



The 10-Year Health Plan: Implications for the Food Industry



Introduction

Amy Glass

**Head of UK Diet and Health Policy
Food and Drink Federation**



Industry progress in supporting healthier diets and summary of the 10-Year Health Plan

Louise Allen
Senior Diet and Health Executive
Food and Drink Federation

Supporting healthier diets



Shaping a healthier future through food and drink

fdf

PROGRESS REPORT 2026



Company case studies



Non-HFSS noodles and rice
At least 1 of your 5 a day



Non-HFSS cakes
30% less sugar. Up to 10x more fibre



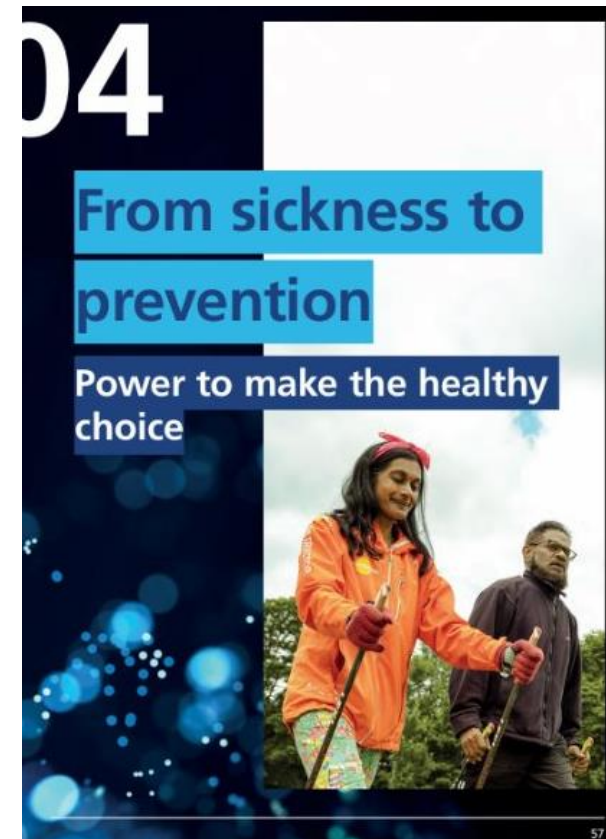
Non-HFSS crisps
Average 47% salt reduction



Non-HFSS – Reduced sugar yogurt



The 10 Year Health Plan for England



From sickness to prevention

“Launch a moonshot to end the obesity epidemic”

Update the Nutrient Profile Model within advertising and promotion regulations

Introduce mandatory healthy food sales reporting for all large companies

Set new mandatory targets on the average healthiness of sales

Updating regulations with a new NPM

“Current advertising and promotion restrictions use the 2004 nutrient profile model to categorise which foods are more or less healthy. This is plainly out of date, and we will update these standards.”

- Relevant to the Less Healthy Food Advertising Regulations 2025 (UK) and the Food Promotion and Placement (England) Regulations 2021
- DHSC proposing to update these regulations with the 2018 NPM

Government guidance – 2018 NPM



Technical guidance

- How to apply the 2018 NPM
- How to calculate free sugars

Guidance on fruit / veg / nut / seed definitions



Worked examples and calculations

- Dairy and non dairy drinks
- Foods with fruit or veg
- Other scenarios for foods with fruit and veg
- Added sugar foods

Consultation on applying the new NPM

Public consultation closed 17 June.

Sought input on:

- Whether the proposals will improve population health
- Whether the categories in scope should be expanded
- If a 12-month implementation period is sufficient
- If the estimated costs to businesses are a fair assessment
- The main challenges or operational issues that businesses might face when implementing the new NPM

Closed consultation

Applying the new NPM to advertising and promotions restrictions

From: [Department of Health and Social Care](#)

Published 25 March 2026

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We are analysing your feedback

Visit this page again soon to download the outcome to this public feedback.

Mandatory Reporting

“In a world-first, by the end of the Parliament, we will introduce mandatory healthy food sales reporting for all large companies in the food sector. This will set a robust baseline upon which to base our future policies as well as improving transparency in the food industry. As well as supporting continued efforts on transparency, the data will support customers with their choices and support investors to invest in healthy companies.”

Draft DHSC metrics

- Sales-weighted average NPM score
- % of total product sales (tonnage) from HFSS products
- Sales-weighted calories content per 100g or per serving/portion

Further clarification needed on...

- Definition of businesses in scope
- Final metrics
- Governance of reporting process

Mandatory Targets

“Using that reporting we will set new targets to increase the healthiness of sales in all communities and work with the Food Strategy Advisory Board on how to sequence the introduction of this policy. Targets will be mandatory but companies will have the freedom to work out how to achieve the target, whether through reformulation, by changing their layout, introducing new healthy products or through changes to customer incentive and loyalty schemes.”

“By introducing smarter regulation, focused on outcomes, we expect to be able to repeal legislation restricting volume price promotions and aisle placement.”

Further clarification needed on...

