proposed maximum target, which has not changed since 2017, is too high and recommend instead a maximum target of 0.55g/100g.

The targets could be lowered, as demonstrated by the products below:

- Aldi Four Seasons Moroccan Inspired Rice – 0.07g/100g
- Tesco's Egg Fried Rice – 0.1g/100g
- Aldi Worldwide Foods Mexican Style Rice – 0.29g/100g
- Aldi Specially Selected Mushroom Rice – 0.3g/100g
- Golden Sun Egg Fried Rice Microwaveable – 0.3g/100g
- Tilda Lemon & Herbs Steamed Basmati Rice – 0.3g/100g
- Sainsbury's Lime and Coriander Rice – 0.33g/100g
- Asda Egg Fried Rice – 0.33g/100g

19. Other cereals

19.1 Other cereals

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 24 retail and manufacturer meat-based pastry products is 0.57g/100g (IQR: 0.49-0.74), with 45.8% of products having less salt than the proposed average target of 0.53g/100g. Therefore we feel this could be lowered to 0.52g/100g.

Maximum Target - Disagree

62.5% of products have less salt than the proposed maximum target of 0.6g/100g. We feel the proposed maximum target could be lowered to 0.58g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Aldi Frasers Shortcrust Pastry - 0.1g/100g
- Lidl Chef Select Ready Rolled Shortcrust Pastry - 0.25g/100g
- Marks & Spencer Shortcrust Pastry - 0.4g/100g
- Waitrose 8 Light and Crispy Yorkshire Puddings - 0.46g/100g
- Aldi Greenvale Puff Pastry Rolled Sheet - 0.49g/100g
- Marks & Spencer Cook with 6 Savoury Pastry Cases - 0.49g/100g
- Lidl Chef Select Ready Rolled Puff Pastry - 0.5g/100g

20. Processed puddings

20.1 Dessert mixes, as consumed

Maximum Target - Disagree

There are few products in the FoodSwitch database that fall within this category. However, based on the following products we feel the proposed maximum target of 0.45g/100g is too high and recommend instead a maximum target of 0.40g/100g:

- ASDA Pearce Duff's Blancmange Strawberry Flavour - 0.1g/100g
- ASDA Free From Pancake Shaker - 0.28g/100g
- Greens Classic Carmelle Dessert Mix - 0.34g/100g
- Morrisons No Added Sugar Chocolate Flavour Delight - 0.4g/100g
- Dr. Oetker Rich Chocolate Pud in a Mug - 0.34g/100g
- Green's Coffee Tiramisu Mix - 0.39g/100g

20.2 Cheesecake

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 105 retail and manufacturer cheesecake products is 0.26g/100g (IQR: 0.2-0.33), with 54.3% of products having less salt than the proposed average target of 0.26g/100g. Therefore we feel this could be lowered to 0.25g/100g.

Maximum Target - Disagree

80% of products have less salt than the proposed maximum target of 0.33g/100g. We feel the proposed maximum target could be lowered to 0.31g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Waitrose Sicilian Lemon Cheesecake - 0.03g/100g
- Plant Organic Grown To Go Majik Lemon Cheesecake - 0.05g/100g
- Gu 2 Strawberry & Raspberry Shortbread Cheesecakes - 0.12g/100g
- Aldi Specially Selected Lemon & Mascarpone Cheesecake - 0.13g/100g
- Aldi Specially Selected Belgian Chocolate Cheesecake - 0.15g/100g

20.3 Sponge-based processed puddings

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 44 retail and manufacturer sponge-based pudding products is 0.58g/100g (IQR: 0.43-0.66), with 18.2% of products having less salt than the proposed average target of 0.6g/100g.

Maximum Target - Disagree

In addition, 45.5% of products have less salt than the proposed maximum target of 0.56g/100g. We feel the proposed maximum target could be lowered to 0.54g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Tesco 2 Melting Middle Sponge Puddings - 0.2g/100g
- Lidl Deluxe Belgian Chocolate Sponge with a Cherry Centre - 0.21g/100g
- Marks & Spencer 2 Autumn Fruit Sponge Puddings - 0.28g/100g
- Tesco 2 Blackcurrant Sponge Puddings - 0.3g/100g
- Marks and Spencer Gold Belgian Chocolate Sponge Pudding - 0.31g/100g
- Mr Kipling 2 Cherry Bakewell Sponge Pudding - 0.31g/100g

20.4 All other processed puddings

Average Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 234 retail and manufacturer processed pudding products is 0.17g/100g (IQR: 0.11-0.25), with 47.9% of products having less salt than the proposed average target of 0.16g/100g. This could be lowered to 0.15g/100g.

Maximum Target - Disagree

In addition, 74.4% of products have less salt than the proposed maximum target of 0.24g/100g. We feel the proposed maximum target could be lowered to 0.22g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Aldi Specially Selected Strawberry Eton Mess with British Whipped Cream - 0.01g/100g
- Lidl Milbona Rhubarb Crumble - 0.02g/100g
- Marks and Spencer Plant Kitchen Chocolate Cherry Dessert Pots - 0.03g/100g



Action on Salt

- Lidl Milbona Apple Crumble - 0.04g/100g
- Waitrose 1 2 Raspberry Panna Cottas - 0.05g/100g

21. Quiche

21.1 Quiches

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 112 retail and manufacturer quiche products is 0.56g/100g (IQR: 0.48-0.68), with 37.5% of products having less salt than the proposed average target of 0.5g/100g.

Maximum Target - Disagree

In addition, 61.6% of products have less salt than the proposed maximum target of 0.6g/100g. We feel the proposed maximum target could be lowered to 0.58g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Sainsbury's Mediterranean Vegetable Quiche - 0.21g/100g
- Sainsbury's Broccoli, Tomato & Cheese Quiche - 0.22g/100g
- Aldi Crestwood 2 Mediterranean Vegetable Tarts - 0.27g/100g
- ASDA Cheese and Onion Quiche - 0.33g/100g
- ASDA Broccoli & Cheese Quiche - 0.37g/100g

22. Scotch Eggs

22.1 Scotch eggs

Maximum Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 38 retail and manufacturer Scotch egg products is 0.76g/100g (IQR: 0.69-0.8), with 71.1% of products having less salt than the proposed maximum target of 0.78g/100g. Therefore, we feel the proposed target, which has not changed since 2017, is too high and recommend instead a maximum target of 0.76g/100g.

