

1. MEAT PRODUCTS

General comments

| Company/Organisation | Comments |
|----------------------|--|
| Waitrose | Categories well defined. Welcomes the raised targets for ham, cured meats and bacon. |

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures |
|--|---|---|---|
| 1.1 Bacon - 3g salt or 1.4g sodium (maximum) (Note figure for salt incorrectly transposed - should read 3.5g) | | | |
| Asda | | Proposed target is not viable for all bacon types. Major implication on cost and taste. Suggests a higher target. | 4.5g salt (maximum) |
| Purac | | Trials have shown that salt can be reduced to 2.5% by using Purac product. | |
| PTF | Suggests that this category cover only standard injection cured bacon in which it is feasible to control ingoing salt. Rename category 'Bacon - includes all types of sliced bacon, i.e. back, streaky, smoked and unsmoked, except immersion cured and dry cured products'. | To take account of the variability in salt content of bacon as a result of the production process, and food safety considerations, the target should be higher and set as an average. | 3.5% salt (average) for injected cured bacon |
| BMPA | Suggests excluding immersion cured and dry cured bacons from this category as these make up a small proportion of the bacon market and ingoing salt cannot be controlled. | Suggests setting a maximum ingoing amount of sodium to achieve the proposed target as an average in the final product. To implement by the end of 2008. Target should be changed to an average. | |
| MLC | | Supports BMPA suggestion. | |
| BRC | | Proposed target is not viable for all bacon types, major implications for cost, taste and safety. 1.4g sodium equates to 3.4g salt not 3.0g. | |
| CASH | | Suggests that the salt content can be reduced far below the proposed target. | |
| 1.2 Ham/other cured meats - 2.5g salt or 1g sodium (maximum) | | | |
| Asda | Continental meats such as prosciutto, parma ham, pepperoni, salami & chorizo need to be exceptions. | Will aim to hit this target for hams but continental meats can be currently up to 5.5g salt/100g. | |
| M&S | | The proposed target would not give the necessary salt levels to prevent Botulinum. | 4.0g salt (maximum) |
| Tesco | | Queries whether this proposed target may compromise safety. | |
| Purac | | Comments that a dry cured ham product with 1.7% salt plus Purac ingredient is on the market. | |
| Nestle | | May not be appropriate for salami and other traditionally preserved meat products owing to safety concerns. | 1.5g sodium / 3.8g salt minimum for salamis and cured meat products |
| PTF | Suggests limiting this category to ham only; 'other cured meat' considered too general, e.g. salami which is uncooked and needs higher salt levels to ensure safety. Recommends that as products such as salami do not contribute significantly to salt intakes these should be exempt from targets. Suggests this category exclude immersion and dry-cured products. | Suggest target should be set as an average, due to similar technical issues as for bacon. | 2.5% salt (average) for standard cooked ham |

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures |
|---|---|---|---|
| BMPA | Suggests the category should cover ham and other cured meats with exemption for products made in a traditional processes such as immersion cured and dry cured products as ingoing salt cannot be controlled. | Suggests setting a maximum ingoing amount of sodium to achieve the proposed target as an average in the final product. To implement by the end of 2008. Target should be changed to an average. | |
| MLC | | Supports BMPA suggestion. | |
| BRC | | Raises safety concerns with the proposed target. Suggest an alternative. | 4.0g salt (maximum) |
| CASH | | Suggests that the salt content can be reduced far below the proposed target. | |
| 1.3 Sausages - 1.4g salt or 550mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target. | |
| Purac | | Fresh pork sausages with 0.6% sodium plus 2.5% Purac product about to be launched. | |
| BMPA | Split into two categories - 'Standard fresh and frozen sausages' and 'Other speciality sausages, e.g. cooked sausages'. | To implement by the end of 2008. | 600mg sodium (maximum) for 'Standard fresh and frozen sausages'; 700mg sodium (maximum) for 'Other speciality sausages' |
| MLC | Add a sub-category for speciality and cooked sausages. | Target not appropriate for cooked sausages, which have a higher salt content per 100g because of cooking losses of water and fat. Supports BMPA suggestion. | |
| CASH | | Proposed target is too high. Much lower targets than proposed can be achieved. | |
| 1.4 Meat Pies | | | |
| Unilever | | Reasonably confident that targets can be achieved. | |
| CASH | | Queries why lower salt levels cannot be achieved than that proposed although acknowledges that the ingredients may have an impact, e.g. cured meat filling. | |
| 1.4.1 Delicatessen, pork pies and sausage rolls - 1.3g salt or 500mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target. | |
| BMPA | | Proposed a higher target which would be possible to implement by end of June 2006. | 600mg sodium (max) |
| FDF | | Unachievable for a significant number of products. The current industry action plan commitment of 600mg will itself be challenging for a large proportion of products. | |
| 1.4.2 All other pies (including Cornish and other meat based pies) - 1.1g salt or 450mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target. | |
| Campbells | | Target is agreeable. | |
| BMPA | Split category into 'Cornish and meat-based pies', and 'Other meat based pastry products, including pies and slices'. | Target is appropriate for 'Other meat-based pastry products, including pies and slices'. To implement by the end of June 2006. A higher target is suggested for 'Cornish and meat-based pies'. | 500mg sodium (maximum) for 'Cornish and meat-based pies'. |

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures |
|--|--|---|--|
| MLC | Separate out 'Cornish and other meat-based pasties' and clarify remainder as 'Other meat based pastry products including pies and slices'. | Supports BMPA suggested target. | |
| FDF | | Proposed target is realistic for standard pies; but would present difficulties for traditional Cornish and meat-based pasties. The current industry action plan commitment of 500mg will itself be challenging. | |
| 1.5 Cooked uncured meats. Includes roast meat, sliced meat, pâté, meat spreads and similar - 1.8g salt or 700mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target. | |
| Purac | | Chicken roll containing less than 1.6% salt plus 2.5% Purac product on the market. | |
| BMPA | Split into 'Cooked, uncured meats' and 'Pates and meat spreads'. | New targets proposed for 'Cooked uncured meats' and 'Pates and meat spreads'. | 650mg sodium (maximum) for 'Cooked, uncured meats'; 800mg sodium (maximum) for 'Pates and meat spreads' |
| MLC | Split into 'Cooked, uncured meats' and 'Pates and meat spreads'. | Cooked sliced meats require a lower sodium content than pates and meat spreads. Supports BMPA suggested targets. | |
| CASH | | Comments on the addition of extra salt to these products querying why it is needed at all. | |
| 1.6 Burgers, grillsteaks etc. Includes beefburgers, hamburgers, pork/bacon burgers, chicken burgers, turkey burgers and all kebabs. Excludes canned burgers - 1.0g salt or 400mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target but queries whether it will be viable. | |
| Unilever | | Reasonably confident that target can be achieved. | |
| BMPA | Split into two categories - 'Standard fresh and frozen burgers and grillsteak products' and 'Other speciality and topped products'. | Suggests alternative targets. To implement by the end of 2008. | 400mg sodium (maximum) for 'Standard fresh and frozen burgers and grillsteak products'; 500mg sodium (maximum) for 'Other speciality and topped products' |
| MLC | Add a sub-category to cover speciality and topped burgers as these can have higher sodium levels. | Supports BMPA suggested targets. | |
| FDF | | Consider proposed target is achievable for a broad range of standard products; but for added value products, e.g. glazed, marinated, coated, a higher target is suggested. | 500mg sodium (maximum) for added value products |
| CASH | | Comments on the addition of extra salt to these products querying why it is needed at all. | |
| WSSC(1) | | All similar products should be reduced to this target. | |
| 1.7 Poultry (coated). Includes processed poultry products, such as nuggets, kiev, etc - 1g salt or 400mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target. | |
| Tesco | | The proposed maximum target could preclude the use of flavoured coatings. | |
| BMPA | Separate out 'Other speciality products'. | Target is appropriate for poultry (coated) - to implement by the end of 2008. A higher target suggested for 'Other speciality products'. | 650mg sodium (maximum) for 'Other speciality products' |
| FDF | | Achievable for a broad range of standard products. Suggests an alternative target for non-standard or recipe-style products. | 500mg sodium (maximum) for non-standard or recipe style products |

