

FDF submission to the Public Health Commission – December 2008

Introductory remarks

As the voice of UK food and soft drink producers, the largest manufacturing sector in the country, the Food and Drink Federation is pleased to have this opportunity to comment on the work of the Public Health Commission.

Our membership comprises manufacturers of all sizes, as well as trade associations and groups dealing with specific product sectors – fully reflecting the diversity of our sector.

All our members share society's concerns about the health of the nation, particularly in relation to rising obesity levels, and are absolutely committed to playing a positive role in responding to this vital debate. Our commitment is long-standing: we published our first health and wellbeing action plan way back in 2004. And in 2007 we established a Health and Wellbeing Steering Group to work constructively with Government, regulators and others to help find solutions to the complex issues at the heart of the nutrition, health and lifestyle challenges here in the UK.

Our ambition is to make a real difference for consumers. And much progress has been made, particularly in areas such as on-pack nutrition information and recipe formulations, where the UK is now widely acknowledged to be leading the world. Our ability to help consumers make healthier choices has been built on our industry's significant investment over many years in the science of nutrition and the study of consumer behaviour. Our members have also been developing workplace wellbeing schemes that go way beyond the traditional health and safety agenda – again, setting the pace in an area that is only now moving up the political agenda.

Food and drink manufacturers are keen to forge genuine partnerships with Government on new initiatives that will result in long-term behaviour changes – the Department of Health's ambitious Change4Life social marketing programme is one positive recent development.

With that in mind, FDF welcomes the Conservative Party's concept of developing a 'Responsibility Deal' between Government and business. We would agree that the public health challenges facing the UK cannot be solved by regulation and legislation alone.

In reality, our sector operates within a complex EU regulatory framework that actually limits the ability of a UK Government to legislate in isolation – a fact recognised in the recent Cabinet Office Food Matters report. Those who wrote that report understood that a real challenge for policymakers today is accepting that the Government is just one of many players in the complex debate now raging – and it has, in reality, very few policy levers to pull.

It is, therefore, sensible that Government sets a broad policy framework within which all stakeholders work together to deliver solutions that are achievable and measurable as well as make a lasting impact. We would argue that the priority should be to develop policy approaches that harness the power of industry to invest, innovate and understand consumers' needs.

Clearly, the challenging economic climate in which we are now operating is making life much more challenging for our sector, but we do believe that health issues will remain a top priority for our members and their customers. Nevertheless, as the industry focuses on developing strategies to cope with recession, we would also argue that future policy approaches should be realistic and not undermine the long-term vitality of the food chain, from farm to fork.

General observations

We fully support the direction being taken by the Public Health Commission and the three broad pillars of policy described in the proposed Responsibility Deal.

As we do not represent producers of alcoholic beverages, we will not comment in detail on the second pillar of policy – ‘How best to enable and encourage people to drink sensibly and responsibly’. However, we would like to make one observation. While we understand the importance of focusing on the harm caused by excessive or ‘binge’ drinking, we would also point out that little research has been undertaken to evaluate the exact role being played by the consumption of alcoholic drinks (which are, by their nature, high in calories) in obesity in adults. This link is not being made either at national or EU level. We were, for instance, disappointed to see efforts to include calorie labelling on all alcoholic beverages have been watered down in the proposed EU Food Information Regulation. The link between alcohol consumption and obesity in adults is perhaps one area of policy that the Public Health Commission could explore further.

To engage the resources of the food industry, and ensure true partnerships are developed, it is critical that public health policy is underpinned by sound scientific evidence. So we agree that any recommendations made by the Public Health Commission should be practicable and realistic; offer a clear return on investment; be designed so they can be properly evaluated, can be implemented in the short to medium term and involve a broad range of stakeholders; as well as achieving a measurable, real and lasting improvement on public health.

With that in mind, we would like to make some brief observations about our recent experiences of working with Government, and others, that we hope members of the Public Health Commission will find constructive – and discuss in more detail as part of their review.