The target could easily be lowered, as demonstrated by the following products:

- Waitrose & Partners Scrumptious Summer Pork, Pea & Mint Scotch Egg – 0.54g/100g
- Iceland 2 Scotch Eggs – 0.6g/100g
- Morrisons Scotch Eggs – 0.62g/100g
- Asda Extra Special Runny Scotch Eggs – 0.63g/100g
- Asda 2 Scotch Eggs – 0.69g/100g
- Aldi Crestwood Ready to Eat Mini Savoury Eggs – 0.69g/100g
- ASDA 18 Savoury Mini Eggs – 0.69g/100g
- Tesco Finest Scotch Eggs – 0.7g/100g

23. Canned fish

23.1 Canned tuna

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 46 retail and manufacturer canned tuna products is 0.9g/100g (IQR: 0.8-1), with 23.9% of products having less salt than the proposed average target of 0.78g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Morrisons The Best Albacore Tuna Steaks in Spring Water - 0.12g/100g
- Lidl Nixe Albacore Tuna in Olive Oil - 0.47g/100g
- Aldi Ocean Rise Tuna Steaks - 0.52g/100g
- Aldi Ocean Rise Tuna Flakes in Brine - 0.56g/100g

- Aldi The Fishmonger Tuna Steaks In Brine - 0.71g/100g

23.2 Canned salmon

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 22 retail and manufacturer canned salmon products is 0.86g/100g (IQR: 0.81-0.9), with 27.3% of products having less salt than the proposed average target of 0.8g/100g.

The target could be lowered, as demonstrated by the following products:

- Lidl Nixe Skinless and Boneless Wild Salmon Fillet In Brine – 0.65g/100g
- Asda Red Salmon – 0.78g/100g

23.3 Other canned fish

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 79 retail and manufacturer canned fish products is 0.96g/100g (IQR: 0.73-1.23), with 30.4% of products having less salt than the proposed average target of 0.78g/100g.

Maximum Target - Disagree

In addition, 75.9% of products have less salt than the proposed maximum target of 1.28g/100g. We feel the proposed maximum target could be lowered to 1.26g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Sainsbury's Sardines in tomato sauce - 0.35g/100g
- Sainsbury's Sardines in Sunflower oil -0.38g/100g
- Essential Waitrose Sardines in Water - 0.46g/100g
- ASDA Mackerel Fillets in a Sweet Chilli Sauce - 0.48g//100g
- Morrisons Mackerel Fillets - 0.5g/100g

24. Canned vegetables

24.1 Canned and bottled vegetables

Maximum Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 167 retail and manufacturer canned and bottled vegetable products is 0.09g/100g (IQR: 0.03-0.3), with 70.1% of products having less salt than the proposed maximum target of 0.13g/100g. Therefore, we feel the proposed maximum target, which has not changed since 2017, is conservative and suggest the target could be reduced to 0.11g/100g.

The target could easily be reduced, as demonstrated by the following products:

- Lidl Freshona Sweetcorn – 0.01g/100g
- Tesco Naturally Sweet Sweetcorn in Water – 0.01g/100g
- Lidl Freshona Sliced Carrots in Water – 0.03g/100g
- Aldi Sweet Harvest Sweet Corn – 0.03g/100g
- Aldi Sweet Harvest Sliced Mushroom in Water – 0.03g/100g
- Sainsbury's Tender Broad Beans in Water – 0.03g/100g
- Sainsbury's Peeled New Potatoes In Water – 0.03g/100g

24.2 Canned processed, marrowfat and mushy peas

Maximum Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 11 retail and manufacturer canned processed, marrowfat and mushy pea products is 0.4g/100g (IQR: 0.3-0.45), with 72.7% of



Action on Salt

products having less salt than the proposed maximum target of 0.45g/100g. Therefore, we feel the proposed maximum target, which has not changed since 2017, is conservative and recommend instead a maximum target of 0.41g/100g.

The target could be lowered, as demonstrated by the products below:

- Tesco Everyday Value British Mushy Peas – 0.2g/100g
- Sainsbury's Basics Mushy Peas – 0.23g/100g
- Lidl Marrowfat Peas – 0.25g/100g
- Morrisons Marrowfat Peas – 0.35g/100g
- Morrisons Chip Shop Style Mushy Peas – 0.4g/100g

25. Meat alternatives

25.1 Plain meat alternatives

Maximum Target - Disagree

Based on data from the FoodSwitch database, the median salt content of 59 retail and manufacturer plain meat alternative products is 0.7g/100g (IQR: 0.3-1.1), with 44.1% of products having less salt than the proposed maximum target of 0.63g/100g. Therefore, we feel the proposed maximum target, which has not changed since 2017, is conservative and recommend instead a maximum target of 0.6g/100g.

These products are seen as a 'healthier' choice, given advice to eat less meat and to make sustainable choices. We recommend that these products should not contain more salt than meat equivalents. People looking to make a healthier choice should not have to consume higher levels of salt.

The targets could easily be reduced, as demonstrated by the products below:

- Cauldron Organic Tofu – 0.03g/100g
- Tesco Meat Free Mince – 0.2g/100g
- The Tofoo co. Sizzlers Smoked – 0.2g/100g
- Quorn Mince – 0.3g/100g
- Aldi The Deli Meat Free Bolognese Mushroom Mince – 0.36g/100g
- Waitrose Vegan Mince – 0.42g/100g
- Quorn Vegan Pieces – 0.43g/100g
- Nestle Gourmet Kitchen Simply Mince – 0.43g/100g

25.2 Meat free products

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 606 retail and manufacturer meat free products is 1.04g/100g (IQR: 0.78-1.3), with 34.5% of products having less salt than the proposed average target of 0.85g/100g.

Maximum Target - Disagree

58.3% of products have less salt than the proposed maximum target of 1.12g/100g. We feel the proposed maximum target could be lowered to 1.1g/100g.

