

Specific questions		
1. Whether the product categories, and sub-categories, for which targets have been proposed are appropriate and if not why not		
1.1 Agree that categories and subcategories are appropriate	The sub-division of product categories is useful and adds clarity in order to determine which products are to be assessed against the FSA targets. Think that the categories and subcategories are appropriate.	Heinz
	The chosen product categories are a reasonable reflection of foods that contribute most to overall salt levels in the diet.	NCC
	Product categories and subcategories are appropriate.	BDA Renal NHS Ayrshire and Arran MRC-HNR RCP RCP(E)
	Believe the product category list is comprehensive.	NHF/FPH/RIPH
	Product categories and subcategories are appropriate, as they are based on the main contributors to added salt intakes according to NDNS data.	BNF
	Agree that product categories and subcategories are wide-ranging. The categories for which targets have been proposed are largely agreeable.	HoM Asda
1.2 Agree that specific categories and subcategories are appropriate	Agrees with the single product category proposed for margarine and spreads.	MSA
	Agree that the categories and subcategories for the cheese and butter categories are appropriate.	Arla Foods
	Pleased the FSA has accepted the subcategories for crisps and savoury snacks proposed.	SNACMA
	Agree that the categories and subcategories for dairy foods are appropriate.	Dairy Council
1.3 Generally agree with the categories and subcategories but suggest some changes and/or additions	Subcategories have provided better clarification and take into account the diverse range of products, ingredients, recipes and technical issues that apply to wider product categories e.g. ready meals. Suggests the addition of some subcategories.	M&S
	Most own-brand products are included in the categories. However there are a few outside the proposed categories. Suggests ideas for creating some separate new categories.	Tesco
	Welcome the work done in identifying product categories and broadly support the definitions proposed.	BRC
	Support the subcategorisation of many of the main product groups but some categories are still too wide. A number of additional subcategories are suggested.	FDf
	In general the subcategory targets are useful and help differentiate between recipe variants. Suggestions were made to merge a number of categories and add one subcategory.	Waitrose
1.4 Suggest changes to and/or additions to specific product categories and subcategories	Addition of a subcategory to quiche.	Northern Foods
	Suggests some new categories/subcategories for relevant products.	Premier Foods
	Addition of a subcategory to rice.	Westmill Foods
	Suggests changes to some categories for relevant products.	Nestle
	Merge all the bread subcategories into one category and have one target.	FoB
	Addition of a number of subcategories for meat products.	BMPA

	Suggests addition of two subcategories to section 11: buns and flapjacks. Suggests changing the 'beverages dry weight' category to 'beverages ready to consume'.	BCCCA
	The main meat product categories are appropriate, clear and unambiguous. However, in some areas it is necessary to consider subcategories, for sausages, meat pies, cooked uncured meats and burgers, grill steaks etc.	MLC
	Welcomes the subcatergorisation of the cheese category, suggests an additional subcategory for cheese. Suggests the ham and cured meats category should be named 'ham' as 'other cured meats' is too general.	PTF
	Commented on categories specifically related to their products and suggests new categories.	Campbells
	Suggests categorising cheeses differently.	BCB
	Suggests some alterations to the categories and subcategories related to its products (cheese and butter), as it thinks some products within particular categories will more easily meet the targets than others.	Dairy UK
	Would like to see addition of an extra category with new targets for products it represents.	The Rice Association
	Generally agree with the categories but recommends alterations to the cakes and dessert category, no suggestions given.	Greencore
	Generally agree with the categories but would like to see further categories with different targets for certain dairy products (do not believe that soft white cheese fits in the fresh cheese category).	Kraft
	Requests the addition of a subcategory to processed puddings.	BRC
	Suggests there should be a subcategory and target for nut products and Asian snacks in the savoury snack category. Suggests the addition of Indian sauces in the table sauces category.	BDA
	Generally agree with the categories but suggest some changes, specifically in relation to its products.	United Biscuits
1.5 Do not believe that categories are appropriate	Product categories and subcategories have not been drawn up with the catering industry in mind - restaurants serve composite meals not individual products and 'as served' not 'as sold'.	Whitbread
1.6 Request for further clarification of which products fit within each category	Targets in the consultation differ slightly from those in the original salt model, some groups being separated out. This causes difficulty in reassigning some products, e.g. donuts and muffins.	3663
	Categories are confusing. Needs more clarity as to the products included in each category.	Seafish
	Believe that the categories might not be clear (e.g. what products fit where). Would benefit from including a comprehensive list of all those products which sit within a category.	StCC
	As businesses work with the table anomalies will come to light and the Agency will need to provide guidance to companies in placing products in the right categories.	BRC
	Needs clarification as to where flans sit within the product categories.	Waitrose
1.7 Others	Agree that the product categories have focused on the important contributions to salt intake in the UK but that many other areas need to be addressed. Interested to find out how much of our salt intake is not covered by these food categories and where further work needs to be done.	CASH
	Had hoped for fewer categories to enable more targeted focus.	Waitrose

