BDA response to the application of the new nutrient profile model (NPM)(2018)

June 2026

Questions that apply to all respondents, previous are demographic etc

Do you agree or disagree that applying the new NPM to the advertising and promotions restrictions will improve population health?

- Agree
- Neither agree nor disagree
- Disagree
- Don't know

Please provide any specific information or evidence to support your answer. (Optional, maximum 300 words)

We support the new Nutrient Profiling Model (NPM) as a critical step towards creating the healthiest generation of children and delivering the government's ambition to end the obesity epidemic. The Impact Assessment (IA) shows the new NPM could prevent 110,000 cases of childhood obesity and 520,000 cases in adults, alongside reductions in asthma, hypertension, depression and type 2 diabetes.
In 2015, SACN halved recommended free sugar intake to 5% due to compelling evidence of harm. Yet 9% of 4-10 year olds and 5% of teenagers meet this recommendation[1], and dietary-related ill health is rising. Consumption of food and drink high in free sugars is the leading cause of dental caries[2], the main driver of child hospital admissions[3], and contributes to obesity, type 2 diabetes and various cancers. In 2024/25, 10.5% of 4-5 year olds were living with obesity, the highest level recorded outside the pandemic peak[4]. Improving fibre intake is associated with lower risk of cardiovascular disease, type 2 diabetes and colorectal cancer, making it an important maker of dietary quality within the updated model.

The BDA supports the new NPM because it better reflects contemporary nutrition science and current UK dietary recommendations, particularly relating to free sugars, fibre, fruits, vegetables. The benefits extend beyond obesity prevention by supporting healthier dietary patterns across the population.
The new NPM will also improve transparency. With 70% of British adults thinking that food companies are not honest about the health impacts of their food[5], the new NPM will help address the 'health halo' effect[6], where products high in free sugars benefit from processed fruit being treated favourably and confusing customers.

Early signs from placement regulations indicate positive progress[7]. Strengthening policy through the new NPM is the next step to close loopholes[8] and support public demand for government action[9].

Ref in attached document [1][2][3][4][5][6][]7][8][9]

We welcome views on how effective the new NPM would be at capturing more of the products that contribute the most to childhood obesity.

Do you agree or disagree that applying the new NPM to the advertising and promotions restrictions will capture the products that contribute to childhood obesity?

- Agree
- Neither agree nor disagree
- Disagree
- Don't know

Please provide any specific information or evidence to support your answer. (Optional, maximum 300 words)

We agree that the new NPM will better capture products contributing to childhood obesity. These categories were originally identified as key drivers of excess calorie and free sugar intakes in children, this remains true[10]. The new NPM will continue to exclude core foods aligned with the Eatwell Guide, such as fruit and vegetables.

Due to reformulation, many products in categories within scope now pass the existing NPM, despite being high in free sugars. The Broken Plate report found 34% breakfast cereals would be 'less healthy' under the current model, rising to almost 100% using the 2018 draft model[11].

While a positive next step, there are important gaps in the categories currently in scope. The government should commit to regularly reviewing and updating the NPM to reflect changes in dietary guidance and the food environment.

In –scope categories should include pies and pastries and products such as processed meats which deliver high levels of public health nutrient of concern (i.e. saturates, salt). These are commonly consumed and are likely HFSS and possess inherent red traffic lights (which will be shown in Front of Pack labelling), but are not currently captured. Other categories which are similarly out-of-scope but show high proportionality of HFSS include beef burgers, party food.

BDA member's earlier academic research has also indicated potential for policy alignment issues for categories between "reds" in multiple traffic lights and NPM2004 (for products promoted instore)[12]. Some products were out-of-scope and yet possessed red traffic light and HFSS, whilst others in scope (ready meals, pizzas) had red traffic lights and were non-HFSS.

Consistency between School Food Standards, the Eatwell Guide, front-of-pack nutrition labellling and the NPM is important to avoid conflicting nutrition messages for children, families, schools and healthcare professionals.