The targets could be lowered further, as demonstrated by the following products:

- The Tofoo Co. Tempeh - 0.01g/100g
- Upton's Naturals Original Jackfruit - 0.05g/100g
- Marks & Spencer Sesame Chilli, & Coriander Tofu - 0.15g/100g
- Fry's Spicy 3 Bean Pasty - 0.28g/100g
- Goodlife Spicy Veg Bean Burgers with a kick of chipotle chilli - 0.29/100g

25.3 Meat-free bacon

There are few products in the FoodSwitch database that fall within this category and therefore we will not comment on this target.

26. Other processed potatoes

26.1 Dehydrated instant mashed potatoes (as consumed)

There are few products in the FoodSwitch database that fall within this category. Therefore, we will not comment on this target.

26.2 Other processed potato products

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 202 retail and manufacturer meat-based pastry products is 0.45g/100g (IQR: 0.33-0.62), with 36.1% of products having less salt than the proposed average target of 0.39g/100g.

Maximum Target - Disagree

In addition, 75.7% of products have less salt than the proposed maximum target of 0.63g/100g. We feel the proposed maximum target could be lowered to 0.6g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Aldi Champion Hash Browns -0.47/100g
- ASDA Crispy Hash Browns - 0.43/100g
- Lidl Harvest Basket Hash Browns -0.6/100g

27. Beverages

27.1 Dried beverages (as consumed)

Maximum Target - Agree

Based on data from the FoodSwitch database, the median salt content of 109 retail and manufacturer dried beverage products is 0.14g/100g (IQR: 0.09-0.95), with 52.3% of products having less salt than the proposed maximum target of 0.14g/100g.

The targets could be lowered further, as demonstrated by the following products:

- Marks and Spencers Festive Hot Chocolate - 0.05g/100g
- Nestle Milo - 0.05g/100g
- Nescafe Cafe Menu Coconut Latte - 0.06g/100g
- Nescafe Gold Cappuccino - 0.07g/100g
- Nescafe Dolce Gusto Cafe Au Lait -0.06g/100g
- Nescafe Gold Cappuccino Unsweetened Taste - 0.07g/100g
- Nescafe Cafe Menu Gingerbread Latte - 0.07g/100g
- Green & Black's Organic Hot Chocolate Drink - 0.1g/100g

28. Stocks and Gravies

28.1 Stocks (as consumed)

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 40 retail and manufacturer stock products is 0.81g/100g (IQR: 0.62-0.94), with 25% of products having less salt than the proposed average target of 0.6g/100g.

Maximum Target - Disagree

In addition, 50% of products have less salt than the proposed maximum target of 0.8g/100g. We feel the proposed maximum target could be lowered to 0.79g/100g.



The targets could be lowered further, as demonstrated by the following products:

- Marks & Spencer Cook with M&S Chicken Stock -0.5g/100g
- Marks & Spencer Cook with M&S Vegetable Stock - 0.6/100g
- Marks & Spencer Cook with M&S Beef Stock - 0.63/100g

28.2 Gravy (as consumed)

Average Target - Agree

Based on data from the FoodSwitch database, the median salt content of 59 retail and manufacturer gravy products is 0.9g/100g (IQR: 0.8-0.96), with 30.5% of products having less salt than the proposed average target of 0.8g/100g.

Maximum Target - Disagree

86.4% of products have less salt than the proposed maximum target of 1.01g/100g. We feel the proposed maximum target could be lowered to 0.99g/100g.

The targets could be lowered further, as demonstrated by the following products:

- ASDA Chicken Gravy - 0.14g/100g
- ASDA Extra Special Chicken Gravy - 0.58g/100g
- Marks and Spencer Cook with M&S Just Add Lamb Gravy - 0.66/100g
- Marks & Spencer Cook with M&S Meat Gravy - 0.85g/100g
- Aah! Bistro Bistro Best Beef & Red Wine with Chestnut Mushroom Rich Gravy Sauce - 0.86/100g

Out of Home Targets

General comments

Food and drink consumed when eating out or getting takeaways is a significant contributor to people's diets and at least a fifth of our salt intake comes from food consumed outside the home. Research also suggests that people are eating out more often; in 2014, 75% of people said they had eaten out or bought takeaway food in the past week, compared to 69% in 2010 (25, 26). Food consumed outside the home tends to be higher in salt than food bought in the retail sector.

The 2017 targets included targets for OOH meals but they were lenient and much higher than the retail targets. Despite this, 30% of products included in PHE's analysis of the targets had salt levels above their maximum target. This fails to create a level playing field, which is needed for all companies to fall in line and achieve the biggest reductions.

We strongly recommend stricter salt reduction targets for OOH, aligning them with retail targets, which are thoroughly disseminated to the sector. We recommend progress monitoring be taken on by local authorities, potentially as part of the trailblazer programme.

While monitoring of OOH is difficult, given that there are at least 370,000 catering outlets in England, an immediate solution would be to require nutrition labelling in the sector. We acknowledge that the Department of Health & Social Care (DHSC) has consulted on implementing calorie labelling in OOH, the outcome of which is pending, but all companies should at a minimum be required to provide nutrition information online, with a phased approach to providing that information at the point of sale. All companies know what goes into their recipes and larger chains especially will have the resources required for nutritional analysis, and so there is no excuse for only the more responsible companies displaying this information. Given the justified and necessary response to allergy labelling, providing information on what is in our food in the OOH sector is proportional. For SMEs, knowledge sharing, access to nutrition experts and grants must be made available.



In recognition of the impact the out of home sector has on our intake of products high in salt, sugar and fat, all chain food service establishments in New York City and Philadelphia are required to display a warning icon next to items on menus that have more than 5g salt per portion, with an explanatory note where customers place their orders (27, 28). If the OOH sector does not engage with voluntary salt reduction measures, we recommend that DHSC review menu labelling and implement high salt warning labels on all dishes with more than 5g per portion, and lower thresholds for children’s meals.

Specific Comments

We believe the targets are far too lenient and have provided examples of dishes from the UK’s leading restaurant/fast food chains that easily meet the proposed targets to emphasise this.

