

SETTING SALT REDUCTION TARGETS

Encouraging the population to eat less salt and use less salt during cooking is important, but the amount of salt already added to the foods they buy is beyond their control. A large proportion of salt intake in the region comes from bread, processed meats, cheeses, pickles and olives, sauces and condiments, as well as other packaged foods and cafes, restaurants and street foods. Engagement with the food industry (for both processed packaged foods and the out of home (OOH) sector) to use less salt during production is essential to drive population intakes lower. This is best done through the setting of salt reduction targets, for the entire industry to work towards.

The salt content of products within the same category is likely to vary e.g., seasoning cubes from different brands often differ widely in the amount of salt they contain, and assessing this variation is necessary when first setting salt targets. It is important to introduce gradual and achievable reductions, over a period of 3-4 years, so that consumers do not notice the difference in taste.

Setting Salt Reduction Targets

The targets should be ambitious, but at the same time realistic and achievable. In 2021 the World Health Organization (WHO) released a set of global benchmarks for sodium (salt) levels in foods across almost 100 subcategories of food. These benchmarks, intended as a guide for national policy makers, provide an excellent starting point when developing salt reduction targets. Each WHO benchmark gives a target maximum sodium content (mg/100g) for each food subcategory, generally based on the lowest existing maximum salt target in place globally [1].

Ideally, category-specific targets would be set across a wide variety of products to encompass the entire food industry. This way, reductions are made across the board which will impact everyone's health and bring population salt intake in line with the WHO's recommendations (<5g/day for adults). However, as a starting point, salt targets can be set for the leading contributors of salt in the diet (see Assessing Sources of Salt protocol). This will still have an impact on public health, and importantly, will act as a proof of concept to demonstrate to other food companies that reductions are possible and acceptable by the consumers. Categories to prioritise should include:

- Products that aren't especially salty, but account for a large proportion of total salt intake (e.g., bread) or have a large market share

BENEFITS OF SALT TARGETS

Salt reduction targets benefit both the food industry and consumer tastes:

- Gradual reductions allow for changes to salt taste receptors on the tongue, making consumers more sensitive to lower salt concentrations. Evidence suggests salt content can be reduced by up to 20% without impacting on consumer acceptability.
- Salt is often associated with taste; if the reductions in salt are too great, or declared on packaging, then consumers may complain, and this will potentially impact sales and/or industry reputation. Gradual reductions will go unnoticed and thus will likely prevent negative feedback from consumers.
- 'Low salt' or 'reduced salt' versions of products should be avoided. Consumers can perceive low-salt products to be less tasty and they will likely be bought only by a small sub-set of health-conscious consumers.
- Small and gradual reductions in salt content across all products in a subcategory of food allows consumers can buy and enjoy the same products but with less salt. Over time, this benefits health by lowering blood pressure and thereby lowering the risk of having a stroke or developing heart disease

- Products with a very high salt content, but relatively low volumes of consumption, e.g., cured meats and fish, olives and pickles, canned products, sauces, salted snacks
- Products that are frequently consumed by vulnerable groups, such as children
- Foods that affect the supply chain beyond what is sold to individual consumers e.g., margarines used in bakeries for production of bread and other baked goods, or soup cubes and bases

It is important to consider salt levels in products available within the country when setting a target. If the average salt content of a particular product subcategory is much higher than the corresponding Benchmark it will be necessary to set a series of incrementally stringent targets over a period of 2 – 4 years so that salt can gradually and inconspicuously be removed.

On the other hand, if the average salt content of a product subcategory is already below the Benchmark, there is an opportunity to set a more stringent target. For example, the salt content of bread in several countries in the Eastern Mediterranean Region is already below the WHO Benchmark, so there is an opportunity to set a lower target, as has been done in Bahrain, Oman and United Arab Emirates.

When setting targets, it is also important to consider food eaten outside the home, including food sold in restaurants, fast food outlets and street food. There is an absence of salt content data in the OOH sector which must be considered; while salt reduction targets should be developed with the OOH sector in mind, initial efforts should focus on gathering necessary baseline data which may require a lot of resources. Early engagement with restaurant associations/representatives, street food vendors, vendor associations and local authorities on the need to reduce salt levels is recommended, alongside engagement with manufacturers of processed, packaged food. For more information, please see our Addressing Salt Levels in the Out of Home Sector protocol.