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures |
|--|---|--|---------------------|
| 1.8 Canned frankfurters, hotdogs, and burgers. Includes canned frankfurters, canned hotdogs and canned burgers only - 1.4g salt or 550mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target but queries whether it will be viable. Suggests a higher target. | 1.7g salt (maximum) |
| Campbells | | Target is sensible. | |
| Nestle | Category takes no account of chilled and ambient (not canned) frankfurter products - these differ owing to safety issues and should be included in 1.2 Ham/other cured meats. | | |
| BMPA | | Accepts target and suggests potential to implement by the end of 2008. | |
| MLC | | Target is acceptable but moving too quickly to this level could affect consumer acceptability. | |
| CASH | | Suggests that the target could be set lower. | |

2. BREAD

General Comments

| Company/Organisation | Comments |
|----------------------|--|
| RHM | Owing to the key role salt plays in bread manufacture we are now getting very close to palatability and functionality limits and feel that the targets set out are not realistically achievable. Supports the Federation of Bakers submission. It is worth noting that Hovis have previously launched three separate Lo-salt breads. All three options had extremely poor uptake by the consumer and as a result have had to be removed from the market place. |
| FoB | Salt levels in bread have been reduced by about 30% over the last 20 years and are reaching technical limits, the industry believes that a cautious, gradualist approach is the one most likely to yield positive results. Proposes an initiative to reduce average salt levels with a targeted 5% reduction within two years, to be repeated within a further two years subject to consumer acceptance. Believes that Subcategory 2.1 should be termed 'Bread and rolls' to include freshly baked products and consider definitions between Subcategories 2.2 and 2.3 to be arbitrary. Suggest one set of targets for all bread products of whatever type. Prefer an average target to a maximum though there could be a role for both. |
| FDF | Suggest one set of targets for all bread products of whatever type as suggested by the Federation of Bakers. |
| RCP | Bread is not mentioned in the lists of foods for which the FSA has plans! Since 10% of salt comes from bread, this is clearly an important point. |
| CASH | Bread should be a primary target due to the volume consumed. There is no need to add salt to bread and the salt reductions can be much larger than those envisaged. Gradual reduction of the salt content of bread has been achieved without consumer rejection and can continue to be achieved. CASH's view that these targets need to be reduced. |

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures suggested |
|---|------------------------|--|---|
| 2.1 Pre-packed bread and rolls. Includes pre-packed (pre-sliced), part-baked and freshly baked white, brown and wholemeal bread or rolls - 1g salt or 400mg sodium (maximum) | | | |
| Asda | | Asda will aim to hit this target. | |
| FoB | | Consider this target to be unattainable and suggest stepped reductions. A higher maximum target proposed and also will consider reducing the current average by 5% within two years and a potential further 5% by 2010 providing no adverse effects found. Proposal applies across all bread products. | 500mg sodium (maximum). Only sodium from salt is taken into account by the proposed alternative target. |
| FDF | | Although there are some products on the market at 350mg sodium, a maximum (or even an average) target of 400mg will be impossible to achieve without widespread processing problems. A higher target proposed to apply across all bread products. | 500mg sodium (maximum) |
| Nutrition Society | | The target for bread seems optimistic particularly given the increased popularity of French sticks where salt water is sprayed/brushed onto the dough to make it crisper during baking. | |
| 2.2 Speciality bread and rolls. Includes bagels, brioche, ciabatta, pitta, naan, chappattis and similar - 1.2g salt or 470mg sodium (maximum) | | | |
| Asda | | 1.2g needs to be an average. | 1.2g salt (average) |
| M&S | | This target should be achievable as a maximum for most products except those with added cheese. | |
| WSCC(1) | | Comments that the highest current level of 2.8g salt/100g is high and queries the reason for this level. | |
| 2.3 Morning goods. Includes crumpets, english muffins, scotch pancakes, croissants and similar - 1g salt or 400mg sodium (maximum) | | | |
| Asda | | 1g needs to be an average. | 1.0g salt (average) |

| | | | |
|----------|--|--|--|
| M&S | | This target should be achievable as a maximum for most products except those with added cheese and made with baking powder, i.e. cheese and Devon scones. | |
| Tesco | | This proposed maximum target could not be met for muffins. | |
| Waitrose | Croissants appear in this category and pastries (11.3). This category would be better. | | |
| BRC | | Products with added cheese and baking powder, e.g. cheese and Devon scones need to be given consideration as maximum targets for these will be difficult to achieve. | |
| | | | |

3. BREAKFAST CEREALS

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures |
|--|------------------------|--|------------------------|
| 3.1 Breakfast cereals - 0.8g salt or 300mg sodium (average) | | | |
| Asda | | Will aim to hit this target. | |
| ACFM | | This is a very substantial reduction compared to the 2003 figure of 450mg sodium and a start point in 1998 of 571mg. Suggests a higher target. | 350mg sodium (average) |
| Nutrition Society | | Comments that the target seems optimistic. | |
| CASH | | Agrees with proposed target (but quotes the proposed target as being 0.5g salt). | |

4. CHEESE

General Comments

| Company/Organisation | Comments |
|----------------------|---|
| Arla Foods | Agree that the categories and subcategories are appropriate. |
| BCB Dairy UK | Suggest alternative subcategories based on changing consumer preferences to mature cheeses with higher salt levels. Suggest categories as follows: 'Natural cheese' (subcategories 'Fresh cheese'; 'Mozzarella'; 'Mild pressed cheese (e.g. Cheddar, Cheshire, Lancashire)'; 'Maturing pressed cheese' or 'Pressed cheese for maturation (e.g. Cheddar, Leicester, Gloucester)'; 'Blue cheese') & 'Processed cheese' (subcategories 'Processed cheese spreads'; 'Processed cheese slices'; 'Processed cheese food - spreads, slices, strings'). An alternative suggestion for the last two subcategories of Processed cheese is 'Other processed cheese for retail market (e.g. slices, stings, etc) and 'Processed cheese slices for food service market'. |
| Dairy Council | The proposed targets within the category hard cheese are achievable in time. Adequate time must be allowed to reduce the salt content to ensure safety and acceptability when compared with imported products which will not have an altered salt profile. |
| PTF | Welcome the division of products into separate categories and the use of average targets rather than maximum. |
| BRC | Notes that there may be issues with salt reduction in cheese and is liaising with manufacturers in order to determine what level of reduction is possible. |
| Nutrition Society | There are issues concerning traditional recipes. Major reductions in the salt content of some cheeses would change the very nature of the cheese. Meddling with traditional foods in attempts to reduce salt intake is likely to attract adverse publicity from many food writers. |
| CASH | Modern cheese production now depends on the supply of pure cultures and this has considerably reduced the need for salt addition as a process control function. In terms of the expected flavour, provided reductions are done gradually very large reductions in salt concentration could be achieved. |

