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Ms Victoria Targett  
Team Leader, Sugar/Calorie Reduction  
Health Improvement Directorate  
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Dear Victoria

I am writing to respond to PHE's Calorie Reduction proposals on behalf of both The British Sandwich & Food to Go Association and the Café Life Association.

Our industry is very supportive of the objectives of tackling the UK's growing obesity crisis and would welcome the opportunity to work with Government and PHE in encouraging consumers to be more considerate of their diets. However, we do not believe that this can be tackled by the food industry in isolation as, without a willingness by consumers to rethink their diets, reductions in calories or portion sizes are unlikely to succeed on their own and could even prove counter-productive if they drive consumers into buying additional products.

For this reason, we believe it is essential that the Government/PHE works in partnership with the industry to drive a change in consumer habits through a concerted public awareness campaign.

As set out below, our industry would willingly support such a campaign by making calorie contents much clearer on packs and reminding consumers of the 400:600:600 guidelines published by PHE earlier in the year.

Our fear is that, without this public awareness support, the PHE campaign will ultimately fail.

### **Products in Category**

While we agree with the broad definition of the category, we believe that it needs to be divided into sub-categories to be realistic as there are substantial differences in calorie levels in the product categories within the group.

The sub-categories we suggest would be:

- Standard 'wedge' sandwiches and wraps
- Triple sandwiches & triple wraps
- Sub rolls and Baguettes
- Hot eat sandwiches and subs etc.
- Sushi
- Pasta pots etc.
- Salads

### **Base Line**

We are of a view that the current data on packs per 100gms is not helpful to consumers as it means that they have to calculate the total calories in a pack for themselves. Since sandwich packs are not required to carry weights, this can be impossible.

It would be much clearer to consumers, and more realistic, if food packaging carried the total calories in a pack or portion.

For the sandwich industry, which has already undertaken major reformulations to reduce salt and fat levels, there is little room for further reductions without reducing portion sizes. This poses a further problem, since technically reductions in size do not necessarily equate to reductions in calories.

Our research also suggests that the base line data for calories per 100gms in sandwiches is incorrect. Analysis across 298 products, covering both retail and foodservice, shows that the average calories per 100gms is just over 218 calories. This is considerably different to the 198 quoted by PHE and would equate to a 27% reduction against the 159 target quoted.

Sales weighted averages provided to us by some manufacturers suggest the figure should be higher than the averages from our research - somewhere between 222 and 250 calories per 100gms. It is likely to be even higher in the foodservice sector which is still largely focused around independents where there is no data available. Taking a more realistic figure of say 230 calories, this would necessitate over 30% reduction to meet the 159 target.

Our members are saying that they would struggle to achieve anything close to 20% reductions without significantly limiting the choices available to consumers and hitting technical problems with some ingredients.

In the case of breads, for example, fats are a functional ingredient so there is no scope for cutting calories. Mayonnaises or butters are used as a barrier to stop leaching and have a role in extending shelf-life – any reduction would impact on store and manufacturing waste.

Popular ingredients such as cheese and bacon would become difficult to use in any quantity if the proposed 159 target was applied. The choice limitations that such a target would impose would limit consumer choice severely and could well result in them turning to alternatives that are much less healthy.

### **Per Portion Targets**

Our recommendation is that the targets set by PHE should be based on calories per single portion and not per 100gms.

On this basis, we believe that an average portion target should be set at around 450 calories per serving/portion for standard wedge sandwiches/wraps etc. if based on straight averages but would be higher if sales weighted averages are used, in which case we suggest realistic maximum portion calories for each of the sub-categories should be:

- Standard 'wedge' sandwiches and wraps – 480-500 calories
- Triple sandwiches & triple wraps – 650 + calories
- Sub rolls and Baguettes – this category needs further research
- Hot eat sandwiches and subs etc. – 550 calories
- Sushi (all) – 400 calories
- Pasta pots etc. – 600 calories
- Salads – 400 calories

Furthermore, we believe it is unrealistic to see a global 20% reduction across all food categories and instead the target should be based on the feasibility of the category to achieve reductions. Without this, we believe many businesses would simply see the task as impossible.

In the case of sandwiches, we believe the target should be no more than 5%. Even this will be extremely difficult to achieve involving considerable reformulation work and cost.

### **Food Safety, Waste etc.**

There are very real fears in the industry about the effects on shelf-life, waste and food safety that reductions in calories could cause as a result of the proposed targets.

Our industry has been working with suppliers for several years to reduce salt, sugar and fat levels in ingredients. For example, reduced fat mayonnaises are now widely used across the industry and salt in bacon has been reduced to levels they can safely go without compromising microbiological safety. Going further will be extremely difficult.

Further reductions in these areas could also have food safety and shelf-life/waste implications.

### **Meal Deals**

The original target set by PHE for meal deals of 600 calories is unrealistic – particularly given that PHE is suggesting a maximum calorie level for sandwiches at 550 calories. Even at 450

calories this would be extremely difficult to achieve, given that such meal deals generally include a drink and another snack item.

### **Small/Micro Businesses**

Over 40% of High Street sandwich retailers fall into the small/micro category and, as such, are a major factor in the competitiveness of the market. These are the main competitors of most chains and other retailers.

It is important for maintaining a fair balance in the market that these businesses are given the support they need to provide calorie information in the same way as chains and the retail sector do. This will be important in enabling their businesses to compete if consumers start to respond to calorie data.

In order to allow these businesses to do this, the Government/PHE needs to provide an on-line calculator where operators can put in their ingredients to create a 'typical' calorie figure. At the same time support needs to be provided for these business in showing them how to calculate the data, possibly via EHOs, and Trading Standards need to accept the tolerances needed to make this viable.

At least a two year transition will be needed to achieve this.

### **400:600:600**

Earlier in 2018 PHE promoted the 400:600:600 message. As part of encouraging consumers to manage their diets more effectively. In our view, this should be maintained as a part of an on-going public awareness campaign. Businesses could then support the message on pack and in marketing.

However, if this is to happen, businesses need to know that it will be supported on an on-going basis and not just intermittently.

When the original message was put out some businesses picked this up and planned to support it but dropped the idea when they discovered that the Government/PHE was not going to support it on an on-going basis.

This is an area where Government/PHE could work in partnership with business to get the message across to consumers, but businesses need the assurance that it will be sufficiently and properly supported.

We would welcome meeting with you to discuss these points and agree final targets.

Yours sincerely

