

Joint Response from Action on Salt & Action on Sugar to the Food Standards Scotland Strategy 2021 - 2026

FSS's Vision

A safe, healthy and sustainable food environment that benefits and protects the health and well-being of everyone in Scotland.

5. What are your views on whether this strategy will help to achieve FSS's vision for 'A safe, healthy and sustainable food environment that benefits and protects the health and well-being of everyone in Scotland' (Section 1)

Strongly agree

Agree

Neither agree or disagree

Disagree

Strongly disagree

Don't know

Comments

The UK governments' have a duty to ensure everyone can afford, access and enjoy a healthy and sustainable diet. Poor diet, which includes too much salt, sugars and saturated fat, with insufficient wholegrain, fibre, fruit and vegetables leads to ill health and nutritional deficiencies. Excess sugar intake leads to dental decay, with a disproportionate impact on the most disadvantaged and vulnerable children. Excess salt is also ubiquitous in packaged food. Eating too much salt raises blood pressure, increasing the risk of cardiovascular disease, osteoporosis, kidney disease and even stomach cancer.

Due to the independent, impartial role FSS have from Scottish government, we believe that more action could be taken to improve the health and well-being of everyone in Scotland. As an independent expert organisation, FSS are best placed to provide rigorous scrutiny, monitor progress and provide evidence-based recommendations to ensure continued progress in the improvement of health in Scotland, beyond the monitoring and evaluation of Scottish diets. Scotland has an opportunity to be an example of best practise to the rest of the UK. While the future of dietary improvement departments of Public Health England remains unclear, FSS along with Public Health Scotland and Scottish government have an opportunity to act and implement action where UK government are slow to do so.

Mission Statement and Strategic Outcomes

6. Do you agree or disagree that FSS's mission statement reflects what will be needed from us as an effective food body between 2021-26; acting in the best interests of the people of Scotland? (Section 2)

Strongly agree

Agree

Neither agree or disagree

Disagree

Strongly disagree

Don't know

Comments

We agree that FSS are trusted and can set an example to UK government that an independent expert body to scrutinise food and diet policies is what is needed. We need a governance mechanism to ensure that essential work implemented is high quality and meets set objectives. Poor performance of the UK's current voluntary reformulation programmes are in part due to PHE's lack of independence, hampering their ability to make strong, national recommendations, provide transparent monitoring and evaluation and implement effective policies. Public Health England are now set to be replaced and it is unclear who will implement their crucial functions on a national and international level. This continues a trend of responsibility for nutrition being underfunded and pushed from pillar to post over the last 20 years. However, FSS can become the standard of an independent governance mechanism, which could undoubtedly form the model for the other UK countries.

7. Do you agree or disagree that the 5 strategic outcomes FSS aims to achieve through this strategy will be sufficient to protect the food interests of consumers in Scotland between 2021-26? (Section 2)

Strongly agree

Agree

Neither agree or disagree

Disagree

Strongly disagree

Don't know

Comments on the 5 outcomes and whether any additional outcomes should be included

1. Food is Safe and Authentic

No comment to make

2. Consumers Have Healthier Diets

Poor diet is the leading cause of obesity. Living with obesity increases the risk of developing type 2 diabetes, cardiovascular disease, non-alcohol-related fatty liver disease and thirteen types of cancer, as well as worsening the outcomes for COVID-19. Treatment costs to the NHS are currently £6.1bn per year, with an estimated cost to the wider economy of £27bn. There is also a huge, often ignored personal cost to individuals; those living with obesity are more likely to live with mental health issues and face stigma, worsening their prospects in all areas of life. This is not a societal cost we need to bear: obesity can be both treated and prevented and families can be healthier as a result.

In 2018, 65% of adults in Scotland were classed as overweight and 28% as having obesity (1). In children aged 2-15 years, 29% were classed as at risk of overweight and 16% at risk of obesity (1), whilst 22% and 10% of Primary 1 children are at risk of overweight and obesity, respectively (2).

All bodies that have powers to improve the diets of people living in Scotland need to go above and beyond current actions in order to turn the tide on diet related poor health.

