

FDF Scotland response to the FSS Consultation on Proposals to improve the Out Of Home (OOH) food environment in Scotland

Question 1 Do you agree that the businesses listed below should be included within an Out of Home strategy for Scotland?

- Cafes, all types of restaurants, takeaways, pubs/bars, vending machines, workplace canteens, hotels, leisure and entertainment venues.
- Supermarkets and convenience stores who provide “food on the go”
- Places where we purchase food when commuting or travelling.
- Manufacturers and suppliers of food and drink to the Out of Home sector
- Food delivery services, including online.

We agree. As representatives of the manufacturing industry, we have already been at the forefront of world-leading reformulation programmes, voluntary calorie caps, consumer healthier choices campaigns e.g. Treatwise, and providing clear nutrition labelling. We would be happy to share our experiences to promote best practice with the Out of Home Sector more broadly. However, as the list above demonstrates, the Out of Home sector is very diverse and, as manufacturers, our members are limited in what they can do to improve “the out of home food environment”.

We would also ask that FSS considers the food policies food manufacturers are already responding to, to ensure our companies do not face a double, and divergent, set of demands. For example, food manufacturers already work to reformulation guidelines and targets in sugars, calories and salt which are set and monitored by Public Health England (PHE) and the Scottish Government proposals to introduce restrictions on marketing and promotion of certain foods.

Question 2 Which of the following measures should be taken to reduce excessive calorie contents of food and drinks eaten outside the home? Please tick as many as you think apply.

- reducing portion sizes
- changing recipes e.g. by reducing fats and sugars and increasing fruit/vegetable/bean/pulses and fibre content
- applying maximum calorie limits
- applying maximum energy densities (calories per 100g)
- ensuring single serve packs are available as an alternative to packs containing multiple servings
- excluding very high calorie menu items
- Other (please specify)

Please explain your answer/s.

We observe that the list above is a very specific list and other measures may be more effective.

The measures that FSS recommend to the Scottish Government must have evidence that they will have some success. Further research may need to be carried out to demonstrate the impact of these measures on the different sectors within Out of Home.

One key difference between OOH and food purchased in retail, is it is predominantly purchased for one person to eat, and there are limited options to store unused food for future eating occasions. As such, the portion size of the food purchased would seem to be of particular importance in this setting as opposed to considering information on a per 100 gram basis. Focusing on portion sizes may help any strategy to apply across into smaller businesses who may not have detailed per 100 gram information.

We question how practical or enforceable it would be to set maximum energy densities for food. Many nutritious foods such as nuts, oily fish, cheese, olive oil or avocado have high energy densities and could be excluded from recipes under this policy. We consider it would be more practical to consider a range of voluntary calorie caps for a portion of the food as served. We note PHE is currently considering work in this area aimed at the Out of Home sector and would ask FSS works with PHE so only one set of guidelines are developed.

We note that use of different cooking oil and cooking methods has not been included in the list above. From our members' experience, changing cooking oils can make a significant difference to the saturated fat content of the end product. A member that supplies casual dining restaurants said that the restaurants are increasingly asking for products that can be oven baked as opposed to fried.

In 2015 Glasgow city council carried out a The Saturated Fat in Takeaway Meals Project ¹ Analysis of primary and secondary samples and subsequent comparison revealed a noticeable reduction in saturated fat in the majority of meals following the implementation of officer recommendations about cooking oil types and frying temperatures.

The above list also does not account for the fact that an estimated 39% of takeaway meals to be consumed in the home are now purchased online². We believe there is a great opportunity to work with intermediaries (e.g. Deliveroo and Just Eat) to convey nutritional information to consumers.

As we understand this is to be a 10-year strategy, the rise of "dark restaurants", not on the high street, preparing meals for several restaurant brands will also need to be considered alongside how best to use software and technology.

We reiterate that manufacturers have little or no control over the final meal that reaches the customer and provide an ingredient, an accompaniment (e.g. a burger sauce) or final product (e.g. a stuffed pepper) which may form part of a serving. Manufacturers have no control of design of the menu.