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures suggested |
|---|------------------------|--|-------------------------------|
| 4.1 Cheddar | | | |
| 4.1.1 Mild Cheddar and other milk cheeses (Cheshire, Lancashire, etc.) - 1.7g salt or 670mg sodium (average) | | | |
| 4.1.2 Mature Cheddar, Double Gloucester and Leicester cheeses - 1.95g salt or 750mg sodium (average) | | | |
| Asda | | Will support the levels major cheese manufacturers believe to be possible. | |
| M&S | | For mild Cheddar, if setting a maximum target lower fat cheeses more salt would be required to deliver the correct salt/moisture ratio. | 2.0g salt (maximum) |
| Arla Foods | | Consider proposed targets acceptable. | |
| BCB Dairy UK | | Proposed targets are stretching and in time may be achievable. | |
| PTF | | Consider proposed targets achievable; although the level for mild cheese may be a little low for mild cheese originally destined for maturation. Support British Cheese Board suggestion that mild cheddar be re-classified to 'mild and maturing pressed cheese'. | |

| 4.2 Processed cheese | | | |
|---|--|---|--|
| Asda | | Will support the levels major cheese manufacturers believe to be possible. | |
| Nutrition Society | | Targets seem suitable. | |
| CASH | | Processed cheeses present a different technical problem as they are largely a children's product and their relevance to the national diet should perhaps be questioned. | |
| 4.2.1 Cheese spreads - 2g salt or 800mg sodium (average) | | | |
| Kraft | | Consider this target to be achievable. Now close to the technical minimum that can be achieved. | |
| Dairy UK PTF | | These have different manufacturing processes and different compositions and characteristics. If a single target is to be set for all the products falling into this category, suggests a higher target. | 2.5g salt / 1000mg sodium (average) |
| 4.2.2 Other processed cheese (e.g. slices, strings, etc) - 2.9g salt or 1170mg sodium (average) | | | |
| Kraft | | Suggests a higher target to take account of the technical minimum of salt required to make processed cheese products and the significant reductions already achieved. | 3.0g salt (average) |
| Dairy UK PTF | Suggest separating out those products for retail and those for the foodservice sector to account for different requirements of firmness and melting characteristics. | Suggests higher targets. | 3.3g salt / 1300mg sodium (average) for retail; 3.8g salt / 1500mg sodium (average) for foodservice |
| FDF | | Suggests a target average of 1200mg sodium fits better the FSA rationale of a 10% reduction from the current 1300mg sodium. | 1200mg sodium |
| 4.3 Mozzarella (used in food products). Includes mozzarella products for food industry use only. Excludes fresh mozzarella sold in retail outlets - 1.8g salt or 700mg sodium (average) | | | |
| Asda | | Asda will aim to hit this target. | |
| Arla Foods | | Consider the proposed target acceptable. | |
| BCB | | Salt is not required for preservation purposes – it is there to add taste and that will be determined by customer preference. | |
| Dairy UK | | Proposed target is acceptable for low moisture product (often used as pizza topping). | |
| CASH | | Most on the market already contain far less salt than the target proposed. | |

| 4.4 "Fresh" cheeses. Includes cottage cheese, fromage frais and similar - 0.5g salt or 200mg sodium (average) | | | |
|--|---|---|---|
| Asda | | Asda will aim to hit this target. | |
| Tesco | Suggests a separate category for fromage frais. | Most sodium in fromage frais is naturally occurring in the milk limiting the chances of reduction. Suggests an alternative target. | 100mg sodium (average) for fromage frais |
| Kraft | Suggests an additional category of 'soft white cheese' to cover Philadelphia-type cheeses which are not suitable to this category. | Suggests a higher target for soft white cheese owing to consumer acceptability issues. | 1.0g salt (average) for soft white cheese |
| Arla Foods | | Consider the proposed target set acceptable. | |
| BCB | | Salt is not required for preservation purposes – it is there to add taste and that will be determined by customer preference. | |
| PTF | | Proposed target is achievable for unsalted/unflavoured fromage frais and cottage cheese. However, it would not be achievable for lightly salted and flavoured fresh cheeses. | |
| Dairy UK | Delete reference to fromage frais as no salt is added. Assumes this category to include cottage cheese, soft white cheese and cream cheese. | Considers the category to be broad and therefore suggests a higher target. | 1.0g salt / 400mg sodium (average) |
| 4.5 Blue cheese. UK produced blue cheeses only - 1.9g salt or 750mg sodium (average) | | | |
| Asda | | Based on current levels the proposed target is potentially not viable. Will support the levels major cheese manufacturers believe to be possible. | |
| M&S | | Some cheeses, e.g. Roquefort, would be unsafe at this level. To set a maximum target, testing modelling would be required. | |
| BCB Dairy Council PTF Dairy UK | | Proposed target is not achievable. Stilton has amongst the lowest level of salt of any blue cheese with levels typically of just over 2%. Recent reduction work has suggested that it is very difficult to get salt levels of mature Stilton consistently down to the level shown in McCance & Widdowson of 1.97% salt. It is too early to establish what would be an appropriate level. Suggest that no target is set for blue cheese at this stage. | |
| PTF | | In addition to the above comment, PTF also suggested that this target would not be achievable for imported blue cheeses and salt reduction options may be limited for registered protected cheeses. | |

5. FAT SPREADS

General comments

| Company/Organisation | Comments |
|----------------------|---|
| Waitrose | Need to clarify why butter targets are set as averages yet margarine and fat spreads set as a maximum. |
| Unilever | Considers further reductions than those already achieved difficult without affecting consumer preferences. |
| CASH | Suggests far lower targets be set for this category. |
| Dairy Council | Targets for salted and lightly salted butter are very close, and if further reductions are introduced, the distinction between butters may be lost. |

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures |
|---|--|---|-------------------------------------|
| 5.1 Butter | | | |
| Dairy UK | Suggests that butter be placed in its own category distinct from fat spreads. This is required for two reasons: butter does not contain preservatives; and in general the higher the fat content the more salt is required (the fat content of butter has a minimum level set in legislation). | Suggests that butter be exempt from targets as salt content is clearly labelled and butter consumption is reducing. | |
| 5.1.1 Welsh butter. Includes all Welsh butters only - 3.8g salt or 1.5g sodium (average) | | | |
| Asda | | Will aim to hit this target. | |
| PTF | Suggests category is extended to cover other traditional regional butters where higher salt levels needed to maintain traditional characteristics and flavour profiles. | Suggests that a lower target is achievable. | 3.4% salt |
| Dairy UK | Should be renamed as 'Regional high-salted butters'. | Suggests a lower target since this is still significantly higher than the salt content of standard salted butter. | 3.4g salt / 1360mg sodium (average) |
| CASH | | Considers the higher salt target for this category to be a mistake or a joke. | |

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures |
|---|--|---|------------------------------------|
| 5.1.2 Salted butter. Includes all other 'standard' salted butter - 1.4g salt or 550mg sodium (average) | | | |
| Asda | | Will aim to hit this target. | |
| BRC M&S | | Would not taste significantly different from lightly salted butter. Levels of portion size should be taken into account rather than per 100g. | |
| Arla Foods | | Suggests a higher target which is distinguishable from lightly salted butter in consumer acceptance tests. | 1.6g salt (average) |
| PTF | | Supports the Dairy UK position. | |
| Dairy UK | | Suggests a higher target that represents a reduction from current levels while maintaining a taste difference compared to lightly salted butter. | 1.8g salt / 720mg sodium (average) |
| 5.1.3 Lightly salted butter. Includes all lightly salted butters (made using different processes to that used for salted butters at 5.1.2) eg Lurpak - 1.2g salt or 470mg sodium (average) | | | |
| Asda | | Will aim to hit this target. | |
| Arla Foods | | Already achieved in own product but recommends no further reduction to maintain the differential in taste between lightly salted and unsalted. | |
| PTF | | Supports the Dairy UK position. | |
| Dairy UK | | Suggests a higher target for consumer choice. | 1.3g salt / 520mg sodium (average) |
| 5.1.4 Unsalted butter. Includes all unsalted butters - 0.1g salt or 40mg sodium (average) | | | |
| Asda | | Will aim to hit this target. | |
| Arla Foods | | Already achieved in own product . | |
| Dairy UK | | Accept this target, which represents levels naturally present. | |
| 5.2 Margarines/other spreads - 1.4g salt or 550mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target. | |
| MSA | Accepts a single category for these foods. | Suggests target will be difficult to achieve and retain consumer acceptance, particularly where the comparison with butter plays an important role. If reductions are made in excess of those made in butter consumers will switch to butter. Suggests a higher average target. | 600mg sodium (average) |

6. BAKED BEANS

General Comments

| Company/Organisation | Comments |
|----------------------|---|
| CASH | There is no technical reason why the salt level of baked beans cannot be reduced further, particularly as this is a product primarily focussed on children. |