Ref in attached document: [10][11][12]

As part of the process for determining which products are in scope of the advertising and promotions restrictions, a product must fall into one of the categories of food and drinks products within the schedules of the regulations and be assessed as 'less healthy' by the NPM.

The NPM 2018 technical guidance provides businesses with the information they need to calculate whether a product is 'less healthy'.

If the technical guidance requires any further clarity to help you to determine if a product is classified as 'less healthy', please set this out. (Optional, maximum 300 words)

The BDA attended an arranged a free sugars roundtable convened by the OHA with members of its NPM working group, composed of NGOs, academics, and representatives from DHSC on Wednesday 25th March 2026. The meeting aimed to be a practical, problem-solving workshop focused on calculating free sugars as part of the 2018 NPM technical guidance.

NGOs and academics in attendance agreed that the current technical guidance could offer further clarity by setting out a clear set of assumptions to base free sugar calculations on (e.g. thresholds, rounding, negligible quantities) and further worked examples (including out of home products and other complex products)[13].

From 2016/2017, the National Diet and Nutrition Survey has estimated free sugars intakes at a population level from dietary intake, which is supported by a set of assumptions[14].

All declared ingredient types contributing to free sugars, as defined in the NPM2018 technical guidance, must be represented in CoFID, and in the same forms as listed on product labels. Currently, many processed forms are missing, preventing independent calculation of free sugars and requiring reliance on manufacturers' recipe data. For instance, strawberry purée is absent despite raw strawberries being included, and similar gaps exist for banana, cranberry and mango purées. Greater transparency and data granularity are therefore needed for consistent calculations.

To enable the proposed model to function accurately, manufacturers need to disclose the percentage of each ingredient containing free sugars (e.g. sugar, dextrose, fruit concentrates). Currently, many products cannot currently be evaluated beyond the first stage of NPM2018 calculations due these missing ingredient amounts, making both free sugars and overall NPM2018 scores impossible to calculate independently from label data.

Additionally, CoFID lacks specific gravity data, including for drinks such as cola or oat milk, meaning free sugar values cannot be reliably calculated without assumptions.
Ref in attached document: [13][14]

Understanding the impact on industry

Questions for individuals sharing their professional views and people responding on behalf of a business or organisation

What are the main challenges or operational issues that businesses might experience when implementing the new NPM? We welcome examples of actions businesses are taking to overcome these challenges. (Optional, maximum 300 words)

While NGOs and academics face using limited back-of-pack nutrition information, many businesses already hold detailed product information including ingredients and method of production. The priority for the new NPM should be consistency and defensibility, not perfect precision. Clear, defensible definitions of free sugars and assumptions can support consistent implementation.

Academics from BDA public health specialist group provided the below evidence and attached document later

As academics, we applied the NPM2018 manually following the provided guidance to our independent dataset of ~3000 real-life products using their labelled nutrition (per 100g/ml) and ingredient information (pre-packed products sold in UK Supermarkets).

Our analysis found that between 1-11% of products (footnote 1) in the breakfast cereals and yoghurts categories which required free sugars calculations could be scored using the proposal NPM2018 model and available data.

We used two food composition databases to calculate free sugars (CoFIDs suggested by the guidance) and the USDA. For the products that had sufficient information in their ingredients list to calculate free

sugars this could progress to next step of looking for the total sugar contribution in the databases. From the 15 ingredients that needed sugar values from the food composition databases, 33% were total sugar so that was already known, 20% were found in ConFID, 7% were found in the USDA and 40% were found in neither database. In several cases, ingredients were puree based, but the databases tended to have the whole fruit/vegetable information noted, of which the sugar contribution would be different, so couldn't be used. CoFIDs is not presently sufficiently populated to support calculation of free sugars in line with proposed policy.