1. Cheong C, Dean L, Dougall I, et al (2019) The Scottish Health Survey. 2018 Edition. Volume 1. Main Report. Edinburgh
2. Information Services Division (2019) Body Mass Index of Primary 1 Children in Scotland. School Year 2018/19

3. Responsible Food Businesses are enabled to thrive

Responsibility should include engaging with reformulation programmes to improve the nutritional profile of food and drinks, and a willingness to improve portfolio of products.

4. Consumers are empowered to make positive choices about food

More pressure should be placed on Scottish government to act on vital policies ahead of Westminster. Priority must be placed on enabling the Food Promotions Bill due in Scottish Parliament next year and help to deliver reduced advertising and marketing of unhealthy foods in Scotland to support people to have healthier diets, including through better labelling and healthier food and drink environments.

In the recent 'Right to Food' consultation we commented that an independent and transparent statutory body, free from ministerial, industry and other vested-interest influences, should be established. This will enable them to make clear, independent, evidence-based decisions and fully scrutinise Government and bodies such as Public Health Scotland. This watchdog must put the primary focus on healthy diets, with physical activity encouraged for general health improvement. The watchdog should be well funded, for research and agility to respond to new evidence and provide innovative solutions.

However, we have concerns whether the work of this body would impact the essential and high-quality work of FSS, and question whether the function of the proposed statutory body could be absorbed by FSS. In addition, ideally a statutory body would have a UK-wide remit, in recognition of the joined-up nature of the UK food system.

8. Do you agree or disagree that the values and guiding principles outlined in the strategy fully reflect what will be required from us to fulfil our consumer protection and regulatory functions between 2021-26? (Section 3)

Strongly agree

Agree

Neither agree or disagree

Disagree

Strongly disagree

Don't know

Comments

We support FSS values that aim to connect with consumers but also support businesses to achieve high standards. However, the food environment currently has an overpowering influence on consumer choice. More emphasis should be placed on supporting and applying appropriate sanctions if businesses do not improve practices.

The burden of diet-related diseases is significant in Scotland, and it is frequently those from lower socio-economic backgrounds that bear the brunt of this. If Government can accept their responsibility and ensure accessibility and affordability of healthy food while addressing issues such as too much salt, sugar and saturated fat in everyday products, marketing of unhealthy products to children, unclear and misleading labels on food and drink products, nutritionally poor quality food for infants and young children, then we have a real chance of improving health in Scotland and reducing the prevalence of diet-related disease such as obesity and cardiovascular disease.

Data and Evidence

9. Do you agree or disagree with our proposals for using data and evidence to address key priorities highlighted in the strategy? What are your views on how FSS can optimise the use and sharing of data and evidence to deliver this strategy? (Section 4)

Yes, I agree in full

Yes, I agree in part

No, I disagree

Comments on how FSS can optimise the use and sharing of data and evidence to deliver this strategy

Lack of improvement in people's diets over the years coincides with a lack of action by governments to improve the food environment. FSS can optimise this strategy by acting as an independent body and authoritative voice to ensure Scottish Government do more to move policies forward that improve the food environment. Data and evidence gathering is important, but translating it to action is somewhat lost within the strategy document.

People in Scotland live in an environment that makes it easy for them to gain weight, and very difficult to lose it. The more socially deprived in particular are more at risk of suffering from ill health; young people from poorer backgrounds are more likely to be obese, consume a range of less healthy products and be exposed to more adverts promoting unhealthy food.

We first released our *Scorecard 2020: The road to preventing obesity (1)* in July, to track UK Government's progress with obesity reduction and prevention. Monitoring and evaluation of Scottish Government action should form part of data and evidence gathering process by FSS.

1. <http://www.actiononsugar.org/news-centre/press-releases/2020/keeping-score-as-leading-experts-evaluate-progress-of-the-obesity-prevention-plans-and-urge-the-government-to-ban-junk-food-ads-before-9pm-.html>

Flexibility and Sustainability

10. Do you agree or disagree that this strategy will enable FSS to be sufficiently flexible to adapt to the impacts of EU Exit and COVID-19 on the food chain in Scotland? (Section 5)

Yes, I agree in full

Yes, I agree in part

No, I disagree

Comments

Securing trade deals with the European Union and others will be critical for our overall food supply. However, these deals could also have significance to our diets and, importantly, public health, depending on which foods are prioritised and which standards applied. We are concerned that the UK government has not yet provided any impact assessment of future trade deals on public health in the UK. Keeping this level of flexibility to adapt and keeping public health a priority throughout this period of transition will be vital.

