

28 February 2007

Hugh Henry MSP
Minister for Education and Young People
Scottish Executive
Victoria Quay
EDINBURGH
EH6 6QQ

Dear Mr Henry

SCHOOLS (HEALTH PROMOTION AND NUTRITION) (SCOTLAND) BILL

In advance of the Stage 3 debate in the Scottish Parliament, I thought it would be helpful to advise you of the Scottish Food and Drink Federation (SFDF) position on the Schools (Health Promotion and Nutrition) (Scotland) Bill.

As you will be aware, SFDF represents the common interests of the food and drink manufacturing industry.

Background

The food and drink manufacturing industry recognises that it has a responsibility to help consumers understand more about the food they eat and how to enjoy a healthy lifestyle and balanced diet. Therefore, SFDF has undertaken to play our part alongside government, educators, consumers and the rest of the food chain, in helping to improve the nation's health.

1. Health Promoting Schools

SFDF **welcomes the 'health promoting schools' concept and 'whole school' approach** that has been enshrined in the Bill.

SFDF has consistently advocated a '*whole diet, whole lifestyle*' approach to improving health. It is our view that this approach – with at least equal importance attached to physical activity as diet - is what will succeed in improving health.

Indeed, industry has committed itself to being an exemplar for promoting healthy living within its own workforce – and when you remember that we employ circa 50,000 people in Scotland alone and upwards of 500,000 across the UK, there is the potential for this to have a truly positive impact.

2. School Meals

In relation to school meals, SFDF is of the view that it is unquestionably right for Government to intervene. Right because it is important to instil 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.

SFDF actively contributed to the FSA Scotland led process of developing nutrient specifications for school meals. Indeed, the successful introduction of the original target nutrient specifications for school meals can, to a large extent, be attributed to the preparedness of FSA Scotland to work together with industry to devise practical, achievable specifications.

However, the nutritional requirements provided for in the Bill and developed by an Expert Working Group, have not yet been subject to any formal consultation process. Therefore, **SFDF would urge the Scottish Executive to conduct a full consultation process on any statutory instrument used to introduce such nutritional requirements.** After all, their success is pivotal to the success of the Bill.

3. Product Reformulation

In 2004, industry set out seven clear commitments in the ***FDI Food and Health Manifesto (2004)***. Then, in order to demonstrate the very real progress industry is making, the '***Delivering On Our Commitments***' report was published in 2005. In relation to product reformulation, the report established that (compared to 2004):

Products worth £7.4bn had a lower level of salt; £2.2bn had a lower level of fat; and £1.4bn had a lower level of sugar, by end 2005.

Whilst industry has already delivered considerable progress that will benefit all consumers, the new nutritional standards recommended by the Expert Working Group still present both challenges and opportunities for the industry.

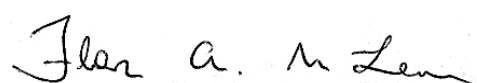
Therefore, **our members are committed to continuing to reduce levels of fat, salt and sugar in products and providing lower fat, salt and sugar options where technologically possible, safe and acceptable to consumers.**

4. Cereal Bars and Confectionary

Given that many cereal and fruit bars are low in fat, salt and sugar and contain valuable vitamins, minerals, fibre and wholegrains, SFDF has concerns with the classification of cereal bars as confectionary. Failure to amend this classification would effectively exclude cereal bars from schools and therefore SFDF would urge the Scottish Executive to reconsider this classification and address this matter before bringing forward the necessary Statutory Instrument.

I do hope you will take the SFDF position into consideration. If you require further information regarding any of these points, please do not hesitate to contact me.

Yours sincerely,



**Flora A McLean
Director**

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:

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:

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