

Ciaran Conroy (Finance)

From: Marita Hennessy <maritahennessy@gmail.com>
Sent: 08 December 2016 10:44
To: FINANCE SSD.TAX
Subject: Response to the Department of Finance consultation on the sugar-sweetened drinks (SSD) tax

To whom it may concern

I wish to voice my support for the introduction of a sugar sweetened drinks tax in Ireland, a measure designed to improve health, particularly children's health. Such measures are crucial to improve health across all population groups.

In response to the consultation, I have the following points/suggestions to make:

- The SSD tax should have two rates (per 5g & per 8g per 100ml) to ensure that proportionally higher sugar products are more costly and to promote industry reformulation across their portfolio of drinks. [This would also align with the approach being taken in the UK.]
- The tax should be set at a rate to achieve a 20% increase in price. Such an increase in price is necessary to ensure behaviour change by consumers, away from high sugar drinks.
- Reflecting healthy eating guidance, the following products should be defined as SSDs and included in the tax: water-based SSDs; squashes, sprays, dilutable cordials, and iced drinks. As the SSD market develops, there may be the need to include new products within the scope of the tax: this should be monitored.
- Dairy products which are 90% milk and have less than 5% added sugar content should not be subject to the tax.
- A significant proportion, if not all, of the tax revenue should be reinvested in programmes to address obesity, particularly childhood obesity, and food poverty, supporting all to have access to healthy, nutritious food and more supportive environments. For example, a proportion of the tax could be used to support the introduction of bike schemes throughout the country – without relying on food industry funding (and therefore mixed messages) to do this.
- The SSD tax is one in a suite of measures which will be required to reduce obesity in Ireland. The government should continue to introduce other supportive measures to achieve this objective. Examples include: regulation of high in fat, sugar and salt marketing (HFSS) to children (including online advertising); increasing supports for the early years and interventions during this crucial period; increasing the accessibility, availability, and affordability of healthy food options for all but particularly amongst lower socio-economic groups for example through support for community and school food initiatives; encouraging greater opportunities for the population to be physically active, for example by incorporating into design of the built environment and introducing incentives for people to engage in more active forms of transport.
- The industry has in the past and will find more ways to reformulate their products – this is welcome; however, it must be ensured that such reformulation is a positive step to improve health; reformulation strategies, and the outcomes of same, should be evaluated (as part of the overall evaluation of the SSD tax) and monitored to ensure positive health effects.

Thank you for the opportunity to input into this process.

Kind regards

Marita Hennessy | Responding to the consultation as a member of the public, however, I declare the following interests:

1. SPHeRE Programme PhD Scholar, Health Behaviour Change Research Group, School of Psychology, NUI Galway
2. Member, Irish Heart Foundation Nutrition Council
3. Member, HSE Healthy Weight for Children Working Group