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures suggested |
|--|--|--|---|
| 6.1 Baked beans in tomato sauce without accompaniments - 0.75g salt or 300mg sodium (maximum) | | | |
| Asda | | Will hit this target. | |
| Premier Foods | Reduced Sugar / Reduced Salt Healthy Baked Beans should be a separate category as they have lower salt levels and added sweetener. | Achievable for standard baked beans. | |
| 6.2 Baked beans in tomato sauce with accompaniments. Includes baked beans with sausages, meatballs, other meats and cheese - 0.75g salt or 300mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target, but concerned that in lower salt sausages, if the sodium level is below 1%, this can cause breakdown of the sausages during processing. | |
| Waitrose | | Urge for a higher target for this category owing to the accompaniments. | |
| Premier Foods | | Comments on the same target applying to both standard baked beans and those with accompaniments, which are likely to be higher in sodium. Cites technical difficulties in lowering sodium for beans with sausages. Have been advised that sausages with less than circa 1% salt will fall apart. | 400mg sodium (maximum) for beans with sausages; 400mg sodium (average) for beans with accompaniments |
| Heinz | | Comments on the same target applying to both standard baked beans and those with accompaniments, which are likely to be higher in sodium. Suggests a higher target. | 0.875g salt / 350mg sodium (maximum) |

7. READY MEALS

General Comments

| Company/Organisation | Comments |
|----------------------|---|
| Unilever | Reasonably confident that these targets can be achieved. |
| Greencore | Targets potentially achievable depending on ingredients. |
| Heinz | Some of the targets may take some time to achieve, especially for healthy eating products where sodium levels are already at the lower end of the scale. |
| BMPA | Suggests recategorising to 'Fresh and Frozen ready meals' and 'Other meat based ready meals and meal centres' to cover canned products. Cannot comment on suggested target for the fresh and frozen sectors. Suggests a target of 400mg sodium (maximum) for 'Other meat based ready meals and meal centres'. |
| CASH | Proposed targets are far too high, particularly as they apply to a whole meal. |

Category and target specific comments

| Company/Organisation | Comments on category | Comments on target | Alternative figures |
|---|---|--|------------------------------------|
| 7.1 Chinese/Thai/Indian ready meals. Includes all Chinese, Thai and Indian ready meals with accompaniment (potato, rice, noodles etc) e.g. sweet and sour chicken with rice, thai green curry with noodles, chicken tikka massala with rice etc - 0.8g salt or 300mg sodium (average) | | | |
| Asda | Assumes this category excludes meal deals which also include starter snacks, e.g. bhajis/samosas and popadoms/crackers. Comments that it is difficult to reduce fat/salt further without impacting on the quality or authenticity of the product. The salt levels for frozen meals in this category has been reduced to hit the target. | Will aim to hit this target. | |
| FDF | Suggests combining meat based ready meals with meat based versions of 7.3 with an appropriate average target to take account of impact on flavour that salt reduction in traditional meals may have. | | |
| 7.2 Chinese/Thai/Indian meal centres. Includes all Chinese, Thai and Indian meal centres without accompaniment (potato, rice, noodles etc) e.g. sweet and sour chicken, thai green curry, chicken tikka massala, etc - 1.0g salt or 400mg sodium (average) | | | |
| Asda | Agrees that specific products (e.g Teriyaki) will have to be exceptions. | Will aim to hit this target. | |
| Premier Foods | | Achievable for meal centres over time. | |
| FDF | Meat based meal centres within this category and 7.4 could be combined with an appropriate average target to take account of seasoning profiles. | | |
| 7.3 Italian/traditional/other ready meals. Includes all Italian, traditional and other ready meals with accompaniment (potato, rice, noodles etc) not covered in 7.1 e.g. lasagne, chilli con carne with rice, coq au vin with potato, cottage pie - 0.6g salt or 250mg sodium (average) | | | |
| Asda | | Will aim to hit this target. Some products within this range will need to be higher salt than others due to their expected taste and ingredients. | |
| FDF | See comment for 7.1 | | |
| WSSC(1) | | Supports this target. | |
| 7.4 Italian/traditional/other meal centres. Includes all Italian, traditional and other ready meals without accompaniment (potato, rice, noodles etc) not covered in 7.1 e.g. chilli con carne, coq au vin, beef stew - 0.8g salt or 300mg sodium (average) | | | |
| Asda | | Will aim to hit this target, but some products will need to be higher salt than others due to their expected taste and ingredients. | |
| Premier Foods | | Cannot see logic of a lower target than for 7.2 as this sub-category has a diverse range of products within it. Suggests both categories are merged with the target the same as 7.2. | 1.0g salt / 400mg sodium (average) |
| FDF | See comment for 7.2 | | |

| Company/Organisation | Comments on category | Comments on target | Alternative figures |
|----------------------|----------------------|--------------------|---------------------|
| | | | |

8. SOUP

General Comments

| Company/Organisation | Comments |
|----------------------|---|
| Heinz | Considerable reformulation to reduce salt levels has already been achieved. Consumer acceptance is already diminished for soups at salt levels only 5-10% greater than the suggested target. |
| FDF | Recommends this category includes an additional sub-category for condensed soups. This should take into account that, like dried soups, the product is not consumed as sold. Also comments that the proposed targets are still approx 25% lower than current levels even when taking into account salt reduction work done so far. |
| FDF-Project Neptune | Considers the soup targets as unreasonable given the tremendous work undertaken and the reductions already achieved. Lists the current Project Neptune salt levels for soups and the reductions required to achieve the proposed targets. Cites the following reasons why the proposed targets are not achievable: microbiological concerns, consumer acceptance issues, minimum salt levels have already been identified for some products, unwelcome knock-on effects on fill weight, increase in herb/spice and flavouring usage. Suggests that a further reduction of 10%, on top of the original 30% reduction commitment by the group, may be possible. Suggests that higher average figures should be set for each of the categories wet/dry/condensed soups, to take account of the wide variability of products within each category |
| CASH | No reason why the salt concentration cannot be reduced much further than the proposed targets. The industry suggestion that 0.5g salt/100g would not pass consumer acceptability is clearly untrue. |

Category and target specific comments

| Company/Organisation | Comment on categories | Comments on targets | Alternative figures suggested |
|---|-----------------------|---|----------------------------------|
| 8.1 Dried soups (as consumed). Includes all soups in a cup and other dried soups as consumed, i.e. once rehydrated - 0.7g salt or 280mg sodium (average) | | | |
| Asda | | Will aim to hit this target but it may need to be reviewed if not achievable. | |
| Nestle | | Technically possible to reduce current salt levels further but have reached a threshold of consumer acceptability. Suggests a higher target. | 1g salt / 400mg sodium (maximum) |
| WSCC(1) | | Suggests a choice of lower salt varieties may be used to test consumer acceptability. | |
| 8.2 "Wet" soups. Includes all canned, ambient packed and fresh (chilled) soups - 0.6g salt or 250mg sodium (average) | | | |
| Asda | | Will aim to hit this target. | |
| Premier Foods | | Should acknowledge salt reductions already achieved by Project Neptune and not expect a further large reduction. Suggest using the projected 'end of Neptune 3 year' figures and then target a further circa 10% reduction (as an average). | |
| Greencore | | Potentially achievable target for chilled soups. Need to focus on key ingredients to meet target across all ranges. | |
| WSCC(1) | | Comments that salt content of wet soups could be gradually reduced. | |

9. PIZZA

General comments

| Company/Organisation | Comments |
|----------------------|--|
| PAPA | Achieving these targets across a wide range of products may not always be practicable owing to ingredients used and vulnerability of market to imported ready prepared products and ingredients. Suggest that the targets be averages except for products making healthy claims. On this basis, the targets would be acceptable. |

Category and target specific comments

| Company/ Organisation | Comments on categories | Comments on targets | Alternative figures |
|---|------------------------|--|---------------------|
| 9.1 Pizzas with higher salt toppings e.g. cured meat, olives, anchovies, prawns and “Cheese Feast” or similar toppings - 1.2g salt or 470mg sodium (average) | | | |
| Asda | | Will aim to hit this target, but 1.3g may be more realistic. | 1.3g salt (average) |
| M&S | | Achievable as an average but the maximum would need to be set higher to allow for some of the high salt fillings used as toppings. | 2.9g salt (maximum) |
| FDF | | Proposed target is realistic. | |
| CASH | | The toppings with high salt content should have their salt levels reduced. Proposed target should be lowered. | |
| 9.2 Pizzas without high salt toppings e.g. chicken, vegetables, etc - 1.0g salt or 400mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target. | |
| FDF | | For consistency propose target should be an average. | |