We do not believe Government should be banning any items on menus, as long as consumers have been provided with sufficient information to make an informed choice. Manufacturers can recommend and provide the nutritional information to the out of home establishment. However, as the manufactured product is likely to form part of a composite meal it is difficult to provide a suggested serving/maximum calorie limit.

Manufacturers are already reformulating products in line with PHE sugar reduction targets and FDF and our members are in discussions with PHE around proposed calorie reduction across categories.

Question 3. Do you agree that consumers should routinely have easy access to small or half portions? Please explain your answer.

¹ <https://www.glasgow.gov.uk/CHttpHandler.ashx?id=40212&p=0>

² https://jeweb-11431-s3.s3.eu-west-2.amazonaws.com/application/files/2215/0045/3682/TAKEAWAY_ECONOMY_REPORT_2017.pdf

We believe portion size is very important, especially in this setting. Numerous studies have indicated that people will consume more food, and therefore more energy, when they are presented with a larger portion size (e.g. [Rolls et al 2012](#)).

Manufacturers will often produce pre-portioned products for the catering industry. It is the OOH establishment that often specifies what this portion size is to be.

Question 4. Should calorie labelling at the point of choice* apply in Scotland? *point of choice includes calorie labelling on menus, labels on shelves or display cases, and on web pages where consumers select the food items they wish to purchase. Please explain your answer.

Yes. Food eaten out of the home now makes up a substantial part of most people's diets, whether that's food and drink from a coffee shop, sandwich shop, bar, restaurant or take away establishment.

We consider this policy measure will create a level playing field across the food industry and could help inform consumers to make lower calorie choices. To be of any practical use to the consumer, we agree that point of choice is the most appropriate place to display calorie info. Most suppliers to out of home provide nutritional information including calorie information with their products, this information can be used by the OOH establishment to calculate the total calories in a composite meal.

Question 5. As a food business, would MenuCal help you to provide calorie labelling? Please explain your answer.

MenuCal is one of several calorie software solutions that we are aware of. Many businesses have their own supplier portals that manufacturers have to submit nutritional and allergen information through e.g. Starchef or Whitbread.

The natural variance of a product will need to be considered in any software solution to help businesses

We understand the Food Standards Agency in Northern Ireland has undertaken a lot of work with smaller businesses to implement calorie labelling on menus and therefore they may have useful insights as to whether these companies can provide the information and how best they can be engaged with.

Question 6 As a food business, what additional support would you require to provide calorie labelling?

We assume this question is aimed at the Out of Home sector. As our response to question 4 details, most manufacturers who supply to OOH establishments already provide nutritional information per 100g of product.

Question 7. Should calorie labelling at point of choice be made mandatory in Scotland? Please explain your answer

FDF supports the need for clear and consistent calorie labelling at point of purchase out of the home. Food manufacturers have been providing nutrition labelling on packs for decades, first

as a voluntary provision and subsequently as a mandatory labelling requirement via the Food Information to Consumers Regulation

Mandatory calorie labelling could create a more level playing field across the food industry and could help nudge consumers to make lower calorie choices.

We consider any item which is offered as a standard item on a menu should be labelled. Consideration should be given to items which are genuinely novel items, for example a daily special made to use leftover foods and cut down on food waste. We understand that in previous UK government pilots of calorie labelling and in examples internationally this has been considered by setting a minimum number of days on a menu within a month or a year, below which an item is exempt.

However, care must be taken not to overburden menus with nutritional information, this could quickly become very confusing for consumers. For example, in a coffee shop it may be appropriate to label the 'standard' milk offering at each size and indicate elsewhere the difference changing milk can make.

Question 8 Should any business be exempt from mandatory calorie labelling at the point of choice? Yes/No

If yes, which types of business should be exempt and why?

No. No business should be exempt.

FDF Scotland believe in a level playing field to provide consistent nutritional information to consumers across the food and drink sector. However, there should be careful consideration of the practicalities of implementing and enforcing the policy in microbusiness, such as small independent family run establishments or takeaway food vendors.

We understand the at the Food Standards Agency in Northern Ireland has undertaken a lot of work with smaller businesses to implement calorie labelling on menus and therefore they may have useful insights as to whether these companies can provide the information and how best they can be engaged with.

