

Lidl GB

Policy on Health and Nutrition

August 2020



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1. Introduction

At Lidl, we are committed to making 'good food accessible to everyone'. As a leading food retailer, we are aware of our responsibility to help our customers to make healthier choices when they shop in our stores. In this policy, we outline the steps we are taking to promote health and nutrition, whether that be the formulation of recipes or the selection of food additives used in our products.

Our Approach

Policy purpose

This 'Health and Nutrition' policy sets out the criteria, specifications, and targets for Lidl GB's own brand product range. For each section of the policy, we introduce the relevant issue, our approach and communicate our defined targets.

Continuous improvements – a science-based approach

To develop this policy, we have followed the latest findings in health, science, and technology, as well as closely assessing current social trends. To maintain our commitment to quality and price, we continually assess and evaluate our own brand product range, keeping our customers' needs at the heart of our decision making.

2. Helping our customers make healthier choices

To help our customers make healthier choices, we are taking a range of actions to reduce the levels of salt, sugar, calories and saturated fat in our products. This builds on our commitments towards the Public Health England (PHE) salt, sugar and calorie reduction schemes. These actions include:

- Reformulation of products
- Reduction of package/portion size
- Shift in product portfolio

When reducing salt and sugar, we first attempt to simply reduce the levels of these in our recipes, to train our customers to prefer less salty/sweet foods. Only where this is not achievable, would we investigate the use of alternative ingredients and methods.

2.1 Sugar

The reduction of sugar follows the advice from PHE, focusing primarily on foods that contribute the highest sugar intakes in a child's diet:

- | | |
|-----------------------|-----------------------------|
| • Breakfast cereals | • Yoghurt and fromage frais |
| • Biscuits | • Cakes |
| • Morning goods | • Puddings |
| • Ice cream | • Chocolate confectionery |
| • Sweet confectionery | • Sweet spreads and sauces |
| • Nut butters | • Milk drinks and juices |

When reducing sugar, we strive to ensure PHE salt targets are met and saturated fat content is not increased as a result.

2.2 Salt

The reduction of salt focuses on a wide variety of food categories determined by PHE. These are typically consumed on a regular basis in the UK and make up a large share of the daily salt intake. Examples of food categories covered include:

- | | |
|-------------------------|----------------------------|
| • Meat products | • Sweet & Savoury biscuits |
| • Cheese | • Ready meals |
| • Rice, pasta & noodles | • Pizza |
| • Bread | • Sandwiches |

2.3 Calories

The reduction of calories follows advice from PHE, focusing primarily on foods that contribute the highest calorie intakes in a child’s diet. Examples of food categories covered include:

- Crisps & savoury snacks
- Sandwiches
- Chips & potato products
- Ready meals
- Pastry products
- Pizza
- Garlic & cheesy bread
- Breaded and battered products

Lidl GB Target	
Sugar and calories: 20% sales weighted average reductions to be achieved in pre-determined own brand product categories.	ONGOING (sugar) August 2024 (calories)
Salt: Reduce salt content of our products in line with the UK’s PHE targets.	2024 (salt)

3. Choosing food ingredients with care

Product quality begins with the selection of ingredients. We have high standards in this regard, and the products we offer our customers must have the highest quality and taste. That is why we have defined specific criteria for the selection of ingredients used in Lidl GB’s own brand product range.

3.1 Food colours

What are food colours and why are they used in food?

Food colours are added to improve the appearance of food. Food colours are also used in foods that are generally colourless, such as confectionery, to serve as a flavour indicator.

Why are some food colours controversial?

According to a study published by the University of Southampton in 2007, certain azo food dyes and quinoline yellow are suspected of causing hyperactivity and attention disorders in children. These food colours are listed in the EU Regulation on food additives, and any food and drink containing these must carry a warning on the packaging with the wording e.g. “May have an adverse effect on activity and attention in children”.

What are the legal requirements?

In the European Union, food colours are governed by the regulation on food additives. Only colours that have had their safety assessed by EFSA can be authorised for use. Foods containing any of these colours must be labelled with the additional information "food colour", followed the name or E number of the colour. To be as transparent as possible, Lidl's own brand product labels always contain the specific name(s) of all additives.

Lidl's approach to food colours

For many years now, our aim has been to avoid using azo dyes in food. Going forward, we also intend to move away from using the following food colours: quinoline yellow; carmine; erythrosine and green S. This is because there is evidence that these may be allergenic and harmful for children.

Our target is to avoid using artificial colours as far as possible. We are reviewing all own brand products to determine whether the use of food colours is necessary. Where they cannot be removed completely, we prefer to use natural alternatives such as colouring from foods (e.g. beetroot).

Lidl GB Target	
Continue to review all products containing food colours to determine whether the use of food colours is necessary. Where possible, we intend to avoid artificial food colours.	ONGOING
We will also avoid using quinoline yellow, carmine, erythrosine and green S.	

3.2 Preservatives

What are preservatives and what are they used for?

