

NATIONAL SALT AND SUGAR REDUCTION INITIATIVE (NSSRI)

Questions & Answers Based on Public Comment

Updated February 24, 2021

NSSRI Framework

1. Is this a New York City initiative or a national one?

This is a national initiative. The National Salt and Sugar Reduction Initiative (NSSRI) is a partnership of over 100 state and local health authorities and national health organizations from across the country, convened by the New York City Department of Health and Mental Hygiene (NYC Health Department) to encourage voluntary corporate commitments to sugar and salt reduction targets.

2. Is the initiative focused on salt, sugar or both?

The initiative focuses on both salt and sugar reduction. When the initiative launched in 2009, it was the National Salt Reduction Initiative (NSRI) and the partners focused on setting and calling for the food industry to meet sodium reduction targets. The Food and Drug Administration (FDA) is finalizing sodium guidance that was informed by the partnership's work on sodium reduction. Companies that committed to meeting the sodium targets are already well positioned to meet FDA guidance. In 2018, the partnership was updated to include a new goal of reducing sugar in the packaged food and beverage supply.

3. How will reducing sugar in packaged foods affect other ingredients?

Reducing sugar in packaged foods will not necessarily affect other ingredients. The NSSRI encourages food companies to reduce sugar in food without replacing it with other unhealthy ingredients such as saturated fat, sodium or refined carbohydrates. During the salt reduction phase of the initiative, reductions in calories and sodium occurred in tandem, suggesting that manufacturers reformulated for more than one health goal at the same time. In addition to monitoring salt and sugar reduction over time, the NSSRI will monitor other nutrients, such as fat and calories, over time.

4. How will companies be recognized for their work?

Companies may commit to meeting the sales-weighted mean (SWM) target by 2023 and/or 2026 in a category. The SWM is the average sugar density within a category, weighted by product sales. Companies meet the target by demonstrating that the SWM sugar density of all products in a specific category is at or below the target by the end of the target year. For companies that commit to meeting at least one SWM target, the NSSRI will also recognize past sugar reduction efforts or complementary sugar reduction strategies (such as switching consumers to unsweetened products or portion size reduction).

Voluntary Sugar Reduction Targets

1. Why is it important to reduce added sugar intake?

Added sugars contribute calories but few essential nutrients. Research shows that consuming added sugars is associated with increased risk of excess weight, type 2 diabetes, hypertension, stroke, heart disease and cavities. In children, research shows a link between consumption of added sugars in sugary drinks and higher body mass index (BMI). Most of the added sugar in the U.S. diet is not added by individuals at home. Sugar is widespread in the national food supply. Currently, 68% of packaged foods and beverages purchased in the U.S. contain added sugars, making it difficult for individuals to reduce their sugar consumption.

The current public health landscape demonstrates that diet remains critical, even during a public health emergency like COVID-19. Diet-related health conditions such as diabetes and heart disease,

which can increase the risk of severe illness from COVID-19, are important to address right now. To improve public health, we must change manufacturing practices and the broader food environment to create a food supply with fewer added sugars.

2. How does the NSSRI set its sugar reduction targets?

First, we defined the categories of food and beverages that contribute to sugar intake in the U.S. population. For those categories, we merged Nielsen sales data with nutrition information from Label Insight and manufacturer websites by Universal Product Code to create the NSSRI Packaged Food Database. For each category, we calculated the SWM and distribution in grams (g) of sugar per 100 g of food or 100 milliliters of beverage for the products that are in the top 80% of sales volume. We set preliminary reduction targets based on a percentage reduction from the SWM. For most categories, 2023 targets were set at a 10% reduction from baseline SWM and 2026 targets were set at a 20% reduction. The food and beverage industry was invited to provide two rounds of feedback on the preliminary categories and targets to help refine the category definitions and to help the NSSRI set gradual, achievable and meaningful targets for each category.

3. Are the targets voluntary?

Yes, the targets are voluntary. When companies make a voluntary commitment to a target, they help create a healthier food supply, improving the public's health. The public health authorities and organizations that make up the NSSRI partnership are joining together to put forth a single set of transparent targets to guide the food and beverage industry, as well as to measure and recognize the industry's progress toward meaningful, achievable goals.

4. Are the targets for total sugars or added sugars?

Targets are based on total sugar, consistent with the approach taken in the United Kingdom. In most categories the total sugar content is equivalent to the amount of added sugars because the products do not contain naturally occurring sugars. The exception is for products containing milk, fruit, nuts or legumes, which also contain some natural sugars. We have carefully reviewed products with these ingredients and developed an allowance for natural sugar in products containing milk. We will monitor added sugar content, by product and by category, when available on all Nutrition Facts Labels (2021).

5. Will reducing sugar affect the taste of foods?

Companies are experts in reformulating products, and many consumers are unaware of stealth changes. Targets were set at levels already met by similar products on the market, demonstrating feasibility.

6. Why are the food and beverage categories so broad?

The 15 food and beverage categories are broad to provide industry with flexibility. The broad categories allow industry to take the approach to sugar reduction that works best with their portfolio of products within a category. This could include reformulation, removal or higher sugar products, introducing new lower sugar products, or shifting sales of existing products which will influence the SWM.

