

A GUIDE FOR SETTING TARGETS AND TIMELINES TO REDUCE THE SALT CONTENT OF FOOD 2013

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Table of Contents

Key Messages.....	1
Purpose of the guide.....	2
Step 1 – Secure the national strategy to reduce dietary salt	3
Step 2 – Prepare data	8
Step 3 – Identify the key stakeholders.....	14
Step 4 – Plan the meetings	16
Step 5 – Monitor performance	17
Dealing with technical issues, controversies, barriers.....	18
Appendix 1: Targets and timelines for food categories in common in Argentina, Brazil, Canada, Chile and the National Salt Reduction Initiative in the United States (as of January 2013).....	21
Appendix 2: Links to national targets and timelines including industry commitments made public.....	26
Appendix 3: Pros and cons for types of targets that can be set	28

Key Messages

Typical modern diets provide excessive amounts of salt¹. While people can control the salt added at the table and in cooking, it is the food industry that determines how much salt is added during food processing. Engaging the food industry in setting and following a schedule of targets and timelines to reduce the use of salt requires first a secure national commitment to dietary salt reduction.

Countries that intend to set targets for reduced salt content in foods should examine the approaches and achievements of already active countries – evidence of what reformulations are feasible and that progress can be made. In the Americas, as of January 2013, there are targets and timelines for reduced salt in foods in five countries: Argentina, Brazil, Canada, Chile and in the United States the National Salt Reduction Initiative (NSRI).

Canada and the NSRI are accounting for all food categories that contribute salt to the diet. Argentina and Brazil are taking a step-wise approach, beginning with priority food categories. Chile began with voluntary agreements to reduce the salt in bread, followed by a law requiring warning labels on packaged products in which salt and other nutrients exceed upper limits.

This document gives links to the comprehensive strategies in these five countries and presents the targets and timelines for the food categories common to all or most of them as of January 2013: all five countries have targets for bread and bakery products; four are dealing with biscuits and cookies and snacks; three have targets for cakes, meats, dairy products, mayonnaise, soups and pasta.

Ideally, targets should be set both an average and maximum target per category or per sub-category. The two targets affect the range of products in a category, this way protecting more of the population, no matter which products from within the category people consume.

It is vital that progress relative to national targets and timelines, whether voluntary or regulated, be monitored and made public. Asking companies to regularly report the nutrient profiles of their foods in a standardized electronic format to a central database can facilitate monitoring.

Countries should also assess from time to time their progress against what other countries in the Region and elsewhere are achieving and should monitor advances in food technology that may offer new reformulation options.

¹ While sodium is the technically and scientifically correct term for the nutrient of public health concern, the term salt is used in this document. Whether a country refers to salt or sodium in its national discourse on the nutrient is a matter of national discretion.

Equivalencies: 5 gm salt (NaCl) = 2000 mg sodium (Na) = 87 mmol sodium = 87 mEq sodium

Introduction

Typical modern diets provide excessive amounts of salt, from early childhood through adulthood. In high income countries processed foods account for most dietary salt intake, and in lower and middle income countries their consumption is rapidly increasing as nutrition transition evolves. While people can control the salt added at the table and in cooking, it is the food industry that determines how much salt is added during food processing.

A core component of any national program to reduce dietary salt consumption is government working with the food industry to lower the amount of salt added during food processing. Governments are justified in intervening directly with the food industry because salt is such a common food additive and salt intake levels are consistently high. The food companies that participate in reducing the salt content of their products demonstrate corporate social responsibility and stand to benefit from a positive public image. As more companies participate in such health promoting activity, the potential grows for a shift in the whole food market towards improving the nutrition profile of processed foods.

While a number of food companies have ongoing initiatives to reduce the salt content in their products, and while their product development schedules should be taken into consideration when setting national targets and timelines for reducing the use of salt, experience to date has shown that when governments and the food industry coordinate their efforts in a national strategy to reduce the overconsumption of salt, there have been larger and more timely reformulations of food products.

Purpose of the guide

Audience

This is a step-wise Guide intended to assist governments and public health authorities with initiating and maintaining interactions with food companies to set and then monitor targets and timelines for gradually lowering the salt content of processed foods. It has been developed by representatives of public health authorities in countries in the PAHO region that have committed to reducing dietary salt intake and are involved with the food industry to stimulate product reformulations.

Primary aims

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- give advice and recommendations on how to initiate and maintain the involvement of food industries and other relevant agencies and entities in a transparent and open process of developing and monitoring a schedule of targets and timelines intended to reduce the amounts of salt added to specific food categories.
 - disseminate the targets and timelines for food categories in common as reported as of January 2103 for five countries (Appendix 1) – Argentina, Brazil, Canada, Chile and the US National Salt Reduction Initiative (NSRI) – to inform countries that intend to reduce the overconsumption of salt of what others are seeking to achieve. Appendix 1 has a compilation of:
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1. the food categories identified for salt reduction, common to all or most of the five countries
 2. for each food category above, the targets and timelines set to date in each country
- An on-line version of Appendix 1 is to be updated as progress is made.
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Secondary aims

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- foster a harmonization of targets for common food categories as more countries engage the food industry and the lead countries demonstrate successes
 - provide links to the national salt reduction program details in the five Pan American countries with targets and timelines as of January 2103, presented in Appendix 2.
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Step 1 – Secure the national strategy to reduce dietary salt

Establish the national importance of dietary salt reduction

Salt intake exceeding physiologically adequate levels has a causal and linear relationship with greater-than-optimum levels of blood pressure – the science is incontrovertible. Useful references and resources with evidence and justifications for a national dietary salt reduction initiative include:

- the Political Declaration of the High-level Meeting of the [UN] General Assembly on the Prevention and Control of Non-communicable Diseases (2011) at http://www.un.org/ga/search/view_doc.asp?symbol=A/66/L.1
- the PAHO initiative on Cardiovascular Disease Prevention through Dietary Salt Reduction at http://new.paho.org/hq/index.php?option=com_content&view=article&id=2015&Itemid=4024&lang=en
 - core scientific and policy references at http://new.paho.org/hq/index.php?option=com_content&view=article&id=3043&Itemid=2375
- *WHO Guideline: Sodium intake for adults and children* at http://www.who.int/nutrition/publications/guidelines/sodium_intake_printversion.pdf
WHO guidelines for sodium and potassium intake at http://www.who.int/nutrition/publications/guidelines/sodium_intake/en/index.html and http://www.who.int/nutrition/publications/guidelines/potassium_intake/en/index.html
- US Institutes of Medicine report *Strategies to Reduce Sodium Intake in the United States* (2010) at <http://www.iom.edu/Reports/2010/Strategies-to-Reduce-Sodium-Intake-in-the-United-States.aspx>

