

PROCESSING, POLICY AND NUTRITION – WHERE IS THE BALANCE?

Nigel Sunley

Sunley Consulting, Johannesburg, South Africa

FOOD MANUFACTURING IS A BALANCING ACT

1. Give the people what they want
2. Do it in an economically viable manner
3. Consider the broader environment in which we operate both locally and globally



THE CHALLENGE

- CAN WE RECONCILE NUMBERS 1 & 2 WITH NUMBER 3???
- HOW TO WORK WITH THOSE WHO BELIEVE NUMBERS 1 & 2 SHOULD BE ENTIRELY SUBJUGATED TO NUMBER 3?

LET'S CONSIDER THE FUNDAMENTALS OF
NUMBERS 1, 2 & 3

1. 'GIVE THE PEOPLE WHAT THEY WANT'

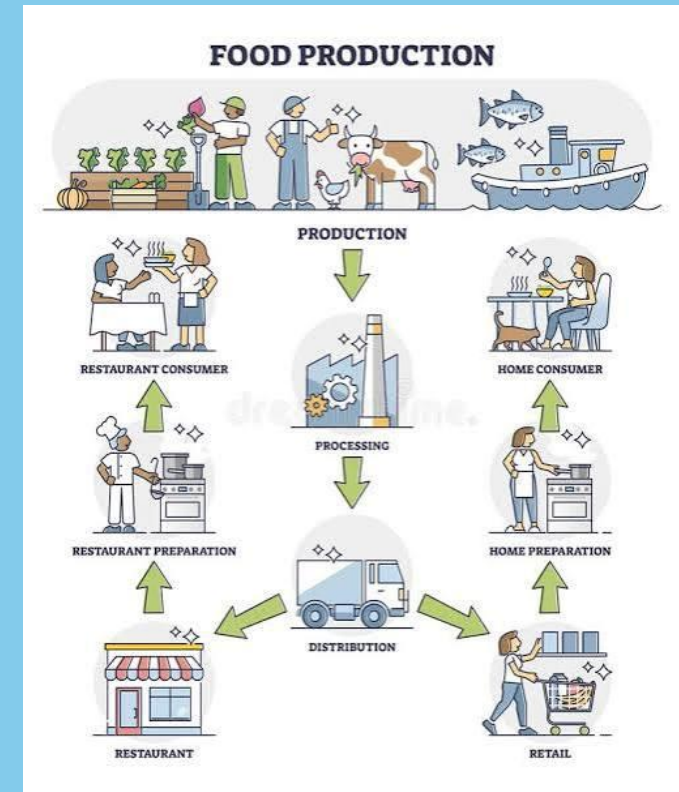
- Food is probably the most consumer driven commodity in the world
- Food is an emotional subject – behavioural considerations are key!
- Food companies can only offer products that people are prepared to buy and consume
- People are driven by price and taste

What are the most important factors governing choice (2025 data ex USA)	% of respondents rating it in top 3
Price	79
Taste	58
Nutritional content	46
Convenience	37
Food Safety	25

For low-income consumers, price & taste will be even more important!

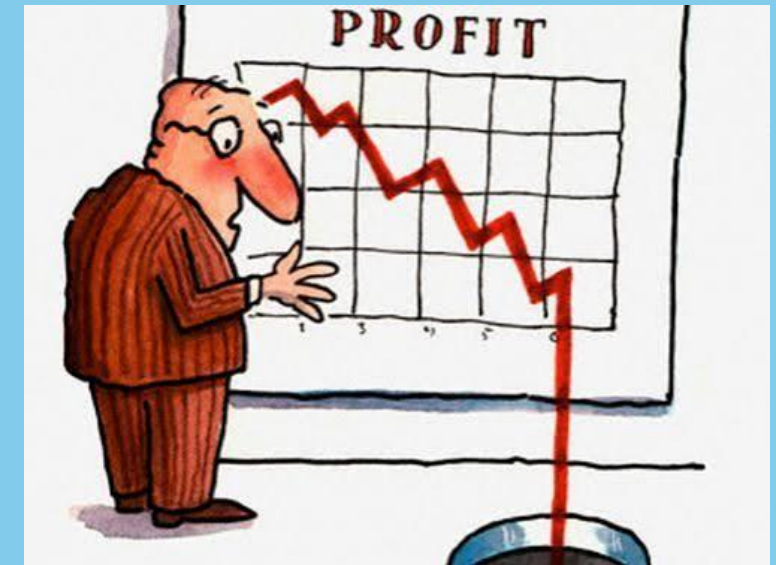
AND TO DO THAT WE NEED TO PROCESS MUCH OF OUR FOOD

- Processing enables us to:
 - Ensure food is safe
 - Extend shelf life
 - Improve ability to distribute over wider areas
 - Reduce waste
 - Increase palatability
 - Increase diversity of diet
 - Keep cost of our food down
 - And sometimes improve its nutritional quality!



