

Food reformulation and product innovation

POSITION PAPER



European
Snacks
Association

The EU Farm to Fork (F2F) Strategy, which is at the heart of the European Green Deal, aims at making food systems fair, healthy and environmentally-friendly. In this context, the high prevalence of (childhood) obesity and other noncommunicable diseases in Europe is of serious concern and food and drink manufacturers have already taken their responsibilities in contributing to address this challenge.

Finding and implementing solutions to this highly complex and multi-factorial health and wellbeing issue (e.g. physical activity levels, age, overall health, dietary preferences, etc.) requires a whole of society effort and multistakeholder collaboration.

National governments and food business operators (including industry, retail, catering, bars and restaurants, etc.) have a joint interest and responsibility in ensuring that consumers have access to a wide range of food and drinks that help them to achieve a healthy and balanced diet.

The Farm to Fork Strategy sets out a number of measures to make that happen, including launching initiatives to stimulate food reformulation. Product formulation and innovation are important means, although not the only ones, to enhance the nutritional composition of products, for example by reducing levels of salt, saturated fat and calories; by adding fibre, proteins, vitamins and minerals; or by adjusting portion sizes, amongst others.

ESA members have a long-lasting involvement in the nutrition and health debate, at both national and European level, with a track record of successful reformulation efforts. Committed to act, we are supportive of a strengthened approach to better and smarter regulation at EU level in which multi-stakeholder actions and self-regulation come in useful.

Building on this experience, the European Snacks Association is looking forward to sharing its recipe for successful reformulation initiatives.

ESA supports the Commission's ambition to further stimulate reformulation and would like to share the following recommendations for a proportionate, fair, evidence-based but also more effective strategy:

Summary of our key recommendations

- 1 Involving all concerned sectors to ensure a balanced, goal-oriented and transparent process.
- 2 Avoiding discriminatory interventions such as setting maximum limits for certain nutrients.
- 3 Using robust methodology and data for setting realistic and balanced targets and ensuring proper monitoring and reporting of reformulation efforts.
- 4 Considering past reformulation efforts/ achievements.
- 5 Considering the different barriers to reformulation for each product category.
- 6 Considering actual contribution of food and drink products to nutrient intake in order to optimise the potential health outcome.
- 7 Allocating sufficient transitional periods for manufacturers to meet targets.

1 A sector with a strong history in reformulation and product innovation

The European savoury snacks industry listens to the preferences of the millions of consumers who enjoy our products every day. Our consumers demand safe and great tasting snacks and treats, excellent value for money, striving for improved nutritional content and of course the highest-quality ingredients and finished products.

Responding to health concerns around consumers' diets, savoury snacks manufacturers have worked very hard over the last decades to bring these great flavours and tastes to market whilst ensuring lower overall salt levels, reducing saturated fat and also total fat content in products. To meet these expectations manufacturers continually invest millions of Euros into the reformulation of existing and development of new products, ingredients and manufacturing methods.

The sector has a long history of participation in reformulation programmes across the EU. The Member States survey unveiled in 2016 by the Slovak Presidency titled *"Best practices for Member States in food reformulation"*¹ confirms that the savoury snacks sector has been successfully involved in reformulation programmes in the past decades, notably on salt reduction. This demonstrates the commitment of the sector, its sense of responsibility and its ability to collaborate with authorities to address current challenges on nutrition and health.

The different EU Framework for National Initiatives on Selected Nutrients² as well as the dynamic generated by the EU Platform on Diet, Physical

Activity and Health - to which ESA was an active member since its inception³ more than a decade ago - has been instrumental in fostering voluntary activities, notably on food reformulation.

There are many examples of manufacturers' achievements in reformulating popular mainstream products, as well as developing the market of healthier options, for instance using protein-rich pulses like lentils.

FOCUS ON SALT REDUCTION

Savoury snacks taste salty because the salt is applied to the surface; whilst other everyday foods often contain higher amounts but taste less salty as the salt is distributed throughout the foodstuff.

Savoury snack manufacturers have responded quickly to changing consumer preferences with respect to salt and many ranges of lower-salt and no-salt products are now available; allowing consumers to make the choices best suited to their individual lifestyles.



France

Between 2009 and 2013 (latest data available), significant sodium reduction was achieved for coated nuts (-21%), breadsticks and pastry snacks (-13%) and puffed snacks (-9%). A reduction of 13% in salt in potato crisps was also reported between 2009 and 2011⁴.



UK

Savoury snack manufacturers voluntarily reduced the amount of salt in crisps by over 53% between 1990 and 2019. Latest Public Health England progress report on salt reduction confirms that the sector has again met the average salt reformulation targets⁵.