Open calculation and ingredient database enhancement are therefore now required to support policy implementation (footnote 2) enabling its effective and accurate use by policymakers, manufacturers, and independent researchers.

Footnotes in attached document evidence.

The government is committed to implementing proportionate regulation and minimising administrative burdens of new regulation on businesses.

If the NPM is reviewed and updated again in the future to reflect new dietary recommendations, what would be a proportionate timeframe for applying any future updates which supports alignment with the investment cycles of industry? (Optional, maximum 300 words)

The BDA support the NPM being regularly reviewed and updated to reflect our changing food system and the latest evidence base on diet and health. We do not have a view on alignment with investment cycles of industry. However, we urge the government to learn from the lessons of the new NPM by ensuring updates are delivered in a timely manner, match the scale and urgency of the challenge in relation to dietary-health, and stakeholders are provided with a clear implementation plan of when the changes will take effect.

Timescale for applying the new NPM

Questions for all respondents

Subject to the consultation outcome, we would introduce an implementation period to allow businesses to adapt to any changes.

Do you agree or disagree that 12 months is a sufficient implementation period for businesses in scope of the advertising and promotions restrictions and enforcement authorities to adapt to the new NPM being applied? (Optional)

- Agree
- Neither agree nor disagree
- Disagree
- Don't know

If you said 'disagree', how long should the implementation period be? Enter the number of months. If you have any specific information or evidence to support your answer, please include it in your response. (Maximum 300 words)

We support a 12-month implementation period. Given ongoing work and long-standing industry awareness since 2018, we do not believe a longer implementation period is justified, but the government should publish its consultation response within 12 weeks alongside updated technical guidance with a clear set of assumptions.

How can government support businesses during an implementation period? (Optional, maximum 300 words)
Businesses are best placed to provide insights on how they can be most effectively supported during the implementation period. Researchers at the Centre for Food Policy at City St George's, University of London are currently conducting work to capture business perspectives on the new NPM, which may offer further valuable insight. As this research has not yet been published, we refer to the Centre for Food Policy's submission to this consultation, where it is referenced in more detail.

From experience in previous obesity policy, businesses emphasise the importance of the government delivering on committed policies and providing clear, consistent direction and a level-playing field to support investment planning. Interviews with retailers stressed the importance of timely, clear and comprehensive guidance to facilitate effective implementation of the HFSS locations legislation [15]. Furthermore, uncertainty and delays risk undermining business confidence in the regulatory framework, creating a 'first-mover' disadvantage and a loss of engagement and buy-in [16]. The government can mitigate these risks by setting out a clear implementation roadmap and ensuring that agreed timelines are met.

Ref in attached document: [15][16]

Enforcement

Questions for all respondents

Guidance is available to support enforcement authorities in enforcing the advertising and promotions restrictions.

What kind of support would be useful to enable enforcement authorities to effectively adapt to the new NPM being applied to the advertising and promotions restrictions? (Optional, maximum 300 words)

Evidence from the implementation of current HFSS location promotion regulations shows that local authorities lack the resources, training, and practical tools needed to enforce compliance effectively, with evidence of few enforcement checks and penalties issued. Research highlights the need for better support, including accessible HFSS calculators, targeted help for smaller businesses, and increased capacity for local enforcement teams. To ensure the new NPM is successfully implemented and delivers expected health benefits, the government must strengthen local authority resourcing, provide workforce training, and develop simple tools to assess compliance.

Consultation-stage impact assessment

Questions for people responding on behalf of a business or organisation

Do you agree or disagree that the transition cost calculations within the impact assessment reflect a fair assessment of the costs that would be faced by your organisation or business?

- Agree
- Neither agree nor disagree
- Disagree
- Don't know
- Not applicable

Please provide any further evidence that could be used to improve our estimates. If you are referring to a specific calculation, please state which one. (Maximum 300 words)
N/A

Do you agree or disagree that the ongoing cost calculations within the impact assessment reflect a fair assessment of the costs that would be faced by your organisation or business?