1. Potato Products

1.1 Seasoned fries

Outlet	Dish Name	Salt Content (g) per Dish
Harvester	Sweet Potato Fries	1.4
Pizza Hut	Oven Baked Fries	1.2
	Fried Fries	2.3
	Oven Baked Seasoned Fries	2.3
	Fried Cheesy Fries	4.1
	Oven Baked Seasoned Cheesy Fries	4.6
	Sweet Potato Fries	0.8
Bella Italia	Fries	1.6
	Sweet Potato Fries	0.6
Hungry Horse	Dirty Fries - Mac 'n' Cheese & Smoked Bacon	4.3
	Dirty Fries Tikka	2.85
	Dirty Fries - Nacho Cheese & Smoked Bacon	3.11
	Sweet Potato Fries	0.15
	Fries	1.23
	Sweet Potato Fries	0.7
	Skinny Fries	1.6
Prezzo	House Fries	0.16
	Truffle oil infused fries	0.19
Five Guys	Little Fries	1.11
	Reg Fries	1.62
	Large Fries	2.38
	Little Fries with Cajun Seasoning	2.26
	Reg Fries with Cajun Seasoning	2.77
	Large Fries with Cajun Seasoning	3.53
Zizzi	Sweet Potato Fries	1.8
	Rosemary Sweet Potato Fries	1
Café Rouge	Frites	2
	Sweet Potato Frites	2

Gourmet Burger Kitchen	Chunky Fries	1.4
	Skinny Fries	4.4
	Sweet Potato Fries	1.1
	Truffle Cheese Fries	1.2
YO! Sushi	YO! Fries	3
	Dirty Fries	2.9
	Tiger Fries	1.3
	Sweet Potato Fries	0.7
	Skinny Cut Fries	1.5

1.2 Seasoned chips and other potato products

Outlet	Dish Name	Salt Content (g) per Dish
Nando's	Chips - Regular	0.7
	Chips - Large	1.9
	Peri-Salted Chips - Regular	1.3
	Peri-Salted Chips - Large	3
	Creamy Mash - Regular	1.5
	Creamy Mash - Large	3
	(Kids) Chips	0.5
Harvester	Triple Cooked Nashville Hot Chunky Chips	0.1
	Triple Cooked Chunky Chips	0.1
	Triple Cooked Sage & Onion Chunky Chips	1
	Home-Baked Jacket Potato	<0.01
	Mash	1.1
Toby Carvery	Loaded Roast Potatoes	0.9
	Roast Potatoes	0.01
	Beef Dripping Roast Potatoes	0.06
	Mash Potato	0.11
	Cheesy Mash	0.37
	Colcannon	0.1
	Bubble & Squeak	0.09
Frankie & Benny's	Crushed New Potatoes with Spring Onions	0.1
	Baked Jacket Potato	0.03
	Chips	0.24
	Cheesy Chips	0.99
Beefeater	Loaded Potato Dippers	1.1
	Loaded Potato Dippers with Bacon	2.7
	Sharing Potato Dippers	2.3
	Sharing Potato Dippers with Bacon	5.4
	Triple Cooked Chips	0.7
	Jacket Potato	0.3

	Fried Herby Potatoes	0.1
ASK	Chips with mayo	2
	Garlic and Cheese Chips	1.8
	Dauphinoise Potatoes	0.9
	Bowl of Cheesy Chips (Starter)	1.25
Crown Carvery	Bowl of Roasties (Starter)	2.11
	Chips with Curry Sauce (Starter)	0.78
	Roast Potato (100g - side)	0.7
	Mash Potato (100g - side)	0.5
	Chips (100g - side)	0.02
	Potato Dippers (Starter)	1
Table Table	Chips	1.3

2. Burgers in bun

2.1 Small burgers without cheese or other cured meats

Outlet	Dish Name	Salt Content (g) per Dish
Gourmet Burger Kitchen	Classic Small	1.7
	Chicken Classic Small	2.1

2.2 Burgers with cured meats

Outlet	Dish Name	Salt Content (g) per Dish
Harvester	The Big One	14.2
	The Cowboy	5.4
	The True Blue	11.3
	The Classic - Beef	7.6
	The Classic - Chicken	4.5
Hungry Horse	Bacon & Cheese Burger	5.27
	Double Bacon & Cheese Burger	5.86
	Smokin' Jack Burger	5.95
	Quedzilla Burger	9.68
	Double Daddy Burger	7.48
Beefeater	Double Bacon & Cheese Beef Steak with chips (Autumn Menu)	5.8

	Grilled Chicken, Bacon & Avocado Burger with chips (Autumn Menu)	4.9
	Double beef burger with bacon & cheese (Daytime Saver)	4.6
	Bacon & Cheese Beef Steak Burger (Evening Menu)	4.8
	Double Bacon & Cheese Beef Steak Burger (Evening Menu)	4.8
Prezzo	Calabrese Burger	3.84
Five Guys	Beef Burger Patty and Bacon with Bun	1.54
	Bacon Cheese Burger (Beef Burger Patty, Cheese Slice, Bacon with Bun)	2.3
Gourmet Burger Kitchen	Cheese & Bacon with American Cheese	5.1
	Cheese & Bacon with Cheddar	4.4
	Cheese & Bacon with Smoked Applewood	4.3
	Avo Bacon	3.8
	Major Tom	4.7
	Hey Pesto	5.3
YO! Sushi	Chicken & Avocado Burger	5.8
	Double Stack Steak Burger with Cheese & Bacon	5
	Mac & Cheese Burger	5.6

2.3 All other burgers

Outlet	Dish Name	Salt Content (g) per Dish
Nando's	Butterfly Burger - Plain...(ish)	2.7
	Butterfly Burger - Extra Hot	4.5
	Sunset Burger - Plain...(ish)	2.3
	Sunset Burger - Lemon & Herb	2.7
	Grilled Chicken Burger with lettuce and tomato - Plain...(ish)	2.1
	Grilled Chicken Burger with lettuce and tomato - Extra Hot	3.9
	Double Chicken Burger with lettuce and tomato - Plain...(ish)	2.9
	Double Chicken Burger with lettuce and tomato - Extra Hot	4.7