‘2. DO IT IN AN ECONOMICALLY VIABLE MANNER’

- Love it or hate it, we have a market driven capitalist food system
- Unless that changes, food companies have to be profitable to survive
- Any factors influencing the environment in which food is produced must include the financial implications
- We can only ‘adapt or die’ to a certain degree, after which it becomes essential to take steps to counter changes in that environment, in order to ensure a secure food supply and survive financially



‘3. ‘CONSIDER THE BROADER ENVIRONMENT IN WHICH WE OPERATE IN SOUTH AFRICA AND GLOBALLY’

What are the fundamental challenges we face?

- Growing and increasingly urbanised population
- Sustainability becoming increasingly important
- Global political developments we cannot influence
- 2 economies – affluent ‘westernised’ and low income ‘survival’
- Low-income consumers aspire to more sophisticated diets
- ‘Westernised’ consumers’ needs very similar to broader global needs i.e. convenience, health, sustainability
- ‘Survival’ consumers driven almost entirely by cost and taste
- All the above coupled with increased incidence of obesity and related NCDs

SO – HOW TO RECONCILE, PRORITISE AND ADDRESS THEM ALL?

TODAY I THEREFORE WANT TO FOCUS ON
THE NUTRITIONAL SIDE

THE PUBLIC HEALTH REQUIREMENT

- No dispute that dietary behaviours have a significant impact on our health
- Incidence of obesity and related NCD's in South Africa is high
- Question is – are we focusing too much on diet at the expense of other factors?
- Food and the people involved in producing and supplying it are a convenient scapegoat
- Diet is easy to quantify, unlike exercise, sedentary lifestyle, lack of nutritional education, genetic disposition

ADD THE IDEOLOGICAL FACTOR...

- Activists demanding change tend to have ideological objections to food manufacturing and the 'food system'
- Favorite term is 'policies'
- Policies are meaningless unless they contain practical implementation steps
- We see dozens of papers, conferences and NGOs demanding change but few or no practical suggestions as to how to achieve it
- Unless those demanding change work with companies and persons involved in the existing system instead of sitting in isolation and complaining, nothing will be achieved



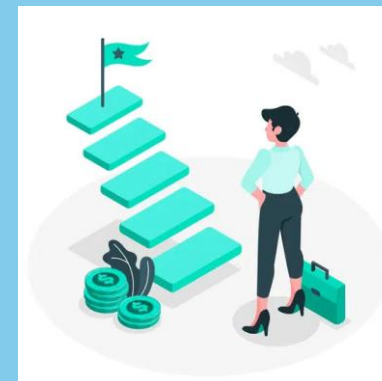
THE FOOD INDUSTRY IS NOT PERFECT...

- Bonus systems for senior management driven by volume and margin i.e. almost entirely financial in nature
- Very limited use of other incentives (e.g. nutritional quality, sustainability) for bonus purposes
- Reluctance to take risks in terms of consumer acceptance and potential impact on volumes & profitability



AND

‘Beware of the 25-year-old brand manager who wants to change the world’



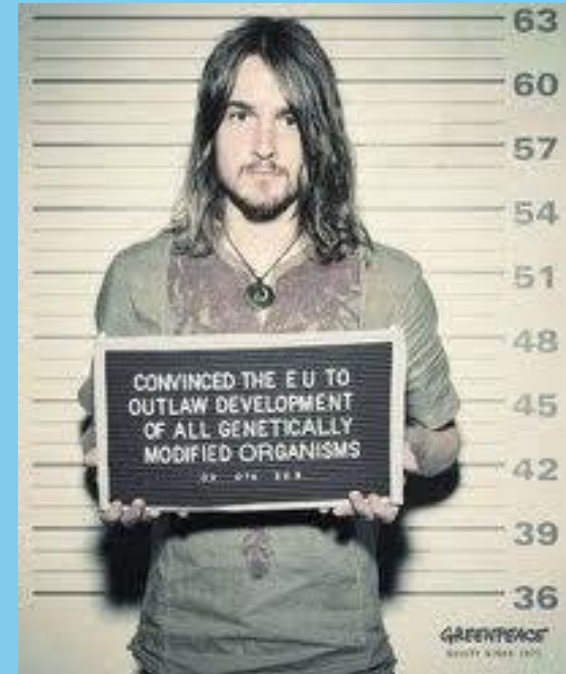
AND THEY SHOW DISTURBING BROAD TENDENCIES...

