

30 June 2005

Jill Murie  
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Glasgow G3 7LS

Dear Jill,

**Consultation on “Obesity - Developing a Healthy Weight Action Plan for Scotland”**

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.

I would also like to take this opportunity to restate the food and drink manufacturing industry’s commitment to work constructively with consumers, Government and others to find solutions to the complex, multi-factorial issues surrounding obesity and the food and health debate generally.

With this in mind, I have included a copy of the FDF Food and Health Manifesto, which clearly sets out the food and drink manufacturing industry’s commitments in relation to the food and health debate.

In terms of our comments on this consultation document, I have split them into two sections. Section 1 of this submission will set out some general comments to be taken into consideration in the context of developing a Healthy Weight Action Plan, and Section 2 will address specific comments to those headings that are of particular interest or relevance for us.

I trust these comments will be taken into consideration and I look forward to hearing from you in due course about progress on the development of a Healthy Weight Action Plan for Scotland.

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**

## Section 1: General Comments

1. We welcome the acknowledgement contained in the consultation document that for any strategic approach to be effective in supporting the achievement of a healthy weight it must recognise the complex and widespread nature of the obesity problem – energy in versus energy out; the importance of physical activity etc. Therefore:
  - i. In looking at calorie intake, for instance, it is important not to lose sight of the importance of micronutrient intake, especially among young people who have the lowest calorie intake [only around 1600 kcals if the last National Diet and Nutrition Survey (NDNS) data is correct].
  - ii. It is not correct to assume (as the consultation document appears to) that because food is cheap and accessible calorie intakes are rising. To do so is to ignore the UK dietary trend data, which actually shows a **decrease** in calorie intake.
  - iii. Although obesity is prevalent in affluent countries, it is also important to reflect the fact that it is within lower income groups where obesity is most prevalent. This is important to note for targeting the problem.
2. If an obesity action plan is to be successful, physical activity must be given more prominence as a critical factor in achieving energy balance and addressing the complex problem of obesity.
3. Similarly, in addressing complex, multi-faceted issues such as obesity there is a need to build partnerships - involving consumers, Government, health education, industry and others – that will mobilise the commitment to finding solutions.
4. Furthermore, it is our view that in order to successfully influence and encourage change in lifestyles there is a need for a widespread and widely supported public education campaign to promote healthier lifestyles that combine balanced diets and physical activity.

Therefore, 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.

## Section 2: Comments by Heading

(Refer to headings used in consultation document)

### Energy Input

1. The consultation document seems to assume that because food is cheap and accessible calorie intakes are rising, however, this ignores UK dietary trend data, which actually shows a **decrease** in calorie intake.
2. Whilst it is true that food is more abundant and affordable in affluent countries than in the past, food availability does not accurately reflect the amount of food eaten. For instance, we now know that the level of food wastage is significant and increasing, indeed levels of food wastage can be as high as 50%.
3. Although obesity is prevalent in affluent countries, it is also important to reflect the fact that it is within lower income groups where obesity is most prevalent. This is important to note for targeting the problem.
4. Whilst the Swedish Institute of Public Health estimates an increased average calorie intake, other dietary surveys show that calorie intake is on the decline, even allowing for under-reporting. In fact, surveys show that the general population is eating fewer than the Estimated Average Requirement (EAR) for calories, especially the younger age groups.
5. Furthermore, **in looking at calorie intake, it is important not to lose sight of the importance of micronutrient intake**, especially among young people who have the lowest calorie intake [only 1600 kcals or so if the last National Diet and Nutrition Survey (NDNS) data is correct]. Indeed, energy levels are so low in the younger age groups that widespread micronutrient deficiencies are occurring which need to be taken into account.
6. The UK NDNS is, arguably, the best European dietary survey that exists, but it does not give a very clear picture of what is happening in Scotland, as the sample size is too small. The new (replacement) NDNS rolling programme hopes to rectify the small sample sizes in Scotland, Wales and Northern Ireland.

It is vital that the situation in Scotland is fully understood in terms of dietary intake and current dietary deficiencies. **A wrong turn could mean that some dietary and health problems (such as micronutrient deficiencies) are made worse.**

7. **Physical activity plays an important role in health and should be given more prominence as a critical factor** in achieving energy balance and helping to address obesity in any action plan. For instance, within FDF's [foodfitness](#) campaign, we have sought to promote healthy eating **combined with** increased moderate physical activity. The programme promotes moderate activity at least five times a week for 30 minutes and encourages participants to try different leisure activities and sports they enjoy.