	Portobello Mushroom & Halloumi Burger - Plain...(ish)	3.2
	Portobello Mushroom & Halloumi Burger - Extra Hot	5
	Sweet Potato & Butternut Burger - Plain...(ish)	1.7
	Sweet Potato & Butternut Burger - Extra Hot	3.5
	Supergreen Burger - Plain...(ish)	2
	Supergreen Burger - Extra Hot	3.8
	Beanie Burger - Plain...(ish)	2.9
	Beanie Burger - Extra Hot	4.7
Harvester	The Beyond Bean	3.4
	The BBQ King	7.1
	The Purist	7
Bella Italia	Pollo Burger	2.9
	Oumph! Burger without fries	2.6
	Black Angus Burger without fries	3.1
	Cannellini Bean Burger without fries	3
	Gluten free burger americano	3.1
Hungry Horse	Classic Beef Burger	4.36
	Double Classic Beef Burger	4.95
	Cheese Beef Burger	4.62
	Double Cheese Beef Burger	5.21
	Southern Fried Chicken Burger	5.58
	Double Southern Fried Chicken Burger	7.39
	Bombay Bird Burger	5.53
	Chinese Veggie Burger	4.49
	Double Chinese Veggie Burger	5.77
	Fajita Burger	6.59
Beefeater	Lobster Double Stack Burger with chips (Autumn Menu)	3.9
	Lamb & Feta Burger (Autumn Menu)	4.7
	Vegan Sloppy Joe Burger (Autumn Menu)	3.5

	Short Rib, Peppercorn & Pulled Beef Burger (Autumn Menu)	3.6
	1/4lb beef steak burger (Daytime Saver)	4.1
	Vegan Sloppy Joe Burger (Evening Menu)	3.1
	Lobster Double Stack Burger (Evening Menu)	3.9
Five Guys	Plain Beef Burger Patty with Bun	0.62
	Cheese Burger (Beef Burger Patty, Cheese Slice with Bun)	1.38
Café Rouge	Spicy Chick Pea Burger	2.2
	Poulet Burger	1.9
	Rouge Burger	2.7
Gourmet Burger Kitchen	Classic Burger	2.1
	Classic Small with American Cheese	2.5
	Classic Small with Cheddar	2.1
	Classic Small with Smoked Applewood	2.4
	Classic with American Cheese	3.6
	Classic with Cheddar	2.9
	Classic with Smoked Applewood	2.8
	Blue Cheese with Blue Cheese Mayo	2.6
	Blue Cheese with Cheese Slice	2.2
	Blue Cheese with Blue Cheese Mayo Small	1.9
	Blue Cheese with Cheese Slice Small	1.7
	Taxidriver	4.6
	The Mighty	5.5
	Every Day I'm Trufflin'	2.7
	Rocket Man	4.7
	The Legend - Applewood	2.5
	The Legend - American	3.4
	The Legend - Cheddar	2.6
	Chick Chick Boom Panko	3.1
	Chicken Classic	2.8
Chicken Classic Panko	1.7	

	Chicken Classic Small Panko	1.5
	Satay	3.5
	Satay Panko	2.4
	Chicken Camembert Cranberry Panko	2.4
	Chicken Camembert Cranberry Grilled	3.6
	Californian (Vegan)	2.4
	Falafel	4.4
	Falafel portion	2.9
	Vegan Classic	2.6
	Vegan Classic Small	2
YO! Sushi	Chicken Katsu Burger	1.3
	Chicken Teriyaki Burger	1.4
	Mushroom Teriyaki Burger	1.3
Table Table	Sloppy Joe Burger	3.7
	Lamb & Feta Burger	5.3
	Double Stack Steak Burger with Cheese	4.1
	Surf & Turf Burger	5.6

3. Battered or breaded chicken portions and pieces

3.1 Battered or breaded chicken portions and pieces under 200kcal

Outlet	Dish Name	Salt Content (g) per Dish
KFC	Drumstick (170kcal)	0.79
	Wing (175kcal)	0.61
Burger King	Nuggets 4 pieces (165kcal)	0.8
Beefeater	Buffet menu - pop in Chicken per 6 (122kcal)	0.3
Table Table	Buffet menu - pop in Chicken per 6 (122kcal)	0.3

3.2 Battered or breaded chicken portions and pieces between 200-400kcal

Outlet	Dish Name	Salt Content (g) per
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		Dish
Harvester	Buttermilk-fried chicken tenders with BBQ dip (395kcal)	1.5
	Bigger appetites - buttermilk-fried chicken (253kcal)	0.8
Wetherspoons	Chicken breast bites - 10 battered chicken breast chunks (310kcal)	1.3
	Fried buttermilk chicken breast (350kcal)	1.2
	Three southern fried chicken strips (370kcal)	1.2
McDonald's	Chicken selects (359kcal)	1.8
	6 Chicken McNuggets (259kcal)	0.51
	9 Chicken McNuggets (388kcal)	0.77
	5 Chicken McNuggets (216kcal)	0.43
KFC	Keel (265kcal)	0.94
	Thigh (285kcal)	0.98
	Rib (325kcal)	1.32
Burger King	6pc Jalapenos Chicken Fries (218kcal)	1.4
	Chicken fries 6 pieces (212kcal)	1.2
	Chicken Fries 9 pieces (318kcal)	1.8
	Chicken Strips 2 pieces (217kcal)	1.4
	Nuggets 6 pieces (257kcal)	1.5
Beefeater	Buffet menu - Chicken Goujjons (per 3 plus dip) (289kcal)	1.2
Chef and Brewer	Bar menu - Homemade chicken goujons with Garlic & Rosemary mayo (373kcal)	1.54
Leon	Gluten free Chicken Nuggets (371kcal)	1.0

Pizza Hut	Southern Fried Nuggets (248kcal)	1.1
Slug and Lettuce	Kids menu - Baked Chicken Goujons (314kcal)	1.3
	Buffet menu - Southern fried chicken goujons (205kcal)	0.6
Table Table	Buffet menu - Chicken Goujjons (per 3 plus dip) (289kcal)	1.2
Crown Carvery	Child Chicken Nuggets (258kcal)	1.12
Yo Sushi!	Chicken Katsu (225kcal)	1.1
	Japanese Fried Chicken (382kcal)	1.7
Wasabi	Chicken Katsu (399kcal)	1.32