	Maintains that target foods should be classed as those that contribute more than 5-10% of the GDA per portion.	Nutrition Society
	Provisions should be made to allow the transition of foods between categories as new variant products develop.	Dairy Council

2. Whether it is appropriate to have maximum targets in most cases but averages for some specific categories and if not, why not		
2.1 Is appropriate to have maximum targets for all categories	Recommends that salt targets should be set as a maximum for all product categories.	NFWI
	Agree that it is generally appropriate to have maximum targets. It is more difficult to compare progress if the targets are based on average levels	Which?
	Are concerned that average targets may lead to health inequalities. Those members of the population who already understand the salt message will look for the products at the lower end of the scale while others will continue to purchase products with higher levels of salt.	UCL
	Agree with the proposal to set maximums.	NLC
	Agree with the setting of maximum targets as they are easier to regulate.	RCP
	Support the introduction of maximum targets for all food types.	RCP(E)
	Support the introduction of maximum targets for all food types. Introducing average targets may exacerbate health inequalities and are less sensitive than maximum targets for responding to the needs of children.	NHF/FPH/RIPH
	Setting averages allows too much flexibility. Setting both maximums and averages will lead to increased consumer confusion and it is important to have one clear message.	Nutrition Society
	Maximum targets within product categories are easier to monitor and their impact on salt intake is easier to predict and clear for consumers to understand.	BNF
Recommend there should be maximum salt reduction targets for all product categories and do not agree with the proposal for average targets. Averages will make it impossible for the population to reach the 6g per day target and also may increase inequalities.	HoM	
2.2 Is appropriate to have maximum targets for specific categories	Consider the use of maximum targets as the most appropriate approach for meat products in achieving an industry-wide reduction in sodium levels. Averages are difficult to target and monitor as they depend on volume sales of different product lines. Averages also allow certain product lines to be produced with excessive sodium levels.	MLC
	Agrees that targets in the meat sector should be set as a maxima.	BMPA
	Believes that maximum targets are most appropriate for fish products.	Seafish
2.3 Is appropriate to have average targets for all categories	The establishment of average targets per category is the best way to deliver the 6g/day by 2010 target.	Tesco
2.4 Is appropriate to have average targets for specific categories	Average is preferred as variations in the levels of salt within the flavoured pouched rice category is high.	Westmill Foods
	More appropriate to set averages rather than maximum targets.	PepsiCo
	Targets set should be averages to be achieved across ranges of relevant products and only applied as absolute targets where retailers/manufacturers make healthy food claims.	PAPA
	Believe that averages are the most appropriate way to set targets for its sector.	ACFM
	Suggests an average target for margarine and spreads. The MSA can adopt methodology to measure the average sales weighted figure for branded margarine and spreads and believe this is the most appropriate way of setting targets. Do not support the setting of a maximum.	MSA

