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Dear Pat McFadden and Laura Kyrke-Smith,

We are writing to express our serious concern about the UK's oversupply of sugar, and the barriers it is creating for the government's mission to build an NHS fit for the future. We request that your government takes active steps to reduce the UK's sugar supply, to support dietary and environmental health.

On 11th October, the Department of Business and Trade announced a decision to maintain the Autonomous Tariff Quota (ATQ) on raw cane sugar imports for 2025, and, according to recent speculation, the Department of Environment, Food and Rural Affairs may grant another emergency exemption to use neonicotinoid pesticides on sugar beet crops, despite a pre-election promise to ban these,ⁱ and an ongoing investigation by the Office for Environmental Protection.ⁱⁱ

These policy decisions, which serve to support sugar supply, undermine the government's other efforts to reduce sugar consumption. The UK's sugar supply is nearly three times greater than the total needed to meet the entire population's maximum daily intake. In 2021, the total supply required to meet safe consumption limits was 0.73 million tonnes, based on the NHS's health guidelines and that year's census data.ⁱⁱⁱ However, the actual sugar supply in the UK was closer to 1.91 million tonnes,^{iv} with about a quarter of this from imported raw cane sugar, and half from domestically grown sugar beet (the remainder is imported refined sugar).^v Substantial evidence shows that reducing sugar supply is essential to addressing public health harms caused by poor diets. If the Department of Health and Social Care's effort to half sugar consumption^{vi} and the government's 10 Year Turnaround Plan for health are to be successful, the government must "take preventative public health measures to tackle the biggest killers and support people to live longer, healthier lives" – namely by reducing the UK's supply of sugar.^{vii}

The overconsumption of sugar contributes to major public health challenges including obesity, tooth decay, type 2 diabetes, and hypertension.^{viii} As highlighted in the House of Lord's recent report, obesity and diet-related disease have become "a public health emergency", and, after tobacco, "diet-related risks now make the biggest contribution to years of life lost".^{ix} On average, hospitals in England perform 119 tooth extraction operations each day on children and teenagers, costing the NHS £40.7 million per year.^x Research published recently found that cutting sugar in the first 1,000 days of a baby's life

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appears to reduce the risk of developing significant health issues in adult life.^{xi} Nigel Carter, Chief Executive of the Oral Health Foundation, noted “Around one in three adults in the UK suffer from tooth decay, with sugar being the cause. We are in dire need of a stronger approach to take on the sugar industry and to promote a healthier, sugar-conscious society”.^{xii}

However, with a sugar supply nearly three times the maximum safe consumption limit, it is unsurprising that efforts to reduce sugar sales and public sugar consumption over the past 30 years have seen limited success. From 2015 to 2020, the total amount of sugar sold across products in the voluntary Sugar Reduction Programme actually *increased* by 7%^{xiii}. High sugar supply keeps prices low, making it attractive for food manufacturers to continue using sugar in their products. Therefore, whilst we support the government’s commitment to increasing the Soft Drinks Industry Levy in line with inflation,^{xiv} as well as the House of Lords’ recommendation to introduce a salt and sugar reformulation tax for food manufacturers, reducing sugar *supply* must also be a priority.

This is echoed by Lord Darzi’s recent investigation which highlighted that “bold action has been sorely lacking on obesity and regulation of the food industry” and that “interventions that protect health tend to be far less costly than dealing with the consequences of illness.”^{xv} This is particularly relevant to the issue of excessive sugar supply, where government action to reduce supply could ultimately save public funds rather than increase costs. The Office for Health Improvement and Disparities has estimated that reducing free sugars intake to no more than 5% of energy intake within 10 years could save the NHS nearly £500 million per year in obesity-related healthcare and associated comorbidities.^{xvi}

Alongside the health challenges posed by excessive sugar supply, there are also significant environmental risks and opportunity costs. Last year, the domestic sugar beet growers used around 99,000 hectares of land to grow beet,^{xvii} an area similar to the hectareage of land used to grow all vegetable and salad crops combined.^{xviii} Sugar beet harvesting removes a significant quantity of non-renewable topsoil from English farmland every year, resulting in the depletion of soil resilience, water holding capacity and fertility. New figures released by the Department for Environment, Food and Rural Affairs shows that 102,837 hectares of land were utilised for sugar beet in 2024, causing an estimated 474,593 tonnes of vital topsoil loss.^{xix} Meanwhile, repeated requests to permit the use of neonicotinoids suggest that what the sugar beet industry describes as “exceptional circumstances” are now becoming the norm for beet crop production. Neonicotinoids accumulate over time in soils, waterways, and plants, posing risks to other organisms in the ecosystem.^{xx xxi} Tackling the public health and environmental harms of excessive sugar supply clearly requires a coordinated, cross-government approach that involves both health, trade, and environmental departments.