Voluntary versus Mandatory Salt Reduction Targets

Both high- and middle-income countries have adopted voluntary or mandatory targets, with voluntary targets favoured by most countries. Argentina and South Africa are key examples of countries that have mandated targets for the leading sources of salt in their populations' diets, including bread, meat, soups, snack foods and canned foods. Mandated targets in other countries are primarily for bread products, such as in Oman.

A mandatory approach has been shown to be more effective in driving salt reduction down across the food sector [2]. However, legislation may not be possible for many countries, and the long and complicated process of legislation could cause delays in action. Countries must consider their own political processes to determine whether a legislative or voluntary approach is more appropriate. The best way to proceed is to start with voluntary targets with the threat of legislation and, at the same time, enact the legislation process. There are pros and cons to both types of target but mandatory targets are increasingly preferred to ensure industry compliance. Countries could opt to develop legislation, but use voluntary targets in the interim while the legislation is passed by the Government.

Oman Example

In 2019, Oman introduced the Omani Standard for Bread [3]. The initiative was led by the Ministry of Commerce and Industry and set out a mandatory maximum salt content for bread. Originally a voluntary initiative, a target of a 10% reduction in salt content was set in 2015, followed by another 10% reduction to a total of 20% in the main three bakeries supplying most of the bread in the country. The initiative became mandatory in May 2019 when a maximum salt content of 0.5% (0.5 g of salt in 100 g of bread) for flat bread (Arabic bread) and a 1% (1 g of salt in 100 g of bread) other breads such as sliced bread or French bread.

Bahrain Example

In Bahrain the following legislation was passed to limit salt levels in bread and other bakery products: Resolution No. (28) of 2018 Determining the proportions of adding table salt in popular and automatic bakery products: BHR_20180_مرفق قرار خفض استهلاك الملح.pdf (who.int) [4]

The legislation, which was introduced in 2018 with a 3 year implementation period, applies to products of popular bakeries and Arab and European bakeries. The limit is a maximum of (0.5%) salt at the level of raw flour, which is equivalent to one teaspoon per kilo of flour. Further policy details are available: (قرار رقم ٢٨ لسنة ٢٠١٨) [Resolution No. (28) of 2018 Determining the proportions of adding table salt in popular and automatic bakery products] [5]

Saudi Arabia Example

The Saudi Food and Drug Authority adopted a technical regulation No. SFDA.FD 2362/2018 "Technical Requirements for Bread Production", which requires manufacturers and importers of bread products in Saudi Arabia to limit the salt content of bread to less than or equal to 1g salt/100g bread (finished product). Following an initial grace period, the authority committed to taking formal steps in case of non-compliance [6].

Target Type	Pros	Cons
Mandatory	Creates a level playing field - all food companies expected to comply	Lengthy process to pass the law mandating the targets Difficult to reset to lower targets, as the law must be amended Requires political support, which can be challenging
Voluntary	Shorter timeframe to develop and implement Easier to reset to gradually lower targets Politically appealing	Requires strict, transparent monitoring to ensure progress is being made Requires support and leadership from government Requires compliance across the whole sector which can be challenging

Types of salt reduction targets

There are a number of approaches that can be taken when setting targets for categories of food. All targets are set for salt content per 100g, and the approach taken will depend on what is feasible for the Region/country.

Maximum Targets

Maximum targets are generally used for each of the agreed food categories for the entire industry to achieve. The target is set per category, and each product made by a company must achieve it, e.g., if a company produces 10 different bread products, they must all fall below the maximum target.

Average Targets

Average targets allow for flexibility in the level of salt present in products within a specific category of food and can either be simple averages or weighted on sales data.

