

FM/JC

28 October 2005

Dr Cathy Higginson  
NHS Health Scotland (SDAP Review)  
Rosebery House  
9 Haymarket Terrace  
Edinburgh EH12 5EZ

Dear Dr Higginson

**Scottish Diet Action Plan 1996 - 2005**

On behalf of the Scottish Food and Drink Federation (SFDF), I would like to thank you for the opportunity to submit our comments as part of the Scottish Diet Action Plan 1996-2005.

As you will be aware, SFDF aims to represent and promote the common interests of the food and drink manufacturing industry – primarily to the Scottish Executive, Scottish Parliament and FSA (Scotland). SFDF is a devolved division of FDF.

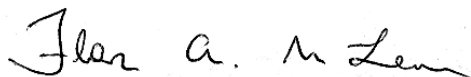
The food industry recognises it has a part to play in addressing diet and health concerns. Indeed, it is our view that greater impact can be achieved in this area when all interested parties work together - including the food chain, government, regulators and educators.

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

I trust these comments (provided in completed questionnaire below) 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



Flora A McLean  
**Director**  
**Scottish Food & Drink Federation**

**Survey of Implementation Activity – Manufacturers and Processors Sector**

**Purpose of this questionnaire**

As part of the Review of the Scottish Diet Action Plan 1996-2005, we are seeking information from organisations, groups and key individuals identified in the Diet Action Plan regarding progress made in delivering the Action Plan recommendations since 1996. This questionnaire is for the Manufacturers and Processors sector and asks you to provide specific information about food and health activities you or your organisation have undertaken over this ten year period in relation to Diet Action Plan recommendations relating to this sector. You have been sent this questionnaire because we have identified your organisation from the Diet Action Plan as having a role to play in achieving the Plan's actions for this sector. If you do not feel this is the case, please disregard this questionnaire.

**Completing the questionnaire**

Because we are asking you to look back over the last ten years, it is likely that you will need to draw on the knowledge and experience of a range of people in your organisation or group who have been involved in food and health work over the last ten years to complete the questionnaire. *Please ensure that you only provide information about work which you or the informant who provides the information has been involved in directly.*

*Please note that we only require a brief summary of the work, up to a maximum of 150 words.*

The information collected via this survey will be summarised and used as the basis for a report for the Review Panel.

**Respondent details**

Please provide the name of the organisation or key individual represented by the attached response:

Scottish Food and Drink Federation (SFDF)

Names and positions of individuals contributing to the attached response:

Name	Position/job title
Flora A McLean	Director

Please indicate which of the following sectors the main business of your organisation falls into:

Primary producers	<input type="checkbox"/>	Caterers	<input type="checkbox"/>
Manufacturers & processors	<input type="checkbox"/>	National Health Service	<input type="checkbox"/>
Retailers	<input type="checkbox"/>	Local authorities	<input type="checkbox"/>
Communities, consumers	<input type="checkbox"/>	Social Marketing and media	<input type="checkbox"/>
Pregnancy, pre-school & education	<input type="checkbox"/>	Other (please specify) Trade Association – represent manufacturers	<input type="checkbox"/>

**Contact details for follow-up**

We may wish to contact you for further information about some of the activities or initiatives you describe. Please provide your contact details below if you are happy for us to do this.

Name	Flora A McLean
Job title	Director
Organisation	Scottish Food and Drink Federation
Postal address	4a Torphichen Street, Edinburgh EH3 8JQ
E-mail	flora.mclean@sdfd.org.uk
Telephone no.	0131 222 8030

**Please e-mail the completed questionnaire to:** [SDAPreview@health.scot.nhs.uk](mailto:SDAPreview@health.scot.nhs.uk)

**If you are unable to return an electronic copy please send a hard copy of the completed questionnaire to:**

Dr Cathy Higginson  
NHS Health Scotland (SDAP Review)  
Rosebery House  
9 Haymarket Terrace  
Edinburgh EH12 5EZ

**Thank you for taking part and completing this survey**

**Once completed, please e-mail the completed questionnaire to:**  
[SDAPreview@health.scot.nhs.uk](mailto:SDAPreview@health.scot.nhs.uk)

**Action No. 8 Recommended:**

The food manufacturing and processing industries should investigate how new technologies can specifically facilitate the manufacture of existing and new food products which are low in fat, salt and sugar, consulting, as appropriate, with recognised sources of expertise and research advice in this area.

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**Response:**

SFDF worked in partnership with Scottish Enterprise's Food and Drink team to deliver jointly a seminar (10 November 2004) - 'Fat, Salt and Sugar: A Question of Balance'. The seminar aimed to provide industry attendees with an opportunity to learn about the latest research and technical processes on achieving reductions in the fat, salt and sugar levels in manufactured food products; salt alternatives / replacements; and the industry experience.