	Proposes average and not maximum targets to be set for own categories.	BCCCA
	Welcomes the average target for cheese rather than a maximum. An average target is suggested for bacon and ham categories.	PTF
	Proposes the use of averages for its relevant product categories, cannot accept maximum targets.	SNACMA
	Do not agree with the setting of maxima for dairy products, would prefer averages, as levels of salt in the ingoing ingredients, and batch to batch, vary.	Arla Foods BCB Dairy Council Dairy UK
	Would prefer an average to a maximum.	The Rice Association
	Setting of averages is preferable as biscuit and cake recipes vary considerably.	United Biscuits
2.5 It is appropriate to use both averages and maximums	Targets for wet/dry/condensed soup and wet and dry sauces should be average figures, possibly with an absolute maximum being set at 150% of the target.	FDF-Project Neptune
	Welcome maximum targets to be set in addition to averages.	BDA Renal
	Would seem sensible to include maximum and average values for all product categories, unless there is a particular reason for using one rather than the other.	StCC
2.6 It is appropriate to use averages and/or maximums depending on category	It may be difficult to set maximum levels for some foods, e.g. blue cheese due to lack of safety data supporting reductions.	M&S
	Supports the view that if a category is wide ranging then an average target should be set, but where a category is very specific, e.g. tomato ketchup, then it is feasible to have a maximum target.	Premier Foods
	There is a role for the use of both average and maximum targets depending on the category being considered.	RHM
	It is dependent on food category and subcategory whether average or maximum levels are appropriate.	Nestle
	Agree that targets should be set as maxima except for those product categories where an average would be more suitable.	SAMW
	Average targets would measure changes in total salt consumption while allowing a range of products to be offered within any particular category. Could be a role for both a maximum target and an average target.	FoB
	The choice between working to maximum or average targets depends on the food sector.	BCCCA SNACMA
	It may be difficult to set maximum levels for some foods, e.g. blue cheese due to lack of safety data supporting reductions. The support for setting maximum targets is not unanimous, as some members would prefer to see average targets being set.	BRC
	Recommends that FSA liaise with stakeholders and decide, on a category basis, whether a maximum or average target (or combination of both) would be appropriate. A table is provided with members views. Not all sectors will be able to work towards an average target due to the burden of gathering the information from hundreds of different products in one category. For these sectors maximum targets would be an easier way of monitoring.	FDF

	<p>Consideration should be given to BRC approach, i.e. setting maximum levels and a level for 'no more than 50% of range to contain'. This allows for the odd product with ingredients essential to the make up of that product, but with higher salt levels, to be captured.</p>	<p>Greencore</p>
	<p>Category average figures would be more meaningful to industry in terms of product development and the consumer. Realistic target maxima could also be applied to these averages to reflect the variance that already exists in each food category.</p>	<p>Heinz</p>
	<p>The approach on setting maximum targets for some categories and average targets for other categories is welcome and seems sensible.</p>	<p>Waitrose</p>
	<p>Would suggest that targets proposed could be made the maxima for sandwiches which are labelled as being 'healthy' or low in salt. Believe averages could be workable provided they are analysed as averages within a retailer's entire range rather than across brands or retailers.</p>	<p>BSA</p>

3. Where averages are proposed, the appropriate level for maximum targets to be set in addition to the averages.		
3.1 Support the use of a maximum where an average is applied	Supports the view that average targets should additionally have a maximum applied. It also believes that for simplicity the maximum in such circumstances should be an arithmetic calculation of the average target for all categories, e.g. make the maximum 150% of the average target.	Premier Foods
	Realistic target maxima could be applied to averages to reflect the variance that already exists in each food category.	Heinz
	Where averages are set there should also be a target maximum.	UCL NHS Ayrshire and Arran CASH Foodaware Which? BNF
3.2 Support the use of a maximum where an average is applied for specific product	Supports the view that average targets should additionally have a maximum for some products, however there may be some difficulties. M&S has specified categories where maximums should be set in addition to an average.	M&S
3.3 Do not support the use of a maximum where an average is applied	Do not support the addition of maximum targets where averages are already proposed as this would complicate the process.	Nestle
	A maximum target is not necessary. ACFM has consistently worked to average sales weighted figures for branded cereals.	ACFM
	Difficult to propose maximum targets, as cannot agree them for its sector.	SNACMA
	Do not agree with the setting of maxima where averages are set.	Dairy UK
	Do not agree with the setting of maxima where averages are set. Natural variations makes maximum targets difficult to meet.	BCB Dairy Council
	The concept of setting maximum targets when averages have been agreed seems unnecessary.	Waitrose
3.4 Other comments	Important to consider the contribution that pouched rice products have to the diet when evaluating whether a maximum or average value should be used.	Westmill Foods
	There are no meat specific categories where the targets are based on averages.	MLC