3.3 Battered or breaded chicken portions and pieces over 400kcal

Outlet	Dish Name	Salt Content (g) per Dish
Wetherspoons	Chicken breast bites with sticky soy sauce (411kcal)	3
	small southern fried chicken strips - 3X and chips (625kcal)	1.4
	Southern fried chicken strips - 5X with honey glaze made with Jack Daniels sauce and chips (1166kcal)	3
	Southern-fried chicken strips 5x (500kcal)	1.1
McDonald's	20 Chicken McNuggets (863kcal)	1.7
KFC	Mini Variety Pack (655kcal)	2.32
	2 piece (730kcal)	2.39
	6 piece bargain bucket (610kcal)	1.93
	10 piece bargain bucket (850kcal)	2.85

Burger King	Chicken Strips 4 pieces (434kcal)	2.8
Beefeater	Buttermilk Chicken Goujons topped with Jalapenos and creamy cheese sauce and smoky tomato dip (494kcal)	3.1
Brewer's Fayre	4 X Buttermilk Chicken Goujons topped served with a smoky BBQ dip (406kcal)	1.8
	Chicken Wings with a BrewDog punk IPA BBQ sauce (58kcal)	0.9
Chef and Brewer	Hand-Batter Chicken Goujons with IPA BBQ sauce (474kcal)	2.7
Slug and Lettuce	Southern-fried chicken goujons with BBQ sauce (450kcal)	1.6
Table Table	Buttermilk and Rosemary Chicken Goujons (407kcal)	1.8
Crown Carvery	Southern Fried Chicken (420kcal)	1.98

4. Battered or breaded seafood based meals

4.1 Fish fillet meals

Outlet	Dish Name	Salt Content (g) per Dish
Harvester	Cod and Chips	1.7g
Beefeater	Beer-Battered Fish and Chips	2.2g
	Ultimate Haddock and Chips	1.9g
	Beer-Battered Haddock & Chips with Peas	1.9g
Chef and Brewer	Dinner - Hand-battered atlantic cod and chips	2.65g
	Lunch - Hand Battered fish and chips	2.19g
Hungry Horse	Hand battered fish and chips	1.69g
	Jumbo Cod & Chips	1.97g
Slug and Lettuce	Battered Cod and Chips	1.6g
	Group menu - fish and chips	2.2g
Crown Carvery	Hand Battered fish	0.38g

4.2 Bitesize seafood meals

Outlet	Product Name	Salt Content (g) per Dish
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Harvester	Calamari Strips with garlic mayo dip	1.3g
	Scampi	1.1g
	Wholetail Whitby Scampi	2.7g
	Smaller bites - fish fingers	0.3g
	Bigger appetites - fish fingers	0.4g
Wetherspoons	Calamari	1.5g
	Small whitby breaded scampi - chips and peas	2.1g
	small whitby breaded scampi - chips and mushy peas	2.6g
	Kids menu - Whitby breaded scampi	1g
Wagamama	Chilli Squid	3.01g
	Tama Squid	2.25g
	Ebi Katsu	2.31g
Beefeater	Calamari served with surf and turf mayo	3.6g
	Kids menu - Cod Bites	1.7g
	Scampi & Triple Cooked Chips	2.1g
	Scampi & Fries	3.0g
	Scampi & Salad	1.7g
	Tempura prawns (2 each plus dip)	0.8g
All Bar One	Fish Finger Wrap	2g
	Kids menu - Cod goujons with mushy peas, tartare sauce and choice of rice, fries or salad	1g
Bill's	Crispy Calamari	2.6g
	kid's cod fish finger with fries	1.5g
Brewer's Fayre	tempura king prawns served with sweet chilli sauce	2.2g
	Kids menu - Cod Tastic with chips and peas	0.9g
	Breaded Wholetail Scampi with peas	2.8g
Chef and Brewer	Panko-Coated Calamari with garlic and rosemary mayonnaise	2.94g
	Lunch - Wholetail Whitby Scampi	2.78g
	Bar menu - whitebait with tartare sauce	1.24g
	Bar menu - fish goujons with tartar sauce	2.42g
Hungry Horse	Breaded Wholetail Scampi with dressed salad	2.47g
	Omega 3 fish fingers & Mayo	1.09g
	Classic Breaded wholetail whitby scampi	1.45g
Leon	Fish Finger Wrap	1.7g
Slug and Lettuce	Panko-crumb calamari sticks with lemon mayo	1.8g
	Scampi and Chips	2.9g
	Buffet menu - panko-crumbed calamari sticks with mayo	1.1g
Table Table	Breaded Scampi and Chips with Peas	2.6g
	Kids menu - Cod bites	0.9g
	Tempura prawns (2 each plus dip)	0.8g

Bella Italia	Calamari served with gremolata aioli	2.4g
Prezzo	Calamari served basil pesto dip	0.9g
Zizzi	Calamari with lemon and rosemary aioli	1.1g
	Main Meal Calamari	2.2g
Yo Sushi!	Prawn Katsu Curry in curry sauce served with rice	1.7g
	Spicy Pepper Squid	2.4g
ASK Italian	Whitebait with garlic mayo	1.1g
	Calamari with garlic mayo	0.9g
Café Rouge	Kids menu - Fish goujons with frites and peas	1.5g

5. Pies

5.1 Pie based meals

Outlet	Dish Name	Salt Content (g) per Dish
Hungry Horse	Steak & Ale Pie, Chips	3.35
Hungry Horse	Chicken & Woodland Mushroom Pie, Chips	3.68
Beefeater	Chicken & chorizo pie, triple cooked chips	2.4
Crown Carvery	Steak & Ale Pie, mash potato (100g)	2.16
Table Table	Fake & Ale Pie	2.7
Table Table	Chicken & Mushroom Pie	3.8
Table Table	Chick, Mozz & Pesto Pie	1.2

5.2 Pies only

Outlet	Dish Name	Salt Content (G) Per Dish
Greggs	Savoury Mince Pie 253g (*½ Portion 126.5g)	0.99

Crown Carvery	Steak & Ale Pie	1.66
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6. Sauce based main dishes