- Agree
- Neither agree nor disagree
- Disagree
- Don't know
- Not applicable

Please provide any further evidence that could be used to improve our estimates. If you are referring to a specific calculation, please state which one. (Maximum 300 words)

N/A

Questions for individuals sharing their professional views and people responding on behalf of a business or organisation

We are assessing how many advertisements there currently are for products that would be reclassified as 'less healthy' if the new NPM was applied to the advertising restrictions.
If you have any evidence or data that would help inform our assessment, you will be asked to include it. (Optional, maximum 300 words)

We are assessing children's exposure to these advertisements for products that would be reclassified as 'less healthy'.
If you have any evidence or data that would help inform our assessment, you will be asked to include it. (Optional, maximum 300 words)

Impact on groups with protected characteristics

Questions for all respondents

We would like to understand the impact of our proposals on people with protected characteristics. It is against the law to discriminate against anyone because of protected characteristics, which are:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

Do you think that this proposal is likely to impact on people who share a protected characteristic in a way that is different from those who do not share it?

- Yes
- No
- Don’t know

If you said ‘yes’, which protected characteristics do you think this applies to? Select all that apply. (Optional)

Highlighted above

If you selected any characteristics, how might the proposal impact people differently because of these characteristics? Provide any specific information or evidence to support your answer, including whether the impact is likely to be positive or negative. (Maximum 300 words)

Currently, those most at risk of dietary-related ill health include people with disabilities; those on lower incomes; families living in deprived areas; some minority ethnic groups; and vulnerable populations such as people experiencing homelessness [17]. There may also be dietary-related inequalities linked to sex, sexual orientation, gender and other characteristics, although there is more limited evidence in these areas.

Policies focused solely on individual behaviour are not effective in reducing these inequalities [18]. Instead, action is needed to address the wider economic, social and commercial drivers that shape the food environment and make it harder for many people to eat healthily. Strengthening regulation through the new NPM represents an important step in tackling these systemic factors and has the potential to reduce health inequalities.

People with learning disabilities and some physical disabilities experience disproportionately high rates of obesity and diet-related ill health and may particularly benefit from improvements to the wider food environment. Measures that reduce exposure to less healthy food marketing may therefore help support more equitable health outcomes.

Strengthening the NPM and restricting less healthy food marketing can help reduce these inequalities, particularly as evidence shows these groups and young children are more exposed to such advertising. However, exemptions for smaller retailers in the promotions regulations may limit the policy’s impact in some communities, highlighting the need for comprehensive implementation and to consider opening the businesses in scope to SMEs in line with the proposals for the energy drinks age of sale restrictions.

Ref in attachment: [17][18]

Additional information you would like to submit

Questions for all respondents

We welcome any further information on impact you may have. You will be asked to include any further information you would like to provide to inform our final impact assessment. (Optional, maximum 300 words)
You will be given the opportunity to upload up to 3 relevant files. All file types are accepted. Please make clear which questions the information relates to within the file. Do not submit any commercially sensitive information.

- Corresponding consultation numbered reference list
- Impact on Industry BDA Public Health specialist group evidence: Footnotes 1 and 2 provided by Dr Sally Moore RD (Committee member and former Chair of the Public Health Specialist Group) and Liv Chessell (Msc Nutrition research student) to support this organisation's response.

See both below

If applicable, you can raise any further matters about this consultation. Please do not include any personal information. (Optional, maximum 300 words)

We welcome this consultation as an important next step to strengthening advertising and promotions regulations and achieve the government's ambition of raising the healthiest generation of children and achieve the 'moonshot' to end the obesity epidemic.
We support the application of the new NPM, with the following safeguards in place to protect the credibility of the NPM, and wider policy landscape on obesity.
A clear and defensible mechanism for calculating free sugars must be established before the policy is implemented, as a lack of clarity creates a significant risk of legal challenge during implementation. We do not believe a delay is required to resolve this issue, as work is well underway as presented at the OHA free sugars roundtable.