¹ https://ec.europa.eu/health/sites/health/files/nutrition_physical_activity/docs/2016euskpresidency_bestpractices_en.pdf

² https://ec.europa.eu/health/sites/health/files/nutrition_physical_activity/docs/euframework_national_nutrients_en.pdf

³ ESA held three core commitments with the EU Platform for Action on Diet, Physical Activity and Health: improving the products' nutritional composition; helping consumers making informed choices and advertising responsibly, notably towards children.

⁴ https://oqali.fr/content/download/3444/33031/file/OQALI%202016_Synthese%20evolution%20secteur%20Aperitifs%20a%20croquer.pdf

⁵ <https://www.gov.uk/government/publications/salt-targets-2017-second-progress-report>



Italy

Between 2010 and 2017, 19% reduction of salt in potato crisps and 10% reduction overall for savoury snacks (including snack nuts) between 2013 and 2017. 35% reduction on crackers between 2008 and 2017⁶.



The Netherlands

The most recent governmental reformulation programme (ended in 2018) showed that within the savoury snacks sector, an average of 74% of the products meet the agreement⁷.



Ireland

Between 2005 and 2012⁸, 38% reduction in salt for savoury snacks (incl. crisps, chipped, fried & roasted potatoes, nuts & seeds, herbs & spices, savoury snacks).



Spain

Between 2005 and 2016, savoury snack manufacturers voluntarily reduced 30% of salt in potato crisps and 23% of salt for savoury snacks. Additionally, in 2017 savoury snacks manufacturers joined the governmental reformulation programme which implied additional commitments: reduction of the sectorial median of salt content (further 13,8% in potato crisps and 5% in savoury snacks)⁹.

FOCUS ON SATURATED FAT REDUCTION

Over the past decade, manufacturers have invested into new technologies (e.g. equipment and cooking/baking techniques) and ingredients (vegetable oils with more unsaturated fats, e.g. shifting to sunflower or rapeseed oils) to reduce the level of saturated fat in savoury snacks, leading to up to 60% less saturated fat in the final product. Most recent data in Italy showed a drop of 44% in saturated fat content for potato crisps between 2008 and 2018.

2 When product reformulation reaches its limits

Product reformulation cannot be the silver bullet for entirely tackling nutrition and health issues, partly because there are profound limitations. These were highlighted in 2016 by the Dutch Presidency in its Roadmap for Action on Food Improvement⁷, which clarify that:

“To maintain consumer acceptance” a gradual reduction of nutrients is required and that **“technological possibilities, food safety and sustainability goals can influence the possible results of food product improvement”**

This is especially valid for the savoury snacks sector which has a long experience of reformulation and product innovation. Consumer expectation has to be considered as well as the realities of consumer behavior. Change cannot happen overnight and time is needed to introduce a new recipe (R&D, technology) onto the market and to get it known by the consumer.

But more importantly, the sector is reaching its technological limits and further reducing salt for instance might mean that some products simply cannot be manufactured anymore (e.g. baked or extruded products) or organoleptic properties might alter so much that consumers will stop purchasing products.

Thanks to continuous improvements of product recipes over the past decades, some products have already reached the limits of what can be realistically achieved.

⁶ http://www.salute.gov.it/imgs/C_17_pubblicazioni_2426_ulterioriallegati_ultioreallegato_0_alleg.pdf

⁷ <https://www.rivm.nl/bibliotheek/rapporten/2019-0032.pdf>

⁸ www.fdi.ie/Sectors/FDII/FDII.nsf/vPages/Publications~fdii-creme-global-reformulation-report?OpenDocument

⁹ https://www.boe.es/diario_boe/txt.php?id=BOE-A-2019-3634

MAIN BARRIERS TO PRODUCT FORMULATION AND INNOVATION



Food safety
(e.g. preservation, shelf-life)



Consumer acceptance
(e.g. taste, texture, price)



Technological constraints
(e.g. production, function – salt needed for expansion process)



Legal frameworks
(e.g. limited possibilities to communicate about gradual step-changes e.g. through nutrition claims)



Conflicting objectives
(e.g. food wastage)



Contractual arrangements between retailers and manufacturers for private label products

3 Implementing efficient food reformulation and product innovation strategies

We believe that different strategies can prove effective in stimulating reformulation and driving food innovation forward. As demonstrated above, **self- and co-regulation approaches are efficient tools to incentivise reformulation and product innovation** since it usually allows for the setting of realistic objectives (both in terms of nutrient reduction and timing), considering manufacturers constraints, especially Small and Medium Enterprises (SMEs).