- Businesses in scope
- Targets
- Timings for implementation
- Governance and monitoring

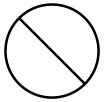
Other policies reconfirmed



Restrict junk food advertising targeted at children



Update to the England school food standards



Ban the sale of high-caffeine energy drinks to under-16's in England



Changes to the UK Soft Drinks Industry Levy – Uprating and a review of scope and thresholds

Challenges for the food industry



Businesses are facing high costs, which limits investment opportunities

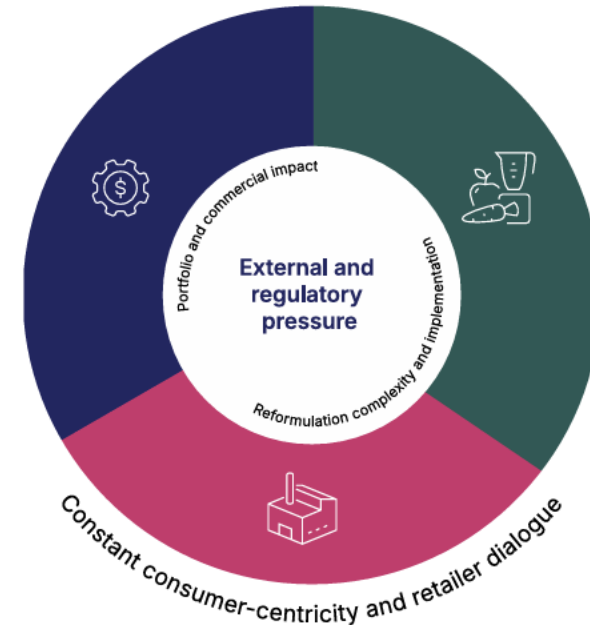


Shifting regulatory benchmarks damages confidence to invest

Reformulation is a complex, iterative balancing act across compliance, operational and commercial risk

Does this work commercially?

- Will the price difference be too great to swallow?
- What is the impact on performance and margin?
- What is the impact on the broader portfolio of products?
- What are customers thinking and doing?



Can we reformulate it?

- Can we make it in a test kitchen?
- Can it pass sensory testing?
- Can it pass test panels and external customer testing?
- Does it meet safety and shelf life requirements?

Can we make it at scale?

- Do we need new ingredients, suppliers or packaging?
- Can we get security of supply and quality at scale?
- Can it run on the factory line? What adjustments need to be made?

Driving further progress

Government can support industry by:



Maintaining a stable regulatory environment and consistent goalposts to give companies the certainty they need to invest in further healthier product innovation



Delivering mandatory healthy food sales reporting across the whole food sector, working in collaboration with industry to support transparent data reporting

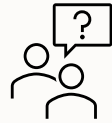


Establishing a reformulation programme to support SMEs based on the Reformulation for Health Programme in Scotland



Launching a new public health campaign with positive, practical messaging to support consumer behaviour change

Preparing for future policy



FDF
HFSS Toolkit



FDF
NPM Explainer



Top Tips

- Showcase your success stories & share learnings on what works (and what doesn't!)
- Measure the opportunities and risks for your business
- Respond to government consultations
- Engage with your trade body!

Thank you

For more information, please contact louise.allen@fdf.org.uk



Current perspective on HFSS innovation

Hannah Theobald
Principal Scientist
Mars Wrigley Confectionery

MARS

Tomorrow starts today

Current Perspectives on HFSS Innovation

Hannah Theobald RNutr

Senior Principal Scientist, Health & Nutrition

Mars Wrigley, Europe & Central Eurasia

About Mars UK

The world we want tomorrow starts with how we do business today
MARS

Five Principles
 Quality Responsibility Mutuality
 Efficiency Freedom

12
 Sites

8
 Factories

1932 Forrest E. Mars opened the factory in Slough, launching the original Mars® Bar
 Wrigley has a long and proud history in the UK dating back to **1911**

1
 M&M'S Retail Store

Mars Food UK launches pouch designed for recyclability 2021
 Circular packaging

MARS UK
 NAMED
 'GLASSDOOR'S BEST PLACES TO WORK' 2025
 We are proud to be ranked as one of the best places to work by Glassdoor

~15,000
 Associates

All our UK offices and factories operate on **100% renewable electricity** powered by our wind farm in Moy, Scotland

WALTHAM
 Petcare Science Institute
 Home of the **Waltham Petcare Science Institute™**, the global scientific research centre for Mars Petcare and a world leading scientific authority in pet nutrition and wellbeing

All of our factories have been zero waste to landfill since 2017



Overview

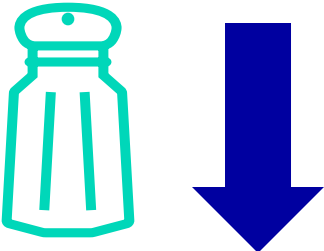
Non-HFSS as a business imperative

Challenges & opportunities for innovation & renovation

Innovation & investment

The case for a stable regulatory environment

Over the last 20 years business have responded to multiple health improvement measures



Salt, sugar & kcal reduction targets
Soft drinks industry levy



Marketing & advertising restrictions



Retail placement restrictions
Volume-based price promotion restrictions

Since 2021 FDF member products have seen significant nutrition improvement. Products, on a sales weighted average (SWA) now contain:

19% less sugar

18% less salt

17% fewer calories

And there's been a

13% improvement in NPM score

Non-HFSS has become a business imperative

**Can no longer advertise or
promote HFSS foods &
beverages in 13
categories of food & drink**

MARS

Health case

- ✓ **Addresses consumer demands for healthier products**
- ✓ **Improves the nutritional value of product offerings**
- ✓ **Supports dietary improvement**
- ✓ **Provides choice & encourages consumer behaviour change**

Business case

- ✓ **Maintains brand visibility and relevance**
- ✓ **Differentiates against competition**
- ✓ **Supports nutrition & health commitments and corporate reputation**

What does it take to develop non-HFSS products?

