

Consultation:

Food Standards Scotland proposals to improve the out of home environment

Which? is the largest consumer organisation in the UK with over 1.3 million members and supporters, more than 110,000 of whom live in Scotland. We operate as an independent, a-political, social enterprise working for all consumers and funded solely by our commercial ventures. We receive no government money, public donations, or other fundraising income. Which?'s mission is to make individuals as powerful as the organisations they have to deal with in their daily lives, by empowering them to make informed decisions and by campaigning to make people's lives fairer, simpler and safer.

Summary

Which? supports this initiative by Food Standards Scotland (FSS) to improve the out of home (OOH) environment in Scotland, building on the Scottish Government's *Diet and Healthy Weight Delivery Plan* and related initiatives such as the Scottish Government's recent consultation on *Reducing Health Harms of Foods High in Fat, Sugar or Salt*.

People in Scotland eat out regularly and this sector contributes around 25% of calories eaten. It is therefore important to look at how the sector can help consumers to make healthier choices. Our consumer research¹ has found that most people in Scotland think that the priority actions that should be taken by OOH businesses are cutting down on fat, sugar and salt levels; offering more healthier choices and providing information about the nutritional content.

We support the provision of mandatory calorie information out of home and our research shows that around 6 in 10 (58%) people want this information. How this is provided should reflect the nature of the business as this is a very diverse sector. More generally, we agree that a range of actions should be encouraged to promote healthier choices of foods to consumers when eating out and particularly when food is provided for children.

¹ Research Now, on behalf of Which?, interviewed 502 adults residing in Scotland, between 12th and 17th January 2018. Data were weighted to be representative of the Scottish population by age and gender.

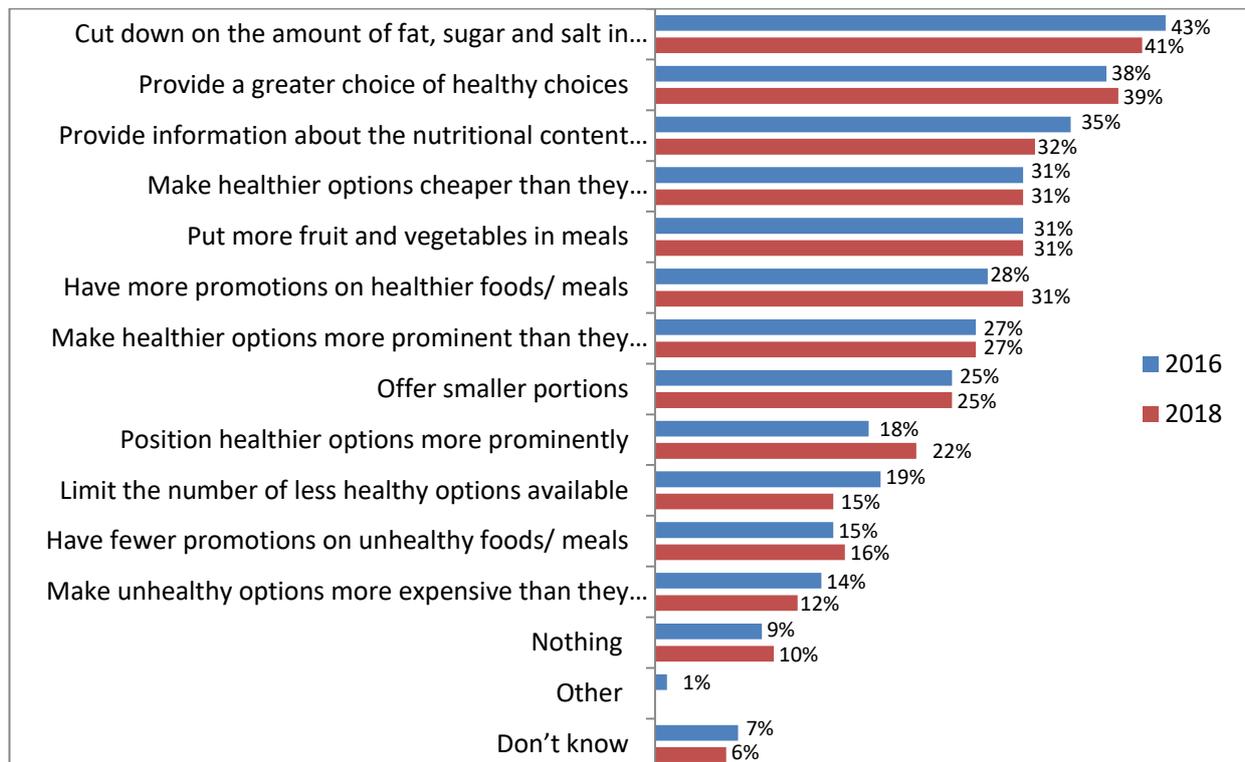
Introduction

Which? welcomes Food Standards Scotland’s consultation on improving the out of home environment in Scotland. We supported the proposal for an Out of Home Strategy for Scotland which was included in the *Scottish Government’s Diet and Healthy Weight Delivery Plan*.