However, we want to ensure that this work does not delay progress on the Healthy Food Standards. The government must acknowledge that different policies may legitimately use different versions of the NPM (for example, Healthier Food Standards, local advertising policies including Transport for London, and promotions policies in Scotland and Wales). However, alignment must be actively managed and a clear roadmap of how policies will align over time must be published.

The BDA also welcomes stronger collaboration between policymakers, and dietitians. Dietitians are key to ensuring the updated NPM is applied consistently and transparently. Dietitians can help bridge the gap between technical policy requirements and practical implementation, supporting accurate nutrient profiling, advising on meaningful reformulation, and helping organisations understand how changes should translate into healthier food environments for all.

References:

1. OHID (2025) National Diet and Nutrition Survey [online] Available at: https://www.gov.uk/government/statistics/national-diet-and-nutrition-survey-2019-to-2023/national-diet-and-nutrition-survey-2019-to-2023-report#executive-summary

2. World Health Organisation (2025) Sugars and dental caries [online] Available at: https://www.who.int/news-room/fact-sheets/detail/sugars-and-dental-caries

3. Office for Health Improvement and Disparities (2025) Short statistical commentary for hospital tooth extractions in 0 to 19 year olds 2024 [online] Available at: https://www.gov.uk/government/statistics/hospital-tooth-extractions-in-0-to-19-year-olds-2024/short-statistical-commentary-for-hospital-tooth-extractions-in-0-to-19-year-olds-2024

4. NHS (2025) National Child Measurement Programme [online] Available at: https://digital.nhs.uk/services/national-child-measurement-programme/

5. Recipe for Change (2026) Public polling highlights [online] Available at: https://www.sustainweb.org/assets/recipe-for-change-public-polling-highlights-1776860544.pdf

6. Action on Sugar and Salt (2020) Processed Fruit Snacks Survey Report [online] Available at: https://www.actiononsugar.org/media/actiononsugar/Processed-Fruit-Snacks-2020-Survey-Report-.pdf

7. Jenneson VL, Pontin F, Ennis E, Fildes A, Johnstone AM, Morris MA; DIO Food team. Protocol for a quasi-experimental analysis: using retail sales data to evaluate impacts of the high fat, sugar and salt (HFSS) product placement restrictions legislation in England. BMJ Public Health. 2025 Dec 25;3(2):e002065. doi: 10.1136/bmjph-2024-002065. PMID: 41458241; PMCID: PMC12742058.

8. Nesta (2026) Mind the gaps: Why restrictions on less healthy food and drink advertising fall short [online] Available at: https://media.nesta.org.uk/documents/Mind_the_gaps_-_full_report.pdf

9. Recipe for Change (2026) Public polling highlights [online] Available at: https://www.sustainweb.org/assets/recipe-for-change-public-polling-highlights-1776860544.pdf

10. Office for Health Improvement and Disparities (2025) National Diet and Nutrition Survey 2019 to 2023: report [online] Available at: https://www.gov.uk/government/statistics/national-diet-and-nutrition-survey-2019-to-2023/national-diet-and-nutrition-survey-2019-to-2023-report

11. Food Foundation (2026) The Broken Plate 2026 [online] Available at: https://foodfoundation.org.uk/sites/default/files/2026-06/The%20Broken%20Plate%202026_DIGITAL.pdf

12. Hurst, E., et al. (2025) *Prevalence of High Fat Sugar Salt Products, Labeling Characteristics, and Categories of Foods Sold within In-Store Restricted Areas: A Survey in 3 UK Supermarkets after the 2022 Implementation of the Food (Promotion and Placement) Regulations*. Current Developments in Nutrition, 9(1). Available at: https://www.sciencedirect.com/science/article/pii/S2475299124024430 (Accessed 16 June 2026)