First, the importance of a consistent UK-wide approach to tackling complex public health issues such as obesity.

FDF and its members are increasingly concerned that devolution is creating a confusing patchwork of regulatory, quasi-regulatory and voluntary approaches to public health issues across the regions. We fear this is leading to duplication of effort and a waste of public resources; and it certainly adds to the burdens for commercial operators. It must surely also be confusing for consumers who bump into very different policy approaches in different parts of the country, when a primary objective must be to give clear, simple and consistent messages.

To take one example, the £75m Change4life campaign is an impressive social marketing approach – and we fully support its ambition. But it is an ‘English’ campaign, whereas the problem of obesity is clearly very much a UK-wide challenge.

Even the very detailed food chain ‘action plan’ contained in the recent Cabinet Office Food Matters report – covering safety, health and sustainability – was only applicable to England. That means, for instance, that a new ‘Healthier Food Mark’ for public sector procurement is being developed under the auspices of Food Matters report – and yet this will only be relevant for England. The devolved regions will be free to develop their own strategies for public sector procurement. And they are already going their own way. In Wales, for instance, the devolved administration has adopted (with minimal consultation) the Food Standards Agency’s Nutrient Profiling model to decide which food and drink products can be sold in hospital vending machines – even though the FSA insists the model was not designed for any other purpose than to support Ofcom’s regulations on advertising to children.

We do see some evidence that ideas are being cross-fertilised – such as a ‘healthy ranging’ initiative for small shops in England, which builds on experiences gained from a similar scheme piloted by the Scottish Executive. But such examples are the exception.

Second, there is a need for long-term and consistent policy approaches with a clear set of public health priorities. We believe any ‘Responsibility Deal’ must set tangible objectives and explain how they will be delivered through a hierarchy of policy initiatives that are evidence based, with set milestones (that do not chop and change), that are applied in a consistent way. The draft published by the Conservative Party was encouraging in this respect.

Our experience with reformulation provides examples of a lack of consistent thinking and highlights how policy makers sometimes fail to ‘join up’ their work, which at a very practical level can cause genuine headaches for industry partners. For instance:

- Sometimes we find that the goalposts are moved – such as happened with the Food Standards Agency’s salt reduction targets. The introduction of new short-term targets was deeply frustrating for those companies that had invested a lot of money and effort reformulating to meet the existing 2010 goals. They now face the prospect of having to reconfigure their product development programmes to meet new expectations before we have fully assessed the impact (positive and negative) of the current targets.
- Sometimes we receive contradictory messages. For instance: Public Health Minister Dawn Primarolo recently called for the sugar content of soft drinks to be reduced without use of artificial sweeteners – even though in Parliament in March 2008 she acknowledged the use of sweeteners in foods as an important tool for tackling obesity and extending consumer choice. This unexpected new challenge to industry came despite the fact that purchasing data shows two-thirds of soft drinks are already either low in sugar or sugar-free (thanks to the use of sweeteners) and are popular with consumers. We are not sure on what evidence this apparent opposition to artificial sweeteners has emerged – neither are we clear about the rationale for the sugar reduction targets now being discussed with soft drinks suppliers.
- Companies are being encouraged to invest in reformulation and the development of ‘better for you’ recipes, yet other Government interventions such as traffic light labelling and advertising restrictions mean in many cases that it is not fully possible to highlight the improved health credentials of popular brands to consumers. This not only gives a disincentive to business to invest but weakens our collective ability to give consumers information on how to make healthier choices.

Specific comments about the proposed Responsibility Deal

So far in this short submission we have set out some areas for further thinking by members of the Public Health Commission and, based on our recent experiences, we have identified potential barriers to progress in developing genuine partnerships with business.

We understand the Public Health Commission is also keen to hear from those with experience of successful and innovative schemes which have promoted healthy lifestyles, and we would like to share our experiences relating to the first and third policy pillars of the Responsibility Deal.

