

Consultation response: Choosing the Right Ingredients - The Future for Food in Scotland

The Food Discussion
Room 256
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GENERAL COMMENTS

Which? welcomes the Scottish Government's 'Choosing the Right Ingredients' discussion paper on the future for food in Scotland and the opportunity to comment.

We strongly support the intention to ensure a co-ordinated, holistic, more joined-up approach across Government and between stakeholders. It is, however, essential that there is strong Government leadership to ensure that the Policy makes a difference.

We broadly agree with the Vision that is set out, ie:
'Our vision for food in Scotland is that it should make the nation healthier, wealthier and smarter with production production making communities stronger and consumption respecting the local and global environment'.

We would, however, like to see greater emphasis on the importance of putting the consumer first and reflecting the broad range of interests that consumers have in relation to food including the importance of enabling effective and informed food choices.

Lessons from previous initiatives

We appreciate the commitment to establishing a Food Policy for Scotland for the first time. In order to ensure that it really can make a difference, it is important to learn the lessons from previous initiatives such as the Scottish Diet Action Plan.



A review of the Action Plan which was in place from 1996 to 2005¹ highlighted that initiatives to improve diet had been more successful where they had the following features:

- longevity;
- a sustained and increased commitment of resources to the achievement of defined objectives;
- their delivery involved action by a defined body of professionals who could take responsibility for driving action and change;
- local action was supported at national level; and
- regulatory and legislative actions were used to consolidate and mainstream changes.

The Scottish Diet Action Plan review also identified the following lessons for future policy which should be taken into account as the policy is developed and implemented:

- > To achieve population-level impact, a more focused and prioritised approach to policy and implementation may prove to be more effective than a broad range, or 'scattergun', of initiatives.
- > Given the complexity of modern food systems and their dynamics, action needs to be coordinated across all levels of food governance, from local to international level.
- > The actions need to be more plausibly linked to policy outcomes and targets and founded upon the overarching strategic themes or 'directions of travel' with which all stakeholders can engage.
- > Lines of accountability, monitoring and performance reporting on policy implementation need to be improved, using a wider range of shared intermediate outcomes to help evaluate progress towards targets across sectors.
- > Greater use of regulatory powers and incentives can be appropriate and can be used to set goals for the food supply chain as well as help build consumer demand.

¹ Review of the Scottish Diet Action Plan: Progress and Impacts 1996-2005, September 2006, Professor Tim Lang, Dr Elizabeth Dowler and Professor David J Hunter.



Issues to be addressed

Food issues continue to be one of Which?'s priority areas for campaigns and policy development. We also regularly feature articles on food issues within our magazine. For example, recent campaigns include our nutrition campaign which aims to tackle the barriers to healthy eating including the irresponsible marketing of foods high in fat, sugar and salt to children. We also continue to work on issues around food safety, including our on-going campaign promoting the publication of hygiene scores. As recognized in the discussion paper, a wide range of co-ordinated actions will be needed in order to ensure safe and nutritious food for consumers and it is essential that these issues are a Government priority.

However, food policy also has to take account of a much broader range of issues that impact on the quality and acceptability of the food on offer to consumers. The Government has to put the consumer at the heart of the debate on food policy. Ultimately, the food industry is dependent on consumer confidence and consumer demand. A succession of food scares in relatively recent years, most notably related to meat safety, highlighted the danger of cutting corners in terms of consumer protection which ultimately was costly for public health and for economic development and reduced consumer trust in the food industry.

As part of the Vision, we also consider that it is important that the Government's food policy also gives greater recognition to the importance of ensuring that consumers are able to make informed food choices about the food that they buy. In terms of ensuring a healthier Scotland, as set out below, we consider that more can be done to ensure that the food industry adopts the recommended Food Standards Agency (FSA) multiple traffic light labeling scheme. However, more generally consumers are becoming more reliant on food labelling in order to make informed choices about the food that they buy - whether this is on grounds of safety, healthy eating, quality, sustainability or ethical issues for example. It is, therefore essential that information to consumers is meaningful, clear and honest and they are not misled. We appreciate that many aspects of food information and labelling is determined at European level. However, the Scottish government is in a position to propose guidance, working with the Food Standards Agency (FSA), encourage responsible industry practice and ensure effective enforcement at local level.

The policy also needs to take account of the broader European and international context for food production and supply, including for example, the impact of rising food prices. We would also like to propose that the Scottish food policy takes account of developments in the food chain that are in the pipeline that may impact on the Scottish food vision. New technologies, currently under development, could



impact on foods and food ingredients in the coming years with potential ethical, safety and environmental issues. This includes some uses of nanotechnologies in food production, for example, and the possibility that the products of cloned animals and their offspring could enter the global food chain shortly. The issue of genetically modified (GM) foods remains an important issue for consumers who expect such products to be safe and for them to be able to make informed choices about whether to eat them or not. While commercial production of GM crops is unlikely in the near future, it is important that there is a strong policy in place beforehand that ensures effective co-existence measures are in place that minimise contamination of organic and conventional crops.