4. Whether the targets proposed for each category are realistic and achievable, and if not, why. If the targets are not achievable, it would be appreciated if suggestions could be made for what would be.		
4.1 Agree with proposed Targets	Agree with the targets set.	NLC Shetland Farm
	Targets appear to be both realistic and achievable.	StCC
4.2 Agree with proposed targets for specific product categories	Has carried out salt reduction in certain categories already and believes that in these categories they are reaching the flat part of the 'improvement curve'. Will find it difficult, in the short term, to make further significant reductions without influencing consumer preferences. However Unilever is reasonably confident it can achieve the targets for the following categories: meat pies, burgers, ready meals and mayonnaise (with exception of the extra light version). No alternative targets are suggested.	Unilever
4.3 Generally agree with proposed targets, suggest new targets for specific product categories	The majority of the targets should be achievable at the proposed levels. M&S have made new target suggestions for ham/cured meats, pizza with cured meat and high salt filling, blue cheese, standard potato crisps, processed puddings, cook-in pasta sauces.	M&S
	Generally agree with the targets. Some alternative target figures are suggested.	Asda
	In general Kraft is supportive of the targets and has a number of comments regarding those categories that relate directly to its products and suggests some alternative target figures.	Kraft
	Agree with the target for the rice category providing there is a new category with new targets for flavoured and pouched rice.	The Rice Association
	Made comments on the targets for several categories. On the whole believes that the targets are achievable, but suggests an alternative target figure for salted butter.	Arla Foods
	Outlined a number of concerns with the proposed targets for a number of categories, and suggests new target figures for some categories.	Tesco
	Has suggested alternative target figures for some product categories.	BMPA
Welcomes the targets for ham and cured meats, cooked meats and bacon,	Waitrose	
4.4 Suggest new targets for specific product categories	Proposes new average target figures for a number of product categories.	BCCCA
	Agrees with the proposed target for dry rice but feels cooked pouched rice products have been overlooked. Proposes a new target figure for pouched rice products.	Westmill Foods
	Suggestion made for the target for the quiche category.	Northern Foods
	Suggests a number of alternative target figures with comments.	Premier Foods
4.5 Do not believe the targets proposed for specific product categories are realistic and achievable. No alternative target figures are suggested.	The targets are quite ambitious. Comments provided on the categories specifically related to its products.	Greencore
	Suggests changes to some of the targets specifically related to its products.	Seafish
	Some of the categories are achievable (this may depend on clarifying in which categories some products sit). However, Campbells feels that some targets are not realistic or achievable.	Campbells
	Suggests some targets are achievable but others are not achievable for categories specifically related to the products it represents. Specific problems with blue cheese.	BCB

	Suggests the targets for hard cheese are achievable over time but that the target for blue cheese is unachievable.	Dairy Council
	Some sectors of the baking industry find some of the proposed targets unrealistic due to technological reasons and consumer acceptance. Proposes that targets proposed by the baking industry should be adopted.	UKBICC
	Comments made on the bread, cakes, cook-in & pasta sauces and ready meals targets. Believes some targets are unrealistic and unachievable.	RHM
	Does not believe the targets set for baked beans in tomato sauce with accompaniments and processed pudding targets are achievable.	Waitrose
	Not prepared to meet the proposed targets for soups and sauces. Suggests that a further reduction of 10%, on top of the original 30% reduction commitment by the group, may be possible. Reasons given are microbiological growth, consumer acceptance, threshold minimum acceptable salt levels, reduction in fill weight and herb/spice flavouring increasing.	FDF-Project Neptune
4.6 Do not believe the targets proposed for specific product categories are realistic and achievable, suggest new targets for specific product categories.	Some targets are achievable, but others are not for relevant products. Suggests alternative targets.	United Biscuits
	Suggests different target figures for some dairy categories. Specific problems with blue cheese. Suggests alternative targets.	Dairy UK
	Supports the response from the BMPA which details target maximum sodium levels that are realistic and achievable. Comments regarding the targets for bacon and cured meats, meat pies, cooked uncured meats and canned frankfurter, hotdogs and burgers were made.	MLC
	Do not believe some of the targets for specific product categories are achievable. Proposes new targets for a number of product categories.	BRC
	Many manufacturers find the targets unrealistic. Comments are made on specific sodium targets for a number of different categories and subcategories. Suggestions for alternative targets for some categories are made.	FDF
	Submitted comments and new targets for cheese, butter, bacon, ham and canned fish categories.	PTF
	The target for breakfast cereals is very aspirational. Proposes an alternative target.	ACFM
	The target proposed is a very substantial reduction leading to problems in reaching it and maintaining consumer acceptance. Suggests an alternative average target.	MSA
	Comments regarding the targets for baked beans, ready meals, soup, table sauces, pasta and processed pudding products were made. Suggestions for alternative targets for some categories were made.	Heinz
	The maximum target for pre-packed bread and rolls and morning goods is unattainable. An average target at this level would also be unrealistic. Suggests the setting of maximum targets which are reduced over the next five years. Suggests an alternative figure.	FoB
	Does not believe the target for 'other processed potato products' category is achievable. Suggests an alternative figure.	PPA
	Targets are highly aspirational and therefore may be unachievable. Suggests that the target set for salt and vinegar flavour snack products is raised.	PepsiCo
Some targets not achievable. Suggestions made for alternative targets.	Nestle	