PEOPLE

R&D

Procurement

Quality

Factory

Sales

Marketing

TIME

Product development cycles – up to 3 years

Numerous formulation iterations & factory trials

MONEY

Alternative ingredients

Staff costs

Line trials

Packaging

Equipment

Advertising & marketing

Investing in non-HFSS is a significant business commitment!

The numerous complexities of formulating to be non-HFSS need to be considered



Challenges vary by ingredient and category

KIND

5 non-HFSS SKUs
≥81% nuts



MARS

Pringles

Base renovation
to be non-HFSS.

Choiceful use of
flavours



Kellogg

Renovation to be non-HFSS

>50% cereal SKUs
non-HFSS vs 2004/5
NPM



Food & Nutrition

12 non-HFSS ambient
ready meals launched
across Ben's Original
and Dolmio



Investment in non-HFSS product development

- Commercially sensitive information!
- In the 5 years to 2022, **£21 billion** spent on **voluntary reformulation, healthier innovation & appropriate portion sizing**. Money spent on Capex and R&D as well as marketing¹.
- **In 2024** alone, FDF members invested £180 million on renovation and innovation of healthier products in response to less healthy food legislation².

1) Office for National Statistics Dataset - Annual gross fixed capital formation by industry and asset

2) FDF State of Industry Survey 2025

Impact of HFSS restrictions to date

Initial indications:

Leeds University research¹ indicates:

- Businesses are responding to HFSS food restrictions by reformulating products to be non-HFSS
- Retailers are replacing in-scope HFSS products with out-of-scope products at store entrances, aisle ends & checkouts
- 2 million fewer sales of HFSS products each day in England

OHID food purchasing data² reports year-on-year reduction in HFSS sales from 2021 to 2023, with particularly notable reductions in:

- Pizzas: 57.3% → 43.1%
- Soft drinks: 40.1% → 30.5%
- Crisps and savoury snacks: 93.5% → 88.4%
- Breakfast cereals: 31.6% → 25.0%

1) Jenneson et al (preprint) https://osf.io/preprints/osf/j6b8p_v1

2) OHID 2025 <https://fingertips.phe.org.uk/static-reports/obesity-physical-activity-nutrition/food-purchasing-impact-on-diet.html>

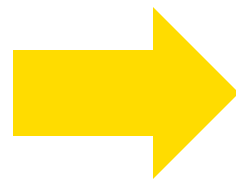
The need for a stable regulatory environment

- **Policy must be proportionate, realistic and have the desired impact**
- **Businesses need regulatory certainty for long-term success of innovation**
 - Product development and renovation takes time
 - Multi-year investments require time for a RoI
 - Products need to be embedded in the market to succeed
- **Unintended consequences of existing policy must be fully understood before amending**
- **Changing the goalposts disincentivises business investment into delivering healthier products & makes healthier innovation A LOT harder**

The challenge facing breakfast cereals

A move to the 2018 NPM risks the ability to promote foods embedded within the Eatwell Guide

- Differentiating healthier versions of foods is imperative for improving diets
- Few breakfast cereals will pass the 2018 NPM, despite their high fibre content
- Significant renovation would be required to meet the new NPM – impact on consumer acceptability
- Impact on fibre and micronutrient intake



A plea to consider the impact of existing legislation before implementing any changes as well as to fully understand the impact of the 2018 NPM on intakes of foods within the Eatwell Guide and the subsequent impact on key nutrient intakes, i.e. fibre and micronutrients

Thank you

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MARS

In the world we want tomorrow,
society is inclusive.

In the world we want tomorrow,
our planet is healthy.

In the world we want tomorrow,
everyone is thriving.



Future perspective on HFSS: Implications and challenges for industry

Lewis Wallace

Regulatory & Nutrition Affairs Advisor
Campden BRI

FDF Webinar: Future Perspective on HFSS

30th June 2026

Lewis Wallis (Regulatory & Nutrition Affairs Advisor)

STATEMENT: Any views or opinions expressed by Campden BRI are independently and impartially held and should not be taken as representing the views of its members.