Prepare the arguments, supported by epidemiologic data, as to the national importance

of dietary salt reduction. Collect data on mortality and morbidity due to risk factors related to high salt diets, and if available, also the economic burden related to them. Consider also determining the health economic benefits of reduced salt intake. Examples of methodologies are in:

- Wang G, Labarthe D. The cost-effectiveness of interventions designed to reduce sodium intake. *J Hypertens*. 2011; 29:1693–99.
- Cobiac LJ, Vos T, Veerman JL. Cost-effectiveness of interventions to reduce dietary salt intake. *Heart*. 2010; doi:10.1136/hrt.2010.199240

Ensure high level political commitment and operational support for the national initiative and publicize it. As timelines for reformulations typically span a number of years, the government initiative must be able to sustain ongoing discussions and negotiations along with performance monitoring for the period.

Develop a comprehensive strategy with a clear goal; indicate whether it will take a voluntary or regulatory approach

Referring to international experiences and achievements, define a comprehensive strategy for dietary salt reduction. The strategy can begin by setting a national goal for salt intake, as a number of countries in the Americas have done, or in its absence, adopting:

- the target recommended by the PAHO Expert Group – less than 5g salt intake/day/person by 2020
or
- the WHO global target – a 30% relative reduction in mean population intake of salt, aiming to achieve the recommended level of less than 5g salt per adult per day

Governments can follow several different approaches for setting targets for reduced salt in foods. They can focus on the whole food supply (e.g. the food processing industry, restaurants, food caterers, the informal food sector), on specific sectors of the food supply and all their respective food categories (e.g. processed food manufacturers), or on specific components of the food supply or key food categories (e.g. breads, processed meats). Regardless of which sector of the food supply or which food categories are being addressed, the approach must include a monitoring framework that assesses industry performance against commitments made to targets and brings feedback to the next stages of reduction. See Section 6 Monitoring Performance.

Whether voluntary or regulated, successful initiatives have strong government oversight. To be avoided is relying solely on the food industry to self-monitor. See

- US Institutes of Medicine report *Strategies to Reduce Sodium Intake in the United States* (2010) at <http://www.iom.edu/Reports/2010/Strategies-to-Reduce-Sodium-Intake-in-the-United-States.aspx>
 - Moodie R, Stuckler D, Monteiro C, Sheron N, Neal B, Thamarangsi T, Lincoln P, Casswell S. Profits and pandemics: prevention of harmful effects of tobacco, alcohol, and ultra-processed food and drink industries. *The Lancet*. 2013; 381:670-79.
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The voluntary approach undertaken to date by several jurisdictions is based on negotiations with food industries to establish reduction targets, often complemented with a voluntary commitment mechanism. Most have committed to gradual reductions of salt content per food category. Success depends on:

- genuine commitment by the food industry to reach targets
- the strong position of the government to set and hold to the lowest feasible targets possible and
- government commitment to monitor progress

A regulatory approach typically sets an upper limits of salt in foods and depends on enforcement. It has been most commonly used for widely consumed products such as breads. An advantage of the voluntary approach over the regulatory one is that it can be initiated relatively rapidly in most countries that have basic national data on salt intake and on the main food sources of salt, and it retains some flexibility for adjusting reduction targets over time. On the other hand, a regulatory approach has been assessed as more effective in reducing salt consumption and for industry, levels the playing field across food processing sectors.

It is also possible for voluntary approaches to be followed by legal measures. If this is the intention from the outset, the food industry is initially prompted to respond to voluntary targets and is in a ready position once regulations are passed. This may also be an outcome in cases where voluntary targets are not being fully achieved by industries or when small but cumulatively significant segments of the food market have not responded to voluntary targets.

Chile began with voluntary agreements with industry to gradually reduce the salt content in food, in particular in bread made in small bakeries and by supermarket chains. Most recently it has also enacted a Law on Nutrient Composition of Foods and Advertising (Nº20,606, 2012) that requires a warning label on food packages where the salt and other nutrients exceed upper limits. The intention is to encourage the food industry to improve the overall nutritional quality of food products. See Appendix 2 for links to the Chile approach.

Leverage and coordinate with supporting initiatives, agencies and resources

Position dietary salt reduction within the larger national public health agenda

Look for a convergence of interests, where concerted dietary salt reduction can strengthen other national policies, instruments and processes already in place that refer directly to salt e.g. national nutrition guidelines or the prevention of non-communicable diseases e.g. cardiovascular and renal diseases, hypertension.

Wherever possible, link to other diet related risk factor programs e.g. obesity, school

health, trans fatty acid elimination, where the health risks of high salt can be profiled.

Coordinate with the national salt iodization program

It is crucial to check and account for impacts of reduced dietary salt on the prevention of iodine deficiency disorders where salt delivers supplementary iodine (I). In some cases, household table salt is the sole source of the supplement whereas in other cases, both table salt and the salt used in food processing are iodized. See

http://new.paho.org/hq/index.php?option=com_content&view=article&id=2015&Itemid=1757 for the *White Paper on Improving Public Health by Optimizing Salt and Iodine Intakes, 2011* and the *Final Report on Improving Public Health in the Americas by Optimizing Sodium and Iodine Intakes – A Meeting Summary*.

Secure food labelling

Clear easy-to-read food labels can be a central tool for directing consumers to healthier choices and at the same time are very often a key source of data on the salt content of packaged foods – required for the baselines on which the case is made to reduce salt use and central to monitoring performance against targets.

Ideally official food composition tables are the sources of nutrient information about national foods. If tables are not up to date, label data become a key source of nutrient contents. For label data to be reliable to serve both consumers and nutrition policies, a system to confirm the accuracy of labels needs to be in place including feedback and enforcement of requirements.