	Suggests new average target figures for some of the crisps and savoury snack categories. Does not agree with the maximum targets proposed.	SNACMA
	Technical difficulties have to be faced when trying to reduce the sodium levels in pappadums. Due to the specialist nature of pappadums and the relatively low consumption (suggests only 16% of UK household buy pappadums) they should be exempt from Government targets. Suggests a figure that it feels is achievable.	Pataks
	Believes that the target for other frozen and chilled potato products is unrealistic and proposes an alternative target.	McCain Foods
4.7 Do not agree with the proposed targets, believe the targets could be lower.	A number of products in each food group already have low salt versions with far lower salt levels than the proposed targets, causing uncertainty in interpreting industry's assertions that it is not possible to lower salt levels. No alternative targets suggested.	UCL
	Believes that the targets should be lower as children will be consuming the same foods and require a lower salt intake. No alternative targets suggested.	WSCC(1)
	Unclear as to how the targets were obtained. Note that details for the specific recalculations are not provided. The FSA should initially base the maximum salt targets on the averages from the original salt model. Any recalculations to the values proposed by the model should be verified by independently appointed food technologists.	HoM
	It would be far better for the FSA to adopt the original salt model illustrative values and set these as maxima as they can easily be achieved in all food categories. The targets should be set by the FSA and not by industry. Comments and suggested targets were made for specific product category targets.	CASH
	Concerned that 15 targets proposed are in many cases higher than those drawn up in 2003.	NCC
	Important that these targets are the lowest achievable.	SCC
	Support the targets set for key food categories, but feel that the proposed reductions will be insufficient to meet the 6g/day salt reduction target.	MRC-HNR
	The reasons given for the target salt contents are not well justified. Most are based on what industry spokesmen say they would be happy to do. Reductions are small and could easily be increased without detriment to trade.	RCP
	Targets are higher than those proposed in the FSA salt model and RCP(E) feel that the proposed reductions will be insufficient to meet the 6g/day salt reduction target. Concerned that setting the targets at too generous a level will make it more difficult to reach the overall target intake.	RCP(E)
	The original salt model should be the sole basis for setting the salt reduction targets for industry, not the new targets now proposed in the FSA's consultation paper. If modelling is abandoned then there is a real danger of not achieving the 6g/day target. It is not clear how the proposed targets for 2010 relate to the salt model.	NHF/FPH/RIPH
The targets seem to be a relaxation of figures originally suggested. Recommend a re-run of the estimated salt intake modelling process is conducted to ensure that the proposed targets will achieve the 2010 target. Comments made on the cheese, bread and breakfast cereals, cook-in sauces proposed targets.	Nutrition Society	

	Many of the processed meat products currently on the market have average salt levels at or below the maximums proposed. If the proposed targets are taken in isolation there appears to be little incentive for food produced to further reduce from the maximum set.	Dera Technology
4.8 Other comments	Purac have made comments on salt targets within the meat products categories. No alternative targets suggested.	Purac
	Do not believe such a prescriptive approach can be taken with sandwiches. Sandwiches are an assembly product and the process of assembling products in many operations is not a precise process. To achieve the targets may be detrimental to the perceived quality of the product. Emphasis should be on consumer education with regard to salt reduction. No alternative targets are suggested.	BSA
	All proposed targets for levels of salt in foods must reflect manufacturers' views on what is feasible and be thoroughly tested to ensure that consumer safety is not put at risk. The potential salt reduction achievable from these targets should be calculated to ensure the 2010 target is met as many are a relaxation of those in the original salt model.	BNF
	Targets set should be averages to be achieved across ranges of products. If this was done then the targets would be acceptable and achievable.	PAPA
	Difficult to set targets across the catering industry, due to the diversity of dishes and constantly changing menus. Products where salt reductions have been made by the processors/manufacturers will reach the catering industry via suppliers.	Whitbread
	Made various comments on many of the product categories and their targets.	WSCC(2)