We are therefore writing to urge you to prioritise reducing sugar supply as a key public health goal. We recommend the following actions:

1. **Reduce sugar supply as a public health priority.** Reducing sugar supply should be central to disease prevention efforts within the Health Mission to ‘Build an NHS fit for the future’. The government should conduct a comprehensive review of the drivers of sugar supply and the relationship between supply and demand to facilitate a managed reduction in supply that supports public health, enhances wellbeing, and alleviates the huge cost borne by the NHS. A report by Action on Sugar and Feedback, *Sugar Pollution*, provides further details on reducing sugar supply.^{xxii}
2. **Coordinated action across key government departments.** As policy levers impacting sugar supply fall within the remit of several different government departments, there is a need for a cross-government taskforce to bring sugar supply under control and within safe limits, from

both domestic beet and imported cane, alongside demand-side measures to reduce sugar consumption.^{xxiii}

3. **Work with the Department for Business and Trade to conduct a holistic review of the ATQ for 2025.** The review should be aligned with broader government policies and missions, addressing the impact of sugar oversupply on public health, equalities and environmental outcomes.
4. **Refuse to grant another emergency derogation for the use of the neonicotinoid, thiamethoxam, on British sugar beet crops.**

We urge you to take a fresh approach to addressing the barrier to better public health and a stronger NHS posed by the UK's excessive sugar supply, and look forward to hearing from you.

Sincerely,

Jessica Sinclair Taylor, Deputy Director, Feedback Global
Shane Holland, Executive Chairman, Slow Food UK
Josie Cohen, Head of Policy and Campaigns, Pesticide Action Network UK
Stephanie Slater, Founder and Chief Executive, School Food Matters
Ellen Fay, Executive Director, Sustainable Soils Alliance
Matthew Philpott, Executive Director, Health Equalities Group
Kath Dalmeny, Chief Executive, Sustain: the alliance for better food and farming
Tim Coleshaw, Chair, British Dragonfly Society
Russel Hobson, Director of Evidence & Policy, Butterfly Conservation
Neil Carmichael, Executive Chair, The Association of Dental Groups
James Toop, Chief Executive, Bite Back
Professor Graham MacGregor, Chair, Action on Sugar based at Queen Mary University of London
Katharine Jenner, Director, Obesity Health Alliance
Martin Lines, Chief Executive Officer, Nature Friendly Farming Network
Eddie Crouch, Chair, British Dental Association