It should be noted that if a small or micro business is calculating calorie information, this may not be as accurate as the normal tolerances provided in EU guidelines accompanying the Food Information to Consumers Regulation. Consideration should be given as to whether enforcers need to adopt a pragmatic approach to tolerances with these businesses.

Provision of allergy information should take precedence at this particular point in time, and provision of calorie information should not steer the focus of businesses from this important work.

Clear description of menu items corresponding to the nutritional information provided	<i>e.g. Chicken burger, bun and salad</i>	
Portion size (g/ml)*		
	Per portion	Per 100g/100ml
Energy (kcal)		
Energy (kj)		
Fat (g)		
Saturated fat (g)		
Total carbohydrate (g)		
Sugars (g)		
Protein (g)		
Salt (g)		
<p><i>* Where a menu item could reasonably be consumed by more than one individual (e.g. pizza) then the number of portions contained in the item should also be stated (e.g one portion is ½ a 10 inch pizza).</i></p>		

Figure 1: FSS Proposed Standard for the Provision of Calorie and Nutrition Information Out of Home

Question 9. Where nutrition information is provided online and on printed materials should it be standardised in the way set out in figure 1. above? Yes/No

Please explain your answer.

We agree that nutritional information should be available in a standardised within the Out of Home sector although we suggest that FSS carries out consumer research to find out the easiest format for consumers to understand. There should be specific guidance on legibility.

We urge the FSS and relevant UK authorities to work together to implement a UK-wide standardised format to minimise consumer confusion.

Question 10. Where nutrition information is provided online and on printed materials, should it be **mandatory** that it is standardised in the way set out in the table above? Yes/No

Please explain your answer.

See response to Q9. We do not know if the table in fig.1 is the best way to help inform consumers eating OOH but we do agree that an agreed format should be standardised throughout the UK to provide consistency for consumers.

Question 11. Which actions would change promotion and marketing practices to support healthier eating outside the home? Please tick as many as you think apply.

- businesses dropping practices that encourage overconsumption
- businesses positively marketing and promoting healthier choices
- raising consumer awareness through the use of social marketing campaigns
- other (please specify)

Please explain your answer.

FDF members have already provided a detailed response to the Scottish Government Reducing Health Harms of HFSS foods consultation on promotions and marketing³

Our members produce a wide variety of products to supply the hugely diverse OOH sector. As previously mentioned, consumers are increasingly demanding healthier options on menus but the OOH establishments have to cater for a wide variety of consumer tastes and needs including allergies, intolerances and appetites.

Question 12. What types of actions could be taken to improve the food provided Out of Home in the vicinity of schools?

This is best answered by those involved in selling food near schools.

Question 13. Which of the following should be changed to improve food provided for children: Please tick as many as you think apply.

- Less reliance on menus specifically for children
- Provision of children's portions from adult menu items
- Increased use of vegetables and fruit in dishes, sides and desserts
- Reduced reliance on breaded/fried products
- Reduced reliance on chips
- Plain water and milk offered as standard options
- Reduction of drinks with added sugar
- Reduction of high sugar dessert options
- Reduction of confectionery and crisps
- No changes are required Other (please specify)

Please explain your answer/s.

Our members have no influence over implementing any of the measures above in an OOH setting.

We believe all foods can be consumed as part of a balanced diet, and that individual foods should not be demonised, but rather consumers should be helped to understand their place in the diet. Similarly, caterers should be helped to understand how they can undertake product improvements.

For example, 'chips' covers a wide range of products with very different nutrition; from some of our members oven chips which would have an all green front of pack label in a retail package, compared to skinny fries fried in a high saturated fat oil with poor frying practice.

Similarly, breaded and fried products can be made healthier by changing the cooking oil and temperature of the oil. As mentioned previously, our members are already seeing an increased demand for products suitable for oven baking instead of frying. A breaded or fried product will often only be a part of a composite meal and so e.g. a breaded fish fillet with salad will have a very different nutrition content compared to the same product served with skinny fries.