- Simple averages look at the category of food as a whole and allow for flexibility in the level of salt present within a category of food
- Sales weighted averages pay particular attention to sales data and high market volume products

It is recommended both average and maximum targets are developed for each food category, per 100g. All companies should be encouraged to meet the maximum targets, while average/sales-weighted average targets provide companies with flexibility to prioritise further reformulation in their best-selling products. Average targets can be set as the mean or a median salt level, depending on the distribution of salt content in the products within the category.

Percentage Reductions

It is also possible to set a broad reduction target e.g. a 20% reduction from the average salt content of all products within a category within a specified timeframe.

There are pros and cons to the different targets.

Target Type	Advantages	Disadvantages
Maximum target	Simple to understand Easy to develop, implement and monitor Prioritises highest salt products	May not incentivise further reductions on products that already have a lower salt content than the target
Simple average target	Easy to implement and monitor	Not focused on the saltiest products Without sales data, industry may reduce levels of salt in poor-selling products to claim a reduction
Sales-weighted average target	Encourage stronger reformulation efforts on the most popular selling products	Sales data is expensive to acquire Does not consider the products most consumed by the more socially deprived and vulnerable groups
Percentage reduction	Easy to understand	Difficult to monitor and evaluate at the category level Progress made within one category may be ignored if other categories have not made significant reductions

Setting Salt Reduction Targets

Food Categories

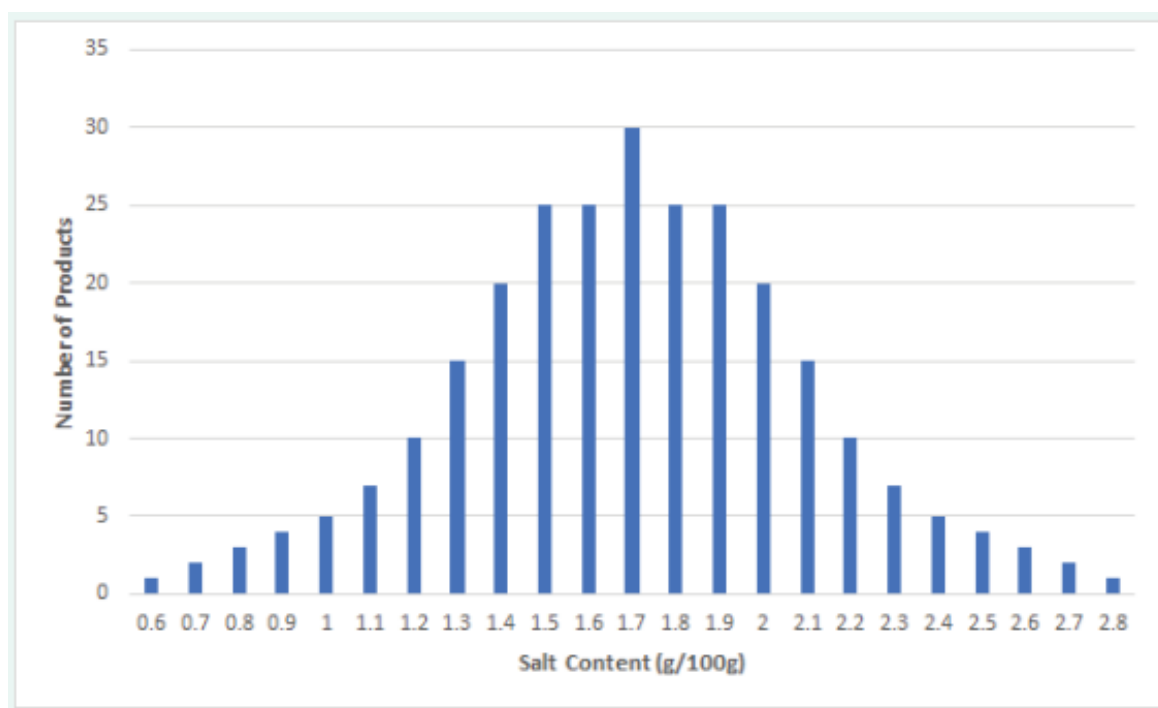
Decide on the categories of food to set targets for - either comprehensive across all food products with added salt (recommended), or specific high contributing categories (see Assessing Sources of Salt protocol).