Healthier food choices

The discussion paper rightly gives emphasis to improving health. It recognizes that most people eat too much fat, sugar and salt and we are seeing the consequences in terms of rising rates of obesity and diet-related disease in children as well as adults. Scotland does significantly less well in most cited health statistics. Premature death rates remain 30 per cent higher than in England and Wales, longstanding illness rates 20 per cent higher, and poor dental health 80 per cent higher.

While some steps have been taken, we consider that a lot more still needs to be done to enable consumers to make healthier choices. This includes for example:

- > *Ensuring a more responsible approach to the way that foods high in fat, sugar and salt (HFSS) are marketed to children so that healthy eating messages and initiatives are not undermined.*

Children are bombarded with a range of sophisticated marketing tactics encouraging them to eat foods high in fat, salt and sugar (HFSS). Academic literature reviews carried out by Professor Gerard Hastings and colleagues at Strathclyde University and Professor Sonia Livingstone at the London School of Economics have produced irrefutable evidence of the impact HFSS food advertising has on children's preferences at the brand level but also and more importantly at a category level. Which? research shows that 86 per cent of parents think the Government should do more to control the way unhealthy foods are marketed to children. We are concerned that there is not enough Government leadership on restrictions to limit the advertising of HFSS foods through a wide range of non-broadcast techniques, including the internet, packaging and sponsorship and that the current Ofcom restrictions on TV advertising are too limited in scope because they do not cover the programmes that children watch in greatest numbers.



- > *Increasing the take up of the multiple traffic light labelling scheme on front of pack so that consumers can easily make healthy choices.*

Research by the FSA and by Which? shows that the multiple traffic light nutrition labelling scheme on front of pack works best in terms of enabling consumers to assess the levels of key nutrients in a product and to compare between two products. While there has been wide take-up of the scheme, some retailers and manufacturers are still refusing to add traffic light colours to their labels.

- > *Encouraging further product reformulation so that levels of saturated fat, sugar are reduced as well as salt and artificial trans fats are eliminated.*

With FSA leadership, progress is being made reducing salt levels in foods. The FSA has recently published a strategy for saturated fat and energy reductions. It is important that this is taken up by the food industry including retailers, manufacturers and caterers. Making changes to product composition in this way can make it easier for consumers to eat more healthily however motivated they are. It is also important that the food industry also looks at ways of increasing the consumption of fruit and vegetables through its product development and the choices that are on offer.

- > *Provision of more information about the nutritional quality of foods eaten outside the home and increased availability of healthier options.*

It is recognized in the discussion paper that more money is now spent on eating out than eating in where no information is usually provided on the nutritional value of a product. Which? research has shown that there is support from consumers for more information to be provided when eating out. Sixty one per cent of people told us that they would like nutrition information to be provided when you buy sandwiches at lunchtime; 57 per cent when buying food in a fast food outlet; 47 per cent when eating in a pub and 51 per cent when eating in a restaurant². There are positive examples of efforts to provide this information now underway in some US cities that we can learn from.

- > *Pushing retailers to help consumers to make healthier choices through the information that they provide in store, product positioning and promotional offers.*

The discussion paper recognizes that nearly all of the food that is bought in Scotland is from supermarkets or independent convenience stores. These retailers have an ideal opportunity to help enable consumers to make more healthier choices at the point of purchase that has yet to be fully explored and utilized.

² 996 adults aged 15+ representative of the GB population were interviewed face to face between 28 January and 3 February 2005.



- > *Improving the nutritional quality of food available through public institutions.*

Building on Hungry for Success, it is important to consider the nutritional quality of food available in key public institutions other than schools. It is also encouraging that the importance of hospital food has been recognised. A timetable should be established for the implementation of nutritional and food-based standards, based on the FSA's advice.

- > *Ensuring consistent messages about healthy eating.*

It is also important to ensure that there are consistent messages about what people should eat to maintain their health. Contradictory views are often given a disproportionate amount of media coverage and should be challenged where there is no evidence to support them.

Conclusion

Which? welcomes the development of a Scottish food policy and would be pleased to contribute further as it is developed and implemented. We broadly support the Vision that is set out for a co-ordinated approach focusing on ensuring that food is healthier, safe and produced sustainably. While some steps are already being taken to improve consumers' ability to make healthier food choices, this still needs to be given much greater priority and further actions are necessary. It is also important that the food policy encompasses some of the broader challenges that are facing the food supply chain including issues that may be raised through the complex and global nature of the food supply chain, such as the introduction of new technologies and increasing food prices.

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