The seminar included presentations from Bryan Hanley, Director of Research at Leatherhead Food International, who spoke about the technical challenges in reducing Fat, Sugar and Salt; and Rupert Maitland-Titterton, General Manager, HJ Heinz, who gave the industry perspective on the challenges and difficulties the company had encountered in seeking to reduce salt levels in their product range.

In addition, three workshops addressed fat, salt and sugar. Leatherhead Food International experts facilitated the workshops.

In April 2005, the collaboration between SFDF and the food and drink team at Scottish Enterprise continued with the facilitation of a series of one-to-one "surgeries" between manufacturers and Leatherhead Food International and Queen Margaret University College. The aim was to provide manufacturers with advice on how to resolve technical difficulties experienced in reformulating products for lower fat, salt and / or sugar levels.

Discussions are currently under way on a further follow up event for SMEs in Scotland.

**Action No. 9 Recommended:**

The food manufacturing, processing and bakery industries, in consultation with the retail sector and recognised sources of expertise and research advice in this area, should introduce small but progressive reductions in the fat, salt and sugar content of manufactured and processed foods and of bakery products; and in the sugar content of non-diet versions of soft drinks.

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**Action No. 11 Recommended:**

The food manufacturing and processing industries, consulting as appropriate with recognised sources of expertise and research in this area, should consider how best to facilitate, by audit and other means, a reduction in the fat content of existing products to help achieve the dietary fat targets.

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**Response:**

1. Manufacturers have achieved significant sodium reductions made in recent years and set out future commitments, subject to consumer acceptance:
  - **Bread:** Around 25% reduction in sodium levels has been achieved since late 1980s and recently a further 5% reduction in sliced bread.
  - **Breakfast cereals:** Sodium has been reduced by 22% between 1998 and 2003, and the industry is committed to a further 10% reduction by the end of 2005. .
  - **Soups and sauces:** Work is well underway to reduce sodium in soup and meal sauces by 30% by the end of 2005.
  - **Meat products:** The industry announced an action plan in 2004 further to reduce sodium.
  - **Biscuits and cakes:** Different reductions can be made depending on the specific recipe. Salt reductions of up to 20% have been achieved with some products.
  - **Savoury snacks:** Sodium levels have reduced significantly in the last ten years; for example, potato crisps are 25% lower in sodium.
  - **Dairy and dairy snacks:** Some significant reductions in sodium have been achieved.
  - **'Reduced salt' products** are available as an alternative to the standard products in some cases.

**FDF members are committed to continuing to reduce levels of fat, salt and sugar in products and providing lower fat, lower salt and lower sugar options where technologically possible, safe and acceptable to consumers.**

2. Industry-wide programme to reduce salt

In 2003, an industry-wide programme to reduce salt was introduced for those foods identified by the Food Standards Agency as making a significant contribution to sodium intake. These foods, supplied by manufacturers, retailers and caterers were bread, breakfast cereals, meat products, soups, sauces, ready-meals and pre-packed sandwiches.

FDF (and member associations) worked with FSA to develop and agree a model for groups such as the Association of Cereal Food Producers (ACFM) and Project Neptune to collect data to provide FSA with that can demonstrate the levels of salt reduction achieved in various product categories due to product reformulation, salt replacement, etc.

3. FDF Food and Health Manifesto

Published in September 2004, the *Manifesto* set out [seven commitments](#) on behalf of all leading food and drinks manufacturers.

In line with these commitments, manufacturing companies have sought to introduce more low fat / salt / sugar foods and drinks into their product portfolio in order to offer consumers choice within product categories.

#### 4. FDF Food and Health Manifesto: Delivering on Our Commitments

One year on, FDF has surveyed our members to check what progress the manufacturing industry has made in relation to these commitments. The results of the 2005 survey were published in September 2005. [http://www.fdf.org.uk/manifesto\\_report\\_2005.aspx](http://www.fdf.org.uk/manifesto_report_2005.aspx)

The survey results demonstrate significant progress in key areas and a continuing commitment by FDF members to help find solutions to the complex issues surrounding obesity, diet, nutrition and physical exercise.

##### **Compared with 2004:**

- 36% of products (worth £7.4bn) will have a **lower level of salt** by the end of 2005
- 15% of products (worth £2.2bn) will have a **lower level of fat** by the end of 2005
- 10% of products (worth £1.4bn) will have a **lower level of sugar** by end of 2005
- 23% of products (worth £2.4bn) are **lower salt** variants of the standard version
- 23% of products (worth £4.4 bn) are **lower fat** variants of the standard version
- 32% of products (worth £4.3 bn) are **lower sugar** variants of the standard version

#### 5. Portion Sizes

In addition, in relation to portion sizes, 56% of products (worth £13bn) are now offered in more than one size. Nearly three-quarters of these include a sharing/family pack/mini version.