Preservatives are food additives designed to limit the growth of microbes in food, keeping it fresh for longer.

Why are some preservatives controversial?

The use of certain preservatives is controversial because they have been associated with allergic reactions, for example, sulphites (e.g. those used in wine and dried fruits) or benzoic acid derivatives (e.g. those used in pickled vegetables or fish products).

The use of nitrites in meat products is also controversial. Nitrite has been linked to the formation of a group of compounds known as nitrosamines, which are known carcinogens. However, nitrite reliably inhibits the growth of pathogenic bacteria and as such is the safest and most effective method for preserving meat products.

What are the legal requirements?

As with all food additives, EFSA is responsible for assessing the safety of each individual preservative. A food additive can only be authorised if it does not, based on the available scientific evidence, pose a risk to the health of the consumer at the proposed level of use (in this case as a preservative). Foods containing preservatives must be labelled with the additional information "preservative", followed by the name or E number of the preservative. To be as transparent as possible, our own brand product labels always contain the specific name(s) of all additives.

Lidl's approach to preservatives

At Lidl we aim to reduce the use of preservatives as far as possible or eliminate them completely, provided this does not compromise food safety. For certain products, such as sausages, and cooked meat, the use of preservatives cannot always be completely avoided. This is due to safety reasons as the elimination of preservatives in these categories would result in the growth of pathogenic bacteria.

Lidl GB Target	
Continue to review and reduce the use of preservatives as far as possible or eliminate them completely, provided this does not compromise food safety.	ONGOING

3.3 Flavours

What are flavours and why are they used in food?

When appropriate, flavours are used to optimise the overall taste profiles of the products. Our aim is to use flavours only where they are needed, ensuring that recipes are optimised without sacrificing on taste. If our desired taste profiles cannot be achieved without natural extracts or natural food flavours, we may choose to use artificial flavours.

Lidl GB Target	
Continue to review all products containing flavours to determine whether the use of flavours is necessary. We will avoid the use of artificial flavours as far as possible.	ONGOING

3.4 Fats

What are saturated / unsaturated fats?

Fats and oils contain saturated and unsaturated fatty acids, which differ in their nutritional properties. Fats that are high in saturated fatty acids generally increase (bad) LDL cholesterol levels in the blood. Fats high in unsaturated fatty acids generally increase (good) HDL cholesterol in the blood. It is therefore important to limit consumption of saturated fats and opt for unsaturated alternatives where possible.

Lidl's approach to saturated and unsaturated fats

Our target is to minimise the levels of saturated fats in our products. When reformulating products, we always strive to prevent the increase in saturated fat, where possible, by either reducing the amount of total fat or using unsaturated fat alternatives.

What are trans-fatty acids and what effects do they have?

Trans-fatty acids are formed when liquid vegetable oils are partially hydrogenated to form a semi-solid or solid fat. Trans-fatty acids are found primarily in fast foods, snack foods, cookies, fried foods and sandwich spreads.

Trans-fats raise the (bad) LDL cholesterol levels in the blood and lower the (good) HDL cholesterol and so advice is to minimise consumption.

What are the legal requirements?

In April 2019, the European Commission decided to limit the amount of industrial trans fatty acids in food products to no more than 2 grams per 100 grams of fat or oil across the EU. This level must be met by April 2021. Some Member States had already introduced such limits on a national level.

Lidl GB Target	
Lidl is committed to ensuring compliance against EU legislation. Where possible, Lidl aims to remove trans-fatty acids altogether. Lidl will also strive to reduce saturated fat levels in food by either reducing the total level of fat or using unsaturated alternatives, where possible.	ONGOING

3.5 Palm oil

Where does palm oil come from and what are the benefits of using it?

Palm oil is derived from the fruit of the tropical oil palm tree and is the most used vegetable oil worldwide. Unlike other vegetable oils that are naturally softer and more fluid, palm oil is semi-solid at ambient temperature and therefore does not have to be hydrogenated first for many applications.

What effects does it have on health?

Palm oil is high in saturated fats. An excess dietary intake of saturated fats can raise triglyceride (blood fat) levels. The processing of palm oil at high temperatures also increases the risk of the formation of certain fatty acid esters (3-MCPD) which are considered carcinogenic.

Lidl's approach to palm oil

Lidl strives to reduce saturated fat levels in food (i.e. reduce palm oil content) by either reducing the total level of fat or using unsaturated alternatives, where possible.

At Lidl, we are committed to sourcing 100% of the palm oil used within our product range from third party certified sustainable sources. Lidl's full approach to the sustainable sourcing of palm oil is outlined in our 'palm oil' policy, which can be viewed at www.lidl.co.uk/sustainability

3.6 Vitamin and mineral fortification

What function do vitamins have for humans?

Vitamins are organic compounds that the human body needs to function properly. Vitamins are found in abundance in fruits, vegetables and grains. Vitamins have a variety of functions in the body, with adequate intakes being linked to good health.

What function do minerals have for humans?