10. CRISPS AND SAVOURY SNACKS

General Comments

| Company/Organisation | Comments |
|----------------------|--|
| United Biscuits | Happy with the subdivisions for this category. |
| PepsiCo | Pleased to see that the proposed targets reflect the technical constraints, such as the role sodium salts play in expansion of pelleted products, and the difficulty in reducing sodium levels in salt and vinegar flavour products. However, all of the proposed targets are highly aspirational. |
| SNACMA | Welcome the suggested subcategories and suggests alternative targets based on averages (not maximums). Comments that the sales of potato crisps and extruded snacks account for 80% of all this category's sales so a 10% salt reduction in these will yield the most impact. The other two sub-categories are a more difficult challenge. |
| BDA | Suggests the need for a target for nut products such as roasted and dry roasted; and Asian snacks such as Bombay mix. |
| CASH | There is no technical reason why pelleted or extruded snack products should require a higher salt content than non-extruded products. The salt content of these snack products relies entirely on their historical taste profile and habituation. |
| Tesco | Salt is an intrinsic part of the product. These targets may cause issues in terms of quality and acceptance and will need higher limits. |

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures suggested |
|--|--|--|---|
| 10.1 Standard potato crisps. All standard potato crisps, all flavours except salt and vinegar - 1.5g salt or 600mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target. | |
| M&S | | Difficult to achieve on some products due to the different seasonings used. | 1.5g salt (average) and 2g salt (maximum) |
| United Biscuits | | Supports a higher average target owing to the current sodium levels in this type of product. | 800mg sodium (average) |
| BRC | | Difficult to achieve on some products due to the different seasonings used. | |
| SNACMA | Clarifies that this category refers to the vast majority of crisps consumed but does not include the smaller volumes of speciality crisps designed for the adult market. | The targets proposed will be tough to achieve as averages, let alone maxima. Agreed to work towards proposed target if set as an average, which equates to a 10% reduction. | |
| 10.2 Extruded snacks. All extruded snacks e.g. cheesy flavour corn puffs, potato hoops, all flavours except salt and vinegar - 2.8g salt or 1.1g sodium (maximum) | | | |
| Asda | | Will aim to hit this target. | |
| United Biscuits | | Agrees with the target if set as an average. | |
| FDF | | Need to take into account that there is a certain amount of sodium in the base ingredients of these products for technological functions (to help expansion). | |
| SNACMA | | For some products, salt is included in the base recipe where it has a primary functional role. The targets proposed will be tough to achieve as averages, let alone maxima. Agreed to work towards proposed target if set as an average, which equates to a 10% reduction. | |

10.3 Pelleted snacks. All snacks made from pellets e.g. prawn cocktail flavour shell, crispy bacon flavour corn snacks, curly cheese snacks; all flavours except salt and vinegar - 3.2g salt or 1.3g sodium (maximum)

| | | | |
|-----------------|--|---|-----------------------------------|
| Asda | | Will aim to hit this target. | |
| United Biscuits | | Agrees with the target if set as an average. | |
| FDF | | Need to take into account that there is a certain amount of sodium in the base ingredients of these products for technological functions (to help expansion). | |
| SNACMA | | Pelleted snacks can contain between 1 and 3% salt in the base. Replacement or reduction has so far proven impossible. Target is too low and does not give sufficient margin to allow for the necessary level of sodium in the flavour. The targets proposed will be tough to achieve as averages, let alone maxima. Suggests an alternative target which equates to a 5% reduction. | 3.4g salt / 1.4g sodium (average) |

10.4 Salt and vinegar products. All crisps, snacks etc salt and vinegar flavour only - 3.1g salt or 1.2g sodium (maximum)

| | | | |
|-----------------|--|---|-----------------------------------|
| Asda | | Will aim to hit this target but progress will depend on taste acceptability. | |
| United Biscuits | | Agrees with the target if set as an average. | |
| PepsiCo | | Target unlikely to be achieved. Suggest a higher target to account for products that are both pelleted/extruded and salt and vinegar flavour. Current products contain around 2g sodium per 100g. | |
| SNACMA | | Target needs to be raised considerably to account for products that are both pelleted/extruded and salt and vinegar flavoured. Suggests a higher target. | 4.3g salt / 1.7g sodium (average) |

11. BUNS, CAKES, PASTRIES AND FRUIT PIES

General Comments

| Company/Organisation | Comments |
|----------------------|--|
| Waitrose | Merge pastries (11.3) and fruit pies (11.4) as one category as they have the same target. |
| United Biscuits | Sub-categorise further to include muffins and flapjacks owing to different nature and production requirements of these products. Suggests targets of 500mg sodium (average) for muffins; 300mg sodium (average) for flapjacks. |
| Greencore | Whole category needs breaking down further to reflect the variety of products. Considerable difficulties in achieving these targets for certain types, e.g. chocolate cake. Reductions would also affect shelf life. |
| BCCCA | Suggest addition of 2 subcategories for 'Muffins' and 'Flapjacks'. Targets suggested: 1.25g salt / 500mg sodium (average) for 'Muffins'; 0.75g salt / 300mg sodium (average) for 'Flapjacks'. |
| 3663 | Queries whether a doughnut or a muffin should be considered as a cake or bun. |
| CASH | There is no reason why salt needs to be added to these and the targets could be set much lower. |

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures |
|---|--|---|------------------------------------|
| 11.1 Buns. Includes fruit buns, iced buns, scones etc - 0.5g salt or 200mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target. | |
| 11.2 Cakes. Includes all sponge cakes, cake bars, malt loaf etc - 0.6g salt or 250mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target. | |
| United Biscuits | | Suggests an alternative target. | 400mg sodium (average) |
| RHM | | Reductions have already been made. Now reaching limit as sodium present from ingredients other than salt. Suggests target should be an average. Supports BCCCA comments | |
| BCCCA | | Suggests a more realistic average target to reflect variation within the product range and reductions already made. | 1.0g salt / 400mg sodium (average) |
| 11.3 Pastries. All pastry-based sweet dishes, e.g. Danish pastries, except for fruit pies and croissants - 0.5g salt or 200mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target. | |
| United Biscuits | | Suggests an alternative target. | 400mg sodium (average) |
| Waitrose | Move croissants from this category to morning goods (2.3). | | |
| BCCCA | | Suggest that the proposed target is achievable as an average and suggests an alternative target. | 0.4g salt / 150mg sodium (average) |
| 11.4 Fruit pies. Includes all fruit pies made with pastry - 0.5g salt or 200mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target. | |
| United Biscuits | | Suggests an alternative target. | 400mg sodium (average) |
| BCCCA | | Suggest that the proposed target is achievable as an average and suggests an alternative target. | 0.4g salt / 150mg sodium (average) |

12. BOUGHT SANDWICHES

General Comments

| Company/Organisation | Comments |
|----------------------|--|
| BSA | Comments that it does not believe such a prescriptive approach (as setting targets) can be taken as sandwiches involve assembly of ingredients, some of which may naturally contain high salt levels. Some products will never achieve the targets, e.g. breakfast sandwich. Suggests an alternative where targets (maximum) apply to sandwiches labelled as 'healthy' or 'low in salt'. |
| CASH | These are an important source of salt in the diet and could be reduced much further. Weight of a packaged sandwich is normally approx 200g; the maximum value should not be more than 1.5g salt per serving whatever the subcategory. |

