

12 November 2007

Nicola Sturgeon MSP
Cabinet Secretary for Health and Wellbeing
Scottish Executive
St Andrew's House
Edinburgh EH1 3DG

Dear Ms Sturgeon

SFDF Response to Better Health, Better Care Consultation

On behalf of the Scottish Food and Drink Federation (SFDF), I would like to thank you for the opportunity to comment on the *Better Health, Better Care* discussion document.

As you are aware, the SFDF represents the common interests of the food and drink manufacturing industry in Scotland. We believe that a successful food and drink sector is a vital component of a healthy Scottish economy, not least because the industry in Scotland employs around 50,000 people and generates sales of around £7.57 billion and manufacturing exports of £3.57 billion.

Our Industry Commitment

With regard to improving health and wellbeing, the food and drink manufacturing industry recognises it has a responsibility to help consumers understand more about the food they eat and a role to play in helping to promote a healthy lifestyle and balanced diet. Therefore, SFDF is committed to playing its part, alongside government, educators, consumers and the rest of the food chain, in helping to improve the nation's health.

Indeed, the publication in 2004 of our *FDF Food and Health Manifesto* highlighted our commitment to providing more informative labelling and continuing to reformulate products to reduce levels of fat, salt and sugar where technologically possible, safe and acceptable to consumers. Since then, considerable progress has been delivered. For instance, when we last surveyed our members, we found that 97% of products had full nutrition labelling; £11 bn worth of products had been reformulated; and a further £11bn worth of alternative products with lower fat, salt and sugar levels had been launched.

Whilst industry can and will play its part in delivering progress and improvements, health and wellbeing is clearly not just about diet or physical activity or environmental or social factors – it is about all of these things. For this reason, SFDF has consistently advocated that a '*Whole Diet, Whole Lifestyle*' approach is what will succeed in improving health and wellbeing.

Health & Wellbeing: Holistic Approach, Cross-cutting Solutions

We are of the view that when it comes to health and wellbeing the challenge is to frame policy to address a complex multi-causal problem in a cross-cutting way.

In our view, a more holistic approach to health and wellbeing and better integration of the policy goal of improving health into other policy areas will be more likely to create new opportunities for joined-up government and partnership working and to achieve progress that can be sustained.

Therefore, we welcome the Scottish Government's approach in terms of streamlining the administration's strategic objectives and expanding the health and wellbeing portfolio to include key determinants of health, such as physical activity, housing and poverty.

Creating a Partnership for Progress

In our view, if, as a community, we are going to successfully address complex, multi-faceted issues and ambitions such as those around health and wellbeing, we must first build the firm foundation of multi-disciplinary and multi-agency (public and private) partnerships to set the direction and drive implementation and delivery.

Establishing a shared commitment to finding solutions and mobilising effort requires ongoing dialogue, collaboration and acceptance of a shared responsibility for delivery. Building and sustaining partnerships across the range of stakeholder groups is essential. Therefore, we would urge the Scottish Government to establish a leadership body – involving the public and private sector – to ensure the range of determinants of health and wellbeing are approached in a joined up and coordinated way.

Furthermore, in terms of the aspiration of achieving population-level impact on health and wellbeing, a more focused and prioritised approach to policy and implementation will prove to be more effective. Greater focus in terms of pooling resources and concentrating the efforts of all the key players on delivering progress on fewer goals is likely to make a more substantial and significant difference than a plethora of targets and small scale initiatives. It will also allow more clarity and consistency of message to be delivered.

Turning Potential into Reality and Opportunity into Progress

The potential for improvement in relation to health and wellbeing will only be realised and turned into reality if individuals are motivated to take action. Therefore, we agree with the discussion document's emphasis on encouraging individuals to take responsibility for their own health and wellbeing. In this respect, government and industry have a shared agenda - of empowering consumers to make informed choices.

In our view, education has a crucial role to play if we are going to successfully influence and encourage change in lifestyles – especially in relation to children. Nutrition and health education can help teach children how to construct a balanced diet and physical education from an early age can encourage lifestyles that are more active. The health promoting schools concept has a crucial role to play in terms of promoting early learning of these key life skills.

However, in terms of wider society, there is an ongoing need for a sustained, widespread and widely supported public education campaign to promote healthier lifestyles that combine balanced diets and physical activity. FDF and its members remain committed to participating, together with the rest of the food chain and advertising industries, in such a Government-led and co-ordinated campaign of public education on healthy eating and healthy lifestyles.

In the meantime, and in order to enable consumers to make better informed choices, we agree with FSA's core principle that front of pack food labelling should provide separate information on fat, saturated fat, sugars and salt as well as information on the levels of nutrients present in a portion of a product. In addition, we support the use of Guideline Daily Amount (GDA) labels as a means to inform consumers about the percentage of their guideline daily amount for calories, sugars, fat, saturates and salt, each portion comprises. This enables them to build an informed picture of what they are eating in the context of their whole diet.

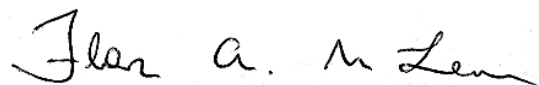
Industry is also committed to being an exemplar for promoting healthy living in the workplace. When you remember that we employ circa 50,000 people in Scotland alone and around 500,000 across the UK, there is the potential for this to have a truly positive impact.