6.1 Curry main meals

Outlet	Dish Name	Salt Content (g) per Dish
Harvester	Katsu Chicken Rice Bowl	3.2g
	Thai Green Curry	3.1g
Wagamama	Chicken Nikko Curry and White Rice	3.08g
	Sea Bream Nikko Curry and White Rice	3.2g
	Yasai Nikko Curry and White Rice	2.84g
	Chicken Katsu Curry	1.92g
	Yasai Katsu Curry	2.5g
	Chicken Raisukaree	3.55g
	Naked Katsu	2.27g
Beefeater	Kids menu - Chicken Curry	0.5g
Yo Sushi!	Chicken Katsu Curry	1.7g
	Prawn Katsu Curry	1.7g
	Pumpkin Katsu Curry	1.7g
	Tofu Katsu Curry	1.3g
Wasabi	Chicken Curry Bento	2.28g
	Spicy Chicken Bento	2.97g
	Tofu Curry Bento	3.2g
Leon	Lentil Masala	2.2g
Wetherspoons	Simple Mangalorean roasted cauliflower and spinach curry	2.7g
	Simple tikka masala	3.2g
Slug and Lettuce	Veg Thai Curry	1.5g
	Chicken Tikka	2.6g

6.2 All other sauce based main meals

Outlet	Dish Name	Salt Content (g) per Dish
Itsu	Teriyaki Chicken Rice Bowl	2.94g
	Spicy Chicken Korean RiceBowl	3.16g

	Thai Chicken rice' bowl	2.33g
Leon	Chicken Satay	1.7g

7. Beef steaks, grilled chicken and roast main meals

7.1 Beef steaks, grilled chicken and roast main meals

Outlet	Dish Name	Salt Content (g) per Dish
Nando's	¼ chicken medium, regular chips, regular coleslaw	2.4
	3 x medium chicken wings, regular spicy rice, regular corn on the cob	3.5
Harvester	10oz Sirloin - Served with triple-cooked chunky chips, roasted flat mushroom, tomato & onion rings	0.7
Toby Carvery	Roast turkey, classic gravy, brocolli, butternut squash and carrots, roast potatoes (1.74)	1.74
	Roast gammon, classic gravy, brocolli, butternut squash and carrots, roast potatoes (2.84)	2.84
Wagamama	Naked Chicken katsu	2.27
Hungry Horse	Big Plate Steak BPS - 9oz Sirloin Steak	2.5
	Live Well Roast Chicken Fillet	0.84
	Flattened Half Roast Chicken	1.15
Beefeater	10oz Rib-eye with chips	2.7
	Mozzarella filled chicken wrapped in pancetta	4
Zizzi	Spiedini pollo with sauce (with sides)	2.9
	Pollo prosciutto (with sides)	1.5
Ask	Pollo Milanese with Chips	3.2
Café Rouge	Ribeye with frites	2.7
	Sirloin with frites	2.6

Crown Carvery	Roast beef (adult), roast potato (100g), stuffing (40g), cauliflower cheese (100g), carrots (40g), peas (40g), 100ml beef and onion gravy	3.03
Table Table	Mozzarella stuffed chicken wrapped in pancetta	3.4
	8oz rump steak with chips	3.3

8. Sandwiches

8.1 Cured meat sandwiches

Outlet	Dish Name	Salt Content (g) per Dish
Pret A Manger	Best Ever BLT	3.1
	Ham & Cheese	2.9
	Classic Super Club	2.8
Greggs	Roast Chicken & Bacon Club Baguette	2
Starbucks	Blt Sandwich	2.6

8.2 All other sandwiches

Outlet	Dish Name	Salt Content (g) per Dish
Harvester	Buttermilk-fried Chicken Wrap	1.6
	Southern Fried Quorn Wrap	1.3
Toby Carvery	Roast Beef, Mushroom & Red Onion Chutney With Wholemeal Bap	1.9

	Cheese & Chutney With Wholemeal Bap	1.7
Beefeater	Buffet Sandwiches Cheese & Tomato (4 X 1/4)	1.6
	Prawn & Marie Rose (4 X 1/4)	2.4
Crown Carvery	Wrap Southern Fried Chicken	1.68
Table Table	Cheese & Tomato (4 X 1/4)	1.6
Pret A Manger	Crayfish And Avocado	1.6
Leon	Chargrilled Aioli Chicken Wrap	0.9
Greggs	Tandoori Chicken Baguette	0.9
Starbucks	Free Range Egg & Mayo Sandwich	1.7

9. Pasta meal

9.1 Lasagne, risotto, gnocchi and pasta with cured meat additions

Outlet	Dish Name	Salt Content (g) per Dish
Pizza Express	Pea & Asparagus Risotto	2.1
Bella Italia	Risotto Verdura	2.6
Zizzi	Spaghetti chorizo carbonara	2.6
ASK	Light Asparagus & Pancetta Carbonara with salad	2.1
	Linguine Carbonara	2.5
	Lasagne	2.1

9.2 All other pasta dishes

Outlet	Dish Name	Salt Content (g) per Dish
Pizza Express	Al Forno Bolognese	2
	Leggera Peperonata	2
Bella Italia	Gluten Free Pomodoro Penne	1.9
	Gluten Free Bolognese Penne	2.5
	Pollo Pesto	1.8
Zizzi	Spaghetti pomodoro	1.8
	Spaghetti bolognese	2.2
	Beef brisket & venison tagliatelle	1.37
	Casareccia pollo piccante	2
	Ravioli di capra	2.3
ASK	Light Purple Basil Pesto Genovese with salad	1.7
	Spaghetti al Pomodoro	2.6
	Penne Al Pollo Della Casa	1.6

10. Pizza

10.1 Takeaway style pizza with cured meat toppings (per slice)

Outlet	Dish Name	Salt Content (g) per Dish
Pizza Hut	Peperoni Sharing Pan (13") slice	1.1

Dominos	American Hot classic crust personal whole pizza	3.41
	Catalan Chicken and Chorizo italian style crust small whole pizza	4.56
	Pepperoni Passion Thin & Crispy Crust large slice	1
Papa Johns	Authentic thin crust medium All The Meats slice	1.1
	Authentic thin crust medium BBQ meat feast slice	0.99

10.2 Takeaway style pizza with all other toppings (per slice)

Outlet	Dish Name	Salt Content (g) per Dish
Pizza Hut	Veggie Individual Thin (11") slice	0.7
	Chicken supreme Individual Thin (11") slice	0.7
	Hot 'N' Spicy Veg Individual Thin (11") slice	0.8
Papa Johns	Authentic thin crust medium cheese and tomato slice	0.8
	Authentic thin crust medium Garden Party slice	0.7

