Dear Simon

NHS England consultation: Action to reduce sales of sugar-sweetened drinks on NHS premises

The BMA (British Medical Association) is an apolitical professional association and independent trade union, representing doctors and medical students from all branches of medicine across the UK and supporting them to deliver the highest standards of patient care.

The Association welcomes the opportunity to respond to this consultation in light of the impact of obesity in the UK. It is particularly worrying that nearly a third of British children at age 10-11 are obese or overweight, which will have long-term effects on their health and wellbeing. Our members routinely face the challenge of managing patients with obesity, which significantly impacts on the demand for NHS resources. It is also worth noting that dental extractions for tooth decay are the primary reason for 5-9 year olds to be admitted to hospital for a general anaesthetic, which uses considerable resource in terms of bed availability.

We recently expressed concern in our response to the Treasury’s consultation on the soft drinks industry levy about the role that SSBs (sugar sweetened beverages) have to play in diet-related ill health in the UK. SSBs are typically high in calories and low in essential vitamins and minerals (often referred to as ‘empty calories’). Added sugars are overconsumed by the majority of children and adults in the UK, and households with children in the UK purchase around 50% more of their added sugar from carbonated and non-carbonated soft drinks, compared to households without children.

The BMA supports a ban of the sale of SSBs on NHS premises as we do not believe these unhealthy products should be sold in a setting which is designed to foster health and wellbeing. Doing so reinforces a social norm of unhealthy dietary behaviour and sets a poor example to patients and visitors, including children and young people. It also challenges an employer’s responsibility to promote workplace health and wellbeing for NHS staff, who may have to rely on drinks purchased from vending machines and retail...
outlets. The healthcare environment provides a closed setting suitable for promoting and supporting healthy behaviours, and doctors believe this setting should be an exemplar of best practice.

We believe that a ban on the sale of SSBs on NHS premises should be consistent with the soft drinks industry levy, by also excluding fruit juice and milk-based drinks. We do believe there is scope for excluding milk-based drinks, but, as stated in our response to the HMRC consultation on the soft drinks industry levy, only those with less than 5% added sugar. Drinks with added sugar over this threshold do not promote healthy eating habits and we support their inclusion in the policy. As some NHS staff may frequently purchase SSBs from vending machines and on-site shops on NHS premises, for sustenance during their shifts, it is important that healthier options are sold in their place. This is also important for patients, such as those in an oncology unit for example, who are in need of a high-calorie diet.

In practice, and in recognising that vending machines and on-site shops may not be under the direct control of the hospital, the sale of SSBs should be phased out through renegotiation with leaseholders and contractors, within a time-limited period. Building on existing guidance, this should be supported by the development of UK-wide mandatory regulations governing the sale of SSBs from vending machines and on-site shops.

While we welcome the proposals in relation to SSBs, we believe this should ultimately be extended to apply to all unhealthy food and snacks sold in hospitals, with a sugar content over a specific amount per 100 grams. This would demonstrate a stronger NHS approach to health and wellbeing, by creating environments that encourage healthy dietary behaviour more broadly. This approach should be considered to be part of a wider, coordinated governmental campaign, applying also to schools and nurseries for example.

We hope that our submission is useful – please do not hesitate to contact us for more information if required.

Yours sincerely

Raj Jethwa
Director of Policy
Policy Directorate