UK NPM 2018 Main Changes

- Energy - Updated to 8,400 kJ (2,000 kcal)
- Saturated fat – reflects new energy thresholds
- Protein – reflects new energy thresholds
- Salt - Sodium replaced with salt values
- Fibre - Increased thresholds (AOAC method)
- Fruit, Veg, Nuts and Seeds
- **Free sugars** - new component with lower thresholds, shifting focus from total sugars

Table 1: points scored for each 'A' nutrient per 100g of the food or drink

Points	Energy (kJ per 100g)	Saturated fats (g per 100g)	Free sugars (g per 100g)	Salt (g per 100g)
0	≤ 315	≤ 0.9	≤ 0.9	≤ 0.2
1	> 315	> 0.9	> 0.9	> 0.2
2	> 630	> 1.9	> 1.9	> 0.5
3	> 945	> 2.8	> 2.8	> 0.7
4	> 1,260	> 3.7	> 3.7	> 0.9
5	> 1,575	> 4.7	> 4.6	> 1.1
6	> 1,890	> 5.6	> 5.6	> 1.4
7	> 2,205	> 6.6	> 6.5	> 1.6
8	> 2,520	> 7.5	> 7.4	> 1.8
9	> 2,835	> 8.4	> 8.3	> 2.0
10	> 3,150	> 9.4	> 9.3	> 2.3

Note: if a food or drink scores 11 or more 'A' points, then it cannot score points for protein unless it also scores 5 points for fruit, vegetables, nuts and seeds (see 'Calculating 'C' points' below).

Table 2: points scored for each 'C' nutrient or component, per 100g of the food or drink

Points	Protein (g per 100g)	Fruit, vegetables, nuts and seeds (g per 100g)	Fibre (as measured by AOAC method) (g per 100g)
0	≤ 1.7	≤ 40	≤ 0.6
1	> 1.7	> 40	> 0.6
2	> 3.4	> 60	> 1.2
3	> 5.1	Not applicable	> 1.8
4	> 6.8	Not applicable	> 2.4
5	> 8.5	> 80	> 3.0
6	Not applicable	Not applicable	> 3.6
7	Not applicable	Not applicable	> 4.2
8	Not applicable	Not applicable	> 4.8
9	Not applicable	Not applicable	> 5.4
10	Not applicable	Not applicable	> 6.0



Calculating Free Sugars

Free Sugars Definition (DHSC Technical Guidance, Jan 2026)

Free sugars includes:

- Added sugars (e.g. sucrose, glucose, syrups, invert sugar)
- Sugars in honey, syrups, nectars
- Sugars in fruit/veg juices, purées, pastes, powders, concentrates, extruded products
- All sugars in drinks (except naturally occurring lactose in dairy drinks)
- Lactose and galactose when added as ingredients (e.g. whey powder, hydrolysed lactose)
- Sugars in lactose-free dairy (where lactose is broken down)

Free sugars excludes:

- Naturally occurring lactose in milk and dairy products
- Intrinsic sugars in intact fruit and vegetables
- Sugars in starchy foods (e.g. grains, potatoes)
- Maltodextrins, oligofructose, and polyols

Method (DHSC Technical Guidance, Jan 2026)

Calculating free sugars

You should use the following approach to calculate free sugars for foods and for drinks. It will enable you to:

- identify and quantify ingredients that contribute to free sugars
- determine the total sugar content of those ingredients per 100g
- calculate the free sugars content of those ingredients per 100g

Worked Examples (DHSC Technical Guidance, Jan 2026)

Table 13a: calculating free sugars for a teacake

Ingredients	Quantity	Source of free sugars	Total sugar per 100g	Calculation of free sugars
Wheat flour	Not applicable	No	Not applicable	0g
Currants	9%	No	Not applicable	0g
Raisins	9%	No	Not applicable	0g
Sultanas	9%	No	Not applicable	0g
Sugar	4%	Yes	100.0g	$4 \div 100 \times 100g = 4.0g$
Water	Not applicable	No	Not applicable	Not applicable
Oil	Not applicable	No	Not applicable	Not applicable
Salt	Not applicable	No	Not applicable	Not applicable