Question 14. Do you agree that recognition schemes are an effective means of supporting healthier eating in the Out of Home sector? Yes/No

³ <http://www.fdf.org.uk/publicgeneral/a-healthier-future-fdf-scotland-response.pdf>

If yes, please outline your views on the key components required for a flexible recognition scheme(s) If no, what other approaches would enable businesses to make the changes needed?.

There are already a number of “recognition schemes” for food in Scotland that we are aware of including the Healthy Living Award, Food for Life and Taste our Best.

All food producers must adhere to the EU Health Claims regulations which can often mean that although a product has been reformulated to be lower in calories or reduced sugar or the fruit and or vegetable content has increased, it is not legal to put this on the packaging.

We know from research funded by Scottish Government that small businesses are keen to respond to consumer demand for healthier products but that they often lack the market research to make changes to recipes. Further support to enable businesses to access market insights would be useful.

Question 15. Do you agree that the following actions should be adopted by the public sector? This includes health and social care settings, local authorities, leisure centres and visitor attractions, including where catering services are contracted out. Note this question does not apply to school food, hospital food for patients or prison food.

- Calorie labelling at the point of choice
 - Reducing portion sizes
 - Provision of small or half portions
 - Changing recipes to lower calories by reducing fats and sugars and increasing fruit/vegetable/bean/pulses and fibre content
 - Caterers redesigning menus to exclude very high calorie menu items
 - Improvements to food for children where served
 - No promotion or marketing of HFSS foods, including no upselling or upsizing
- Please explain your answer.

Our response to earlier question indicated where we feel the most practical interventions can be made in the OOH sector.

Any initiatives which the private sector has to implement should also apply to the public sector. This ensures a level playing field across both public and private sector establishments.

Question 16. Would the proposals outlined in this consultation impact on the people of Scotland with respect to:

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Ethnicity
- Religion or belief
- Sex
- Sexual orientation
- Socioeconomic disadvantage

Please explain your answer, considering both potentially positive and negative impacts, supported by evidence, and, if applicable, advise on any mitigating actions we should take.

Other organisations are better placed to respond to this question.

Question 17. Please outline any other comments you wish to make.

This submission is made by the Food and Drink Federation (FDF) Scotland. FDF Scotland represents the food and drink manufacturing industry in Scotland. We are Scotland's largest manufacturing sector, accounting for 30% of total manufacturing turnover and our gross value added to the economy is £3.8bn, representing 29.7% of Scottish manufacturing value added. We have 1,015 food and drink manufacturing businesses, employing 45,000 people, which represents 25% of the Scottish manufacturing workforce.

The following Associations actively work with the Food and Drink Federation:

ABIM	Association of Bakery Ingredient Manufacturers
ACFM	Association of Cereal Food Manufacturers
BCA	British Coffee Association
BOBMA	British Oats and Barley Millers Association
BSIA	British Starch Industry Association
BSNA	British Specialist Nutrition Association
CIMA	Cereal Ingredient Manufacturers' Association
EMMA	European Malt Product Manufacturers' Association
FCPPA	Frozen and Chilled Potato Processors Association
FOB	Federation of Bakers
GFIA	Gluten Free Industry Association
PPA	Potato Processors Association
SA	Salt Association
SNACMA	Snack, Nut and Crisp Manufacturers' Association
SSA	Seasoning and Spice Association
UKAMBY	UK Association of Manufacturers of Bakers' Yeast
UKTIA	United Kingdom Tea & Infusions Association Ltd

FDF also delivers specialist sector groups for members:

Biscuit, Cake, Chocolate and Confectionery Group (BCCC)
Frozen Food Group
Ice Cream Committee
Meat Group
Organic Group
Seafood Industry Alliance

We note that the online consultation portal does not allow for hyperlinks - our sources are listed below:

<http://www.fdf.org.uk/publicgeneral/a-healthier-future-fdf-scotland-response.pdf>

<https://www.glasgow.gov.uk/CHttpHandler.ashx?id=40212&p=0>

https://jeweb-11431-s3.s3.eu-west-2.amazonaws.com/application/files/2215/0045/3682/TAKEAWAY_ECONOMY_REPORT_2017.pdf