To: Bent Høie, Minister of Health

From: The high-level business group for the food industry

JOINT EFFORTS TO REDUCE SALT INTAKE BY 15% BY 2018

The Minister of Health's high level group takes a positive stance towards the initiative to reduce the population's salt intake, and wishes to contribute to achieving the goal of a reduction of 15% by 2018.

- We support the Norwegian Directorate of Health's proposal for the establishment of a mandatory partnership for salt reduction, which:
 - Sets realistic targets for the salt content of central product groups. The salt criteria outlined in the revised Keyhole Regulations may provide a starting point.
 - Builds upon experience obtained via comparable partnerships in Denmark and Great Britain.
 - Includes all organisations that produce and serve food the food industry, catering / food services industry and groceries trade industry. Consumers eat food in many contexts, and many consume a significant proportion of their food intake outside the home.
- The food industry cannot take responsibility for reducing the actual salt intake of the population, but can take responsibility for reducing the salt content in products.
- Special interest organisations will encourage their members to participate in the salt partnership.
- The authorities may influence consumer attitudes through campaigns. Awareness of the impact of salt on one's health must be raised, as well as awareness of the demand for products with less salt.
- The salt reduction must be undertaken successively in order to give consumers a chance to get used to the taste of products with less salt and prevent them from transitioning to other brands / import products with a higher salt content.
- The potential for salt reduction in different food groups will vary, since salt is important for taste, its technological qualities and food safety.
- It may be possible to implement smaller reductions more quickly.
 - Many companies have already made reductions, but this has not been communicated to consumers for two main reasons: consumers perceive reduced salt content as negative for the food's taste, and the successive changes are not large enough to permit the products to be labelled as having a reduced salt content.
- Larger salt reductions require more knowledge.
 - Research and the transfer of knowledge will be important.
 - After four years, the SALTO research project that is now nearing completion has shown that it is possible to significantly reduce the salt content of "complex" products in which the salt serves several functions.
 - The use of various salt substitutes may be an aid in this work.
- **Enclosure** Salt reduction potential in central food categories a working document for use in the salt partnership

Overview of companies and organisations that support the memo

The Minister of Health's The high-level business group for the food industry Norgesmøllene (Norwegian Mills) Lerøy Seafood Group Nortura TINE Orkla Mills Marine Harvest Nestle Norge Grilstad Compass group NorgesGruppen Coop Norge ICA Norge Rema1000 Virke NHO Mat og Drikke (Confederation of Norwegian Enterprise Food and Drink) Fiskeri- og havbruksnæringens landsforening (Norwegian Seafood Federation) Bama

Other companies and organisations that support the memo Mesterbakeren Bakers Goman Norgesbakeriene (Norwegian Bakeries) Fjordland Findus NHO Mat og Landbruk (Confederation of Norwegian Enterprise Food and Agriculture) Baker- og konditorbransjens landsforening (National Association of the Bakery and Patisserie Industry) Animalia

Enclosure

Salt reduction potential in central food categories – a working document for use in the salt partnership

The salt reduction potential of central food groups is described below. A small reduction in everyday products will reach everyone and have a significant impact on public health. These kinds of reductions should be prioritised over large reductions in products of a small volume. The target figures are stated as the amount of salt in relation to the nutrition regulation. Specific target averages for the salt content of the various product groups within all categories must be discussed further and determined through the salt partnership. A number of companies have been focused on reducing the salt content of products for several years, and the salt level in several products has already been significantly reduced.

Meat products

There is potential to reduce the salt content of the large volume products (sausages, sandwich meats and mince products) by 15% by 2018. A realistic but ambitious target average is 1.6 grams of salt per 100 grams in pâtés and 1.9 grams of salt per 100 grams in sausages. These targets are slightly below the suggested salt content specified in the revised Keyhole Regulations.

The reduction of salt has already been a significant focus area within this product group. Examples here include a 10% reduction in pâtés, a 15% reduction in sausages and up to a 29% reduction in sandwich meats.

The reduction of salt in cured products is challenging with regard to both food safety and technology, and will require research and the transfer of competence.

Bread and grain products

The industrial bakeries have worked to reduce the amount of salt in their breads and baked goods over an extended period, which has resulted in an average reduction of 15%. The Keyhole requirement is currently 1.25 grams of salt per 100 grams, while the average salt level in the 30 best-selling everyday breads is lower than this (1.1 grams of salt per 100 grams). The revised Keyhole criterion is set to 1.0 gram of salt per 100 grams, and the industry will work to reduce the level even further. Together, the bakers Mesterbakeren, Bakers, Goman and Norgesbakeriene have set a common target of an average of 0.9 grams of salt per 100 grams in their everyday breads, which is equivalent to a salt reduction of 18% by 2017.

The salt reduction target for grain products such as breakfast cereals, crispbreads and cake mixes with several sub-categories will be set through the salt partnership.

Fats

A realistic salt content target in the product group for butters, butter-containing margarines and margarines is 1.1 grams of salt per 100 grams. This is in line with the requirements of the revised Keyhole Regulations. For butters, such a target means that the salt content of the varieties that comprise the largest share of the market will be reduced from 1.5 grams of salt per 100 grams to 1.1 grams of salt per 100 grams (a reduction of 25%). For margarines, such a target involves a reduction from an average of 1.3 grams of salt per 100 grams (sandwich margarines) and 2.0 grams of salt per 100 grams (cooking margarines) to 1.1 grams of salt per 100 grams (a reduction of 15% and 45%, respectively).