- Lack of technical and nutritional understanding by senior management
- Tendency to resort to legal procedures and PR ‘fluff’ rather than science / consumer behaviour to handle challenges and disputes
- General tendency to be reactive rather than pro-active on external issues
- Excessive secrecy and reluctance to provide transparent information, even if the facts actually favour them



BUT THE ACTIVIST THINKING IS ALSO HEAVILY FLAWED...

- Public health activists tend to be:
 - Passionate about their causes to the point of fanaticism and sometimes personal abuse towards those opposing them
 - Highly selective and simplistic in the choice of material used to substantiate their issues
 - Often secretive about their structure and funding
 - Unwillingness to debate constructively with those opposed to their views
 - Assumption that anyone opposed to their views has a financial incentive to do so



THEIR SOLUTION TO ALL NUTRITIONAL
CHALLENGES IS...

REGULATION

MORE REGULATION

EVEN MORE REGULATION!



WE SEE THIS IN MANY FORMS...

- Front of-pack labelling
- Warning messages
- Sugar taxes
- Sodium regulations
- Advertising restrictions
- School meal regulations
- Anti-additive regulations

THE INTENTIONS ARE WELL-MEANT BUT...

- Are the interventions properly motivated?
- Why is regulation always the go-to solution?
- Have they considered behavioural and educational aspects?

IN OTHER WORDS...
WILL IT WORK???

OR...

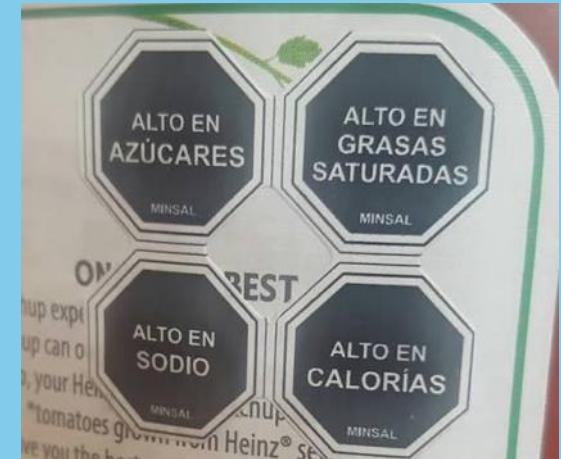
ARE THERE BETTER ALTERNATIVES???

WHERE IS THE MOTIVATION?

- Promoters of regulation to alter eating behaviour are quick to quote peer-reviewed studies proving its efficacy
- Unfortunately, much of the interpretation of results is highly questionable
- Could it be that much of the motivation is driven by industry-hating ideology rather than science?

CASE STUDY – CHILE – WARNING LABELS

- Chile introduced R3337 type measures in 2016 – FOPL, marketing restrictions, prescribed school meal content etc
- The public health lobby had a field day!
- First publications assessing the effect of the measures started to appear in 2021
- Authors of the publications claimed that the measures had been successful
- The reality was very different!



PAPER IN LANCET PLANET HEALTH (Taillie et al 2021)

The claims:

Nutrient	Claimed Reduction in Daily Intake
Energy (kJ)	68.7
Sugar expressed as energy (kJ)	48.1
Saturated fat expressed as energy (kJ)	9.2
Sodium (mg)	27.7

THE REALITY WHEN YOU DO THE NUMBERS

Nutrient	Claimed reduction in per capita daily intake	Reduction in grams (sugar & saturated fat)	Recommended WHO daily intake	% reduction achieved
Energy	68.7kJ		12139kJ (men)	0.56 (men)
			9209kJ (women)	0.75 (women)
Sugar expressed as energy	48.1kJ	2.8g	71.4g (men)	3.92 (men)
			51,4 (women)	5.44(women)
Saturated fat expressed as energy	9.2kJ	0.2g	32.8g	0.61 (men)
				0.80 (women)
Sodium (mg)	27.7		2000	1.39

IN REALITY...