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures suggested |
|---|------------------------|---|-------------------------------|
| 12.1 With high salt fillings e.g. cured meat, olives, anchovies, prawns and mature/high salt cheese etc. - 1.3g salt or 500mg sodium (average) | | | |
| Asda | | Will aim to hit this target. | |
| Greencore | | Concerns about ability to meet this target across a range, particularly those containing naturally salty fillings. Comments that a lot of salt reduction recently undertaken for retailers. | |
| 12.2 Without high salt fillings e.g. chicken, vegetables, egg, etc. - 1g salt or 400mg sodium (average) | | | |
| Asda | | Will aim to hit this target. | |

13. TABLE SAUCES, RETAIL

General comments

| Company/Organisation | Comments |
|----------------------|--|
| RHM | Suggests targets should be averages owing to wide range of products. |
| Greencore | Targets very difficult to achieve for some sauces e.g. oriental types. |
| Heinz | Considers targets unachievable due to consumer acceptance issues. |
| FDI | Some existing products are significantly above the maximum targets proposed. FDI awaiting confirmation of whether targets can be achieved. |
| BDA | Queries whether Indian pickles are included in this category. |
| CASH | Salt content should be reduced slowly but could go much lower than the proposed targets. |

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures |
|--|------------------------|--|------------------------------------|
| 13.1 Tomato ketchup - 1.8g salt or 700mg sodium (maximum) | | | |
| Asda | | Suggests an alternative target to ensure optimum taste. | 2.3g salt (maximum) |
| Premier Foods | | Comments that current brand leader exceeds this target and that it should advise on the achievable target. | |
| Heinz | | Potential reduction of up to 10% added salt may be achievable but greater reductions will require more research. | |
| 13.2 Brown sauce. Includes all brown, BBQ, curry-flavoured etc. - 1.5g salt or 600mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target. | |
| Premier Foods | | Cites similar reformulation issues as with tomato ketchup. Suggests it would be sensible to have standardised targets for both categories 13.1 and 13.2. Additionally this target should be an average to take account of the range of products within the category. | 1.8g salt / 700mg sodium (average) |
| 13.3 Salad cream - 1.8g salt or 700mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target. | |
| Premier Foods | | Comments that current brand leader exceeds this target and that it should advise on the achievable target. | |
| 13.4.1 Mayonnaise (not reduced fat/calorie) - 1.5g salt or 600mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target. | |
| Unilever | | Reasonably confident that this target can be achieved (except for extra light version). | |
| 13.4.2 Mayonnaise (reduced fat/calorie) - 2.5g salt or 1g sodium (maximum) | | | |
| Asda | | Will aim to hit this target. | |
| 13.5 Salad dressing. Includes all oil and vinegar based dressings - 2.5g salt or 1g sodium (maximum) | | | |
| Asda | | Will aim to hit this target. | |
| Kraft | | Not achievable as a maximum as salt is needed for product stability. Suggests alternative target. | 2.3g salt (average) |

14. COOK-IN AND PASTA SAUCES

General Comments

| Company/Organisation | Comment |
|----------------------|--|
| Premier Foods | Should acknowledge reductions already achieved by Project Neptune and not expect a further large reduction. Suggest use projected 'end of Neptune 3 year' figures and then target a further circa 10% reduction from these (as average). |
| Nutrition Society | Expresses disappointment that the industry feels unable to meet the lower FSA Salt Model value. Given the relatively large amount of this type of product consumed in a meal this category, like that of soup, can make a very substantial contribution to intake. |
| FDF-Project Neptune | Cites the following difficulties in achieving the FSA's proposed figures: microbiological concerns, consumer acceptance issues, minimum salt levels have already been identified for some products, unwelcome knock-on effects on fill weight, increase in herb/spice and flavouring usage. Suggests that a further reduction of 10%, on top of the original 30% reduction commitment by the group, may be possible. Suggests that higher average figures should be set for each of the categories wet/dry sauces, to take account of the wide variability of products within each category. |
| CASH | Further information is required but there is no reason why the salt content of these products cannot be considerably reduced. |
| RHM | Notes that the same target has been set for ready meals and cook-in and pasta sauces. This does not take into account that sauces are a component within a meal and therefore will be diluted. Hence a higher target should be set. |

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures suggested |
|---|--|--|-------------------------------|
| 14.1 All cook in and pasta sauces (except pesto). Includes all cooking sauces, e.g. pasta sauce, curry, Mexican. Excludes thick varieties - 1.2g salt or 470mg sodium (average) | | | |
| Asda | | Will aim to hit this target. | |
| Greencore | | Sauces chilled: target potentially achievable, focus on key ingredients to meet targets across all ranges. Sauces ambient: very difficult to achieve on certain ranges notably (but not exclusively) oriental where salt comes from ingredients such as soy sauce, black beans. | |
| M&S | | May be difficult to achieve when using high salt ingredients such as olives, capers, cheese even if no salt is added to the recipe. Suggests an alternative maximum target. | 1.5g salt (maximum) |
| 14.2 Pesto and other thick sauces. Includes thick cooking sauces intended to be used in smaller quantities, e.g. pesto, stir fry sauces, etc. - 3g salt or 1.2g sodium (average) | | | |
| Asda | | Will aim to hit this target. | |
| Premier Foods | Proposes pesto either has its own category or, if it has insignificant dietary intake and influence, it is excluded totally from the category. | Target difficult to achieve without compromising quality as quality Pesto contains traditional Italian cheeses, which have protected compositional requirements. | |

15. BISCUITS

General comments

| Company/Organisation | Comments |
|----------------------|---|
| Waitrose | Would make sense to just have two groups - sweet biscuits and savoury biscuits as the targets are the same. |
| RHM | Suggests targets should be averages. |
| United Biscuits | Supports categories as proposed. |
| BCCCA | Supports categories as proposed. |
| CASH | Industry comments that the FSA Salt Model value for biscuits is unachievable is incorrect. |

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures |
|--|------------------------|--|-------------------------|
| 15.1 Sweet biscuits, unfilled. Includes all unfilled sweet biscuits - 0.7g salt or 280mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target. | |
| United Biscuits | | Sodium present in functional ingredients therefore suggests a higher average target. | 500mg sodium (average) |
| BCCCA | | Suggests a higher average target to reflect product range. | 500mg sodium (average) |
| 15.2 Sweet biscuits, filled. Includes all sweet biscuits with fillings e.g. fig rolls, custard creams etc - 0.7g salt or 280mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target. | |
| United Biscuits | | Target achievable if set as an average. | |
| BCCCA | | Suggests target is achievable as an average. | |
| 15.3 Savoury biscuits, unfilled . Includes all unfilled savoury biscuits - 1.3g salt or 500mg sodium (maximum) | | | |
| Asda | | Needs to be an average not maximum target. | |
| M&S | | Majority of products would achieve this level but there is a wide variation in recipes. Means some products would require a longer term reduction than 2010. | |
| United Biscuits | | Suggests higher average target as sodium present in functional ingredients. Also products are similar to bagged snacks which would fall under Crisps and Savoury Snacks so should have a similar target. | 1000mg sodium (average) |
| BCCCA | | Suggests a higher average target to reflect wide product range, e.g snack bags of crackers and savoury biscuits. | 1000mg sodium (average) |
| BRC | | Suggests the proposed target is too low due to wide variations of salt levels in this sub-category and should consider setting the proposed target as an average. | |
| 15.4 Savoury biscuits, filled. Includes all savoury biscuits with fillings - 1.3g salt or 500mg sodium (maximum) | | | |
| Asda | | Needs to be an average not maximum target. | |
| United Biscuits | | Suggests higher average target as sodium present in functional ingredients. | 700mg sodium (average) |
| BCCCA | | Suggests a higher average target to reflect wide product range, e.g snack bags of crackers and savoury biscuits. | 700mg sodium (average) |
| BRC | | Suggests the proposed target is too low due to wide variations of salt levels in this sub-category and should consider setting the proposed target as an average. | |