5. The additional costs linked to these targets e.g. any additional cost relating to reporting progress	
Quantification is not possible until the protocol is better understood. Costs may arise from the use of additional administrative and data management resources.	M&S
Reduction in salt levels significantly increases the overall cost of manufacturing the product, these costs will inevitably be passed onto consumers. Product reformulation centered around a single ingredient can cost up to £50,000 per product line when taking into account costs such as nutritional research, labour (chef, marketeer, nutritionist, regulatory, legal etc) consumer testing and revised packaging. Additional costs will also be incurred in collating data and reporting progress.	Nestle
The food industry as a whole will be able to work openly to accepted parameters, therefore cost issues should be lessened.	Sodexho/TVF
Reporting/monitoring along with testing/analysis needs will result in extra costs which will have to be met within the supply chain.	SAMW
Difficult to estimate the cost of reformulation. Simple reformulation costs between £35,000 and £50,000. Additional cost would be incurred by assessing and monitoring these changes. Increased cost would be passed on to the consumer.	BCCCA
Not in a position to quantify these costs. Costs would come from reformulation, plus the loss of shelf life and consumer acceptability.	MLC
Annual reporting will be a time consuming exercise therefore some businesses may decide to invest in new or adapt existing IT packages. Such investment is costly and it is vital that the Agency gives clear guidance on what exactly is required.	BRC
Notes the high cost of reformulation at anything from £35,000 to £250,000, plus the additional cost of self-reporting.	FDf
Believes that industry should bear the full costs of reporting and independent scrutiny verification as: 1. society pays for the large extrinsic cost through providing health services to treat hypertension 2. voluntary schemes are usually funded by industry and not the state.	NHF/FPH/RIPH
Supports the view that industry should accommodate any additional costs because: 1. it is usual practice for industry to bear the cost of voluntary codes 2. illnesses due to excessive salt consumption are already met by society 3. increase in longevity and lives saved will mean more sales and profits for industry	HoM
Any change to reformulate a product will incur a cost, including technological research, laboratory samples, pilot scale manufacture, storage trials, consumer testing, plant scale up, packaging costs and management time. Additional costs would also be incurred by assessing and monitoring these changes.	SNACMA
Costs associated linked to achieving these targets are both in raw material costs and management/ packaging costs.	Arla Foods
There is currently no formal reporting framework. Setting one up would incur additional costs.	BCB
Additional costs include: product development, new packaging and labelling, ongoing analysis of product to ensure compliance with new targets, setting up a reporting framework.	Dairy Council
Given that the reporting is currently on a 'good will' basis, responses and costs may be very variable as organisations decide what they can or are willing to spend on this process.	StCC
Have developed a five year programme to keep cost to a minimum especially with respect to new packaging. The generation of new packaging to reflect lower salt levels on labels can be problematic in fast moving categories such as chilled ready meals and slower moving lines such as biscuits.	Waitrose
A reporting framework could be set up but there would be a cost implication. Asks if this is something the FSA would fund.	BSA

6. Whether the proposed self-reporting framework (backed up by independent surveys) would be effective and whether it would be possible to provide the information indicated.

