



Submission to the Department of Finance Consultation on the Sugar-Sweetened Drinks (SSD) Tax

December 2016

Introduction

Early Childhood Ireland (ECI) is the representative and support body for the early care and education (ECE) sector in Ireland. We have over 3,500 childcare members who support over 100,000 children and their families through preschool, afterschool and full day care provision nationwide. Our work includes quality enhancement, publications, political advocacy, training, business support and information for a sector that employs 25,000 people. Children's best interests are of utmost importance to ECI and we work to ensure that all children are thriving and learning in quality early childhood settings and beyond.

In Budget 2017, Minister for Finance Michael Noonan TD, committed to introduce a sugar-sweetened drinks (SSD) tax in 2018. ECI fully supports this targeted public health policy measure, which has real potential to positively impact on children's future health outcomes. ECI welcomes this opportunity to contribute to the Department of Finance consultation on how this tax should be constructed and implemented.

Context¹

Prevalence of obesity in Ireland has increased significantly in the last two decades. Between 1990 and 2011, obesity rose from 8% to 26% in men, and from 13% to 21% in women. Currently, 24% of adults (18-64 years) are obese. Amongst Irish Children, the phenomenon of modern malnutrition is on the rise whereby one in four children are overweight or obese and one in five children go to bed hungry at night. Disadvantaged children are disproportionately affected by obesity and food poverty. Low-income households consume less nutritionally balanced diets, no doubt linked to recent findings that the cost of a healthy calorie is up to ten times higher than an unhealthy one.² The disparity between social classes is demonstrated in the *Growing Up in Ireland* study which shows that among nine-year-olds, whilst 19% of boys and 18% of girls from professional households are overweight or obese, the rate soars to 29% of boys and 38% of girls from semi-skilled and unskilled households.

¹ Irish Heart Foundation and Social Justice Ireland (May 2015) *Reducing Obesity and Future Health Costs: A Proposal for Health Related Taxes*.

² Irish Heart Foundation (2015) *Pre Budget Submission: Investing in Children's Future Health*.

ECI is acutely aware that the experiences in our earliest years lay the critical foundations for future learning, social and emotional development and health.³ It is the period during which food preferences and behaviours develop that often serve as the foundational basis for future eating habits.⁴ To this end, ECI has collaborated with both the Irish Heart Foundation (IHF) and safefood on a number of health promoting interventions in Early Years settings. We promote the following interventions among our 3,500 members:

- [Bizzy Breaks](#) (ECI/IHF) resource for ECI members supporting services to provide 10-minute physical activity breaks developed specifically for the under 5s. The resource provides a series of activities for the setting, designed to get children moving on the spot and help children develop positive habits around physical activity.
- [Kids Active](#) (ECI/IHF/DCU/Medtronic Healthy Community Funds) pilot training programme linked to Aistear. Trains educators to create and deliver physical activity opportunities and help children develop essential movement skills. ECI and IHF have just received 2nd year funding from Medtronic to rollout the pilot Kids Active programme to a further 22 centres which will benefit approximately 300 settings.
- [Little Bites \(ECI/safefood\)](#) information resources on healthy eating, food safety, allergens as well as the importance of the social aspects of food and dining in Early Years settings.

Sugar-Sweetened Drinks (SSD)

A growing body of research indicates that an increase in consumption of SSD is associated with increases in calories, weight gain, obesity and a variety of other negative health consequences such as diabetes, heart disease, obesity and cancer from a younger age. Carbonated drinks are the most consumed beverage in Ireland. In 2010, almost three times more carbonated drinks were consumed (83 litres per person) compared to bottled water as the second most consumed beverage (30 litres per person). SSD are a major contributor to sugar in diets, especially in children and young people. 21% of one year olds and 53% of four year olds consume SSD. At least 75% of 5-18 year olds and 40% of adults regularly drink SSDs.⁵

³ Institute of Public Health in Ireland and the Centre for Effective Services (2016) *Improving Health and Wellbeing Outcomes in the Early Years: Research and Practice* Dublin: Institute of Public Health in Ireland and the Centre for Effective Services.

⁴ Birch L, Savage JS, Ventura A. *Influences on the development of children's eating behaviors: from infancy to adolescence*. Can J Diet Pract Res. 2007;68:s1–s56.

⁵ Department of Health (2016) *Introducing a tax on sugar-sweetened drinks: Health rationale, options and recommendations*.

ECI Recommendations

In addition to supporting the introduction a SSD tax, ECI both supports and echoes the recommendations of our partner in health-promoting interventions in Early Years settings, the Irish Heart Foundation:

1. As with the approach being taken in the UK, the SSD tax should have two rates (per 5g & per 8g per 100ml) to ensure that proportionally higher sugar products are more expensive and to promote industry reformulation across their portfolio of drinks.
2. The tax should be set at a rate to achieve a 20% increase in price. The team which undertook the SSD tax Health Impact Assessment for the Department of Health concluded that a 20% tax would reduce the number of obese adults in Ireland by 22,000. Although not modelled, it can be reasonably concluded that the tax would also impact on the number of obese children.
3. 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.
4. Dairy products which are 90% milk and have less than 5% added sugar content should not be subject to the tax.
5. A portion of the tax revenue should be reinvested in programmes to address childhood obesity and food poverty, supporting all to have access to healthy, nutritious food. This is in keeping with public support for an SSD tax which increases 58% to 76% where revenue from the tax is used to improve children's health.⁶ It would also enable the Government to fulfil commitments in the Obesity Policy and Action Plan, the cross-government public health framework *Healthy Ireland 2013-2025* and the 2014 national policy framework for children and young people *Better Outcomes, Brighter Futures*.
6. 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 supportive measures, such as regulation of high in fat, sugar and salt marketing (HFSS) to children and the introduction of healthy food standards for post-primary schools.

Conclusion

ECI appreciates the opportunity to contribute to this consultation process and hopes that our recommendations are given positive consideration in the design and implementation of this important public health measure.

⁶ Department of Health (2016) *Introducing a tax on sugar-sweetened drinks: Health rationale, options and recommendations*.