13. Public Health England (2017) Appendix AA Calculation of free sugars and AOAC fibre in the NDNS RP [online] Available at: https://data.food.gov.uk/catalog/datasets/cba8b3a8-608a-468d-917d-7dfcacda2dfc

14. Obesity Health Alliance (2026) Free sugars roundtable report summary [online] Available at: https://obesityhealthalliance.org.uk/wp-content/uploads/2026/04/Free-Sugars-Roundtable-%E2%80%93-Meeting-Summary.pdf

15. Food Foundation (2024) Lobbying for Good: Why we need regulation to level the playing field for the food industry [online] Available at: https://foodfoundation.org.uk/news/lobbying-good-why-we-need-regulation-level-playing-field-food-industry

16. Jenneson VL, Pontin F, Ennis E, Fildes A, Johnstone AM, Morris MA; DIO Food team. Protocol for a quasi-experimental analysis: using retail sales data to evaluate impacts of the high fat, sugar and salt (HFSS) product placement restrictions legislation in England. BMJ Public Health. 2025 Dec 25;3(2):e002065. doi: 10.1136/bmjph-2024-002065. PMID: 41458241; PMCID: PMC12742058.

17. UK Parliament (2022) Diet-related health inequalities [online] Available at: https://researchbriefings.files.parliament.uk/documents/POST-PN-0686/POST-PN-0686.pdf

18. Coleman, P.C., Hanson, P., Rens, T and Oyebode, O. (2022) A rapid review of the evidence for children's TV and online advertisement restrictions to fight obesity, Preventive Medicine Reports, Volume 26, https://doi.org/10.1016/j.pmedr.2022.101717.

The text below was provided to the BDA by Dr Sally Moore RD University of Leeds School of Food Science and Nutrition (Committee member and former Chair of the Public Health Specialist Group) and Liv Chessell (Msc Nutrition research student, University of Leeds School of Food Science and Nutrition, to support this organisation's response.

Foot note 1:

a) Yoghurts

Out of 171 yoghurt products in the dataset, **32.5% (n=56)** contained no free sugars, leaving **67.5% (n=115)** requiring a free-sugar calculation. Among these 115 products, **88.7% (n=102)** lacked the necessary %-contribution information in their ingredients lists, making calculation impossible. Only **11.3% (n=13)** had sufficient ingredient-level data to proceed to the next step of identifying numerical sugar values in CoFID or USDA. Of those 13 products, **53.8% (n=7)** had a usable database value, while **46.2% (n=6)** did not.

b) Breakfast Cereals

Out of 205 breakfast cereals in the dataset, **18.5% (n=38)** contained no free sugars, leaving **81.5% (n=167)** requiring a free-sugar calculation. Of those 167 products, **98.2% (n=164)** lacked the necessary ingredient-level information to calculate free sugars accurately. Only **3 products** had sufficient data to proceed, and all three were able to be calculated using values from CoFID or USDA. However, we encountered instances for individual products where required sugar-contribution value was not available in either database, so external sources were required. Overall, this means that **only 1.8%** of breakfast cereals that required a free-sugar calculation were actually able to have their free-sugar content quantified.

Footnote 2:

Our insight echoes evidence shared by other organisations on the feasibility of application of the proposal NPM2018 and specifically data and other requirements for the calculation of free sugars at scale. We refer to the Solutions provided by Obesity Health Alliance and within associated publications from the IGD, Spoonguru and academics including Dr Victoria Jenneson at the University of Leeds.

