

10 October 2005

Felicity Garvie
Scottish Free School Meals Campaign
The Scottish Parliament
Edinburgh
EH99 1SP

Dear Ms Garvie,

“Free School Meals” Consultation

On behalf of the Scottish Food and Drink Federation (SFDF), I would like to thank you for the opportunity to comment on the above consultation document.

Whilst SFDF recognises the need to provide free school meals we do not feel we are in a position to argue for or against free school meals being provided for all school children. However, I welcome the opportunity to highlight the food and drink manufacturing industry’s position on a number of the issues that are raised within the consultation document.

I would like to take this opportunity to restate the food and drink manufacturing industry’s commitment to work constructively with Government, consumers and others and to play an active role in addressing the issues which arise from the food and health debate.

SFDF welcomes better school meal provision however we feel that banning foods is neither a sensible nor an effective solution to tackling obesity and would therefore reject any proposed Bill that seeks to prohibit any foods from being sold in schools. Balance is the key and bans will not help teach children how to build a balanced diet.

Banning foods, either by removing them from vending machines or prohibiting those foods which fail to meet nutrient specifications, effectively reduces the choices on offer. However, if initiatives geared towards increasing the uptake of school meals are to succeed, it is important that a range of products and choices are made available. Nutrient specifications will only make a difference, if schoolchildren actually eat the meals that are being offered. By limiting the choice of meals being provided, it increases the likelihood of children going elsewhere for lunch.

The uptake of school meals will also be adversely affected if the nutrient specifications proposed result in unpalatable food and sudden reductions are made to products. In our responses to the Food Standards Agency when the Scottish Nutrient Standards For School Lunches were being drafted, SFDF urged the agency to ‘**Be Realistic to Be Achievable**’. Certain nutrient specification proposals for reductions in salt and fat levels could pose significant difficulties, especially if the reduction is sudden. Calling for dramatic reductions (even if they are technically possible) will alter product taste and texture and affect palatability, which could be counter productive to improving take-up of school meals.

Working with manufacturers to achieve stepped reductions would be both effective and realistic as gradual change ensures the palette of consumers (including school children) can be adjusted. The recent FSA Consultation 'UK target nutrient specifications for manufactured products used in school meals' which seeks to review the current Scottish specifications recognises the real progress made by the food industry to reduce levels of total fat, saturated fat, sugar and salt in manufactured foods.

Outlawing foods which fail to meet nutrient specifications or imposing bans on certain types of foods will be counterproductive in terms of increasing the uptake of school meals, will restrict choice and are not effective solutions in helping teach children how to build a balanced diet. Consumption of some foods with, for example, higher salt or fat levels is perfectly fine as long as they are not consumed all the time or to excess. Including plenty of appropriate choices along with fruit and vegetables will ensure that the overall balance is achieved.

SFDF agrees with the view expressed in the consultation that the public would benefit from information on how to achieve a more balanced diet. It is our view that in order to successfully influence and encourage change in lifestyles (including those of schoolchildren), there is a need for a widespread and widely supported public education campaign to promote healthier lifestyles that combine balanced diets and physical activity. The industry is committed to a participating, together with the rest of the food chain and advertising industries, in a Government led campaign of public education on healthy eating and healthy lifestyles.

The importance of physical activity in achieving a healthy lifestyle cannot be understated. SFDF advocate a **Whole Diet, Whole Lifestyle Approach** as equal importance must be attached to physical activity as much as diet, in order to succeed in improving health. In addressing complex problems such as obesity, physical activity must be given more prominence as a critical factor in achieving energy balance.

I have included a copy of FDF's Delivering on Our Commitments report for information. This is our stock taking report which shows the very real progress the UK food and drink manufacturing industry has made in delivering the FDF Food and Health Manifesto over the past year. The report includes a section outlining the industry's commitments regarding vending and branding in schools and the progress that has been made in these areas. In summary,

- Food and drink manufacturers don't offer vending to UK primary schools.
- Of the eight companies with vending operations, six have already broadened the choice of products available.
- Of the seven companies which have branded vending machines, five have removed or plan to remove their branding from vending machines in secondary schools.

FDF members are committed to improving choice and removing branding from vending machines in schools where this is requested by the school/LEA.

I trust these comments will be taken into consideration and once again can I thank you for the opportunity to respond to the consultation.

In the meantime, should you require further input or comment from SFDF please do not hesitate to contact me.

Yours sincerely,

Steven Birrell
Executive

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 in excess of £69bn. UK food and drink exports in 2003 were almost £10bn.

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

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 & Barley Millers Association
BSIA	British Starch Industry Association
CFA	Chilled Food Association
CIMA	Cereal Ingredient Manufacturers'
EMMA	European Malt Product Manufacturers Association
FA	Food Association
FOB	Federation of Bakers
FPA	Food Processors' Association
FF	Frozen Food Group
GPA	General Products Association
ICF	Ice Cream Federation
IDFA	Infant and Dietetic Foods Association
LDT	Lifestyle and Dietary Trends Group
MSA	Margarine and Spreads Association
MG	Meat Group
NABIM	National Association of British and Irish Millers
NACM	National Association of Cider Makers
OHG	Out of Home Group
ORG	Organics Food and Drink Manufacturers' Group
SB	Sugar Bureau
SG	Seafood Group
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
VEG	Vegetarian and Meat Free Industry Group