The regulatory framework governing food labels needs to respond effectively and efficiently to the pace of food composition changes. Examining the framework may open opportunities to consider other tools or incentives to lower salt use e.g. additional nutritional information, health claims, health seals, warning labels to alert consumers (e.g. foods with high salt content). These additional sources of information can be a useful complement to nutrition labels.

Consult food technology experts

The food technology sector and food research centres are a particularly important resource for governments to learn about opportunities and constraints regarding food product reformulations e.g. typical reformulation schedules, technology or food safety issues related to the role of salt in specific food products that have an impact on reformulating, schedules for new product development, and how these relate to targets and timelines.

Examine/promote healthy food procurement policies

Determine where reformulated products can represent a new market opportunity for

food companies. Public entities may have food procurement policies for their cafeterias for which they are responsible and may be in a position to adjust their policies to take into account reduced levels of salt in the food products being purchased or offered for sale. Key examples are the procurement policies for schools, hospitals, long term care facilities, daycares and prisons.

Involve other government ministries and agencies

A cross-government approach must be considered as there may be ministries other than health that have roles and responsibilities affecting the food supply. For example, the agriculture ministry may control meat and dairy processing and where there are separate food regulatory agencies, they will be needed to monitor food labels, test food products or have a role in harmonizing salt content across food categories in cases where food products are the responsibility of multiple ministries.

In cases where countries are federations with authorities and responsibilities for food processing distributed across regional, state or local governments, the food industries will engage through these levels. There may also be resources at regional or state levels that can support national implementation or be coordinated to support local efforts e.g. local laboratories for analyzing salt content.

Countries in common or neighbouring markets across which food products circulate can explore the potential convergences of interests on issues such as food labelling or salt reduction efforts.

Use international references

International references such as the *Codex Alimentarius* have standards for labelling of salt that are parallel to the efforts to reformulate food. The *Guidelines on Nutrition Labelling* (CAC/GL 2-1985) recommend that all pre-packaged foods be labelled with nutrition information including the amount of sodium. The *Guidelines for Use of Nutrition and Health Claims* (CAC/GL 23-1997) set out conditions for claims related to sodium.

Examine trade agreements

Where relevant, understand the trade patterns and agreements regarding the processed foods imported from within a common market or from elsewhere, and the extent to which your country has control over these products e.g. nutrition labelling requirements. Consider international or trade agreement levers that can protect national public health in cases of imported products.

Examine also the salt reduction approaches taken in other countries with which there is some relevant relationship e.g. neighbouring country, country with similar food culture,

similar economic status (see Appendix 2).

Control advertising to children

It is especially important for all stakeholders in a healthy food supply to be consistent in supporting the public to make healthy food choices. This includes how and what foods are advertised and especially the nature of advertising to children as they are a vulnerable population. As some products intended for children have high salt content, the World Health Organization recommendations for marketing of foods and non-alcoholic beverages to children are relevant to dietary salt reduction. See <http://www.who.int/dietphysicalactivity/marketing-food-to-children/en/index.html>

Monitor the commitments of transnational companies

Appendix 2 includes links to public commitments regarding salt content made by transnational and large national food companies in the Americas as of January 2013.

An international initiative that is engaging a number of transnational food companies in the region is the Salt Smart Consortium that operates through the Pan American Forum for Action on NCDs. Country-based or sub-regional branches of the multinationals may be predisposed to participate in a national initiative. See <http://new.paho.org/panamericanforum/?p=626>

Consider warning labels with or in the absence of targets

Where systems of warning labels are mandatory, review that salt is featured. Warning labels are a means of complementing reformulation commitments, especially those set as maximum targets. Public health authorities set an upper limit of salt per standardized unit or standardized serving of food product, that if exceeded, requires that consumers be warned. Refer to Appendix 2 for links on warning label legislation in Chile and Appendix 3 for the pros and cons of warning labels.

Step 2 – Prepare data

There are a number of sets of data necessary to initiate engagement with the food industry. A government must prepare some, and depending on its capacity and resources, can prepare the rest or request them from the food industry or from other private commercial sources. In cases where the food industry supplies data on the salt content of its food products, government must provided with the data in a way such that it can be verified as accurate, prior to negotiations and during monitoring of progress.

As the objective for data preparation is a set of priority food products with proposed targets and timelines for salt content reductions, the criteria for selection of the categories and targets must be transparent to all stakeholders and grounded in evidence that the proposed reductions in salt content are technically feasible

and will achieve measurable reductions in salt intake.

Select the food categories and determine baseline salt content

National food consumption data are very important as they identify the foods and eating habits that account for salt intake levels. The consumption data coupled with data on the salt content of products in the food supply (from national or international databases) point out the relative contributions of various foods to total salt intake, hence the products on which reformulations should be focussed and the sectors of the food industry to approach can be established.

Important food consumption data are:

- foods that people eat and the amounts and frequency of consumption
- salt content of the most commonly consumed foods
- the amount of salt added at the table and in cooking
- intake of high salt foods that are culturally or regionally specific within the country

Select food categories based on national data on the sources of salt in the diet and on knowledge of the feasibility of salt reductions.

- The proportion of total salt intake attributed to a food category can be derived by collecting food intake data (estimated through various instruments e.g. 24 hour food recalls or household budget surveys) which is then matched with appropriate food composition data that include the salt content for the products identified. Food composition data can come from either nationally specific or regional databases containing foods with some regional specificity e.g. LATINFOODS (Tabla de Composición de Alimentos de América Latina at <http://www.into.cl/latinfoods/>)
- It is critical that any sources used to determine the salt content of foods be current. (Alternatives to food composition data that include salt content are food labels, food analysis or values provided by the food industry.)
- National food intake data can also be derived from FAO food balance sheets.
- A possible data source is private commercial enterprises that collect and sell product market share data. While they can supply precise and comprehensive information as to all the brands in each food category and their relative share of market, necessary to calculate sales weighted averages for the salt content per food category, it is proprietary information and costly. As well, depending on the country, data may be limited in terms of market coverage and the level of detail needed.
- Give attention to processed foods even in cases where discretionary salt use is high as nutrition transition towards processed foods is accelerating especially in countries with rising economies.