### The Draft Proposals for Action:

#### Families, Childcare and Pre-5 Children

- e) Given the impact that early nutrition has in terms of establishing a child's eating habits, the importance of weaning needs to be recognised in terms of advice and guidance for parents.

## Education

It is worth reiterating the fact that 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.

With regard to the points made under the education sub-heading of the consultation document:

- a) Considerable groundwork has already been undertaken in this respect, with the development in Scotland of nutrient specifications for school meals; an industry code on vending machines in schools etc.

Also, on the issue of vending machines in schools, the FDF Food and Health Manifesto contains a commitment to “removing branding from vending machines in schools where this is requested by the school/LEA” and broadening choice.

- b) The [‘Media Smart’](#) initiative, funded by the industry itself, can help here.

In addition, there are many examples of excellent resources available for use in schools, not least the FDF “Join the Activators” initiative. Part of the [foodfitness](#) campaign, it is an interactive educational programme to promote healthy, active lifestyle to primary school children (7-9 year olds). The programme is rated very highly by teachers and parents.

[foodfitness](#) aims to promote healthy eating combined with increased moderate physical activity. The programme is based on simple, positive, science-based messages and aims to help prevent further increases in levels of obesity in the UK population. The programme is used by teachers, parents, health professionals, health promotion teams, employers, media and consumers of all ages.

## Health Service

- e) It is worth noting that some pilots using *WeightWatchers* have already been shown to be successful.

## Food Industry (including manufacturers, suppliers and retailers as well as government)

- c) [Serving Sizes](#) - In the Food and Health Manifesto, FDF members committed themselves to “exploring new approaches for individual portion sizes to help reduce over-consumption.”

[Energy Density](#) - Industry sees choice as the important element here, so that a wide range of lower calorie options are available, but that some higher energy dense products are still available. Not all individuals require low energy dense diets and some vulnerable sub-groups actually need high-energy dense diets.

- d) In terms of more informative labelling, the food and drink manufacturing industry is committed to working constructively with Government and other stakeholders to ensure the availability of clearer nutritional information under revised EU provisions.

In the meantime, FDF encourages its members to provide on pack where practicable:

- full nutritional information as defined in current EU legislation even where this is not legally necessary
  - salt equivalence as well as the legally required sodium information
  - Guideline Daily Amounts (GDAs) to provide a simple ‘ready reckoner’
- e) This regulatory framework is being developed as an EU regulation/competence.
- f) We support the provision of objective information in the form of GDAs. GDAs provide consumers with a simple “ready reckoner” of on-pack information.

Industry would welcome the opportunity to explain about the benefits of using GDAs.

### **Workplaces and working age adults**

In the context of the food and drink industry promoting health in the workforce, FDF is developing a new strand of [foodfitness](#) – the Workforce Workout. This new web based programme will develop into the Workforce Workout toolkit with practical advice to support those involved in promoting healthy eating and physical activity in the workplace.

This new element will support our industry’s Food and Health Manifesto commitment to establishing and promoting healthy workplace schemes on diet and lifestyle. Several FDF member companies already run established healthy workforce schemes.

Throughout June this year, foodfitness has been working in partnership with the British Dietetic Association (BDA) to support their Weight Wise @ Work initiative. FDF is encouraging members, including large and small companies, to join in and support Weight Wise @ Work. This partnership means that every organisation in the UK joining the BDA programme will receive foodfitness materials to support their activities.

### **Media, Marketing and General Public**

- a) The food and drink manufacturing industry is 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.
- b) FDF members are committed to working with Ofcom and Government on further tightening of self-regulatory codes, and discussing with Ofcom and Government the whole range of concerns relating to advertising to children.

### **Monitoring and Evaluation**

- a) If progress is to be made in this context, there is a need to ensure that actions and initiatives are monitored and evaluated adequately in order to ensure that where success is achieved that model / concept can be rolled out as appropriate.

In addition, as already mentioned above (under **Energy Input** heading), dietary surveys must also monitor micronutrient trends.

## 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