- The results themselves are not disputed
- BUT the reductions in per capita consumption are minimal when expressed as percentages of WHO suggested intakes of the various nutrients
- Effect on obesity / NCDs will be negligible to zero!
- The manner in which the results are displayed is misleading and arguably unethical and their interpretation by the authors is seemingly aimed at substantiating their own theories and ideology rather than facing the realities of the numbers
- Would peer review by food scientists and better-informed nutritionists have identified these major weaknesses?

EFFECT ON CHILD INTAKES – FRETES ET AL 2023

- Changes in intakes via food consumed in school and overall over period 2016-2019

Nutrient	Change in school Intake	Change in overall intake
Total sugars (%)	-11,8	-2.4
Saturated fat (%)	-1.1	+0.4
Sodium (mg / 100kJ	-2.5	-1.3

- Comments of '*compensatory behaviour*' outside school environment
- Comment: '*Future research should determine what other actions are needed to impact overall diets to ensure healthy diets for children and adolescents both at school and out of it*'
- Implication – effect is minimal, this hasn't really worked and we don't know what to do now!

BUT WHAT ABOUT THE END-RESULT?

- Is it not reasonable to assess the actual effect on obesity statistics themselves, 10 years after the Chile initiative?
- The public health activists are noticeably silent and / or reluctant to produce publications on this
- How long is it reasonable to wait for actual effect on health?

I.E. HAS IT WORKED?

THE ANSWER LIES HERE:



Can Front-of-Pack Product Labeling Fix the Obesity Crisis?

Published by Business for Impact at
Georgetown University's
McDonough School of Business
April 2025

Business for Impact
GEORGETOWN UNIVERSITY
MCDONOUGH SCHOOL OF BUSINESS

IMPORTANT TO NOTE THAT:

- Produced by the 'Business for Impact' initiative at Georgetown University in 2025 - so probably some industry support
- Author is Hank Cardello – ex food industry, now 'Executive-in-Residence' at Georgetown and leader of the 'Leadership Solutions for Health & Prosperity' program.
- So – not a peer-reviewed journal paper but edited by Adam Drewnowski who is one of the world's leading public health nutritionists
- Document therefore has academic credibility and is comprehensively referenced (68 peer reviewed references)

IMPORTANT THAT IT FOCUSSES ON THE END-RESULT (I.E. CHANGES IN OBESITY INCIDENCE), NOT THE MEASURES TAKEN TO ACHIEVE IT

A FEW GENERAL SOUNDBITES:

- *‘As of yet, none of these [warning] systems have been proven to meet the proposed goals...’*
- *‘Specifically, the stated goal to help reduce high obesity rates has not been met, even several years after implementation’*
- *‘This paper also offers proprietary consumer segmentation data showing that FOPL labels do not effectively reach or motivate lower income consumers with the highest rates of overweight and obesity’*
- *‘We identify alternative approaches that may be more effective than FOP labeling in addressing the nation’s obesity crisis’*

THE STATISTICS FROM CHILE

- Incidence of obesity / overweight among Chilean population:

- 2010: 67.7%

- 2016: 73.5%

- 2022: 78.8%

Figures ex PAHO – no industry bias!!!

- But a recent publication (Parage et al, Lancet, 2026) claims that for children 4-6 years old over the period 2012-2017:
 - Probability of obesity for boys reduced by 2.40%
 - Probability of obesity for girls reduced by 2.85%
- It took them 9 years to publish the results(!!)
- However, another publication from the Pan-American Journal of Public Health found that child obesity rates climbed back again to previous levels in 2018

What can we believe and are the regulatory changes really having any significant effect? Classic case of ‘warning fatigue’?

PAHO predicts obesity / overweight incidence for Chile will reach 87% by 2030 (!!!)

AND OF COURSE WE HAVE THE 'ULTRA-PROCESSED' SAGA

- The concept is highly flawed scientifically but has been cleverly 'marketed' by radical elements in the public health nutrition lobby
- No proper definition exists and its promoters have changed their own definitions numerous times since its inception
- Evidence is almost entirely correlation related and **no proper causative evidence exists**
- USA scientific authorities have been unable to agree on a definition
- Any attempts to base legislation on it would in any case be completely unworkable and would be challenged on scientific and legal grounds
- Codex Alimentarius have removed UPF from their current agenda of topics requiring review

IN MY OPINION 'NOVA' = 'NO VALUE'

CAN WE THEREFORE HONESTLY SAY THAT
REGULATION WORKS?