The PAHO document *A Review of Methods to Determine the Main Sources of Salt in the Diet*, available at

http://new.paho.org/hq/index.php?option=com_docman&task=doc_download&gid=1155

[9&Itemid=](#)) is a comprehensive guide to identify key food categories and salt content of foods. The FAO/INFOODS food composition databases is one international source for food categories and provides salt content data as well, available at <http://www.fao.org/infoods/infoods/tables-and-databases/faoinfoods-databases/en/>

Knowing the salt levels in locally available food products also allows comparing the levels in same or similar foods in other parts of the world, identifying in particular the global brand products for which lower salt versions are available elsewhere. This is a lever for encouraging multinational companies to replicate product improvements in your country. Refer to the work on global brand products by the Global Food Monitoring Group at <http://www.georgeinstitute.org/global-health-landscape/food-policy/food-monitoring-group> and <http://www.georgeinstitute.org/global-health-landscape/food-policy/food-monitoring-group/resources>

High income countries in the region have chosen to set targets and timelines for the full range of processed foods that contain added salt. See Appendix 2 for links to the comprehensive sets of food categories with targets and timelines in Canada and the US NSRI. In these cases processed foods account for an estimated 75% of total salt consumed and public health authorities have been able to allocate resources sufficient to address all of these products.

Other countries in the region are taking a step-wise approach, beginning with salt reductions in priority food categories, selecting those that:

- account for a large proportion of total salt intake
 - a food category with a high volume of consumption e.g. bread or a product within a category that holds a large percentage of market share, even though not high in salt, may account for a large proportion of total salt intake, while other foods, with relatively low volumes of consumption, may also contribute large amounts of salt to the diet because of their very high salt content (e.g. cured meats, soya sauce).
- have been shown to be highly consumed by vulnerable groups especially children
- have high baseline salt levels
- affect the supply chain beyond what is sold to individual consumers e.g. wholesale pre-mixes such as used by bakeries for bread and other baked goods; soup bases supplied to restaurants
- have food technology solutions for reducing salt content

Selection of priority food categories can also be influenced by what other countries have already selected, particularly countries in a common market or countries from which products are imported. A key example is bread – all countries in the region with targets and timelines are addressing bread, ranging from artisanal bakery bread (in Argentina, Brazil and Chile), to private label brand supermarket bread (Chile), to packaged breads in

Canada and the US NSRI.

Other considerations in category selection are whether the sector associated with a food category has capacity to reformulate and whether there is an existing relationship with a sector, established through previous public health interventions, where there is willingness to participate.

Propose a schedule of targets and timelines for discussion

Ahead of discussions with the food industry, public health authorities should draft targets and timelines for priority food categories. The criteria selected to guide the process must be clear and transparent to the food industries as well as civil society.

Examine first the baseline and ranges of salt content and targets per food category that have been agreed to to date e.g. Appendix 1 for the Pan American region. This can provide evidence of the technical feasibility of reformulations, that technical and food safety issues have been dealt with. Acknowledging these factors during negotiations will better ensure that reductions agreed to are sustainable and meaningful. If for example baseline salt content for a particular food category or product in your country is the same or similar to that found in another country, particularly a neighbouring country or trading partner, consider proposing a schedule of reduction targets and timelines similar to those already negotiated.

Ideally target values should be modelled to demonstrate that they lead to the achievement of the national salt intake goal or are otherwise based on criteria that ensure that proposed reductions will have a meaningful impact on salt intake at a population level. This is to be balanced by the targets and timelines being feasible.

Set targets as averages/ means, or maxima; ideally as both

Consider first if targets are to be set as an average/mean or as a maximum level of salt per food category or product. Ideally both should be used. Averages address the most popular foods within a category, more so if sales weighted averages (SWA) are used. Whether simple or sales weighted, averages allow flexibility in the levels of salt in different products within a category and are helpful in considering the natural variation in salt levels of some foods (as cheeses and cured meats). On the other hand, averages are difficult for consumers to understand and for national authorities to compare and monitor across individual products.

Maximum or upper levels of salt are straightforward and transparent, easier to administer, monitor and use to compare salt in products. They ensure meaningful salt reductions in products with the higher amounts of salt in the category. They do not however indicate whether the salt content range in foods is changing, making it difficult to predict the impact of targets on average intakes. In the long run maxima may even suggest that as long as salt content is at or below the maximum, no further reductions are needed.

Ideally, set both an average and maximum target per category. Companies will work towards the average and in addition will be guided by the maximum level. The two targets affect the range of products in a category, this way protecting more of the population, no matter which products from within the category people consume. If a category has very wide variations in salt content, consider, if resources permit, creating sub-categories to recognize the differences with separate targets. **Refer to Appendix 3 for a thorough discussion of pros and cons of averages, sales weighted averages, maxima, setting percentage reductions and requiring warning labels.**

If determining average salt content is not feasible, set maximum targets with timelines for food categories or products.

For averages/means

- check existing average/mean targets for salt content in other countries (Appendix 1)
- determine the average/mean salt content per standard unit of measure for a food category and the salt content distribution
- if necessary remove outliers in a consistent fashion

For maxima

- check existing salt content maxima in other countries (Appendix 1)
- set maxima as between the 50th and 75th percentile of the salt content distribution
- adjust downward as salt content is reduced based on the range of salt content in different products (i.e. serial reductions with maxima set at the “rolling” 75th percentile)

Consider sales weighted averages/means (SWA/SWM) where available

- check existing SWA/SWM for salt content of food products for Canada and the US NSRI (Appendix 1)
- SWA/SWM are calculated using the salt levels of products within a category weighted by their volume of market share in kilograms
- requires purchasing expensive market share data from the private sector; however these data cannot be published or released publically
- for monitoring whether targets are being met, requires ongoing purchase of the market data

Note that there may be food categories for which salt substitutes might be necessary in order to meet targets or where lowering salt levels beyond a certain target creates a food safety risk. Seek the objective and independent advice of food technology experts on such issues and if needed, consider supporting or encouraging research on the roles of salt in these cases.