Current Salt Content of Food

Using information from an up to date and accurate food database, look at the current salt content of food sold in retail. A food database will allow comparison of salt levels across different companies and establish the range and level of variation in salt used for any given category of food. This data would be a starting point for establishing targets. Please see Developing a Database for Salt Content Monitoring protocol for more information.

Setting Targets Maximum and Average Targets

This is an example histogram which displays the distribution of salt content in a food category



Depending on a number of factors (the level of variation in salt content, feasibility and acceptability of salt reduction) an average target can be set 5-20% lower than the current average. Within the example above, mean salt content is 1.7g/100g and there are examples of products with far less salt, demonstrating the technological feasibility and acceptability for the consumers. Therefore, an average target at 10% less than the current average salt content can be proposed – 1.53g/100g.

- If the salt content was not normally distributed, then the median salt content can be utilised instead of the mean.
- The maximum target is set at a higher level than the average and is useful in trying to drive reductions in the more problematic foods and narrow the distribution. The maximum target can be set between the 50th and 75th centile of the salt distribution of a food category.
- Be mindful of how the product is likely to be consumed, as preparation techniques such as dilution or grilling will affect the end product's salt content. Specify if the target is based on product 'as sold' or 'as prepared'.
- Alternatively, a 20% reduction from the baseline average salt content in all products within a specific category can be proposed.

Examples of Existing Salt Reduction Targets

Salt reduction targets that have already been set are useful examples to assess what might be appropriate targets for other countries in the region [7].

Country	Target Type	Category	Target
Kuwait	Voluntary Percentage Reduction	Pitta bread, white and wholewheat breads	Initial 10% reduction followed by another 10% reduction 6 months later
Oman	Mandatory Maximum	Flat bread (Arabic bread), sliced bread and French bread	0.5g/100g for flat bread 1g/100g for other breads
Qatar	Mandatory Maximum	Bread	0.8g/100g

These can be used as a benchmark for the targets and will also provide evidence of technical feasibility and acceptability which will help when engaging with industry. Multinational companies will claim that products are made according to local taste preferences, however, this does not hold out when international product comparisons have been undertaken.

Timelines

Set reasonable timelines for industry to achieve the targets. As a guide, gradual and achievable targets should be set to be achieved within 3-4 years, but regular monitoring should be performed alongside this. These small and gradual stepwise reductions would be a favourable approach, particularly in categories of food where variation of salt content is wide, to bring the saltiest products more in line with their competitors. Once variation has been narrowed, more challenging targets can be set. This stepwise approach involves the resetting of targets over a number of years to gradually bring the average amount of salt used by the food industry down, ideally until an average population salt intake of 5g per day is reached. Smaller and more frequent reductions may encourage stronger reformulation efforts, and encourages monitoring and evaluation, providing an even bigger incentive for progress.

External Engagement

It is important to engage with government ministries, food industry, NGOs, the general public and other stakeholders to gain support for salt reduction targets.

Monitoring and Evaluation

Monitoring progress is necessary to hold industry to account and apply adequate pressure, especially if running a voluntary system. Strict monitoring processes should be established to identify where sufficient progress has been made to reset targets early, or where companies are collectively struggling.

Monitoring should be done regularly, ideally on an annual basis, but assuming targets are set to be achieved within 3-4 years then monitoring should take place halfway through and at the end of the deadline.

The following monitoring processes can be used:

- Request salt content data direct from companies, particularly where relationships have been built via engagement activities
- The salt content of all products in the categories of focus can be assessed again, utilising the same processes used to build the database (see Developing a Database for Salt Content Monitoring protocol)
- If this requires too much resource, instead randomly sample the products, using the sample matrix

Monitoring reports should ideally be made public, whilst respecting commercially sensitive information, to encourage further progress from industry and drive momentum.

Alongside measurement of salt content, it is important to monitor health outcome data to demonstrate an impact on public health. This will involve assessing population salt intakes (see Measuring Population Salt Intake protocol) and tracking data on population blood pressure and deaths from cardiovascular disease, if available.

For countries that rely heavily on imports, trade flows should also be monitored particularly as trade becomes more liberalised and new trade and investment agreements are signed.

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