Significant salt reductions have already been undertaken within the fats category, with the salt content of some products already being reduced by 50-60% (from 2.2 to 1.0 grams of salt per 100 grams). Further reductions for these products are challenging and will require significant

resources.

Fish products

For fish products, it is appropriate to use the new salt requirements in the Keyhole Regulations as a starting point.

Significant focus has already been placed on reducing the salt content of several types of fish products, and the salt reductions have been in the region of 10-38% since 2008.

Little salt is added to pure fish products, and consequently there are only small reductions to be made here.

In recent years, the manufacturers of fish products (fish cakes/patties/balls/pudding) have placed great emphasis on achieving a higher fish content and lower salt content. Salt reductions have already been made in several volume products, and with regard to sensory and technological properties the potential for further reductions is limited. In products where changes have already been made, the potential for salt reduction will be around 15-30%, depending on the product type.

It is challenging to reduce the salt content in smoked products, since salt has a food safety function here. Research and the transfer of competence are required in order to further reduce the amount of salt in such products.

For fish products that must be steeped in water before consumption, such as salted and dried cod and various types of salted fish, providing consumers with information about effective steeping will contribute to a reduction in salt intake.

Cheese

Yellow cheeses constitute the majority of cheeses consumed in Norway, and a realistic target for the salt content for this group is 1.2 grams of salt per 100 grams. Other types of cheese, including mould cheeses, cream cheeses, spreadable cheeses and processed cheeses constitute a far smaller share of the consumption. Other technological, microbiological and sensory considerations mean that separate salt requirements must be set for each sub-category of cheese. In processed cheeses, 2.5 grams of salt per 100 grams should be an achievable target if calcium-based salt substitutes are used. The majority of current processed cheeses have a salt content of between 2.6 and 3.3 grams of salt per 100 grams.

Targeted work to reduce the salt content of Norwegian cheeses has been undertaken since the 1980s. In Norvegia and Jarlsberg, which represent the majority of cheeses consumed by Norwegians, the salt content has been reduced from over 1.5 grams of salt per 100 grams to 1.2 grams of salt per 100 grams (equivalent to a 20-30% reduction). For comparison, the requirement for salt in the revised Keyhole Regulations is 1.6 grams of salt per 100 grams. In a global context, Norwegian cheese has a low salt content, and the salt that everyday cheeses contribute to the overall diet is limited. For both technological and taste-related reasons, there is little potential to further reduce the salt content of yellow cheeses.

Ready meals

Significant focus has already been placed on reducing the salt content of several types of products in this group, and the reductions in salt have been in the region of 10-38% since 2008.

Today, ready meals comprise a broad range of products with great variations in composition, and the challenges associated with reducing the salt content of these products are therefore complex.

A realistic but ambitious target for the average salt content in ready meals is 0.8 grams of salt per 100 grams. The salt content of ready meals currently ranges from 0.2-2.1 grams of salt per 100 grams, with an average of around 1 gram of salt per 100 grams. A target of an average salt content of 0.8 grams of salt per 100 grams will therefore entail a significant reduction for many of these products.

Pizza

The salt level in frozen pizza has been significantly reduced (by 30-40%) for certain products since 2008 (from an average salt level of 1.8 grams of salt per 100 grams to the current level of 1.0-1.3 grams of salt per 100 grams). The average salt levels for other types of pizza are in the region of 1.8 grams of salt per 100 grams. A realistic target for the salt content of these products is 1.3 grams of salt per 100 grams, i.e. a reduction of 28%.

Snacks

The snacks category includes products such as chips, salted and/or roasted nuts and extruded/pelleted snacks. Such products should not be a part of the everyday diet, and therefore do not represent a significant contribution to the public's salt intake in general. However, we have identified potential for reducing the salt content in this category. The potential reduction varies for the different product types, but an average reduction of 15% is realistic.

The salt level in nuts spans a broad range since many varieties have been launched without added salt, and varies from 0-2.8 grams of salt per 100 grams. The target for the average salt content is 1.1 grams of salt per 100 grams by 2018. Chips currently contain 1.3-2.3 grams of salt per 100 grams. An example of a target average to be achieved by 2018 is 1.4 grams of salt per 100 grams.

The hospitality industry

We currently know little about the amount of salt we consume via food from the hospitality industry. Without a baseline measurement, a concrete target reduction may therefore be difficult.

On the other hand, however, the hospitality industry can work with awareness-raising activities by influencing knowledge and attitudes in the following way:

- Within purchasing departments, increased knowledge of salt and the salt reduction targets, health effects and acceptable salt levels will steer purchases away from products with the highest salt content, and set requirements regarding the upper salt content limits for manufacturers / suppliers / own product development in the products that generally contribute the most salt.
- Have a conscious awareness of salt in centrally managed menus.
- Undertake a survey among chefs in order to map their knowledge of and attitudes to salt. The questions may be in line with the Nordic population survey undertaken by YouGov in September 2014. The survey may be repeated after approx. one year to see whether a steady feed of information about salt and health from the authorities and head office is moving knowledge and attitudes in a positive direction.