Free sugar = 4.0g per 100g
4 points

Table 12a: calculating free sugars for a cereal bar

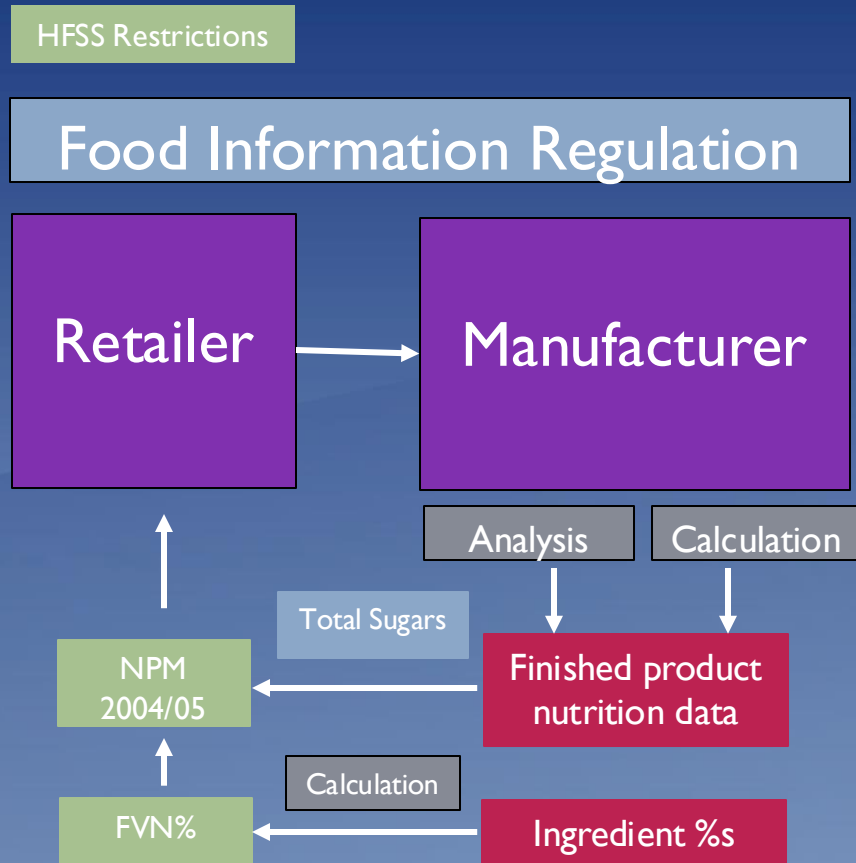
Ingredients	Quantity	Source of free sugars	Total sugar per 100g	Calculation of free sugars
Rolled oats	Not applicable	No	Not applicable	0g
Golden syrup	15%	Yes	79.0g	$15 \div 100 \times 79.0g = 11.85g$
Honey	9%	Yes	76.4g	$9 \div 100 \times 76.4g = 6.88g$
Dried pineapple	7%	No	Not applicable	0g
Dried apricot (pressed and shaped)	7%	Yes	43.4g	$7 \div 100 \times 43.4g = 3.04g$
Sugar	6%	Yes	100.0g	$6 \div 100 \times 100g = 6.0g$
Sunflower seeds	4%	No	Not applicable	0g
Hazelnuts (chopped)	4%	No	Not applicable	0g
Skimmed milk powder	Not applicable	No	Not applicable	0g
Molasses	1%	Yes	59.4g	$1 \div 100 \times 59.4g = 0.59g$
Oils	Not applicable	No	Not applicable	0g
Salt	Not applicable	No	Not applicable	0g