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- ⁱ Horton, H. (2024). UK may approve bee-killing pesticide despite election promise to ban it. [online] the Guardian. Available at: <https://www.theguardian.com/environment/2024/oct/08/uk-may-approve-bee-killing-pesticide-despite-election-promise-to-ban-it>.
- ⁱⁱ "OEP Launches Investigation into Defra's Emergency Authorisation of Pesticides | Office for Environmental Protection," accessed November 27, 2024, <https://www.theoep.org.uk/news/oep-launches-investigation-defras-emergency-authorisation-pesticides>.
- ⁱⁱⁱ Maximum recommended amount for whole of UK is 0.73 million tonnes, calculated by multiplying the estimated UK population in 2021 of 67 million by 10.95kg (30 grams per day over the course of a year), rounded to the nearest 0.1 million tonne. Adjusting these figures for the number of young children in the country would lower this recommended amount further. NHS guideline: <https://www.nhs.uk/live-well/eat-well/food-types/how-does-sugar-in-our-diet-affect-our-health/>
- ^{iv} Figure calculated from Defra's Agriculture in the United Kingdom data (2022), combined with data on confectionary and other high-sugar products from Richardson and Winkler (2019; using 2018-18 data).
- ^v Defra. Agriculture in the United Kingdom 2022. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1170953/auk-202213jul23i.pdf.
- ^{vi} The NHS recommends that adults consume no more than 30g of free sugars (sugars added to food or drinks, and sugars found naturally in honey, syrups, and unsweetened fruit and vegetable juices, smoothies, and purées) per day, making up no more than 5% of daily calorie intake.
- ^{vii} The Labour Party. (n.d.). Build an NHS fit for the future. [online] Available at: <https://labour.org.uk/change/build-an-nhs-fit-for-the-future/>.
- ^{viii} EFSA Panel on Nutrition, Novel Foods and Food Allergens (NDA). Tolerable upper intake level for dietary sugars (2022).
- ^{ix} Recipe for health: a plan to fix our broken food system. (2024). [online] UK: Authority of the House of Lords, p.5. Available at: <https://publications.parliament.uk/pa/ld5901/ldselect/ldmfdo/19/19.pdf>.
- ^x Thomas, T., Health, T.T. and correspondent, inequalities (2024). Number of children having rotten teeth extracted in English hospitals rises 17%. The Guardian. [online] 8 Feb. Available at: <https://www.theguardian.com/society/2024/feb/08/number-of-children-having-rotten-teeth-extracted-in-english-hospitals-rises-17>.
- ^{xi} Sugar in first 1,000 days linked to poor health later - BBC News. (n.d.). BBC News. [online] Available at: <https://www.bbc.co.uk/news/articles/c93qlyp42jyo.amp>.
- ^{xii} Thomas, R. (2024). Experts condemn 'alarming' UK sugar consumption data- Dentistry. [online] Dentistry.co.uk. Available at: <https://dentistry.co.uk/2024/07/25/experts-condemn-alarming-uk-sugar-consumption-data/>.
- ^{xiii} Sugar Rush: How UK supermarkets drive high sugar sales. (2023). [online] London: Feedback, p.3. Available at: <https://feedbackglobal.org/wp-content/uploads/2023/04/Sugar-Rush-Final-Report.pdf>.
- ^{xiv} Autumn Budget 2024. (2024). In: HM Treasury. [online] London: House of Commons, p.49. Available at: https://assets.publishing.service.gov.uk/media/672232d010b0d582ee8c4905/Autumn_Budget_2024_web_accessible_.pdf.
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- ^{xvi} Public Health England (2015). Sugar Reduction: The evidence for action. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/470179/Sugar_reduction_The_evidence_for_action.pdf.
- ^{xvii} Department for Environment Food & Rural Affairs. (2024). Chapter 7: Crops. [online] GOV.UK. Available at: <https://www.gov.uk/government/statistics/agriculture-in-the-united-kingdom-2023/chapter-7-crops#sugar-beet> [Accessed 11 Nov. 2024].
- ^{xviii} Too Much of a Bad Thing. (2019). [online] London: Feedback. Available at: <https://feedbackglobal.org/wp-content/uploads/2019/11/Too-much-of-a-bad-thing-the-use-and-misuse-of-land-and-soils-to-grow-sugar-Feedback-2019.pdf>.
- ^{xix} GOV.UK. (n.d.). Agricultural land use in the United Kingdom. [online] Available at: <https://www.gov.uk/government/statistics/agricultural-land-use-in-the-united-kingdom>.
- ^{xx} Goulson, D. REVIEW: An overview of the environmental risks posed by neonicotinoid insecticides. *Journal of Applied Ecology* 50, 977–987 (2013).
- ^{xxi} Bonmatin, J.-M. et al. Environmental fate and exposure; neonicotinoids and fipronil. *Environ Sci Pollut Res* 22, 35–67 (2015).
- ^{xxii} Sugar Pollution: Curbing sugar supply for health and the environment. (2023). [online] London: Feedback. Available at: <https://feedbackglobal.org/wp-content/uploads/2023/10/Feedback-Sugar-Pollution-23-Report-Final.pdf>.
- ^{xxiii} Brown, M. and Burt, H. (2022). The UK's Sugar Reduction Programme. [online] Action on Sugar, p.17. Available at: https://www.actiononsugar.org/media/action-on-salt/Full-Report_The-UK's-Sugar-Reduction-Programme-What-is-next.pdf.