As recognised in the consultation paper, people eat out regularly and this sector contributes around 25% of calories. It is therefore important to look at how the sector can help consumers to make healthier choices. A Which? survey in 2018 found that just 18% of Scottish consumers thought that this sector (cafes, restaurants and take-aways) was taking enough action to help them eat healthily.

Our consumer research has found that most people in Scotland think that the priority actions that should be taken are cutting down on fat, sugar and salt levels; offering more healthier choices and providing information about the nutritional content. A full breakdown is given in the following table, along with how this compares to a similar survey that Which? conducted in 2016².

Priority actions to be taken by the out of home sector to make healthier choices easier



² Research Now, on behalf of Which?, surveyed 1001 adults residing in Scotland, online between 20th May and 26th May 2016. Data were weighted to be representative of the Scottish population by age and gender.

What, if anything, do you think cafes, take-aways and restaurants should do to make it easier for people to choose healthier foods? Base: All Scottish respondents, 2016 (n=1001); 2018 (n=502)

Response to specific consultation questions

Question 1: Do you agree that the following businesses 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; and food delivery services, including online).

Yes – we agree that the businesses listed should be included within the scope of the Strategy.

Question 2: Which of the following measures should be taken to reduce excessive calorie contents of food and drinks eaten outside the home? (Reducing portion sizes; changing recipes eg. 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)

All of the above options should be considered as part of the strategy depending on the situation eg. the nature of the food, eating occasion or outlet.

Question 3: Do you agree that consumers should routinely have easy access to small or half portions?

We think that provision of smaller or half portions should be encouraged where it is feasible to do this and taking into account the context in which people are making their choice.

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)

Yes – we agree that calorie labelling at point of choice should apply in Scotland and our research shows that this is something that many consumers in Scotland would support. Six in 10 (61%) say they would find it useful to have information on the amount of calories in the food in cafes and restaurants.

Question 5: As a food business, would MenuCal help you to provide calorie labelling?

This question is directed to food businesses.

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

This question is directed to food businesses.

Question 7: Should calorie labelling at point of choice be made mandatory in Scotland?

Yes – to ensure provision across a broad range of businesses, calorie labelling at point of choice should be made mandatory for certain food businesses. At the moment, despite efforts to encourage out of home calorie labelling to be provided on a voluntary basis, there is still limited provision within some out of home sectors – and even where it is provided, it can be on a limited range of food and drink.

Making calorie labelling compulsory for certain types of food businesses would ensure that consumers have the information they want to make informed and healthier choices for themselves and their children when eating out. Greater transparency would also help to incentivise food businesses to offer a wider range of healthier choices.

Our survey found consumer support for this among Scottish consumers. 58% said that the Government should require cafes, take-aways and restaurants to provide the amount of calories for the food they sell.

Question 8: Should any business be exempt from mandatory calorie labelling at the point of choice?

To be useful, calorie information needs to be provided across a broad range of outlets and enable consumers to make meaningful comparisons. We do not, however, think that it is currently feasible to make it a mandatory requirement for all outlets to provide this information.

This is a very diverse sector, which includes a broad range of food businesses, large and small, chains and independents, on-line as well as physical. Some businesses will have more standardised menus, while others will have menus that change on a daily basis. A practical, but comprehensive approach, is needed that provides consumers with a meaningful choice, reflecting the increasing trend to eat out and the breadth of places where people will eat on a regular basis throughout the day and for different eating occasions. Consideration needs to be given to the ability of premises to provide information that will be accurate and meaningful for consumers.

Question 9: Where nutrition information is provided online and on printed materials should it be standardised in the way set out [in the table above]?

It would be beneficial to provide nutrition information online and on printed materials in a standardised way. The format for this presentation should be developed through consumer testing to ensure that it is easily understandable and useable for consumers.

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?

We think that there should be as much standardisation as possible, while allowing a certain amount of flexibility to reflect the different circumstances in which it may be provided. This should also be determined through robust, independent testing with consumers.

Question 11: Which actions would change promotion and marketing practices to support healthier eating outside the home? (Businesses dropping practices that encourage overconsumption; businesses positively marketing and promoting healthier choices; raising consumer awareness through the use of social marketing campaigns; other).

It is essential that businesses promote foods responsibly to consumers. All of these options should be considered depending on the situation in which people are making their choices. We have also supported the Scottish Government's intention to tackle the extent to which price promotions make it more difficult for people to make healthier choices in its consultation on *Reducing Health Harms of Foods High in Fat, Sugar or Salt*.

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

This is not an area where Which? has conducted relevant research.

Question 13: Which of the following should be changed to improve food provided for children? (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).

All of the options that are listed are actions that should be considered in order to improve the quality of food on offer to children and make it easier for parents to encourage healthier options. The type of situation and eating outlet will determine what is most appropriate in particular circumstances.

Question 14: Do you agree that recognition schemes are an effective means of supporting healthier eating in the Out of Home sector? 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?

Recognition schemes, such as the healthy living award (HLA) can have a role – but to be useful they need to be underpinned by robust, transparent criteria that consumers understand and be effectively and regularly audited to ensure on-going compliance.

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.

The public sector should be an exemplar. All of these actions potentially have a role in making it easier for people to make healthier choices depending on the nature of the occasion, food provided and type of outlet.

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