Alternatively, consider percentage reductions from a baseline salt content in the products in a food category. The WHO global target of a 30% relative reduction in mean population intake of salt is an overall guide. This still requires knowing the sources of salt in the diet and the impact of various reductions in salt by source. If for example 50% of salt intake is attributed to discretionary use at home and 50% comes from processed foods, then if all reduction is to be achieved by lowering the salt content of only processed foods, these foods would have to have salt content lowered by 60%.

Standardize the presentation of salt content

To facilitate the reduction efforts by industries and for consumers to know how much salt they get from a food product, it is important to standardize how salt content is presented.

- It is recommended that targets be expressed as salt per 100g or 100ml of product.
- If salt content is expressed per serving size or portion, standard reference amounts should be indicated.
- For products that require reconstitution before consumption (e.g. soup cubes), indicate whether the target refers to the product “as sold” or “as consumed” per 100g or 100ml (once it has been prepared per the manufacturer’s instructions).

Propose timelines

The timeline should be such that the national salt intake goal or the internationally recommended goal can be reached within six to 10 years. Consider the initial targets to span four years with interim targets at e.g. one or two year intervals to underpin monitoring and timely feedback. Discussions may be reopened within the timeframe and targets adjusted as advances are made or technical barriers encountered. If taking a regulatory approach, the timeline will reflect compliance dates.

Ensure that proposed timelines are grounded in experiences proven successful elsewhere and/or are based on evidence of achievability supported by the food technology sector.

Step 3 – Identify the key stakeholders

Effective dietary salt reduction at the population level requires a multi-sector approach. The greatest impact will be achieved when governments, the food industry, civil society and non-governmental organizations (NGOs) coordinate their efforts. It is essential that all participants in the position of negotiating on behalf of or supporting the public health authorities declare no conflicts of interest.

Critical is that all agencies involved in dietary salt reduction efforts publicly state their support for the approach of setting targets and timelines and where relevant, deliver consistent messages and education to the food industry and the public.

Outline the process and principles of engagement with the food industry

There must be a clear understanding and agreement that the selection of food categories, targets and timelines are to make a meaningful impact on salt intake at the population level.

Consider setting terms for technical cooperation. It must be understood that commitments include acceptance of a transparent monitoring framework, that agreements will be documented and official. Consider a process of formal signing of agreements that include roles and responsibilities, targets and timelines and consequences of not meeting targets.

There also needs to be agreement that industry commitments and performance are to be made public, the details of which can be negotiated. Broadcasting the agreements, new targets and industry progress through for example press releases or other means are opportunities to publically reinforce information and education messages and also reinforce the salt reduction policies within the government and to the food industry. This can also be positively linked to building the market for low/no salt products, to the industry's advantage.

The timeframe within which agreements on targets and timelines are expected must be clarified.

Select stakeholders in the food industry

Data on the main sources of salt will direct the selection of food industries to engage in product reformulations. Begin with representatives of food categories that account for the highest market coverage and highest potential effect on population intake of salt. Ultimately all food categories should be addressed and the responsible companies invited to participate in reformulation.

All food companies with products in a food category should be involved to ensure that they are equitably responsible for salt content reductions and to avoid market distortions and differential consumer preferences – issues that are viewed as threats by the food industry.

Umbrella food industry organizations or single large companies can be approached. If for example food markets are highly concentrated, negotiating with individual companies may be fast and effective but caution needs to be exercised to avoid government association with any particular company or brand to appear as an endorsement. In more fragmented markets, dealing with a food industry association, if it represents the majority of the sector (based on either number of companies or market share), will reach more companies simultaneously although it may take more time to agree on targets. If there is less than optimal coverage of a sector by an association, consider approaching sub-associations or undertake outreach that can connect outliers to the initiative.

Associations of importers may be especially important to engage in countries where a significant proportion of the food supply is imported.

Take advantage of existing contacts and relationships with food industry and of any relevant initiatives that are currently involving or have involved the food industry e.g. trans fatty acid elimination, fortification of bread.

Engage both manufacturers and retailers per food category where relevant.

Include other government ministries and agencies

Refer to Section 3 regarding leveraging and coordinating with other government entities. Where other government departments or agencies outside the health sector are involved in the production or regulation of food preparation, it may be advantageous to involve them in discussions with the food industry in order to best understand issues or constraints specific to the sector. Partnerships with these departments or agencies can also be useful in addressing research needs or identifying regulatory hurdles.

Engage NGOs

NGOs can both legitimize and support the national goal and the target setting processes. They can play a key role in balancing the public discourse regarding what consumers can do to reduce salt intake and what the food industry is able to do. They can also extend the reach of consumer awareness and education campaigns through their local and national networks and can offer champions to reinforce them.

Consumer organizations can be particularly helpful if not integral in monitoring whether food companies meet the commitments they make and can strengthen the government position to maintain the momentum to set and reach targets.

Societies of health professionals can also assist with raising awareness, disseminating information, advocating action on behalf of patients and encouraging industry commitments.

Step 4 – Plan the meetings

The design and formats of meeting between governments and food industries will vary from country to country. Much depends on whether there are pre-existing relationships with the food industry, their nature and the extent of communications. Regardless of the differences between countries, a number of points should be taken into consideration when launching the negotiations on targets and timelines.

Agree on a way of working, clarify expectations

- State a clear purpose for all meetings
 - Circulate an agenda in advance of each meeting with objectives specified and invite food companies to send in advance specific questions they want addressed during the meeting
 - At initial meetings, discuss what activities are already underway
 - If applicable, invite leaders in industry to present current contributions or progress already made
 - Meet separately with companies whose products are a concern related to high salt content and/or slow progress in reformulation. One-on-one meetings generally provide more detailed information about progress and future plans as well as successes and challenges. The information from individual companies may be useful in understanding the issues for a particular food category.
 - Consider sector-specific meetings, with groups of companies that produce similar products, with the objective of sharing problem solving and addressing common questions related to salt reduction initiatives. Such meetings can result in partnerships of industry groups to jointly work on technical solutions and reporting mechanisms.
 - Trade associations can be useful in presenting generic barriers and technical issues and solutions but due to the proprietary nature of some information, may not be able to elaborate on specific issues.
 - In preparation for meetings, be aware of the range of salt content of company products as well as the range of salt content of the product category and additionally in global brand products in the same food categories. For the latter, see the Global Food Monitoring Group at <http://www.georgeinstitute.org/global-health-landscape/food-policy/food-monitoring-group> and <http://www.georgeinstitute.org/global-health-landscape/food-policy/food-monitoring-group/resources>
 - Foster as open and honest sharing of information as possible without violating trade secrets
 - Keep brief notes of all key points covered in meetings for future meetings and document challenges and solutions. Circulate to all participants.
 - Where companies have changes in staff or resources, or there are company mergers
-

