



Food Foundation Response to Scottish Government Consultation on 'A healthier future - action and ambitions on diet, activity and healthy weight'

January 2018

Are there any other types of price promotion that should be considered in addition to those listed above? Please explain your answer.

The Healthier Futures plan contains world-leading proposals to restrict multi-buy and other promotions on unhealthy foods and drinks. This is very important as Public Health England's analysis shows that the food we buy on promotion causes us to buy 20% more calories than we otherwise would. We are not aware of any other country with such restrictions on price promotions, and there are none listed in World Cancer Research Fund's NOURISHING database, so Scotland could be a leading example of the impact of restricting multi-buy and other promotions. As it will be the first of its kind, tracking the impact of the restrictions on multi-buys on food purchases and health will be paramount and could be an important part of your monitoring and evaluation of the obesity plan. Price promotions are a very important but so are the use of on-pack licensed and unlicensed characters which promote unhealthy foods to children. We would recommend these are included within scope. It will be important to ensure that restrictions on promotions apply to both the retail and food service / out of home sectors.

However, in addition to promotions, the government should also consider relative price of unhealthy versus healthy foods and beverages. The promotions on foods high in salt/sugar/fat go some way towards making these products relatively less expensive than healthier options, however there are also baseline price differences that are important influencers on consumer behaviour. We would recommend monitoring the relative prices of HFSS foods in comparison to healthy foods as a way of tracking the effect of restriction on price promotions. This issue therefore requires a more holistic view of the food system, to assess which products are affordable and accessible in communities, and how the food system could be improved to shift the balance toward healthier products. Increasing fruit and vegetable consumption by making fruit and veg more available, affordable, accessible and attractive is a concrete way that the government can help shift the healthfulness of the food environment. The Fruit, Vegetable and Potatoes Action Plan is an important step in promoting Scottish produce and increasing fruit and veg consumption, and the Government has made a number of relevant pledges to the Peas

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Please campaign, however further Government support could be given to fruit and veg production and consumption.

How do we most efficiently and effectively define the types of food and drink that we will target with these measures? Please explain your answer.

We would support a decision to focus on foods that are high in fat, sugar and salt as there is an agreed approach to defining these and this will save time in the implementation. Also, wider application of this definition for policy purposes helps to consolidate the view that there are some foods which are unhealthy and that it's not just diets that are unhealthy. An alternative approach not listed in the consultation document could be to restrict promotions on ultra-processed food, and there is a growing body of evidence linking ultra-processed food to increased risk of obesity and diet-related disease. There is a well-established classification system that can be used. Within foods that are ultra-processed or high in fat/sugar/salt, it is also important to look at overall sales volume and frequency of consumption in the diet, as promotion restrictions on the most widely consumed foods will have the widest population impact.

To what extent do you agree with the actions we propose on non-broadcast advertising of products high in fat, salt and sugar?

We fully support the Government's proposal to advocate for a ban on advertising of HFSS foods up to the 9pm watershed. A restriction on advertising of this kind emerged as a priority for the [Food Environment Policy Index](#) we developed for England, a systematic process involving 73 experts from 41 organisations who rated how well England is doing compared to best practices in other countries. It resulted in a list of priority actions for improving diet-related health in England, and there was consensus that controlling advertising of unhealthy food to children was the number one priority. There is also parliamentary support for restricting unhealthy food advertising to children, as demonstrated by a Westminster Hall Debate on January 16 this year, in which 14 parliamentarians spoke, including 2 Scottish MPs. Restricting advertising on TV is a highly recommended strategy for reducing children's exposure to advertising for unhealthy products, which is important as a [recent report](#) from Cancer Research UK found that teens who watch more than three hours of TV a day are more likely to eat unhealthy snacks.

We also support the plans of the government to evaluate the strength of the Committee of Advertising Practice code on non-broadcast advertising of foods high in fat/salt/sugar and in particular near schools. The results of your review would be beneficial for all policy stakeholders working on food and obesity, and it would be helpful if you could make it publicly available. You could also consider the potential application of the Healthcare Retail Standard to streets within the vicinity of schools which could make an even bigger impact than controlling advertising in these areas.

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We would urge you to add within the scope of this the advertising of HFSS foods in sporting events and stadia. These are also places frequented by children, and which are televised and include large child audiences. Experts involved in the development of the Food Environment Policy Index judged this to be as important as the 9pm watershed restrictions.