6.1 Generally agrees with some sort of self-reporting framework.	Are happy to self-report on average sodium usage of 'top 10 sellers' of sodium for the purposes of monitoring sodium reductions.	United Biscuits
	A properly set up self-reporting framework could work.	BCB
	It is necessary to develop a reporting system that is scientifically accurate and consistent.	SNACMA
	Supports a self-reporting system co-ordinated by relevant Trade Associations. Proposes that monitoring should be based on the proportion of products above the target maximum, as averages (particularly sales weighted) are difficult to establish.	MLC
	Agrees with the suggested self-reporting by industry. It is important that the method is standardised across the food industry to ensure consistency in the way the data is reported. Feel it is unnecessary to advise the Agency of de-listed and new products As the data is quite extensive further clarification is required.	BRC
	Supports the establishment of a framework for self-reporting to ensure scientifically accurate and consistent model is introduced. Members have indicated that a yearly evaluation report can be achieved.	FDF
	It is appropriate to have an industry self-reporting framework.	Which?
	Supports a consistent approach taken by industry in monitoring salt reductions to achieve the 6g target.	NCC
	Generally agree with a self-reporting framework with a view to working with the EU towards a legislative framework.	RCP(E)
	Supports the importance of having a system in place to carefully monitor and evaluate all relevant aspects of reducing salt levels in key food categories.	Nutrition Society
	Proposes the immediate establishment of an industry scheme to measure average salt levels in bread loaves.	FoB
	Supports clear reporting of progress through a framework of self-reporting by the food industry to the FSA.	Tesco
	Agrees with the FSA proposal to develop a framework for self-reporting to monitor reductions over time and would contribute to its development.	BMPA
	Agrees with reporting on the salt content of foods on an annual basis including maximum and average levels.	M&S
6.2 Unsure of implication and/or effectiveness of self-reporting framework.	Supports the introduction of a scientifically accurate and consistent framework for self-reporting. This should be as straight forward and user friendly as possible in order to mitigate time and expense.	Nestle
	Thinks self-reporting is the best way to inform both the consumer and the Agency about progress on salt reduction.	Waitrose
	Annual self-reporting should be to a standard format (qualitative and quantitative) prepared by the FSA in collaboration with stakeholders.	Sodexo/TVF
6.2 Unsure of implication and/or effectiveness of self-reporting framework.	It is not clear from the consultation what framework self-reporting should follow, as several options have been given in the RIA. Would have liked to have seen a more decisive approach.	StCC
	Could be set up but there would be a cost implication.	BSA

	Unsure whether it would be effective. It is possible to provide the information outlined if detailed information on reporting was given to organisations.	Heinz
	Do not think there would be any value in collecting data at intervals of less than two years. Self-reporting would be an additional burden for the industry and one which would incur some financial cost.	BCCCA
	The burden of a self-reporting framework must not fall disproportionately on small business.	BCB
	A self-reporting framework may present an additional burden.	SNACMA
	Care will need to be taken to ensure the five year self-reporting framework is effective.	SAMW
6.3 General comments	Preparation should be made to follow the campaign on dietary salt by epidemiological studies based on a set start and end points or bio-markers.	VEGA
	Suggests reporting should be over an 18 month timescale.	United Biscuits
	A reporting framework which will not disadvantage small businesses is essential. Suggest that in theory the self-reporting mechanism is an ideal and easy option but it is not likely to work.	Dairy Council
	Due to the maturation process for cheeses it could take up to 18 months for assessment by both the manufacturer and consumer. Is prepared to assist with self-reporting.	Dairy UK
	The Agency needs to use data taken directly from food manufacturers rather than relying on label information alone (recent salt changes may not be reflected in the packaging), this will provide a more accurate picture. Would like a third party to do some data collection and verification.	Kraft

7. How industry should self-report average levels for the purpose of monitoring		
7.1 Support self-reporting based on weighted sales data.	To report averages accurately it should be based on weighted sales data. Some manufacturers may face difficulties in providing this information and for some sectors it may prove impossible.	SNACMA
	Important for industry to track weighted average sales data, however, some sectors may find this approach difficult due to the large number of products covered.	FDf
	Report in the form of sales-weighted average levels to reflect closely the consumption behaviour of the nation.	Heinz
	Has in place a robust monitoring scheme whereby on an annual/regular basis (every 1 to 2 years) the sales weighted average of branded breakfast cereals is calculated based on levels of sodium in products and their corresponding sales from market data.	ACFM MSA
	Agrees that a weighted average sales data is a good measure.	Nestle
7.2 Do not support self-reporting on weighted sales data	Does not support the view that targets should be based on weighted sales data. It is recognised that this is a true measure of actual consumption but is a lengthy number crunching exercise and necessarily introduces a circa 12 month delay until annual sales data is available. Additionally if FSA want annual updates (or more frequently) then a simplistic method has to be adopted.	Premier Foods
7.3 Further suggestions for self-reporting	As many organisations already have their own internal monitoring systems it would be best if the Agency accepted a variety of reporting methods.	Waitrose
	Do not believe self-reporting is likely to work. Should be the responsibility of FSA to set up a framework for reporting.	Dairy Council
	Targets should be assessed by increased food sampling activities. These should be conducted by member authorities of nationwide food liaison groups guided by the FSA also working in conjunction with other relevant partner organisations.	NLC
	Suggests a consistent mode of reporting across organisations is needed.	StCC
	Proposed mechanism for monitoring and reporting would be conducted through industry organisations and will support them in this process.	Arla Foods
	Currently review on a yearly basis the sodium content of its product. Measure used is a weighted average per portion.	Campbells
	A system is needed that can independently benchmark companies' progress relative to each other and across the range of targets.	SCC
	Proposes that monitoring should be based on the proportion of products above the target maximum.	MLC
	It is a complicated issue and sits with the processor/manufacturer who supplies to the catering industry.	Whitbread
	Industry have proposed setting up a system through the Federation of Bakers which measures the average salt content of the bread produced by its members. An industry average would then be calculated. This would only be operational for bread loaves (400g and 800g).	FoB
Reports should be detailed and comprehensive, including a summary position for each food category on an annual basis with plans for future reduction. The average sodium content and the range of sodium content should be provided for each food category.	Tesco	