-
- or acquisitions, monitor progress and follow-up as needed with meetings
- Welcome meetings at company offices as there may be opportunities to tour food processing plants that can provide greater understanding of challenges and solutions
 - Discussions with food companies are most likely to address individual food categories because the function of sodium salts, food safety issues, the processing technologies and consumer thresholds for acceptability may be specific to a category. Expect discussions with food industry representatives to take varying amounts of time according to the food category.
 - There must be the clear understanding that the draft targets and timelines are to be finalized in a timely manner.
-

Request reformulation schedules

Ask for company-specific reformulation schedules that include the products to be reformulated, by how much and by when. Ensure that there is a focus on products with a larger market share.

Step 5 – Monitor performance

Industry accountability regarding targets and timelines in either voluntary or regulated contexts must be clarified in terms of a monitoring framework, with the framework included in the agreements made when industry engagements are initiated. It should stipulate what will be monitored, how, at what frequency, how performance results will be disseminated and the consequences in cases where targets are not met.

Propose and agree on a monitoring framework

In general terms, a monitoring framework can include:

- Process outcomes: progress with reformulations including food technology findings; advance reports to inform on initial results; dissemination of experiences/lessons learned; information on consumer preferences
- Intermediate outcomes: salt content of food products/categories from e.g. laboratory analyses or labels (NB small reductions may not appear on labels as a range of variations in salt content may be tolerated before a label change is required)
- Long term outcomes: salt consumption, blood pressure, etc.

Establish and maintain public attention to the targets

Launch the dietary salt initiative in a public forum where companies will state their commitments and indicate their plans. Plan subsequent events where company progress and achievement of targets can be applauded with media coverage. Document the successes and challenges.

Consider the different sources of data for monitoring

Valid and reliable data on the nutrition composition of foods are central to both public and private interests. In particular consumers need data especially on food labels to be accurate for their decision making.

voluntary approaches or to ensure compliance with regulation

Data required for monitoring commitments to voluntary targets or to ensure compliance with and enforcement of regulations can come from various sources. Setting baselines and ongoing monitoring of performance against targets requires that data be available on an ongoing basis such that collection can be most readily sustained. This applies equally to countries that require warning labels.

Label data can be a key source for nutrient content information where keeping them updated is mandated and enforced. National food regulatory agencies are a potential resource.

Consider requiring companies to regularly (annually or biennially) report the nutrient profiles of their foods per 100g or 100ml of product (salt and other nutrients as food composition) in a standardized electronic format to a central database.

Other sources of food composition data are food analyses conducted by government agencies, consumer organizations or research institutions.

Engage consumer organizations, scientific societies, health related NGOs
Continue to meet with food industry representatives

Consider inviting and supporting other organizations to monitor progress against the targets. Supply if possible the data required for monitoring or support the collection of data.

Meet regularly with sector representatives to continue to understand the technical issues and barriers being faced as well as learn about the successes in reducing salt use. If within a category or sector certain individual companies are slower to reduce salt, it may be worthwhile to meet with them separately to review the importance of salt reductions, as well as gain an understanding of their particular issues.

Dealing with technical issues, controversies, barriers

Food companies are especially concerned about certain issues when discussing salt reduction e.g. that all companies in a sector are involved and committed; there may be need for new technologies; consumer acceptability of reformulated foods; the reductions already made or underway; and food safety. Public authorities that are to be involved with the food industry must make themselves as aware as possible of these issues in advance of meeting with stakeholders and the proposed approach including the targets and timelines should reflect an understanding of the issues.

It is important to stress that for most food categories it is possible to initiate salt reduction through simple salt

removal e.g. a series of reductions of less than 10% are generally undetected by consumers. In later stages of reformulation, further lowering of salt can pose greater challenges as there may be need for salt substitutes and/or changes to food processing methods and equipment. For these reasons stepwise approaches have been adopted, to allow reductions to parallel the taste adaptation of consumers and also permit changes in production processes. Discussions with food technologists in advance of meetings with industry, to understand reformulation opportunities and challenges per food category, are recommended.

Use the science and the evidence

- Indicate that the science base on the health advantages of reduced salt intake is solid and frequently updated by internationally recognized scientific and public health organization e.g. American Heart Association (http://my.americanheart.org/professional/General/Cutting-Sodium-to-Prevent-CVD-and-Stroke_UCM_424966_Article.jsp); the Canadian Hypertension Education Program (<http://www.hypertension.ca/chep-recommendations>)
- Do not immediately respond to challenges raised by a single company; first carefully consider information from other companies and other countries, along with that from food technology specialists.
- Should the issue of micronutrient fortification arise, particularly the use of iodized salt to prevent iodine deficiency disorders, see http://new.paho.org/hq/index.php?option=com_content&view=article&id=2015&Itemid=1757 for the *White Paper on Improving Public Health by Optimizing Salt and Iodine Intakes, 2011* and the *Final Report on Improving Public Health in the Americas by Optimizing Sodium and Iodine Intakes – A Meeting Summary*

Refer to existing reformulations and targets

- If industry reformulation costs are cited as a barrier, refer to the established targets and timelines in Appendix 1. The existing experiences have proven that there is room for meaningful reductions, particularly in the first stages of reformulation for many food categories where the adjusted levels of salt remain within the acceptable range for taste.
- Reformulation is an ongoing activity for the food processing industry; a substantial proportion of the reformulation costs are part of ongoing business expenses. Companies can accommodate gradually lower salt content targets into product reformulation cycles to coincide with marketing strategies and label changes.
- Be prepared for companies being reluctant to reduce salt content of all brands especially those with global recognition. For the latter, refer to the Global Food Monitoring Group at <http://www.georgeinstitute.org/global-health-landscape/food-policy/food-monitoring-group> and <http://www.georgeinstitute.org/global-health-landscape/food-policy/food-monitoring-group/resources> for data on the salt content in best in class and best in world global brand products and global variations in the same product.