10.3 Traditional Italian style pizza with cured meat toppings (per pizza)

Outlet	Dish Name	Salt Content (g) per Dish
Zizzi	Pepperoni campagna classic whole pizza	4.1
	Calzone carne piccante	3.7

	Skinny gamberone & chorizo (pizza only)	2.4
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10.4 Traditional Italian style pizza with all other toppings (per pizza)

Outlet	Dish Name	Salt Content (g) per Dish
Pizza Express	Margherita whole pizza	4.3
	Fiorentina whole pizza	4.2
	Veneziana whole pizza	4.4
	Calzone Mezza whole pizza	3.2
Bella Italia	Queen Margherita whole pizza	4
	Campagna whole pizza	4
Zizzi	Margherita rustica whole pizza	3.5
ASK	Four Cheese Margherita whole pizza	3.8

11. Children's main meals

11.1 Children's main meals

Outlet	Dish Name	Salt Content (g) per Dish
Hungry Horse	Jacket spud with cheese (up to 8 years)	0.83
	Cod fish fingers with mini jacket spud and corn cobs mini	0.8
Beefeater	Spaghetti Bolognese with garlic bread and veggie sticks	0.9
	Tomato penne pasta with garlic bread and veggie sticks	0.8

	Chicken curry with brown rice and veggie sticks	0.5
Brewers Fayre	Cod tastic with chips and baked beans	0.9
	Tomato pasta	0.8
Burger King	Chicken nuggets 4pc with apple fries	0.9
	Kids hamburger with apple fries	0.85
Nandos	Chicken breast fillet strips, corn on the cob, little tomatoes	0.9
	Sweet potato and butternut pattie, corn on the cob, little tomatoes	0.7
Wetherspoons	Cheesy pasta with broccoli and peas	0.8
	Quorn vegan sausages with cucumber sticks, tomato wedges and jacket potato	0.8
Leon	Chicken rice box	0.8
	Mini chicken burger & fries	0.7
Pizza Express	Pasta Bolognese	0.8
	Pasta Bianca	0.7
Wagamama	Mini grilled chicken katsu with curry sauce	0.7
	Mini chicken cha han	0.6
McDonald's	Chicken McNuggets (4 piece) with small fries	0.78
	Happy meal veggie wrap with carrot bag	0.81

2. Are there any technical or other challenges associated with achieving the draft proposed 2023 salt targets?

Given the wide variation in salt content of each of the categories - for both retail and manufacturer target categories and the out of home target categories - we do not believe there are any technical challenges associated with the proposed targets. Where companies have been able to reformulate their products to meet targets, these products should be upheld as examples to work towards and, where possible, knowledge should be shared on how to achieve reductions.

Small and Medium Companies

Public Health England's engagement with the out of home industry is currently limited to larger companies with more than 250 employees. However, in the accommodation and food services sector, there are a total of 168,040 total out of home businesses, of which 167,520 are SMEs. SME's account for 56% of turnover in the sector (29).

To ensure successful salt (in addition to sugar and calorie) reduction programmes and a gradual reduction in taste preference for salt, SMEs must be included in reformulation efforts. In Australia, the Healthy Eating Partnership developed innovation grants for SMEs, who find reformulation challenging due to limited resources for innovation, consumer testing and research and development (30). Food companies can also obtain advice from experts in food innovation and technology through a new online platform that was developed by Food Innovation Australia Ltd (FIAL).

We would encourage the UK's salt reduction policy to include guidelines on an information sharing platform, allowing SME's to access necessary information to engage with reformulation programmes.

3. Do you agree with the draft proposals for new Table 1 sub-categories and targets for foods not previously covered by salt reduction targets?

We are pleased to see that the categories covered by the 2017 targets are also covered by the 2023 targets, and we welcome the introduction of new targets. In 2015, Action on Salt first raised the issue of the salt content of popcorn, when our survey of 154 flavoured popcorn products revealed 23% had more than 1.5g of salt per 100g (31). Many people think of popcorn as a healthier alternative to other snack products and while plain popcorn can be a source of wholegrains and fibre, flavoured popcorn can be high in salt and cannot be considered a healthy snack.

In September 2019, we released a survey of the salt content of 357 sauces, finding 54% were high in salt (24). Furthermore, where products had a salt target, 38% exceeded this target. Our survey coincided with a study which analysed the salt content of sauces in the UK and China (32). The study highlighted that the salt content of sauces with clearly defined targets mostly decreased while, over the same period of time, the salt content of sauces without targets mostly increased.

4. Do you agree with the proposals to incorporate additional products in certain sub-categories? Are there any further additional products which you think should be included?

As liking salt is a learned taste preference, key to lowering salt intake in the population would be to take action to ensure that children do not develop a liking for salt. Therefore, any food product intended for or marketed to children should contain no added salt. We recommend the introduction of a new target for all food intended for children, for retailers and manufacturers.

Based on data from the FoodSwitch database, we recommend targets for the following product categories - we would be happy to share our data on these categories to help with target setting:

- Calamari and coated prawns
- Fish sauce
- Soy sauce
- Flavoured and smoked fish
- Marinades
- Nut butters

- Olives
- Paté and other meat spreads
- Pickles
- Sandwich fillers
- Smoked salmon
- Soy and lactose-free cheese
- Yeast spread

5. Do you use or are you considering using potassium-based or other sodium replacers to reduce the sodium content of your products? Are there any technical or other challenges associated with their use?

The wording of the section on sodium replacers within the consultation document suggests that the use of alternatives such as potassium chloride is unfavourable. However, in 2017, the Scientific Advisory Committee on Nutrition (SACN) and the Committee on Toxicity (COT) released their report on potassium-based sodium replacers, concluding that the government should encourage food industry to consider the use of these replacers to reduce the salt content of food (33). Research and testing should be shared and where sodium replacers are an appropriate substitute, its use should be promoted.

Action on Salt wants to see salt levels reduced and in turn a reduction in taste preference for salt. However, for the few food categories where salt reduction still proves to be challenging, replacing their salt content with potassium-based or other sodium replacers should be encouraged as a short-term measure, rather than avoiding resetting salt targets for those categories or removing those categories from the salt reduction programme. We recommend clear guidelines on salt replacers be released for industry.

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