	In addition to annual progress reports the FSA and industry should conduct a formal 'mid term' review across all food categories in 2007.	BMPA
	Agrees with reporting on the salt content of foods on an annual basis including maximum and average levels. This information would be provided on a category basis as defined by the final salt model. It is important that the method of reporting is standardised across the food industry to ensure consistency in the way data is reported. The process and protocol should be developed jointly with the FDF and BRC including a timeframe. An early understanding of the protocol would ensure that delivery and additional resource requirements can be met.	M&S
	Would use 'sodium sales tonnage' to monitor sodium reductions accurately.	United Biscuits
	The industry would be happy to self report average salt usage for the top selling products, which could be achieved by monitoring salt sales tonnage against products manufactured.	BCCCA

8. Whether establishment of interim population targets would help monitor progress and if not, why.		
8.1 Do support the setting of interim targets	Concerned about the absence of interim targets for industry to achieve proposed targets.	NCC
	The establishment of annual salt reduction targets over the next five years should be set by the FSA and not industry. Progressive annual maximum targets will serve to ensure that salt reductions occur year on year and will ultimately save lives.	NHF/FPH/RIPH
	There is an obvious danger in having a target by 2010 without annual targets, as many in the food industry will wait until 2010 and then say it is impossible to achieve.	CASH
8.2 Do not support the establishment of interim population targets	Interim targets are unnecessary and could result in confusion around the 2010 goal, especially by the media. Feel it would be useful if the FSA carried out a consumer survey including urinary assessment data, to report on population progress towards to 2010 target. This would identify if the progress made by industry is parallel to population change and if not why not.	M&S BRC
	No interim targets required.	Westmill Foods
	Interim population targets would not help to monitor progress as progress should only be monitored within product categories, it could also be misleading and distract from the principle task of meeting the agreed targets. Urge the FSA to use dietary surveys, urinary analysis and company information as the main sources of data for monitoring progress and should not rely on nutrition information alone.	Nestle
	Short term targets by categories or population groups may not be achieved and wouldn't help the reduction in the salt content of products.	SNACMA
	Provided that there is a clear, consistent, and transparent system of monitoring and reporting progress in place, interim targets are unnecessary.	Tesco
	This would be added complexity that would be of little benefit to manufacturers.	BCCCA
	May hamper movement as it may not take into account the variability of progress (either stepwise or straight line).	FDf
	No need to establish interim population targets as this will only delay progress.	NHS Ayrshire and Arran
	This will not help monitor progress.	BCB Dairy Council
	Strongly opposes interim targets.	StCC
	Do not support this approach. Introduction of interim population targets could lead to consumer confusion.	Waitrose
Would not like to see interim targets applied to this project.	The Rice Association	
8.3 Unsure of the implication and/or effectiveness of interim population targets	Uncertain as to whether it would help monitor progress. Interim targets might convince some manufacturers to reduce sodium as the interim targets would look more achievable.	Heinz
	Interim population targets may help the Agency monitor progress but it would be very difficult to measure these because of the difficulties in determining average levels. It may be possible to achieve this through urinary analysis.	MLC