We would recommend our [recent review](#) of the UK's current restrictions on advertising of junk food to children which highlights a number of loopholes in the current CAP and BCAP policies.

We would also recommend consideration of the potential beneficial force of advertising in promoting healthy foods. The Food Foundation as part of its Peas Please initiative is helping to catalyse the creation of an advertising fund for vegetables. The Scottish government could support this process and consider exploring the potential of a levy on HFSS advertising to finance fruit and veg advertising in the long term.

Do you think any further or different action is required for the out of home sector?

We support the proposed action for the out-of-home sector strategy. This could be further strengthened by:

- Making all or some of the actions within mandatory – at the very least those relating to public procurement. Past experience (noted in A Healthier Future) shows that strategy without a mechanism for implementation will not likely deliver the impact required.
- Emphasizing the potential for the out-of-home sector to make it easier for everyone to eat the recommended amount of fruit and veg. In particular, there is a need to eat more veg when we are eating out-of-home; our analysis found that only 1 of every 3 meals eaten out contains a portion of veg. Encourage out-of-home food providers to promote and use vegetables in main meals to the level of two portions per meal (without charging additionally for the vegetables), and to ensure that meals that are high in vegetables are competitively priced with other options on offer.
- In addition to standards on labelling, promotion etc, there is an important skills agenda. Unhealthy foods are frequently pre-prepared and non-perishable (frozen and deep fried for example). Shifting to healthier foods may require different supply chains as well improved culinary skills. The Scottish government could consider strategies for supporting the development of these skills.

Do you think current labelling arrangements could be strengthened?

Yes. FoP labelling is an important consumer tool for accessing knowledge about their nutritional intake. Yet the traffic light system is currently based on macronutrients (calories, salt, fat, total sugar etc), which represents only one part of a food or beverage's nutritional composition. It is also important to consider the food groups and the healthfulness of ingredients contained within a product. For example, diet beverages earn a green for every traffic light indicator, and yet they contain nothing of nutrient or health value. One way of indicating the overall healthfulness of a product would be to add information on the front of pack about portions of fruit and veg,

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grams of fibre, and teaspoons of sugar (added sugar, rather than total sugar) – ideally in a visual and easy to understand manner (e.g. a picture of a tsp). As it stands, information on the ingredients and food groups contained in a product can only be partially gleaned by the ingredient list – which is not required to list a percentage for each ingredient. There is some voluntary labelling around the 'five a day', but it is not applied consistently across manufacturers or retailers. Finally, the lack of standardization of portions in the application of FOP labelling means that it is difficult to compare products in the same category, undermining the value of the label. This is an area that the Government could look into strengthening.

What specific support do Scottish food and drink SMEs need most to reformulate and innovate to make their products healthier?

While we cannot comment specifically on the support that Scottish SMEs will need to reformulate, there are a few important areas about reformulation more broadly that we will comment on. First, reformulation as it is currently discussed, typically encompasses reducing less healthy nutrients in processed and packaged products. However a single focus on nutrients within a product – such as a focus on reducing sugar - can overshadow the need to evaluate the healthfulness of the product as a whole. A biscuit with less sugar is slightly less unhealthy than a regular biscuit, but it remains a long way from the healthfulness of an apple. With this in mind, it is right to encourage reformulation, but there must be careful consideration of how that product will be presented and marketed to the public. If a reformulated product is allowed to market itself as the 'healthy' option, this may mislead the public into believing that it is healthier than it really is – for just because one nutrient has been reduced in a product doesn't mean the overall health profile has significantly improved. Secondly, and relatedly, reformulation does not need to be restricted to reductions in less healthy nutrients, but can be a mechanism for improving the overall health profile of a product – for example by the addition of fruits and vegetables. This wider view of reformulation should be encouraged.

Do you think any further or different action is required to support a healthy weight from birth to adulthood?