Minerals are inorganic nutrients found in plant-based and animal-based foods. They serve a variety of functions for all metabolic and growth processes in the body.

What are the effects of food fortification with vitamins and minerals?

Foods are fortified with vitamins and minerals in order to compensate for deficiencies in the nutrient intake. However, excessive intake can have adverse health effects in some cases.

Lidl's approach to vitamins and minerals

Vitamins and minerals are only added to certain select products, such as multivitamin drinks (vitamins), sports drinks, meat substitute products (vitamin B12), plant-based dairy substitutes (calcium), margarine and iodised table salt.

3.7 Sweeteners

What are sweeteners and what are they used for?

Sweeteners are synthetically produced (e.g. aspartame) or natural compounds (e.g. stevia) which serve as energy-free sugar substitutes. The use of sweeteners in food makes it possible to offer low-calorie or calorie-reduced alternatives without sacrificing the sweet taste.

Why are sweeteners controversial?

The use of sweeteners for children is considered controversial. When children consume sweeteners, they can become accustomed to the intense sweetness of industrially produced products and lose their perception of what less-sweet natural food tastes like. However, no conclusive research has found negative effects of sweeteners on health.

What are the legal requirements?

As for all food additives, sweeteners are regulated substances which are subject to safety evaluation prior to market authorisation. In the European Union (EU), there are currently 11 approved sweeteners. An acceptable daily intake (ADI) is determined for each individual sweetener in the health assessment.

Lidl's approach to sweeteners

As part of our sugar reduction strategy, we are working towards reducing the sales weighted average of sugar by 20% from predetermined categories across our own brand product range. Where possible, we will look to reformulate products through the removal of sugar, however in some cases the addition of sweeteners may be required.

3.8 Isoglucose

What is Fructose and what is it used for?

Fructose is a naturally occurring sugar, primarily found in fruit. When extracted it becomes a form of added sugar. Isoglucose, which includes glucose-fructose syrup, fructose-glucose syrup and high fructose corn syrup, are forms of sugar syrup made up of varying amounts of the simple sugars, glucose and fructose.

Table 2 Definitions Isoglucose

Name	Fructose content	Origin
Isoglucose	10% or more	wheat, maize, potato
Glucose-fructose syrup	5% – 50%	wheat, maize, potato
Fructose-glucose syrup	> 50%	wheat, maize, potato
High fructose corn syrup (used mainly in the U.S.)	min. 42%, often 55%	maize

Why is added fructose controversial?

A high intake of added fructose has been found to have adverse effects on metabolism. According to various studies, an excessive intake of fructose can lead to an increased risk of obesity, diabetes, metabolic disorders and cardiovascular disease¹.

Unlike glucose, fructose is metabolized in the liver. Excessive fructose intake could therefore lead to what is known as a “non-alcoholic fatty liver”. This is comparable to a fatty liver caused by excessive alcohol consumption. It is estimated that up to 30% of the population in Europe suffers from non-alcoholic fatty liver disease which can lead to diabetes and hypertension².

Lidl’s approach to added fructose

The first steps to eliminate the use of added fructose, fructose syrup and fructose-glucose syrup in Lidl products were taken in early 2017.

Our long-term goal is to use glucose-fructose syrup only where technically necessary and not for sweetening purposes.

If, however, a product does contain glucose-fructose syrup, we require the fructose content to be less than 42%. Through this measure we can ensure that no high fructose corn syrup is used.

Lidl GB Target	
We will avoid the use of added fructose, fructose syrup and fructose-glucose syrup. Our target is to use glucose-fructose syrup only where technologically necessary, not for sweetening purposes. If a product contains glucose-fructose syrup, the fructose content will be less than 42%. This way we ensure that no high fructose corn syrup (HFCS) is used.	January 2025

The following ingredients are to be avoided in Lidl own brand products:

Please note that this list does not include those covered by EU or governmental regulations.

Colours	Quinoline Yellow
	Carmine
	Erythrosine
	Green S
Sugars	Fructose
	Fructose Syrup
	Fructose-Glucose Syrup
	Glucose-Fructose Syrup (when fructose content is $\geq 42\%$ of the syrup)
	Invert Sugar / Invert Sugar Syrup
	Partially Inverted Sugar Syrup
	Corn Syrup

The following ingredients are to be minimised in Lidl own brand products, where possible:

Additives	Soya Lecithins (emulsifier)
	Artificial preservatives, colourants and flavourings
Fats	Trans Fatty Acids
Sugars	Glucose-Fructose Syrup (when fructose content is $< 42\%$ of the syrup)
Other	Palm Ingredients
	Monosodium Glutamate (MSG)

References:

- 1 Bray, George A. et al. (2004) Consumption of high-fructose corn syrup in beverages may play a role in the epidemic of obesity. The American Journal of Clinical Nutrition, Volume 79(4):537-543
- 2 Weiss J, Rau M, Geier A (2014) Non-alcoholic fatty liver disease: epidemiology, clinical course, investigation, and treatment. Deutsches Ärzteblatt Int 111: 447–452