Table 1 Examples of the evaluation of selected individual products' using FOPNL Multiple Traffic lights and the NPM2004 as well as the NPM (2018)

Category	Product Name	Ingredients (from label)	FOPNL MTL colours	NPM2004	NPM2018 (NC= free sugars not calculatable)	Issues
Ready Meal	Tesco Finest Creamy Fish Pie 400G	Mashed Potato [Potato, Skimmed Milk, Butter (Milk), Single Cream (Milk), Whole Milk, Salt, White Pepper], Cooked Smoked Haddock (11%) [Smoked Haddock (Fish), Salt], Cooked Salmon (Fish) (9%), Single Cream (Milk), Cooked King Prawn (6%) [King Prawn (Crustacean), Salt, Acidity Regulator (Sodium Bicarbonate)], Mature Cheddar Cheese (Milk), Whole Milk, Double Cream (Milk), White Wine, Cornflour, Chive, Cod Stock (Fish), Plaice Stock (Fish), Salt, Black Mustard Seed, Gelling Agent (Amidated Pectin), Spirit Vinegar, Sugar, White Pepper, Sunflower Oil, Pepper Oil.	AMBER, AMBER, GREEN, AMBER	-1	NC	Insufficient Ingredient Declaration Details: No % contribution next to the added sugar ingredients
Pizza	Pizza Express Classic Margherita Pizza	Wheat Flour (Wheat Flour, Calcium Carbonate, Iron, Niacin, Thiamin), Mozzarella Cheese (Milk) (23%), Tomato (11%), Tomato Purée, Water, Semolina (Wheat), Rapeseed Oil, Salt, Yeast, Sugar, White Wine Vinegar, Oregano, Black Pepper, Basil	AMBER, AMBER, GREEN, AMBER	2	NC	No % contribution next to added sugar ingredients
Pie	ASDA Broccoli & Cheese Quiche 400g	Skimmed Milk, Broccoli (21%), Fortified Wheat Flour [Wheat Flour, Calcium Carbonate, Iron, Niacin (B3), Thiamin (B1)], Extra Mature Cheddar Cheese (Milk) (11%), Pasteurised Whole Egg (8%), Palm Oil, Maize Flour, Single Cream (Milk), Cornflour, Red Leicester Cheese (2%) [Leicester Cheese (Milk), Colour (Carotenes)], Rapeseed Oil, Dextrose, Dijon Mustard [Water, Mustard Seeds, Spirit Vinegar, Salt], Salt, White Pepper	AMBER, RED, AMBER, GREEN	4	NC	No % contribution next to the added sugar ingredients present
Soft drink	Lucozade Alert Tropical Burst	Carbonated Water, Sugar, Fruit Juice from Concentrate (Fruit Juices from Concentrate (Pineapple, Mango, Passion Fruit)), Acid (Citric Acid), Acidity Regulator (Sodium Lactate), Flavourings, Caffeine (0.03%), Sweeteners (Acesulfame K, Sucralose), Antioxidant (Ascorbic Acid), Stabiliser (Acacia Gum), Niacin (Vitamin B3), Colour (Beta Carotene)	GREEN, GREEN, AMBER, GREEN	0	NC	No % contribution next to the added sugar ingredients present
Yoghurt	Arla Protein Passion Fruit & Papaya 200G	Yogurt (Milk) (91%), Grape Juice Concentrate, Passion Fruit Juice (2.3%), Papaya Concentrate, Starch, Natural Flavouring, Gelling Agent (Pectin), Acidity Regulator (Sodium Citrates), Sweetener (Steviol Glycosides), Lactase Enzyme	GREEN, GREEN, AMBER, GREEN	-4	NC	No % contribution to added sugar ingredients
Oat Milk	Alpro This is Not M*lk Whole Chilled Oat Drink 750ml	Oat base (93.5%) (Water, Oat (8.3%)), Sunflower Oil, Soluble Corn Fiber, Sugar, Pea Protein, Calcium (Calcium Carbonate), Acidity Regulator (Potassium Phosphates), Flavourings, Sea Salt, Stabiliser (Gellan Gum), Potassium Iodide, Vitamin D2	AMBER, GREEN, GREEN, GREEN	-1	NC	% contribution to added sugar ingredients was not noted

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