Encourage

- Encourage industry, especially small and medium enterprises (SME), to discuss and

**technology
transfer**

share technical solutions for reformulations

- If feasible contribute funds for technical research. There may be government departments or agencies other than health, universities or research centres that can fund or be partner in relevant research.
- Consider supporting food technology development among national SME e.g. through small grants in order for all companies in a sector to be actively reformulating their products.
- Seek public commitments from the food industry for technology transfer and otherwise encourage technology transfer by other means available.

**Invoke
corporate social
responsibility**

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- Give examples of industry leaders and be willing to highlight the success stories
 - Set mechanisms whereby industry leaders can report on progress
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Appendix 1: Targets and timelines for food categories in common in Argentina, Brazil, Canada, Chile and the National Salt Reduction Initiative in the United States (as of January 2013)

Food Category	Country and products	Baseline sodium - mg /100 g				Sodium Targets mg /100 g						
		average/ mean (year)	SWA 2009/ 2010	upper limit (year)		Average/mean			SWA/SWM			
Bread and bakery products	Argentina											
	Artisanal bread	920 (2011)		1100 (2011)		805	690					
	Bakery products	1300 (2011)		1600 (2011)		1200	1000					
	Brazil											
	Industrially produced bread and buns											
	Loaf bread	431		796							645	522
	Buns	524		656							531	430
	Artisanal bakery (French) bread	648									616	586
	Canada											
	Pantry bread, rolls, bagels, croissants, flatbread		469						430	380	330	
	Hearth bread		531						520	490	470	
	Chile											
Biscuits and Cookies	Artisanal bakery bread	780 (2010)					450					
	Private label supermarket bread						450					
	NSRI											
	Savory breads and rolls		485						440	360		
	Argentina											
	Crackers without bran	601(2011)		907(2011)		570.95						
	Crackers with bran	781(2011)		890(2011)		741.95						
	Sweet without filling	367(2011)		539(2011)		348.65						
	Sweet with filling	234(2011)		451(2011)		222.3						
	Snack cookies	1190(2011)		3000(2011)		1130.5						

Food Category		Country and products		Baseline sodium - mg /100 g				Sodium Targets mg /100 g									
				average/ mean (year)		SWA 2009/ 2010		upper limit (year)		Average/mean			SWA/SWM			Upper li	
										2012			2012			2012	
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		Baseline sodium - mg /100 g					Sodium Targets mg /100 g																
Food Category	Country and products	average/ mean (year)					upper limit (year)					Average/mean					SWA/SWM					Upper li	
		680(2011)	2010	SWA 2009/	2012	2014	2016	980(2011)	2012	2014	2016	2012	2014	2016	2012	2014	2016	2012	2016	2012	2016		
	Chicken						619																
	Canada																						
	Uncooked bacon - belly						619																
	Fully cooked breakfast strips and bacon substitutes						961																
	Uncooked fresh sausage						789																
	Cooked sausage						990																
	Cooked deli meats						1028																
	Dry cured, fermented deli meats						1592																
	Canned chicken or turkey						554																
	Canned meat						865																
	NSRI																						
	Cold cuts						1085																
	Pepperoni and dry salami						1834																
	Cooked sausage						898																
	Uncooked sausage						838																
Hot dogs						1059																	
Bacon						1792																	
Uncooked whole muscle meat and poultry						NA																	
Canned meat and sausage						987																	
Canned chicken and turkey						403																	
Argentina																							
Cream cheese						583(2011)																	
Danbo cheese						600(2011)																	
Cuartirola cheese						583(2011)																	
Tybo cheese						633(2011)																	
Porsalut cheese						600(2011)																	
Mozzarella						666(2011)																	

			Baseline sodium - mg /100 g				Sodium Targets mg /100 g											
			average/ mean (year)		SWA 2009/ 2010		upper limit (year)		Average/mean			SWA/SWM			Upper li			
Food Category	Country and products						2012	2014	2016	2012	2014	2016	2012	2014	2016	2012	2016	201
	Canada																	
		Cottage cheese				375							350	330	280			
		Cream cheese, cream cheese products, soft unripened goat cheese				472							440	410	350			
		Brie, Camembert, Cheddar, Swiss, Monterey, Jack, Brick, Colby, Gouda, Mozzarella				720							710	700	670			
		Feta and feta-style				1323							1270	1210	1100			
		Hard cheese grated and ungrated																
		Processed cheese and other cheese products				1610							1520	1420	1240			
	NSRI																	
		Grated hard cheese				1530							1450	1300				
		Cheddar, Colby, jack, mozzarella, muenster, provolone, Swiss				668							630	600				
		Cream cheese				408							390	350				
		Cottage cheese				347							330	290				
		Processed cheese				1393							1250	1040				
Snacks	Argentina																	
		Snacks	1500(2011)				2000(2011)		1275									
	Brazil																	
		Extruded corn snacks	832				1288									1090	85	
		Potato chips	548				720									650	58	
	Canada																	
		Chips, popcorn, extruded corn snacks				676							580	490	400			
	NSRI																	
		Flavoured chips				711							570	430				
		Unflavoured chips				524							470	420				
		Puffed corn snacks				969							820	680				

		Baseline sodium - mg /100 g				Sodium Targets mg /100 g									
						Average/mean				SWA/SWM					
						2012	2014	2016	2012	2014	2016	2012	2016	2012	2016
Food Category	Country and products	average/ mean (year)	SWA 2009/ 2010	upper limit (year)		2012	2014	2016	2012	2014	2016	2012	2016	2012	2016
Mayonnaise	Brazil	1269		1567											
	Canada		760								530				
	NSRI		713								570				
	Argentina														
	Soups in cubes	432(2011)		449(2011)		410.4	388.8								
	Instant soups	255(2011)		286(2011)		242.25	229.5								
	Ready to consume	331(2011)		358(2011)		314.45	297.9								
	Cream soups	337(2011)		355(2011)		320.15	303.3								
	Canada														
	Bouillon and broth		296								240				
Soups	Condensed wet		302								240				
	Ready to serve		280								240				
	Fresh and instant oriental noodles		309								240				
	Dry		388								240				
	NSRI														
	Canned		326								230				
	Broth and stock		352								260				
	Dry soup		820								570				
	Brazil														
	Instant pasta	2036		4718										1920.7	
Pasta	Canada														
	Shelf stable pasta, noodles and rice or other grains with sauce or seasoned		368								300	270			
	NSRI														
	Shelf stable dry seasoned pasta and stuffing mix										560 mg/ cup				