16. PASTA

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures suggested |
|---|--|--|--|
| 16.1 Pasta excluding ready meals. Includes dried, fresh, canned (including spaghetti hoops). Excludes stuffed pasta. Includes dried, fresh, frozen and canned noodles, except Pot Noodles and similar products - 0.5g salt or 200mg sodium (maximum) | | | |
| Asda | | Should be as for baked beans. | |
| Premier Foods | | Considers the target achievable for canned pasta. | |
| Campbells | Requests clarification as to whether 'pasta and sauce', a dried product which is hydrated, is included here or a ready meal? If pot noodles (and block/super noodles) are to be included in a separate category then higher targets may be needed. | | |
| Nestle | Suggests dried pasta is separated from canned pasta and filled pasta be included with pizza in 9.1 or 9.2 as appropriate. | Suggests alternative target for dried pasta. | 0.1g salt / 200mg sodium for dried pasta |
| Heinz | Further clarification needed on noodle products, e.g. is a packaged dried noodle cake with a seasoning sachet to be classed in the same way as a Pot Noodle type product? | Considers the target unachievable for dried noodle products as they are oriental-inspired and are richly seasoned by nature, also often include soy sauce. | |
| FDF | Requests clarification as to which category stuffed pasta appears. | Products sold in a dehydrated form (e.g. flavoured noodles), where the salt content per 100g may be much higher in the product as sold than as consumed, need to be taken into account. Suggests setting a target that reflects this variability or separating out dehydrated and hydrated products. | |
| CASH | | Dry pasta needs no added salt. | |
| WSCC(1) | Concerned at the exclusion of Pot Noodles. | | |

17. RICE

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures |
|---|--|---|--|
| 17.1 Rice. Includes flavoured dried rice, cooked rice, frozen cooked rice - 0.2g salt or 87mg sodium (maximum) | | | |
| Asda | | Suggests higher target. | 0.5g salt (maximum) |
| M&S | | Acceptable target for dried rice. Pouched rice would need a separate target as salt is added to enhance the flavour and would not be palatable to consumers at the suggested level. | |
| Tesco | | Could be hard to achieve - sodium is a natural variant. | |
| Campbells | Ask whether this category includes flavoured rice products? | Not achievable for highly flavoured rice products, such as dried savoury rice and savoury rice in a pouch. | |
| Westmill Foods | Suggest flavoured rice products separated out as its own category. | Target achievable for unflavoured rice products; not realistic for flavoured rice products and suggests an alternative. | 0.8g salt (average) for flavoured rice |
| The Rice Association | Suggests a separate category needed for cooked flavoured pouched rice as these are used as meal solutions not as accompaniments. | Agrees with proposed target for dry rice. Also appropriate for unflavoured pouched rice. Suggests an alternative average target for flavoured pouched rice. | 0.8g salt (average) for flavoured pouched rice |
| BRC | Suggests a separate category for pouched rice. | | |
| FDF | Comments that dehydrated products should be considered specifically as the salt content in the sold form will be higher than consumed per 100g. Suggests separate categories for dried flavoured rice and cooked flavoured rice. | Proposed target is not appropriate for flavoured pouched rice, which should be an average to reflect the variation within this category. | |
| CASH | | Proposed target should equal the sodium content of natural rice, cooked or uncooked. | |

18. OTHER CEREALS

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures suggested |
|---|---|---|-------------------------------|
| 18.1 Other cereals. Includes flour, bran, pappadums, Yorkshire pudding - 0.8g salt or 300mg sodium (maximum) | | | |
| Asda | | Suggests a higher target, which is likely to be more viable. | 1.0g salt (maximum) |
| Pataks | Suggest that owing to technical difficulties, the specialist nature and relatively low consumption, pappadums should be exempt. | Faced with a number of technical difficulties when reviewing reducing sodium in pappadums. Suggests that at present the lowest levels that can be achieved for its products are 1.4g sodium per 100g for ready to eat pappadums and 1.7g sodium per 100g for uncooked pappadums. Commits to further research and reductions where possible. | |
| CASH | | Need no added salt. | |

19. PROCESSED PUDDING PRODUCTS

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures |
|---|---|---|--|
| 19.1 Processed pudding products. Includes manufactured custard, jelly, instant dessert, rice pudding, trifle and cheesecake - 0.2g salt or 80mg sodium (maximum) | | | |
| Asda | | Only small reductions viable, if at all for these products - sponge style puddings can be 1.5g salt due to the sodium from baking powder. Cheesecake is typically closer to 0.5g. | |
| M&S | This category needs to be broken down further as it currently contains a wide range of puddings all based on very different ingredients. | Suggests alternative targets for category as it stands or suggests setting separate targets for different product types. | 0.2g salt (average) and 0.5g salt (maximum) |
| Tesco | Suggests splitting category into dry and wet with average targets. | Suggests alternative target. | 100mg sodium (average) 'as consumed' for dry puddings and 'as sold' for wet puddings |
| Waitrose | Cheesecake should be placed under fresh cheese (4.4) category to account for cream cheese component. Suggests sub-categorisation required to reflect range of products. | | |
| Premier Foods | Suggests splitting into 'Ready to eat desserts' and 'Dehydrated desserts'. | The targets should be as sold for ready-to-eat desserts and as ready to consume for dehydrated desserts per 100g made up. Suggests a higher average target owing to sources of sodium from milk and also gelling agents in the case of dehydrated desserts. | 0.25g salt / 100mg sodium (average) |
| RHM | | Cake style puddings unable to meet target, as they contain raising agents. Suggests targets should be averages. | |
| Heinz | Requests further clarification of this category and proposes a separate category for sponge puddings | Not achievable for sponge puddings. | |
| BRC | Needs to be broken down further to reflect wide range of puddings. | Only small reductions are viable if at all. Suggests alternative targets for category as it stands or suggests setting separate targets for different product types. | 0.2g salt (average) and 0.5g salt (maximum) |
| FDF | Comments that dehydrated products need to be considered specifically as salt in these products as sold will be higher than as consumed. | | |

20. QUICHE

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures suggested |
|--|---|--|---|
| 20.1 Quiche. Excludes flans - 0.6g salt or 250mg sodium (maximum) | | | |
| Asda | | Suggests a higher target to enable inclusion of saltier ingredients, e.g. bacon, continental meats. | 0.8g salt (maximum) |
| Waitrose | Where are flans if not here, would this category not suffice? | | |
| Northern Foods | Many contain high salt ingredients, e.g. bacon. Suggests splitting this category to 'Quiche with higher salt inclusions' and 'Quiche, other'. | Proposed target is acceptable for 'Quiche, other' and suggests a higher target for 'quiche with higher salt inclusions, e.g. cured meat' as these components are a key sodium contributor. | 1.0g salt / 400mg sodium (average) for 'Quiche with higher salt inclusions' |
| Greencore | | Difficult to achieve with salt contribution from both the pastry and filling. Suggests different targets are needed for quiches containing cured meats. | |
| FDF | | Strongly doubt that this target is achievable for quiches containing meat (e.g. bacon or ham). Recommends a higher target as for meat pies, which have similar sodium levels, reflecting the Industry Action Plan for Sodium Reduction in Meat Products. | 450mg sodium (maximum) |
| CASH | | This food category is unnecessarily high, particularly considering that consumers eat this as an accompaniment to a main meal. | |

21. OTHER PROCESSED EGG PRODUCTS

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures |
|--|------------------------|--|--|
| 21.1 Other processed egg products. Includes scotch eggs and meringues. Excludes quiches - 0.8g salt or 300mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target but exceptions are required for variants such as smoky bacon egg bites. | |
| FDF | | No comment on category as a whole but note that proposed target not achievable for scotch eggs. Suggests a higher target for this product. | 400mg sodium (maximum) for scotch eggs |
| CASH | | Proposed target needs to be reduced further. | |
| | | | |

22. CANNED FISH

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures suggested |
|--|--|---|---|
| 22.1 Canned fish. Includes fish canned in oil, brine and tomato sauce - 0.8g salt or 300mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target for most variants but it does not appear to be viable for sardines. Suggests a higher target for sardines. | 1.2g salt (maximum) for canned sardines |
| M&S | | Target is achievable with the exception of canned red salmon which has an industry standard level of 1.2g. | |
| Tesco | | This target could exclude the way in which some fish are caught and processed at sea. | |
| PTF | | Target not practicable for canned seafood, such as tuna, as salt levels in fish are largely determined by natural levels of salt found in seafood, and the variability is high. | |
| Seafish | | Suggests fish canned in brine needs a higher target to maintain quality. Lower levels could be set for fish canned in oil or sauces. | |
| FDF | Would benefit from sub-division, separating out those products canned in brine, from those canned in other media. Also note that brine is normally drained off before consumption so the salt intake is not as high as the content 'as purchased'. | | |
| CASH | | Need to be reduced further. | |