Free sugar = 28.36g per 100g
10 points

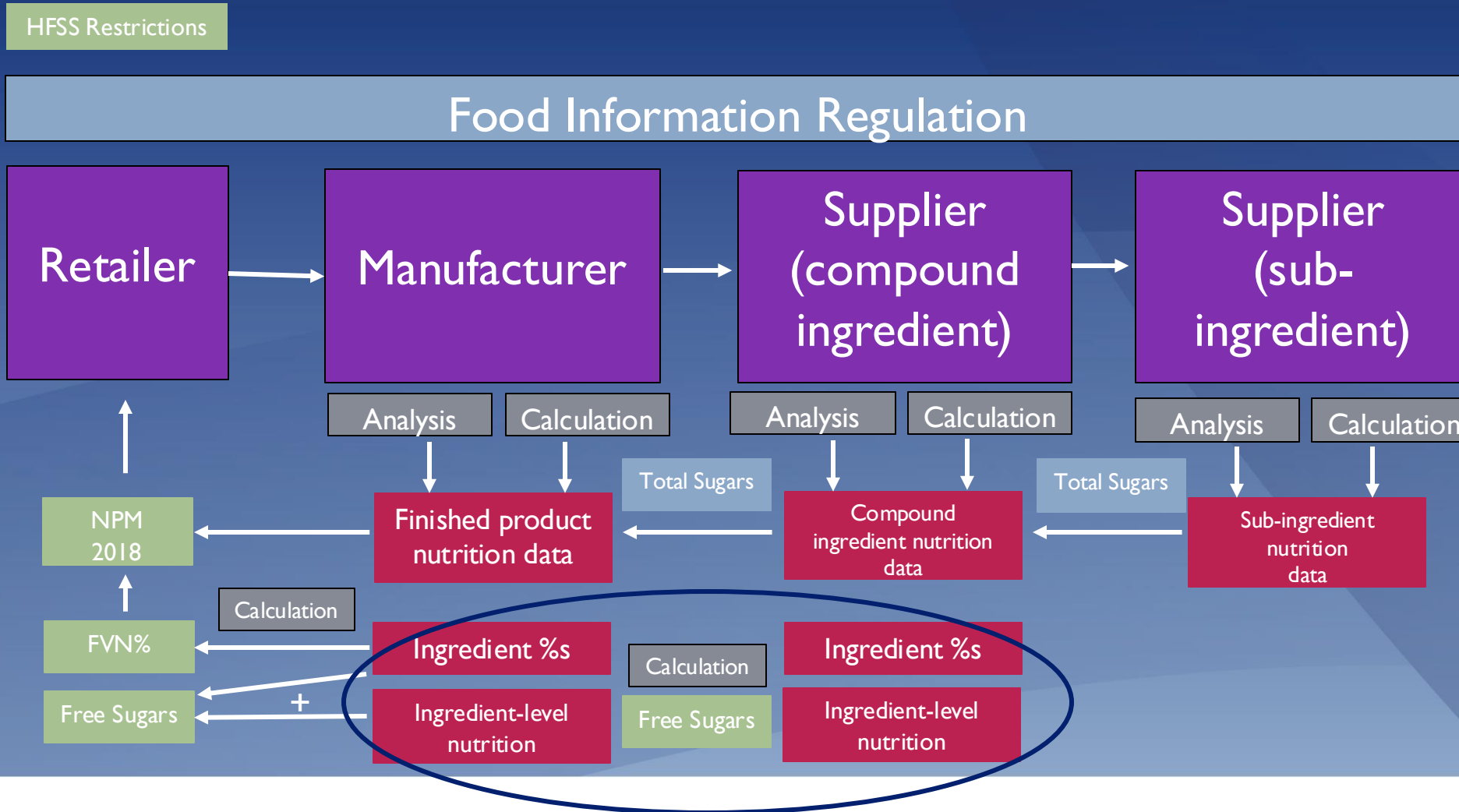


Data Complexities / Technical Challenges

The Food Data Landscape (UK NPM 2004/05)



The Food Data Landscape (UK NPM 2018)



Data & Technical Barriers and Opportunities

Barriers:

- **Manual calculation needed** – current specification systems do not capture free sugar content, there is no legal requirement to provide it for labelling, it cannot be tested for analytically
- **Ingredient sugar content varies** – some ingredients (e.g. glucose syrups, whey powders) have variable sugar content, and specification data is required for each product for accurate calculations
- **Limited reference data** – composition databases (CoFID) lack some ingredients and free sugar data
- **Complex supply chain** – reliance on engaging ingredient suppliers to pass along the data and upskill on why the information is needed
- **Enforcement/monitoring complexity** – limited by data available on product labels, instead will have to rely on manufacturers to document calculation approaches

Opportunities:

- **Data discussions** – opens broader conversations about the structure and limitations of the current food data landscape, creates an opportunity to engage the wider food supply chain to explore consistent/transparent approaches
- **International examples** – provides opportunity to review other regions for practical implementation insights

UK NPM 2018 – Data Discussions

IGD

Free Sugars expert roundtable

An expert roundtable to address the practical challenges associated with the consistent calculation of Free Sugars and the data required to calculate (NPM) 2018 scores

March 2026 | Roundtable discussion summary

Department
of Health &
Social Care

Guidance

Nutrient profiling model 2018: technical guidance

Published 27 January 2026



Free Sugars Roundtable: Meeting Summary

Obesity Health Alliance, April 2026



Spoon Guru Workshop: Exploring the Potential of Technology in NPM 2018 Implementation

June 2026



Assessing the viability and reliability of the 2018 nutrient profile model free sugar calculations using retail back-of-pack labels

This project started in May 2026 and will end in October 2026

Open questions:

- When do naturally occurring sugars become “free sugars”?
- How should different processing steps be accounted for?
- What to do when ingredient-level data is missing?
- What assumptions/tolerances/rounding rules are acceptable?
- How can everyone calculate products in the same way?

UK – What's Next?

Policy developments:

- 17 June 2026: Consultation closed
- Updated technical guidance(?)
- Final stage impact assessment
- Secondary legislation (12-month implementation proposed)

Business actions:

- Keep up to date on policy developments
- Calculate free sugars & UK NPM 2018 scores at product/category/portfolio level
- Upskill internal stakeholders