**Action No. 12 Recommended:**

Industry and trade organisations, such as the Confederation of British Industry (Scotland), the Potato Marketing Board and the Meat and Livestock Commission, should explore with companies how to bring benefit to their sector by joint activities to improve the commercial opportunities derived from nutritionally improved products.

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**Response:**

In October 2004, SFDF worked in partnership with Scottish Enterprise's food and drink team to deliver a seminar on supplying food and drink products into the public sector.

The event sought to present potential suppliers with an overview of the Cost Sector market and the changes taking place within it. It also explored how those changes affected both buyers and supplying companies.

Keynote speakers considered the structure of the market and the influence of drivers of change, such as the Hungry for Success initiative, from the operator's perspective.

The first session saw presentations from Ceara Nevin (Sea Fish Industry Authority); Dr Maureen Bruce (Scottish Executive, Health Improvement Division) Bill Kennedy (Catering Services Manager, Tayside Contracts); and Brian Saberton (Head of Purchasing, Authorities Buying Consortium).

The second session saw three industry speakers, Zoe Nicholls (RHM), Laurent Vernet (Quality Meat Scotland) and Pam Rodway (Organic Farmer and artisan cheesemaker) present and discuss case studies on their individual experiences in approaching the cost sector market.

### Action No. 13 Recommended:

As far as if practicable within current legal constraints, the manufacturing and processing industries should ensure that the information about the composition, and also the nutritional values, of their food products provided on labelling, and at point of sale and in promotional material, is presented in ways which facilitate the public's understanding of these values.

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#### Response:

##### 1. More Informative Labelling

FDF members are committed to working constructively with Government and other stakeholders to ensure the availability of clearer nutrition information under revised EU provisions.

One of the seven commitments outlined by in the 2004 *FDF Food and Health Manifesto* the manufacturing industry gave a commitment regarding the provision of more informative labelling. FDF undertook to encourage its members to provide on pack where practicable:

- Full nutrition information as defined in current EU legislation even where not legally necessary
- Guideline Daily Amounts (GDAs) to provide a simple 'ready reckoner'
- The salt equivalent as well as the legally required sodium information

FDF's 2005 survey, [FDF Food and Health Manifesto: Delivering on Our Commitments](#), found that:

- 97% of products (worth £33bn) will have *full nutrition information* on pack by end 2006
- 58% of products (worth £15bn) will have *GDAs* on pack to provide a simple 'ready reckoner' by end 2006
- 59% of products (worth £15bn) will have the *salt equivalent* as well as the legally required sodium information on pack by end 2006

##### 2. Guideline Daily Amounts (GDAs)

FDF supports the concept of GDAs as a much more acceptable alternative to traffic light signposting. Consumers can see at a glance what their average dietary requirements are, and use this information to help plan meals and see how individual foods fit into a balanced diet.

FDF is working with the rest of the food chain, under the auspices of the Institute of Grocery Distribution (IGD) to agree consistent GDA values for energy, protein, fat, saturated fat, carbohydrate, total sugars, salt and fibre, in order to develop a consistent back-of-pack GDA scheme. A technical IGD group, in consultation with academics has developed GDAs for adult males and females and for children in four age groups. Academics have also agreed a set of GDAs, based upon the female figures to act as a guide for labelling purposes, where space may be limited.

A separate IGD communications working group has been investigating GDA formats and have commissioned research to find out in what format consumers prefer for back of pack GDA information. This group will also plan how GDAs will be communicated to consumers, health professionals, the media etc. The outcome of the communication and technical strands of work will be used to develop IGD Best Practice Guidance

Through the FDF Manifesto, members are encouraged to provide on pack GDA information, where practicable, as a simple 'ready-reckoner' to help consumers construct a healthy, balanced diet. FDF has also published material and web-based information on GDAs as part of its foodfitness consumer information programme. (See <http://www.foodfitness.org.uk/guidetonutritionlabels.pdf> )

NB GDAs 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.

### 3. Foodfitness Campaign

The FDF foodfitness programme was established in 1996 on behalf of the UK food and drink manufacturing industry. [www.foodfitness.org.uk](http://www.foodfitness.org.uk)

Foodfitness is a healthy lifestyle initiative with a dual approach: promoting enjoyable, healthy eating combined with increased moderate physical activity.

The aims of foodfitness are positive and non-judgemental and the five key messages are clear and understandable. The initiative is based on the philosophy that a healthy lifestyle is fun, easily achievable and affordable.

