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Dear Victoria

Thank you for giving us an opportunity to respond to PHE's Calorie Reduction proposals.

We would like to state at the outset that the response set out here is not a challenge to the objectives of the proposals, which will fully support, but is a considered view of the best way we believe calorie management can significantly help improve national diets.

The Targets

Following research amongst our members, we feel we must challenge the fundamental approach to calorie reduction on a per 100 g basis, particularly since our sector is unlikely to be able to reduce calories in products without cutting portion sizes as part of the reduction process.

Our research shows that reducing the size of products has minimal effect on the number of calories per 100 g. We have set out the reasoning for this in a separate document - see 'Weight Reduction Example'.

For this reason we believe that it would be better for targets to be set per serving/portion both in retail and foodservice.

Following a detailed study of the current market, we propose that targets for servings/portions should be set by agreement based on a realistic assessment of what consumers eat rather than the portion suggested by manufacturers/retailers.

Our view is that this should be based around a 9-10” pizza size or similar single serve pizza in foodservice. Calculations on this basis show that the average calories in a single serve foodservice pizza currently average around 900 calories per serving and in the case of similar retail products they equate to 896 calories per serving with a serving size 370g. This average is calculated by excluding all pizzas above 500g and garlic breads.

We suggest that in the case of larger pizza sizes, portions should be measured proportionately against this standard.

We also consider that Garlic Bread should be included in the Bread with Additives category. Our justification for this is:

- Garlic bread is consumed in a different way to pizza, as a side dish as opposed to a main meal.
- Pizza-style garlic bread sits alongside many other forms of garlic bread, as such it would be confusing to have two different standards for very similar products.

The figures we have quoted above are based on simple averages and are not sales weighted as we do not believe that accurate data can be obtained on a sales weighted basis without access to direct sales data. Estimates based upon market research data are likely to be extremely inaccurate when it comes to looking at such detail.

We recommend that the targets for both retail and foodservice products should be aligned over time.

These, we believe, should be the starting targets for pizzas as far as PHE is concerned – providing a basis for measuring progress. We do not propose that these figures should be put into the public domain as they are likely to cause confusion amongst consumers.

Relating Calories to Consumption

In terms of packs and menus, we propose that our industry should be encouraged to show the total calories per pack/whole product and that packs/menus should also show the 400:600:600 advice that PHE promoted earlier in 2018. This should appear close to, and in the same field of vision, as the total calorie figure so that consumers can readily see the differences.

Where pizzas are larger than the base single serve size, we recommend that the number of servings should appear on packs/menus. Perhaps the 400:600:600 could be used to provide guidance on portions per pack?

We believe this approach would be more readily understood by consumers and would allow the industry to directly support PHE’s work to promote the 400:600:600 message.

In the case of small (micro) businesses we would like to see an on-line calculator provided by PHE which would allow them to put in their ingredients to create a 'typical' calorie figure in the same way.

Convincing Consumers

We have an overarching concern that any work done by the food industry to reduce calories will fail without a strong drive to convince consumers to manage their diets better.

The food industry cannot dictate to consumers what they eat. We live in competitive markets where people have multiple choices of what and where they eat.

In the case of the retail sector, consumers may turn to larger pizzas or supplement them with additional dishes. Businesses cannot stop them doing this. Indeed, businesses must listen to consumer demand or they will fail.

In foodservice, the market is arguably even more competitive with plenty of eating out options available to most consumers. In this sector the chains are particularly vulnerable if independent businesses – in most cases their most direct competitors – offer larger pizzas with more toppings etc. at the same prices.

For this reason it is extremely important that the smaller operators are encouraged to work on the same basis as the chains.

Pricing

We have a real concern about the potential damage to businesses that could arise where portion reductions have to be made but where there is little or no saving in costs.

As we have seen in the past, such disparities can lead to negative media headlines and damage to brand reputations. Indeed, in your recent research consumers were very concerned at what they see as 'shrinkflation'.

This further emphasises the need for PHE/Government support for businesses seeking to work with PHE and the absolute need for a strong public awareness campaign to convince consumers of the need to manage diets better and to explain why products are being reformulated.

Indeed, we believe there is a need for an aggressive public awareness campaign designed to change habits, in a similar way to those for drink driving and smoking. The cost of this should be more than justified against the enormous costs to Society in treating the medical and social consequences of obesity.

We have sought to speak to the Secretary of State for Health and Social Care about this but have, so far, not succeeded and have simply been told that this is within the remit of PHE.

Our view is that, given the right approach, industry would be prepared to consider supporting a Government awareness campaign. Indeed, it is in their interests to do so as the costs of reformulation are considerable and businesses need to believe that sufficient consumers will accept reduced calorie products to make them viable.