Appendix 2: Links to national targets and timelines including industry commitments made public

Argentina

Menos Sal + Vida at <http://www.msal.gov.ar/ent/index.php/informacion-para-ciudadanos/menos-sal--vida>

Company commitments at

http://www.msal.gov.ar/ent/images/stories/ciudadanos/pdf/2012-06_listado-empresas-adheridas-Menos-Sal-Mas-Vida.pdf

Brazil

Nilson EAF, Jaime PC, de Oliveira Resende D. “Iniciativas desenvolvidas no Brasil para a redução do teor de sódio em alimentos processados” [Initiatives developed in Brazil to reduce sodium content of processed foods] at

http://new.paho.org/journal/index.php?option=com_content&task=view&id=116&Itemid=215

Company commitments at

at <http://portalsaude.saude.gov.br/portalsaude/noticia/6839/893/acordo-para-reducao-de-sodio-inclui-novos-alimentos.html>

Canada

Complete Health Canada Data Table at http://www.hc-sc.gc.ca/fn-an/legislation/guide-ld/2012-sodium-reduction-indust_data_table-eng.php

Chile

Estrategia de Reducción de SAL/SODIO en los Alimentos at

http://www.redsalud.gov.cl/portal/url/page/minsalcl/g_proteccion/g_alimentos/reduccion_sodio.html

Programa de reducción de sal/sodio en pan at

<http://www.minsal.gob.cl/portal/url/item/9a0feb846ce5475de04001011e01795f.pdf>

Law No. 20,606 on the Nutrient Composition of Food and its Advertising [la Ley de Composición de Alimentos y su Publicidad] at http://www.europarl.europa.eu/meetdocs/2009_2014/documents/d-cl/dv/ley_20606_comp_alim_/ley_20606_comp_alim_en.pdf

Estudio “Propuesta de Criterios y Recomendación de Límites Máximos de Nutrientes Críticos para la Implementación de la Ley de Composición de Alimentos y su Publicidad” at

<http://www.minsal.cl/portal/url/item/d68cf20e14279b92e0400101650119e3.pdf>

Propuesta a Consulta sobre Modificación del Reglamento Sanitario de los Alimentos (Consultation on Proposed Amendments to the Sanitary Regulation of Food] at

<http://www.minsal.gob.cl/portal/url/item/d2682a13c0994729e04001016501108f.pdf>

National Salt Reduction Initiative in the United States

Complete NSRI Packaged Food Categories and Targets at

<http://www.nyc.gov/html/doh/downloads/pdf/cardio/packaged-food-targets.pdf>

Complete NSRI Restaurant Food Categories and Targets at

<http://www.nyc.gov/html/doh/downloads/pdf/cardio/cardio-salt-nsri-restaurant.pdf>

Company commitments at <http://www.nyc.gov/html/doh/html/diseases/salt.shtml>

Appendix 3: Pros and cons for types of targets that can be set

(Key source: European Salt Action Network document “Setting targets and industry engagement”)

Averages

Pros	Cons
- Allows some flexibility in the levels of salt in different products within a category, some lower and some higher allowing for different flavours - Usefully applied to foods where there is some natural variation in salt levels e.g. cheeses, cured meats - Useful for companies to use an average target per particular category to monitor its own compliance	- More difficult for consumers and public health agency responsible for dietary salt reduction to compare levels in individual products to monitor compliance - May be perceived as unfair by companies that have already lowered the salt content of their products
A simple average is the average salt level in foods within a category regardless of consumption levels; relatively straight forward to derive	Industry may reduce the salt in the saltiest low selling products in a category thereby reduce the simple average salt level of the category but have no significant impact on actual salt intake
- Sales weighted average (SWA) is the “gold standard” – is the average salt level in a food category weighted by the relative sales volumes of products within the category ie indicates product consumption at market level more accurately than the simple average - Monitoring SWA of different food categories combined with food intake survey data allow the most accurate estimates of population intake of salt	- To industry, the SWA may reveal sensitive market-share information - Market share data are prohibitively expensive; must be re-purchased to monitor SWA as changes are made; cannot be published or distributed; an unlikely option for LMIC - Much more difficult to monitor than simple averages in an independent transparent way - Does not address products high in salt - The SWA can be brought down with a focus on a few high volume products and not address targeted products at e.g. children - Monitoring on the basis of SWA would not allow a common approach for the whole food supply as some sectors e.g. large restaurant chains, food services industry do not provide sales volume data for menu items
Encourage more action by companies as more products likely need to be reformulated	
Based on UK modeling, an average target in the majority of cases requires far less reduction in salt content in a food category than a maximum to achieve a similar overall reduction in salt intake	

Maxima

Pros	Cons
• Sets a clear ceiling for all products in a category • Set at around the average for a food category at point in time and reduce as average shifts down	• Suggests that if a food product is at or below the maximum, no further action is needed; no incentive for products to have salt levels less than the maximum • Companies whose products have salt levels initially below the maxima have no incentive to reduce salt content • Undermines adoption of best in class/best in world that are based on SWA
• Easy for consumers and food companies to compare products	
• Moves salt content of products above the maxima down to the maxima	• If high salt content products are not high volume regarding consumption, may have little or no impact on actual salt intake levels • Companies whose products are below the maximum do not participate

Setting percentage reductions

Pros	Cons
• May be easier for the food industry • Combine with maxima (averages for food categories at point in time)	• Still need data on before and after levels of salt content for monitoring purposes

“Low” and “high” salt labeling of foods

Pros	Cons
• Requires setting of maximum levels • Conversely need to determine what is “low salt”	• Must be compulsory (regulatory mechanism) • Requires resetting of maximum levels as salt content falls