An offshoot of the foodfitness campaign is *Join the Activators*. [www.foodfitness.org.uk/jta\\_home.aspx](http://www.foodfitness.org.uk/jta_home.aspx) It is an interactive education programme for primary school children aged 7-9. Balancing a healthy diet and being more physically active are increasingly important for young children and these two elements are combined in this programme.

During the development of the *Join the Activators* programme, FDF worked with teachers to assess the effectiveness of the CD-ROM resource.

Join the Activators presents the key nutritional messages in a way that avoids any direct reference to body image, weight or shape. It stresses that there are no 'good' or 'bad' foods, just good or bad diets and that eating a variety of foods is essential, particularly more fruit and vegetables.

The importance of variety is also stressed in the activity messages. Active play and a less sedentary lifestyle is encouraged rather than stressing competitive sport as the only way to become more active.

"Salt and Your Health"

FDF launched this practical guide to help consumers understand more about salt, sodium and health. This is another strand of the foodfitness campaign. [www.foodfitness.org.uk/salt.aspx](http://www.foodfitness.org.uk/salt.aspx)

"Guide to Nutrition Labels"

This publication was also published by FDF as part of its foodfitness campaign. It aims to explain the nutrition information and Guideline Daily Amounts (GDAs) on food labels.

[www.foodfitness.org.uk/nutrition\\_labels\\_guide.aspx](http://www.foodfitness.org.uk/nutrition_labels_guide.aspx)

### 4. Labelling Symposium

In May 2005, SFDF worked in partnership with the Institute of Food Science and Technology (Scottish Branch) to deliver a symposium looking at the ["Limits of the Food Label: Challenges and Perspective"](#).

Key issues discussed included whether the food label should be a tool for education or information, the debate over signposting and Guideline Daily Amounts (GDAs) and the need for improved allergen labelling.

There were presentations on:

- "Food Labelling" by Rosemary Hignett (Food Standards Agency)
- "User Friendly Labelling" by Sue Dibb (National Consumer Council)
- "Allergen Labelling – What is still missing" by Hazel Gowland (Anaphylaxis Campaign)
- "Food Labelling: the public analyst's view" by Charles McDonald (Glasgow Scientific Services)
- "Labelling: The Challenges Facing the UK Food and Drink Industry" by Flora A McLean (SFDF)
- "The implementation of labelling regulations" by Kevin Hawkins (British Retail Consortium)

## **Additional information**

Please describe below, continuing on a separate sheet as necessary, any other activities you have been involved in over the past 10 years designed to implement the recommendations and/or spirit of the Diet Action Plan within this sector, but which do not fit under any of the formal action points.

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In September 2004, the “*FDF Food and Health Manifesto*” set out [seven commitments](#) on behalf of all leading food and drinks manufacturers. The seven commitments are:

### **More informative labelling**

FDF members are committed to working constructively with Government and other stakeholders to ensure the availability of clearer nutrition information under revised EU provisions.

Meanwhile FDF will encourage its members to provide on pack where practicable:

- Full nutrition information as defined in current EU legislation even where not legally necessary
- Guideline Daily Amounts (GDAs) to provide a simple 'ready reckoner'
- The salt equivalent as well as the legally required sodium information

### **Products**

FDF members are committed to continuing to reduce levels of fat, salt and sugar in products and providing lower fat, lower salt and lower sugar options where technologically possible, safe and acceptable to consumers.

### **Portion sizes**

FDF members are committed to exploring new approaches for individual portion sizes to help reduce over-consumption.

### **Vending**

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

### **Advertising to children**

FDF members, and the wider advertising industry, are committed to working with Ofcom and Government on further tightening of self and co-regulatory codes and discussing with Ofcom and Government the whole range of concerns relating to advertising and promotion to children.

### **Industry as exemplar for healthy lifestyle**

FDF members are committed to establishing and promoting healthy workplace schemes on diet and lifestyle in premises belonging to companies in the food chain and within their communities.

### **Public education**

FDF members are 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, for example, through delivering messages on product packaging.

### **FDF Workforce Workout**

FDF members are committed to establishing and promoting healthy workplace schemes on diet and lifestyle in premises belonging to companies in the food chain and within their communities.

[Delivering on Our Commitments Report: 2005 Survey](#)

Key points not mentioned elsewhere in this document:

Vending

- Food and drink manufacturers do not 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 that have branded vending machines, five have removed or plan to remove their branding from vending machines in secondary schools.

Industry as exemplar for healthy lifestyle

80% of respondents run, or plan to run, workplace schemes that promote healthy lifestyles for their employees.

Public education

- 52% of respondents' products, worth £12.9bn, include a healthy eating/lifestyle message on pack.
- 84% of respondents promote healthy eating/lifestyle messages through off-pack formats, principally through company websites, followed by leaflets, corporate publications, consumer information, advertorials and sponsorship.

## 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