THE ANSWER SADLY HAS TO BE NO!

SO – WHAT IS THE ALTERNATIVE?

IT'S ALL VERY PREDICTABLE...

THE INEVITABLE RESPONSE FROM THE PUBLIC HEALTH LOBBY...

- “The wicked, evil food industry is conspiring to prevent introduction of legislation”
- “Profit before people”
- “The food industry should be treated in the same way as the tobacco industry”

THE INDUSTRY RESPONSE SHOULD BE...

- No, we have every right to oppose draconian legislation which has been shown not to work
- No profit – no food!
- The food industry is NOT the same as the tobacco industry – we need food but don't need tobacco

SO, INDUSTRY IS FULLY JUSTIFIED IN ITS
SCEPTICISM AND IN SOME INSTANCES
OPPOSITION TO REGULATORY
MEASURES

IS THERE A SOLUTION?

THE ONLY ONE WITH A REASONABLE
CHANCE OF LONG-TERM SUCCESS IS
BETTER NUTRITIONAL EDUCATION FOR
CHILDREN

SUPPOSING...

- The industry was to fund and pilot a test program in a specific geographical area to provide nutritional education in selected schools
- Would government support it???
- Use competent nutritionists and communications experts to devise the program
- Make nutrition sexy!
- Keep the activists out of it!
- Include a 'train-the trainer' component for teachers
- Assess the successes / failures of the program and use them in devising a broader progressive government-funded rollout



WOULD GOVERNMENT COME TO THE PARTY?

- Debatable, need to overcome bureaucracy, silo mentalities and funding / resource constraints
- BUT if legislation doesn't work, this may be the only viable alternative
- Could be a ripple effect to nutritional education for adults for whom other approaches clearly don't work

WHAT ABOUT GLP-1?

- Will this be the elephant in the room???
- Outcomes will be dependent on uptake among the general population – currently very much only an upper LSM matter
- Impact likely to be gradual but, in conjunction with better consumer education, it will ultimately affect consumption of certain food categories
- Industry will have to adapt:
 - Smaller portion sizes
 - Reformulation without affecting palatability
 - Creative product development combining nutritional improvement with palatability and cost

SO, WE LIVE IN INTERESTING TIMES FOR THE
FOOD SUPPLY...

LET'S RE-VISIT THE INITIAL 'BIG 3'

1. GIVE THE PEOPLE WHAT THEY WANT

- The food industry will remain consumer driven for the foreseeable future
- If consumers' wants and needs change, the industry will respond to this out of commercial and ethical necessity and NOT to illogical and badly motivated government policy and / or regulation or emotional, unscientific and ideologically driven activism
- Only fundamental changes in the food environment forced by consumer demands or uncontrollable external events will result in significant changes to what we eat and at present the key realities driving food choice are palatability and cost
- Would replacing 'Big Food' with 'Small and Medium Food' make any difference?

ANYBODY GOT ANY IDEAS??

2. DO IT IN AN ECONOMICALLY VIABLE MANNER

- The world is full of impractical idealism demanding major changes in the food system & supply chain
- Calls to dismantle 'Big Food' and revert to simpler and more locally driven small scale food supplies are naïve, without any practical suggestions as to how to do it or what the financial implication for consumers would be!
- Reality is we have 8 billion increasingly urbanised people to feed, many of them impoverished and all aspiring to more sophisticated options
- That requires a sophisticated large scale supply system – unless someone can suggest a PRACTICAL alternative!
- The activists seem to think food production can somehow be sustained in denial of the basic laws of economics and consumer behaviour

ANYBODY GOT ANY IDEAS??

3. CONSIDER THE BROADER ENVIRONMENT IN WHICH WE OPERATE BOTH LOCALLY AND GLOBALLY

- The industry clearly cannot exist in splendid isolation and needs to respond to the external environment if it is to survive
- Need to address legitimate concerns regarding health and sustainability but also push back against impractical and scientifically questionable idealism
- Legislation shows no sign of bringing about meaningful change and is largely symbolic in nature
- Public health activists seemingly incapable or unwilling to face economic and behavioural realities
- Supposing we dismantled 'Big Food'...
 - Would 'Small and Medium Food' be any better?
 - Would we have enough to eat globally?
 - Would we still have the resources to tackle the genuine 'Big Issues'?

ANYBODY GOT ANY IDEAS??

THANK YOU