23. OTHER PROCESSED FISH

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures |
|--|------------------------|---|---------------------|
| 23.1 Other processed fish products. Includes dried and pickled fish, fish pates and pastes. Excludes canned fish, fish ready meals and meal centres, smoked fish and canned anchovies - 1.7g salt or 670mg sodium (maximum) | | | |
| Asda | | Will aim to hit this target. | |
| Seafish | | Raises concerns about the addition of salt (at the consumer's request) on takeaway fish and chips before serving. If this is considered 'as sold' how is this to be taken into account. | |
| | | | |

24. CANNED VEGETABLES

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures suggested |
|--|---|---|--|
| 24.1 Canned vegetables. Includes all canned vegetables and pulses - 0.13g salt or 50mg sodium (maximum) | | | |
| Asda | | Will hit this target. | |
| Premier Foods | Suggest a separate category for processed/ marrowfat/ mushy peas. | Achievable except for processed/marrowfat/mushy peas for which an alternative target is suggested. For these products, a certain amount of the covering liquor (sugar and salt solution) is absorbed by the products during manufacturing, and it is this that gives them their characteristic flavour. | 0.5g salt / 200mg sodium (maximum) for 'Processed, marrowfat and mushy peas' |
| Campbells | | Mushy peas and Bigga peas could not reduce salt to the target due to consumer acceptability issues. Suggest that these products be made a separate category or the proposed target be reviewed. | |
| FDF | Suggest separating out those products canned in brine, from those canned in other media. Also note that brine is normally drained off before consumption so the salt intake is not as high as the content 'as purchased'. | | |

25. PROCESSED VEGETABLE BASED PRODUCTS

Category and target specific comments

| Company/Organisation | Comments | Comments | Alternative figures |
|--|---|---|---------------------|
| 25.1 Processed vegetable based products. Includes vegetable burgers unless takeaway, vegetable pies, vegetarian sausages and soya-based products. Excludes baked beans, ready meals, canned vegetables, meal centres, takeaways - 0.7g salt or 280mg sodium (maximum) | | | |
| Asda | | For the vast majority 0.7g should be viable, but as burger-type products are higher in salt a more realistic maximum is suggested. | 0.8g salt (maximum) |
| Premier Foods | Suggests grouping meat-free versions of meat products within the defined meat categories, comparing like for like. | It is illogical for these to have lower target figures than their meat containing equivalents. Salt is required to be present in these products similar to their meat containing equivalents to aid binding, forming and processing. Targets should be the same as the meat containing equivalents. | |
| FDF | Suggests meat-free versions of meat products be recategorised to the relevant meat categories. However, FDF comments on targets for the proposed meat product categories relate specifically to their achievability for meat products alone. FDF is not currently in a position to comment on their applicability to non-meat products and is assessing the technical feasibility of proposed targets for these products. | | |

26. OTHER PROCESSED POTATO PRODUCTS

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures suggested |
|---|---|---|---|
| 26.1 Other processed potato products. Includes instant potato products, waffles, croquettes, oven chips and hash browns - 0.25g salt or 100mg sodium (maximum) | | | |
| Asda | | This is acceptable for e.g. plain chips, but flavoured/processed potato products currently average 0.9g. Suggests an alternative target for these. | 0.8g (possibly 0.7g) salt (maximum) for flavoured/processed potato products |
| M&S | Suggest that separate categories are needed for this group of products for a better definition of products covered within this category, e.g. mash. | | |
| Premier Foods | Suggests setting up a separate category for dehydrated potato products as these differ from other products listed. | Needs clarification that for dehydrated products, e.g. powdered/granular potato flakes, the target is for made up and ready to consume. The proposed target is highly unlikely to be achievable due to a lack of palatability. Suggests a higher target. Proposed target is suitable for other products. | 0.4g salt / 150mg sodium for dehydrated potato products |
| McCains PPA | Notes that this category does not include potato chips. | Consider this target to be unrealistic owing to reservations about the baseline figure used to develop the target for this category. According to McCain's research on current levels of salt in this category, a reduction of 62% would be required to meet the proposed target in addition to salt reductions already made. Suggests a higher target. | 230mg sodium (maximum) |
| FDF | | Products sold in a dehydrated form (e.g. instant mashed potato), where the salt content per 100g may be much higher in the product as sold than as consumed, need to be taken into account. Suggests setting a target that reflects this variability or separating out dehydrated and hydrated products. | |

27. BEVERAGES DRY WEIGHT

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures |
|--|---|---|--|
| 27.1 Beverages dry weight e.g. drinking chocolate, malted drinks. Excludes tea and coffee - 0.13g salt or 50mg sodium (maximum) | | | |
| Asda | | For instant malt drink the target needs to be higher to reflect the milk component. | 0.4g salt (maximum) |
| Premier Foods | | Suggests target presented as 'ready to consume per 100ml' to address anomaly of beverages containing dried milk powder vs those where milk is used in making up the product. Suggests higher average target for products 'as consumed'. | 0.25g salt / 100mg sodium (average) 'as consumed' |
| Kraft | | Not achievable owing to sodium sources other than salt, e.g. milk powder. Suggests higher maximum targets for chocolate and cappucino mixes 'as sold', and a higher average target for all products 'as served'. | 0.6g salt (maximum) for chocolate drinks 'as sold'; 1.5g salt (maximum) for cappucino 'as sold'; 0.6g salt (average) 'as served' |
| BCCCA | Should be 'Beverages, ready-to-consume'. | Suggests a higher average target to reflect sodium component of dried milk ingredient. | 0.25g salt / 100mg sodium (average) 'as consumed' |
| Nestle | Assumes all coffee- and tea-based drinks, such as cappuccinos, lattes are exempt. | Not achievable or realistic for chocolate drinks. Suggests an alternative target for this product. | 0.25g salt (maximum) 'as consumed' |

28. TAKE AWAY, MEAT-BASED**Category and target specific comments**

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures suggested |
|--|----------------------------------|--|-------------------------------|
| 28.1 Take away, meat based. Includes curries, Chinese dishes etc. Does not include beef burgers, pies - 0.6g salt or 250mg sodium (maximum) | | | |
| Asda | | Asda will aim to hit this target. Some products within this range will need to be higher salt than others due to their expected taste and ingredients. | |
| Waitrose | Merge with ready meals category. | Target seems to be much lower than for ready meals. | |
| | | | |

29. TAKE AWAY, FISH-BASED**Category and target specific comments**

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures |
|--|---|--|---------------------|
| 29.1 Take away, fish based. Includes curries, Chinese dishes etc. - 0.5g salt or 200mg sodium (maximum) | | | |
| Asda | | Fish based meals should have the same targets as meat. Note that prawns contain more salt than meat. | |
| Waitrose | Merge with other take away categories under the ready meal heading. | | |
| | | | |

30. TAKE AWAY, VEGETABLE- AND POTATO-BASED

Category and target specific comments

| Company/Organisation | Comments on categories | Comments on targets | Alternative figures suggested |
|---|---|--|-------------------------------|
| 30.1 Take away, vegetable and potato based. Includes take away chips, curries, Chinese dishes etc. - 0.5g salt or 200mg sodium (maximum) | | | |
| Asda | | Asda will aim to hit this target. Some products within this range will need to be higher salt than others due to their expected taste and ingredients. | |
| Waitrose | Merge with ready meals category. | Target seems to be much lower than for ready meals. | |
| Seafish | Comments that the monitoring of salt content in the product 'as sold' will be difficult for take away fish and chips to which salt is added, at the consumer's request, by the seller before serving. | | |