

## Scottish Diet Action Plan Review: SFDF Evidence

- **Factors that have facilitated or constrained work by the manufacturing sector towards improving Scotland's diet, and**
  - **Recommendations as to how policy might best be developed in the future to further support the work of the manufacturing sector towards improving Scotland's diet.**
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### **1. Partnership Working:**

Evolution of partnership working can deliver significant progress. For example, the industry Project Neptune initiative to reduce sodium in soups and sauces across the UK was assisted greatly by a partnership approach in working with FSA.

The politics and emotion associated with some food and health issues can often be a distraction from achieving progress.

Therefore, being able to set aside differences in order to work out a way forward that recognises the different approaches and concerns of all parties is more likely to generate significant progress and progress that is sustainable. **This partnership approach could be the "norm".**

### **2. Product Reformulation: Fat, Salt & Sugar:**

Consumer acceptance, food safety and what is technologically possible are all major constraints on product reformulation.

Nevertheless, industry is committed to increasing consumer choice by continuing the trend of reducing fat, salt and sugar and providing lower fat, lower salt and lower sugar options **where technologically possible, safe and acceptable to consumers.**

i) Step-wise reductions - Consumer behaviour is difficult to predict and so manufacturers have to be aware of the potential loss of sales that can result from changes in formulation. Therefore, it is important for FSA, the Scottish Executive and others to understand the importance of the phrase "acceptable to consumers".

You cannot go faster than your consumer is ready to tolerate. Hence, the **preferred method of reformulation is often step-wise, in order to maintain consumer acceptability** as much as possible.

ii) Choice - **Offering choice to consumers is fundamental to the way manufacturers function in the market place.** Therefore, whilst industry continues the process of reducing fat, salt and sugar levels in a range of products there is a need to acknowledge the importance of continuing to produce options that contain higher levels too.

It is also worth reflecting on the fact that **population intakes of certain macronutrient levels can still be reduced when choice is available**, provided the population is made sufficiently aware of the most suitable choices. An example is that of milk where full fat, semi skimmed and skimmed milk options are available yet more consumers now buy semi –skimmed milk, which has led to significant decreases in fat consumption by the population. However for those who choose, lower and higher fat choices are also available. Alternatively, people can choose foods with relatively high fat or sugar levels, but through education can learn to just eat less of these products if that is appropriate for them.

iii) Impact of Reformulation on Nutritional Profile - **Reducing fat and sugar levels in products needs to be handled differently from salt.**

When a food's composition is changed in one direction, (e.g. to reduce fat), other nutrient levels may rise proportionally (e.g. sugar levels), depending on the reformulation method. This is inevitable if the size or weight of the product is going to remain the same. If one ingredient is removed or reduced, another ingredient will need to take its place. Therefore, unless fat and sugar is replaced by water, a low fat or sugar product may not necessarily be that much lower in calories weight for weight – a factor that FSA and others need to take into account.

Care also needs to be taken to ensure that reformulation does not result in an overall reduction in the nutritional benefits of that particular food. For example, reduction of the fat content of a product may be associated with the reduction in essential fatty acids and fat-soluble vitamins (e.g. Vitamin A, which is not consumed in sufficient amounts by sections of the child population).

iv) Interaction with Legislation – Legislative drivers need to be taken into account too in relation to product reformulation.

For instance, the incentive for manufacturers to produce reduced fat/sugar products will be greatly reduced if the future **Nutrition and Health Claims** Regulation does not allow these products to bear a claim. **The ability to claim is critical to future investment and development.**

In addition, changing the fat and energy content of 'standard' products could change the benchmark, which 'low' and 'reduced' products must meet in order to be labelled as such.

### **3. School Meals:**

It is right for Government to intervene in relation to school meals because of the importance of instilling good nutritional habits at an early age and because, as provider of these meals, the government has a duty to specify the nutritional standards they wish to deliver. As suppliers of some of these foods, manufacturers will meet school meal specifications in the same way they do for retail customers.

However, **it is important to be pragmatic in continuing to roll out this policy** in Scotland – with specifications now being introduced elsewhere in the UK too – **in order to avoid the pitfall of unintended consequences.**

Children will vote with their feet if we go back to serving them braised liver and boiled cabbage. Implementing new nutrient specifications for school meals can only make a difference if children actually eat them. It is a truism that you cannot go faster than your consumer will tolerate.

Banning products from sale in tuck shops and vending machines also falls into this category.

**If children cannot find the food they like in school, they are likely to take lunch elsewhere and bring snacks with them to school or seek them outside the school premises.**

Therefore, manufacturers are broadening choice to include water and fruit as well as fizzy drinks and snacks in the vending offer.

### **4. Public Sector Food Procurement:**

Whilst the *Hungry for Success* report on school meals has resulted in the Scottish Executive providing additional funds for school meals, margins remain low and recent research (by DTZ Pineda) highlights the fact that bureaucratic and logistical issues surrounding public sector procurement make it difficult for many companies to get involved in the sector.

**Unless the Scottish Executive can make supplying the public sector more attractive, encouraging more companies to enter the sector will continue to be a problem.**

## 5. Consumer Information:

**Government and industry have a shared agenda - of empowering consumers to make informed choices by providing better information and supporting this through education.** FDF members have committed to improved nutrition information for consumers. FDF's recent survey found that £33billion worth of products will have full nutrition information on pack by the end of 2006 and almost two thirds will provide Guideline Daily Amounts on their packs as a ready reckoner for consumers.

GDA's are soundly based on clear scientific principles and have been in use in a number of forms for many years. Working with manufacturers, retailers and academics, the industry has agreed numerical values for GDA's based on government recommendations for nutrients. The Institute of Grocery Distribution have recently published the results of very extensive consumer research with more than one thousand consumers, each interviewed face to face for one hour, which demonstrates a high level of consumer recognition and understanding of GDA's.

FSA are currently consulting on two ideas for voluntary front of pack "signposting": at a glance guides to the nutritional content of products. These are a multiple "traffic lights system and a GDA based scheme. The GDA scheme proved most popular with consumers in the FSA research.

**FDF has rejected the use of "Traffic Light" approaches as taking the dumbed down route, being "stop/go" instructions for consumers, which deliver virtually no useful information to help people balance their diet.** Traffic Lights would also be yet another signposting system on the market: it is likely that uptake would be small and consumers confused still further.

Furthermore, GDA's are being favourably considered by food manufacturers Europe-wide. The use of GDA's throughout the EU will encourage harmonisation, thereby optimising consumer benefit and minimising costs.

## 6. Public Education Campaign:

Whilst we support the aims of the *Healthyliving* campaign, any such **Scottish specific campaign poses practical difficulties for manufacturers in terms of use on pack and other promotions.** Manufacturers operating in Scotland will generally sell not just to the Scottish market but more widely too. Also, manufacturers from elsewhere in the UK will sell into more than just the Scottish market.

However, FDF believes that **public education is the most effective way of changing consumer behaviour, and have committed to 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.**

To create the required level of understanding and awareness will require a major programme of public education sustained over a very long period.

The Food Industry's vision for this idea would include:

- A joint government/industry programme of public information designed to raise consumer awareness and understanding about diet, nutrition and physical activity.
- It would focus on the need for balance – balance in terms of what we eat and balance in terms of the lives that we lead.
- It would be jointly funded.

**Given the UK-wide nature of many of the vehicles for delivering information to consumers - advertising, labelling etc - we would encourage co-ordination and partnership between appropriate departments across the UK as this idea develops.**