7. How do the allowances for natural sugar work?

The allowances account for naturally occurring sugars, primarily lactose, in dairy milk and yogurt. A smaller allowance has been made for sugars in plant-based milk substitutes and yogurts. To develop the allowances, we reviewed peer-reviewed literature, analyzed data in the NSSRI Packaged Food Database, reviewed the USDA Food Composition Database, and spoke with content experts.

| Category | Product Type | Sugar Allowance |
|-------------------------------|-------------------------------------|-----------------|
| 1.2 Sweetened milk | Dairy milk is the first ingredient | 4 g/100 mL |
| | Dairy milk is the second ingredient | 2 g/100 mL |
| 1.3 Sweetened milk substitute | Plant-based milk substitute | 2 g/100 mL |
| 7.1 Yogurt | Dairy yogurt | 4 g/100 g |
| | Plant-based yogurt | 2 g/100 g |

The allowance is subtracted from the total sugar density of each product. For example, in the sweetened milk category, a chocolate milk (where milk is the first ingredient) with a total sugar density of 7.6 g/100 mL has an adjusted sugar density of 3.6 g/100 mL (7.6-4=3.6); a sweetened coffee beverage (where milk is the second ingredient) with a total sugar density of 5.9 g/100 mL has an adjusted sugar density of 3.9 g/100 mL (5.9-2=3.9). The adjusted values were used to calculate the baseline SWM and targets in these three categories.

| Packaged Food Category | Category Description Excludes products with 0g added sugar. | Baseline 2018 Sales-Weighted Mean g sugar per 100 mL or 100 g | Sales-Weighted Mean Targets g sugar per 100 mL or 100 g | |
|-------------------------------|---|---|--|------|
| | | | 2023 | 2026 |
| 1.2 Sweetened milk | Drinks containing milk as a first or second ingredient. | 6.0 | 5.4 | 4.8 |
| 1.3 Sweetened milk substitute | Flavored drinks containing milk substitute as a first or second ingredient. | 3.6 | 3.3 | 2.9 |
| 7.1 Yogurt | Dairy and non-dairy yogurt and yogurt drinks. | 6.5 | 5.9 | 5.2 |

8. How do companies meet the sales-weighted mean target?

Companies can shift their SWM within a category by promoting sales of certain products, reformulating or introducing new, less sugar dense products. The SWM target is the average sugar density within a packaged food category, weighted by product sales. The purpose of the SWM target is to encourage companies to reduce the overall sugar density of the products within a category, with greater emphasis on products that contribute the most to population sugar intake. The use of a SWM target provides companies with flexibility in how they meet proposed targets. Some of their products can be above the SWM and some can be below.

9. Are there other things companies can do to work toward the goal of sugar reduction?

Companies are encouraged to employ complementary strategies to reduce availability of added sugar in the food supply and reduce added sugar consumption. This may include:

- Encouraging consumers to switch to plain versions of products, or unsweetened alternative products, that do not contain low and no calorie sweeteners. Examples include plain yogurt, seltzer, and unsweetened cereals.
- Decreasing portion sizes for single-serving products.
- Meeting the Guidance Maximums, which are suggested upper limits for sugar density of products.

The database will be used to track progress against the 2023 and 2026 SWM targets as well as the strategies listed above.

10. How do the Guidance Maximums work?

Guidance Maximums are the suggested upper limits for sugar density of products in each category. Companies do not need to commit to meeting the maximums, but they are encouraged to use the

guidance values in assessing their overall product portfolio, including for new product development and product reformulation.

11. Is there evidence that the NSSRI will work to reduce sugar intake?

There is evidence that suggests this model works. Based on a successful model on sodium in the United Kingdom, the NSSRI worked with the food industry to set voluntary sodium reduction targets for 62 packaged food and 25 restaurant food categories for 2012 and 2014. Using national nutrition and sales data, a 6.8% reduction in sodium levels in top-selling packaged foods between 2009 and 2014 was observed. Further, the FDA subsequently adopted this voluntary target-setting approach for sodium. The UK recently extended this framework to sugar. They released [results for the first three years](#) of their program, in which they observed an overall 3% decrease in sugar, with larger decreases (13%) in the yogurt and breakfast cereals categories.

12. How will you know if the initiative succeeds?

The NYC Health Department created the NSSRI Packaged Food Database to monitor nutrient and ingredient content of packaged foods over time, as well as to inform target setting and to assess overall and individual company progress toward the NSSRI targets. The database will be updated to track progress against the 2023 and 2026 SWM targets and Guidance Maximums, in addition to some of the complementary strategies industry may employ. Progress can be assessed at the company level, category level, or across all 15 categories. Companies have the option of publicly committing to sugar reduction targets through a pledge coordinated by the NYC Health Department, or alternatively may opt to use the targets to inform internal processes and decision making.

13. How will this initiative affect consumer choice?

Many factors shape health outcomes including a history of racist and discriminatory policies and practices that have resulted in high concentrations of poverty, inequitable distribution of resources, and disinvestment in things like transportation options, recreational space, and access to healthy foods. These factors all present challenges to consumers when trying to eat healthier. Ubiquitous marketing and hyper-availability of unhealthy foods can be found in communities across the US, making it challenging for individuals to make healthy choices.

In this context, the goal of the initiative is to work towards a healthier food supply that, in turn, increases consumer choice when it comes to packaged foods and beverages. Consumers may not realize how much sugar is in many packaged foods; some products that appear healthy may contain just as much sugar as dessert. If the industry works toward meeting the targets, those wanting to consume less sugar can do so more easily. Consumers can add more sugar to products but they cannot remove what was added during processing.

14. Can companies use non-nutritive or low and no calorie sweeteners?

Industry is advised to consider existing and new scientific research and regulations to determine the appropriate use of low and no calorie sweeteners in their products. The NSSRI recommends limiting use of low and no calorie sweeteners in products marketed to and commonly consumed by children.

15. How is the NSSRI different from company announcements about salt or sugar reduction?

The NSSRI targets represent an objective, universal, and measurable standard developed with a broad range of industry data and input. NSSRI targets provide a level playing field for companies.

For additional information, visit nyc.gov/health/nssri or email sugar@health.nyc.gov.