Mandatory Reporting: Learnings from existing approaches

Emma Kinsman
Senior Nutrition Manager
Danone

10-YEAR HEALTH PLAN AND IMPACT FOR INDUSTRY



DANONE: A DUAL-PURPOSE BUSINESS

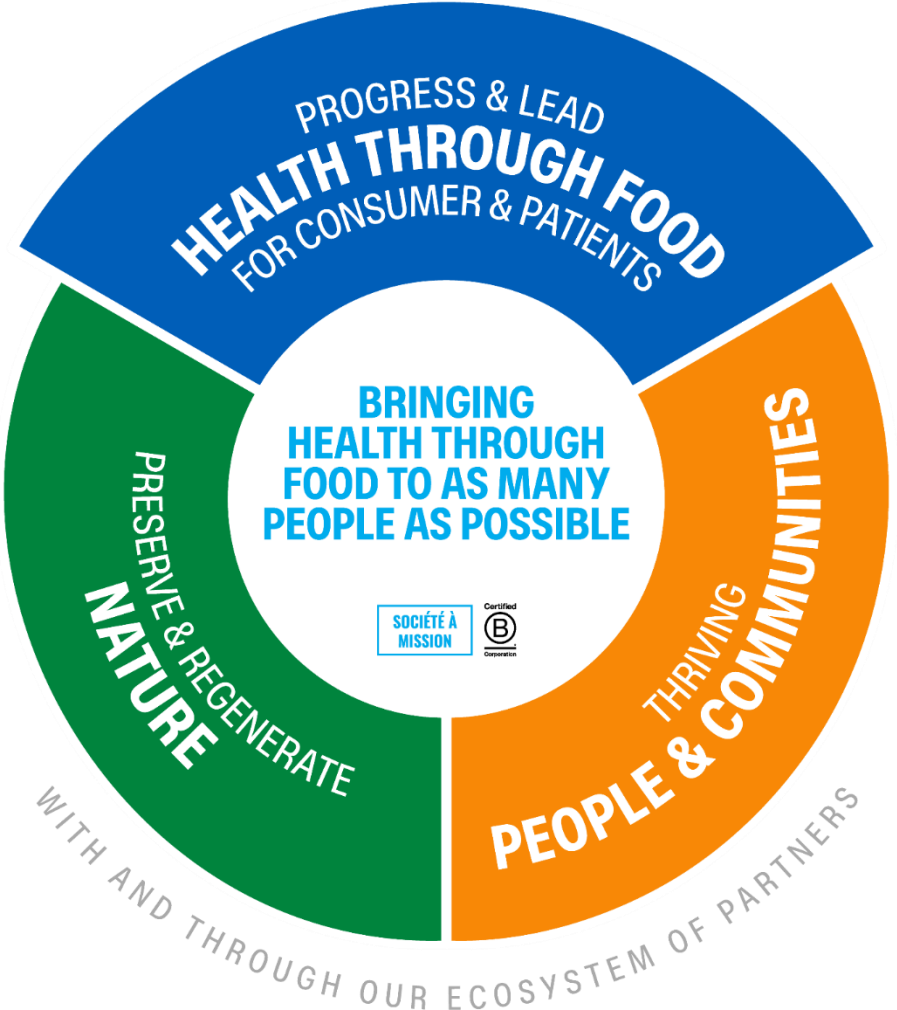
CORPORATE RESPONSIBILITY HAS ALWAYS BEEN IN OUR DNA AND RUNS TO THE HEART OF OUR BUSINESS



OUR MISSION

“To bring health through food to as many people as possible.”