The plan is right to focus on life course approach to healthy weight, as preventing weight gain is the most effective means of reducing the negative health harms of obesity. We fully support the submission from Nourish Scotland, which highlights the need to focus on the first 1000 days of life and healthy eating in the nursery and pre-school environment. There is no mention in the document on standards for food in pre-school settings and this is a significant policy gap for the period of life when taste preferences are laid down. In addition, we recommend linking the life course approach to a food system approach to improving food environment and diets. This would mean ensuring that the food system is producing, sourcing and providing the right mix of foods to maintain a healthy weight throughout the life course. In particular, specific focus should be given to ensuring that the food system is able to produce and provide affordable and accessible fruit and vegetables – and to integrate a preventative life course approach into their promotion, marketing and sales. This could, for example, take the form of fruit and vegetable

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vouchers or prescriptions for key population groups on a low income (pregnant women and young children in particular). Such an approach could also support Scottish horticulture by driving up demand for fruit and vegetables, especially if the programme had an emphasis on local and/or seasonal products.

There is no mention in the plan of the protection of breastfeeding. The UK's departure from the EU will create opportunities for strengthening the current regulations on marketing of breastmilk substitutes. Given the extremely low rates of exclusive breastfeeding across the UK, a much more comprehensive approach to breastfeeding protection and promotion is needed.

We strongly support the planned work to consult children and young people on their experiences of food as part of the Year of Young People. It is worth noting that a Parliamentary Inquiry is being run during 2018 on Children's Future Food and will involve consultation with children and young people in all four UK nations. Philippa Whitford MP is co-chairing this Inquiry. The Food Foundation is supporting the delivery of the Inquiry.

How do you think a supported weight management service should be implemented for people with, or at risk of developing, Type 2 Diabetes – in particular the referral route to treatment?

We commend the Government's £42m commitment, over five years, to support weight management programmes, which sets a really high bar for turning this plan into action. As the prevalence of Type 2 diabetes is already high – and rising – implementing some of this funding on weight management for people with diabetes is necessary. However, in order to stem the tide of diabetes, it will be more effective over the long term to focus on weight management services for people at risk of developing Type 2 diabetes. There is a growing body of evidence around social prescribing which could be considered. We have recently reviewed experience from the USA on fruit and veg prescribing described [here](#).

Do you think any further or different action on healthy living interventions is required?

We agree with the submission from Nourish Scotland that the interventions on healthy living should be particularly targeted at the poorest and most in need populations. Reducing health inequalities will be a necessary aspect of reducing the burden of overweight and obesity in society and on the NHS.

How can our work to encourage physical activity contribute most effectively to tackling obesity?

No answer

What do you think about the action we propose for making obesity a priority for everyone?

Responding to overweight and obesity requires a multistakeholder approach, particularly though the lens of improving the healthfulness of the food system. However, voluntary actions

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of actors with vested interests can only go so far in affecting the level of change necessary. Government leadership is essential in coordinating, monitoring and motivating the actions of stakeholders throughout society. We fully support the plan's aims to 'work to improve the local environment in our most vulnerable communities', yet doing so will require ensuring that business and corporate interests are not placed above those of the public. In consulting with the wide range of stakeholders involved in preventing and treating obesity, particular attention should be paid to preventing conflicts of interest and un-due influence over policy making processes.

How can we build a whole nation movement?

Building a whole nation movement is an admirable goal, and will require concerted effort across stakeholders and society, driven by government leadership. We commend the plan's focus on community food initiatives, which will be particularly important for ensuring low income communities have access to healthy and affordable food. We would recommend that the plan takes a wider view, however, and look at how the entire food system could be shifted to ensure that the whole nation has access to affordable and healthy food, particularly fruits and vegetables. This could take the form of marketplaces and mechanisms that connect communities to local growers, shorten supply chains and that help ensure the produce is affordable for people to purchase it while supporting a viable living for the producer.

What further steps, if any, should be taken to monitor change?

We agree with the submission from Nourish Scotland that an annual report to parliament, established through the Good Food Nation Bill, will be essential to monitoring the impact of the plan.

Do you have any other comments about any of the issues raised in this consultation?

As we have discussed in relation to other answers, the plan does not go far enough in connecting in a wider view of the food system – and the types of foods and products that it encourages us to eat. The food system disproportionately drives us towards high calorie and unhealthy food, however this does not need to be the case. The initiatives in this plan around promotions and taxation go some way in discouraging the overconsumption of less healthy products, however the plan does not include enough initiatives for encouraging the food system to better supply and promote healthy foods such as fruits and vegetables. Doing so requires going beyond consumer-focused initiatives to supporting the food system to grow, procure, market and sell healthy foods.