Similarly, in addition to communicating the importance of a balanced diet and a more active lifestyle, we would urge the Scottish Government and local authorities to prioritise improvements to our built environment in order to enable physical activity to be more easily incorporated into our daily lives. This could be achieved through the provision of more open spaces within communities for no cost or low cost active leisure or improved lighting along paths to encourage walking and cycling. In this vein, the Government's proposal to not only refurbish the school estate, but to enable greater community use of sporting facilities based in schools, is one that we welcome.

Therefore, we welcome the Scottish Government's commitment to creating "environments in which good health can flourish" and that this "requires a shared vision of what can be achieved and the active participation of all parts of society in a shared effort to improve our nation's health".

Thank you again for the opportunity to comment on the *Better Health, Better Care* discussion document, and we would be happy to discuss further any of the matters raised in this letter.

Yours sincerely



Flora A McLean
Director

Annex 1

Industry: Delivering Progress

With regard to improving health and wellbeing, the food and drink manufacturing industry recognises it has a responsibility to help consumers understand more about the food they eat and a role to play in helping to promote a healthy lifestyle and balanced diet. Therefore, SFDF is committed to playing its part, alongside government, educators, consumers and the rest of the food chain, in helping to improve the nation's health.

Indeed, the publication in 2004 of our *FDF Food and Health Manifesto* highlighted our commitment to providing more informative labelling and continuing to reformulate products to reduce levels of fat, salt and sugar where technologically possible, safe and acceptable to consumers. Since then, considerable progress has been delivered. For instance, when we last surveyed our members, we found that 97% of products had full nutrition labelling; £11 bn worth of products had been reformulated; and a further £11bn worth of alternative products with lower fat, salt and sugar levels had been launched.

More recently, we looked at what members were doing about trans fats. Official figures show that trans fats account for just 1.2% of total energy intake and are falling. A survey in October 2006, confirmed that industry is doing its bit to reduce these levels further – with leading manufacturers cutting levels in £1.5bn worth of products as part of their ongoing reformulation programmes.

In order to enable consumers to make better informed choices, we agree with FSA's core principle that front of pack food labelling should provide separate information on fat, saturated fat, sugars and salt as well as information on the levels of nutrients present in a portion of a product. In addition, we support the use of Guideline Daily Amount (GDA) labels as a means to inform consumers about the percentage of their guideline daily amount for calories, sugars, fat, saturates and salt, each portion comprises. This enables them to build an informed picture of what they are eating in the context of their whole diet.

On school meals, we took the view that it was unquestionably right for Government to intervene. Right because of the importance of instilling good nutritional habits at an early age and because, as provider of school meals, government has a duty to specify the nutritional standards it wishes to deliver.

Therefore, SFDF contributed to the original FSA Scotland led process of developing nutrient specifications for school meals and subsequently welcomed the 'health promoting schools' concept and 'whole school' approach enshrined in the Schools (Health Promotion and Nutrition) (Scotland) Act.

Industry is also committed to being an exemplar for promoting healthy living in the workplace. When you remember that we employ circa 50,000 people in Scotland alone and around 500,000 across the UK, there is the potential for this to have a truly positive impact.

The Food and Drink Manufacturing Industry

The Scottish Food and Drink Federation (SFDF) represents the food and drink manufacturing industry in Scotland. The food and drink manufacturing industry in Scotland has a gross output of around £6.5bn and accounts for circa £2.5bn of total UK exports and 11.8% of the UK sector workforce.

SFDF is a devolved division of the Food and Drink Federation (FDF), the voice of the UK food and drink manufacturing industry.

As the largest manufacturing sector in the UK, food and drink manufacturers employ over 500,000 people and have a combined annual turnover of £70bn. UK food and drink exports in 2005 were almost £10bn.

The following Associations are members of the Food and Drink Federation:

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| ABIM | Association of Bakery Ingredient Manufacturers |
| ACFM | Association of Cereal Food Manufacturers |
| BCA | British Coffee Association |
| BCCCA | Biscuit, Cake, Chocolate and Confectionery Association |
| BOBMA | British Oats and Barley Millers Association |
| BSIA | British Starch Industry Association |
| CFA | Chilled Food Association |
| CIMA | Cereal Ingredient Manufacturers' Association |
| EMMA | European Malt Product Manufacturers' Association |
| FA | Food Association |
| FOB | Federation of Bakers |
| FPA | Food Processors' Association |
| GPA | General Products Association |
| IDFA | Infant and Dietetic Foods Association |
| MSA | Margarine and Spreads Association |
| NABIM | National Association of British and Irish Millers |
| NACM | National Association of Cider Makers |
| SB | Sugar Bureau |
| SIBA | Society of Independent Brewers |
| SMA | Salt Manufacturers' Association |
| SNACMA | Snack, Nut and Crisp Manufacturers' Association |
| SPA | Soya Protein Association |
| SSA | Seasoning and Spice Association |
| UKAMBY | UK Association of Manufacturers of Bakers' Yeast |
| UKTA | UK Tea Association |

Within FDF there are the following sectoral organisations:

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| FF | Frozen Food Group |
| LDT | Lifestyle and Dietary Trends Group |
| MG | Meat Group |
| ORG | Organic Food and Drink Manufacturers' Group |
| SG | Seafood Group |
| VEG | Vegetarian and Meat Free Industry Group |
| YOG | Yoghurt and Chilled Dessert |