Pillar one: How best to enable, encourage and motivate consumers to adopt a better diet and to increase their levels of physical activity in order to lead a healthier lifestyle

FDF members are well placed to comment on the dietary issue and we set out below the ways in which they are making a significant contribution. But we welcome the recognition that tackling

obesity and encouraging healthier lifestyles involves both 'calories in' and 'calories out' and many of our members, in addition to their work below on dietary issues, have also long been involved in promoting the benefits of a more active lifestyle to consumers and enabling them to make it a reality within their own lives.

One of the food industry's priorities is finding new ways to lower the salt, fat or sugar content of our products to help consumers make healthier choices – so reformulation is right at the heart of all their innovation and development work. But consumers have a wide range of needs and for some the 'standard' product will be the most appropriate choice, or they may prefer to eat a smaller quantity of the existing product rather than see it reformulated. For some products reformulation is not appropriate or technically difficult to achieve. Members are therefore also looking to develop 'better for you' alternatives to popular brands, or develop a range of appropriate portion sizes, as another way of helping consumers choose the products best suited to their consumption needs.

The results speak for themselves: since 2004, we estimate that £15bn worth of products (at retail) have been reformulated and a further £11.5bn of 'better for you' variants have been launched. Our work to reduce the use of trans-fats has also been held up as an example of best practice – with UK intakes now standing at half the maximum recommended levels. Significant investment in functional products is also delivering genuine benefits for consumers.

We recognise the importance of providing clear nutrition information and our members support the use of Guideline Daily Amount labelling on the front and back of our packs, believing that this is an important tool in helping boost the food literacy of consumers. GDA labelling is being used, voluntarily, by some 75 companies of all sizes – with the symbols now appearing on the front of more than 20,000 packs. New research conducted by the EU Food Information Council shows GDAs are helping UK consumers choose products that are appropriate for their diets.

FDF has long been an advocate of genuine partnership between Government and industry to help consumers to eat better and to exercise more. We are encouraged by the early signs from the DH Change4Life social marketing programme. We believe that the Public Health Commission should learn more about this programme – and understand the positive approach it is adopting in developing a movement of different stakeholders all committed to tackling obesity.

Pillar three: How best to communicate and promote healthy lifestyle choices to people in work, in businesses of all sizes

When it comes to promoting the importance of healthy lifestyles, we have long believed it is vital to act as an exemplar in the workplace. That's why our members have been developing schemes that go beyond the traditional health and safety agenda to focus on initiatives that will help employees lead healthier lives.

FDF has joined forces with Business in the Community to develop the Business Action on Health campaign. This campaign is designed by employers for employers, and aims to encourage companies to commit to making workplace wellbeing a board room issue. Recently, we worked with BITC to produce a no-nonsense guide for employers of all sizes who are looking to boost their productivity by promoting healthy eating in their workplaces. This new Healthy Eating Toolkit builds on the food industry's nutritional expertise and shows how a healthy eating initiative can be incorporated into an overall workplace wellbeing programme. It also highlights how easy it is for companies to plan, execute and refresh their activities.

FDF and BITC are working on a number of joint initiatives for 2009 to promote the importance of workplace wellbeing among employers of companies of all sizes.

Further information

We would be happy to discuss any aspect of our health and wellbeing work in more detail with members of the Public Health Commission and would welcome an opportunity to meet with you to expand the points we have made in this submission.

We would also be pleased to arrange for members of the Public Health Commission to meet with FDF companies to discuss their work in all areas of the health debate.

If you need more information about any aspect of this statement, please contact Julian Hunt, FDF Director of Communications, on 020 7 420 7125 or julian.hunt@fdf.org.uk.

You can also find out more about our work on our website: www.fdf.org.uk.

We have a number of information leaflets and booklets that explain our work in more detail across the relevant policy pillars, please let us know if you would like to see copies.