DELIVERING GROWTH WITH PURPOSE, GUIDED BY THE DANONE IMPACT JOURNEY



PROUD TO BE CERTIFIED B CORP

Certified



Corporation

ROOTED IN HEALTH SCIENCE AND INNOVATION



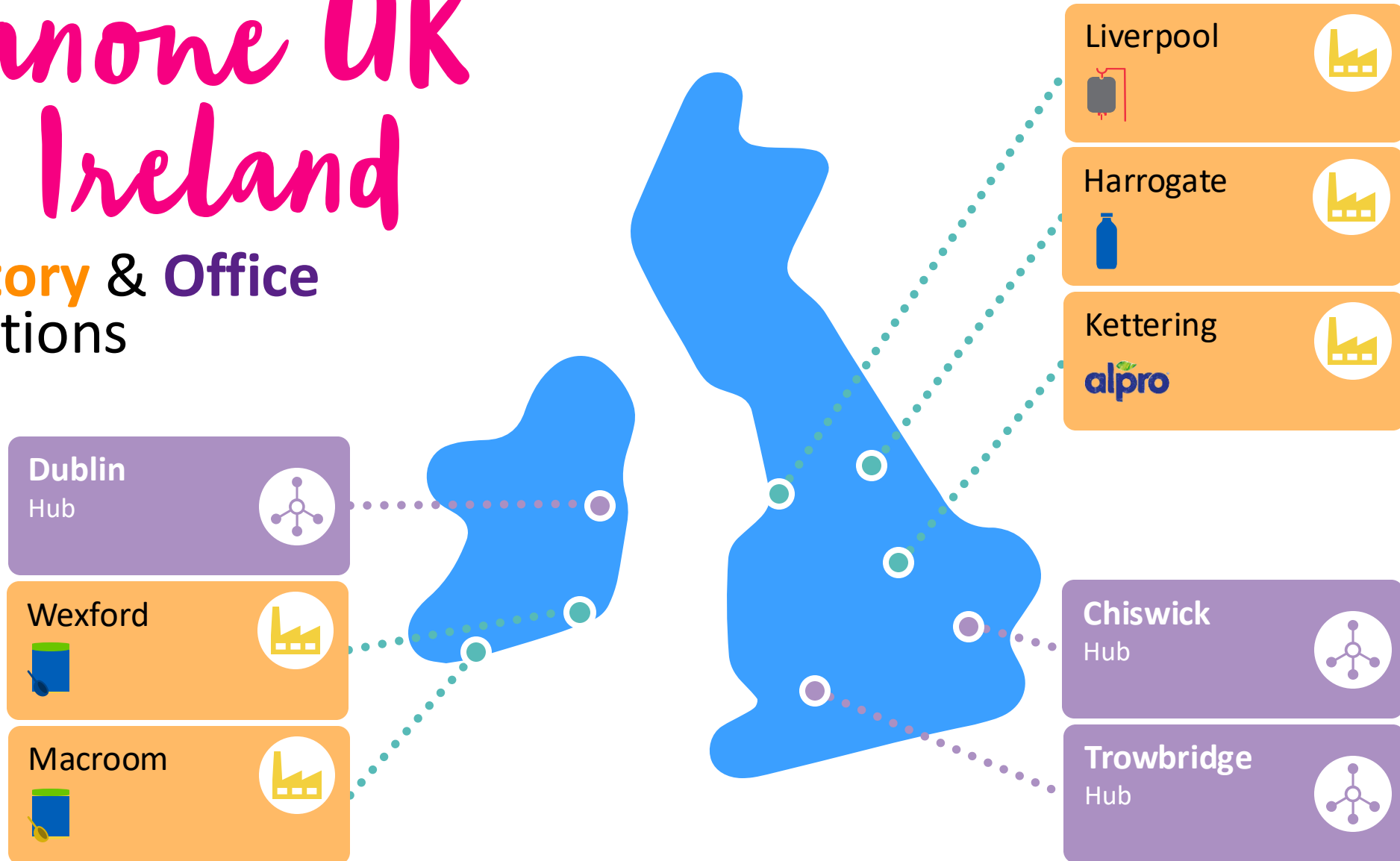
RESEARCH & INNOVATION

1700 WORLD CLASS EXPERTS
 1 GLOBAL CENTER LOCATED IN 2 SITES
 6 SPECIALIZED HUBS
 1 HIGHLY CONNECTED NETWORK



Danone UK & Ireland

Factory & Office locations



~2,400 UKIRL EMPLOYEES ACTING TOGETHER

OUR HEALTH-FOCUSED PRODUCTS & SERVICES

OUR PRODUCT RANGES ARE FOCUSED ON BRINGING HEALTH THROUGH FOOD

WE
NOURISH
LIFE

#1



ESSENTIAL
DAIRY



#1



PLANT
BASED



#1



BEVERAGES



#1



SPECIALISED NUTRITION

MEDICAL NUTRITION



EARLY LIFE NUTRITION



30,000 patients supported by our nursing and homecare services



WHAT HAVE WE DONE TO SUPPORT DRIVING HEALTHIER DIETS IN UKI?

2023

Launched our UK and Ireland Danone Health Commitments

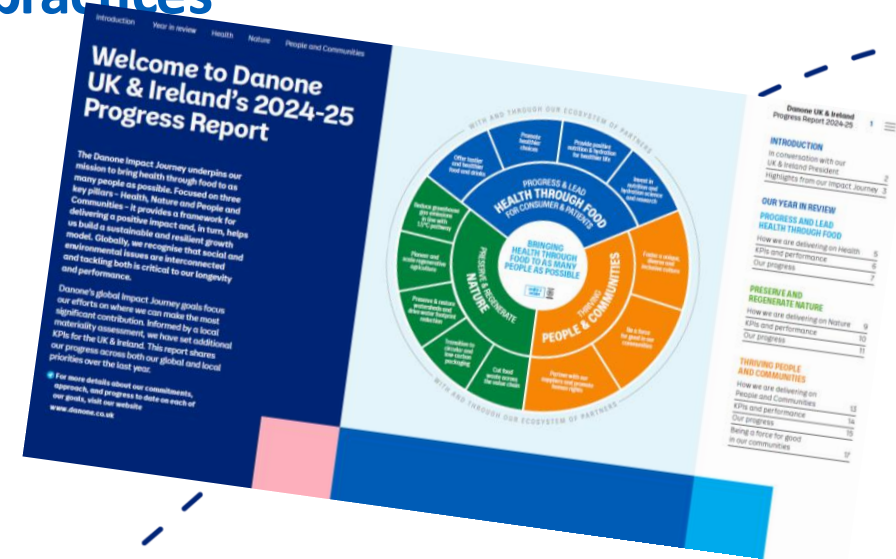


2024

Call in UK House of Lords Select Committee on Food, Diet and Obesity for Mandatory reporting and support for healthier diets

2025

Launched our 2nd impact report showcasing transparency on our portfolio and practices



2026

Launched our Global Danone Impact Journey KPIs, showcasing ongoing commitments to health

OUR DANONE UK-IRELAND HEALTH COMMITMENTS

90% of our portfolio of products by sales volume will not be high in sugar, salt or fat (HFSS)*

We will never produce a product for children that is high in sugar, salt or fat (HFSS)*

85% will be rated as “healthy” – receiving a score of at least 3.5 stars out of 5 – within the health star rating (HSR) index

We will publish nutritional information for our portfolio on our brand websites



OUR GLOBAL FOCUS ON HEALTH HAS LED TO BEING NUMBER 1 IN ACCESS TO NUTRITION INDEX



In 2024, Danone achieved #1 position in Global Access to Nutrition Index (ATNI)



BUILDING HEALTH KPI REPORTS IS A COMPLEX BUT VALUABLE PROCESS



WHAT DOES DATA REPORTING SUCCESS LOOK LIKE?



Simplicity and Proportionality



Clear Metrics



Tracking Progress Over Time



Consistent Reporting

KEY TAKEAWAYS

1) DATA REPORTING SUPPORTS HEALTH AND POLICY DECISIONS



2) TIME AND RESOURCE NEEDED TO ACCURATELY SET UP SYSTEMS



3) CONSISTENCY IS NEEDED ACROSS INDUSTRY TO ALLOW IMPACTFUL CHANGE



THANK YOU!

Panel Q&A

Thank you



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