We also believe that in order to be fully effective, with potentially measurable impact on consumers' intake, reformulation initiatives should consider actual products' contribution to salt, sugar, fat or calorie intake. **The savoury snacks sector is, in the present case, a minor contributor to European diets.** According to the latest figures in the EU¹⁰, only 3% of the average overall dietary intake of salt derives from savoury snacks (less than 2% in the UK, and 1% in France and Spain). Savoury snacks are not among the top 5 largest contributors to dietary salt intake which includes other common everyday foods,

such as bread, meats and cheese. Figures are similar for saturated fat intake coming from savoury snacks. **Overall, across the EU, the average intake of energy, salt, fat and saturated fat through the consumption of savoury snacks is very low, ranging between 2-4% of overall intake, depending on the nutrient and the country.**

It should also be acknowledged that there are no unhealthy foods per se, but only unbalanced diets. Considering the amount, combination and frequency of food intake is a fundamental parameter to maintain a healthy and balanced diet. Savoury snacks are typically not consumed every day and a recent publication from the European Office of the World Health Organisation (WHO Europe) found that 94.8% of children do not eat savoury snacks on a daily basis and close to 2/3 never or rarely eat savoury snacks throughout the week¹¹.

Stimulating the addition of nutrients contributing to a healthy diet should not be overlooked in product reformulation strategies but rather complement reduction of nutrients of public health interest. Savoury snacks manufacturers increasingly include grains, fibre- and protein-rich ingredients to improve the nutritional composition of the products and can further contribute to the uptake of these nutrients in the European diet.

¹⁰ Euromonitor Nutrition Passport 2019

¹¹ "How healthy are children's eating habits? – WHO/Europe surveillance results", 2020. <https://www.mdpi.com/2072-6643/12/8/2481/htm>

We are therefore strongly concerned by the European Commission's proposal to set maximum levels of certain nutrients in certain foods as indicated in the F2F Strategy:

-  It could lead to the disappearance of consumers' favourite food (as well as some traditional foods) and seriously hamper food innovation in the long term.
-  This approach implies that no further reduction is needed for products which already meet the maximum limits and consequently discourage future reformulation efforts.
-  It may prevent new players/new products from emerging in the market even if the volumes sold are low and are having nearly zero impact on population intake of certain nutrients.
-  It therefore represents a strong barrier to market access, especially for SMEs for both locally produced foods and imports.
-  It fails to inform about the actual reduction of the concerned nutrient across the category. Hence, positive impact on the overall intake in the population is difficult to predict.








Moreover, any unnecessary and unjustified regulatory intervention on food composition, such as setting maximum limits for certain nutrients, would pose serious questions in regard to the compatibility with the European Commission's "Better Regulation" approach as well as with EU trade and competition law.

Using other proven methods, such as the Sales Weighted Average (SWA) approach as applied in the UK¹², with realistic targets and timing, is probably the most interesting and effective one as it really captures what is happening on the market at consumer level and also allow for a better tracking of the nutrient intake impact on consumers.

In all cases, **any successful reformulation programmes must be based on accurate data and evidence** since it will form the basis for setting the ambition (targets, time) and ensure proper monitoring and reporting of reformulation efforts.

ESA supports the Commission's ambition to further stimulate reformulation and would like to share the following recommendations for a proportionate, fair but also more effective strategy:

Our recommendations

-  **A transparent process:** Involvement of concerned sectors is essential since they own the knowledge and can share detailed technical inputs about the feasibility of reduction in certain categories of products.
-  **Opting for the most efficient approach:** Setting maximum limits is the most discriminatory as it stifles innovation and can seriously impact the competitiveness of the European food and drink industry. We suggest working against sale weighted average.
-  **Robust methodology and data:** Indispensable prerequisite for setting realistic and fair targets as well as to ensure proper monitoring and reporting of reformulation efforts.
-  **Factor-in past efforts/achievements:** Necessary to discuss fair and realistic objectives for each product category. Benchmark (T₀) should be set between 5 to 10 years ago.
-  **Fully consider the different barriers to reformulation for each product category:** Because of the vast variety of products and associated reformulation challenges, defining well the different product segments is key (e.g. targets/time can't be the same for salty sticks than regular potato crisps).
-  **Consider actual contribution of food and drink categories to nutrient intake:** In order to concentrate efforts where it matters and optimise the potential health impact linked to reduced nutrient intake.
-  **Sufficient time must be allocated to manufacturers to reformulate their products:** Changes do not happen over-night and requires a lot of financial and human resources (esp. for SMEs).

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¹² New UK Roadmap for salt reduction: <https://www.gov.uk/government/publications/salt-reduction-targets-for-2024>