UK government must be held accountable if their action undermines crucial policies to improve our health at a time when we need it most, and ensure recovery from Covid-19 in the hospitality sector enables and supports an improved out of home sector with increased healthier choices and improved labelling. Covid-19 has had a negative impact on diet and nutrition resulted in increased snacking during lockdown and evidence points to further polarisation of drinking patterns, those who were drinking alcohol more before the lockdown more likely to have increased their drinking.

11. Do you agree or disagree that this strategy adequately reflects wider consumer interests with regard to issues relating to sustainability? (Section 5)

Yes, I agree in full

Yes, I agree in in part

No, I disagree

Comments

FSS must take a role in sustainability - a healthy and sustainable diet must remain a key part of the strategy.

12. What are your views on the priorities for FSS's new strategy with regard to reducing health inequalities in Scotland? (Sections 3 and 5)

Comments

Reducing health inequalities has become one of the greatest challenges of our time, which have been further exacerbated by the Covid-19 epidemic. Working in partnership with key organisations will be key to having impact in this area. We need to ensure that we reduce diet-related inequalities, in order to build a more resilient population.

It is well established that those from socially deprived backgrounds struggle to access healthy food. The Food Foundation's Broken Plate report highlighted that healthy food is up to three times more expensive than unhealthy food, and those living in the poorest households would need to spend 74% of their after-housing disposable income to afford the Eatwell Guide, compared to 6% for the richest households (1).

Consequently, diet-related health conditions such as obesity are more prevalent, meaning that the poorest in society are suffering disproportionately from ill health and are more at risk of premature death. Additionally, the COVID-19 pandemic has laid bare the impact of this inequality, with obesity and ethnicity being identified by as independent risk factors for both susceptibility to the virus, and worse outcomes as a result of the virus (2). Improving access to healthy food, and improved labelling, in addition to the myriad of additional factors will have a positive impact on vulnerable people that suffer the most from inequalities.

1. The Food Foundation, 2019 <https://foodfoundation.org.uk/wp-content/uploads/2019/02/The-Broken-Plate.pdf>
2. PHE: Disparities in the risk and outcomes of COVID-19, 2020 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/908434/Disparities_in_the_risk_and_outcomes_of_COVID_August_2020_update.pdf PHE report

Delivery of FSS Strategy

13. Do you agree or disagree that the strategy fully reflects the partnerships that FSS will rely on to be able to deliver this strategy effectively? What partnerships will be particularly important in achieving FSS's Vision, Outcomes and Goals? (Section 6)

Yes, I agree that it fully reflects the partnerships

Yes, I agree that it reflects some of the partnerships but not all

No, I disagree

Comments on partnerships that will be important in delivering this strategy

In addition to the partnerships outlined in the strategy document, close partnership working with Public Health England departments as they are potentially disbanded will be important. PHE have several core health protection and prevention functions and a wealth of evidence-based experience that is at danger of being lost. Regardless of where the PHE team are moved to, it is clear that the current silos present in Westminster are stalling necessary progress on public health. The work of all departments has an impact on public health; cross-department and cross-party working, building on purpose-driven values is urgently required.

Several options have been proposed, including relying on the NHS to take on health protection functions, retaining health improvement responsibilities within DHSC or creating a separate national organisation dedicated to prevention and health improvement. To fully benefit public health, ideally a new and independent organisation will be established to handle all health protection and health improvement functions currently handled by PHE, including the research functions of SACN, data analysis and national dietary surveys oversight. This organisation should have a UK-wide remit or be able to work closely with devolved organisations.

The reformulation programmes currently managed by PHE are especially crucial, improving the nutritional profile of food and drinks to prevent diet-related disease. An independent governance mechanism, which FSS currently provides, is necessary to transparently monitor food industry progress to achieving targets, while having the autonomy to hold industry to account and highlight

where progress has not been made. Ideally, the function of FSS would be replicated across all UK nations.

14. Your views are invited on the key risks and challenges faced by FSS in delivering this strategy and how these should be addressed. (Section 7)

Comments on key risks and challenges

A key challenge will be a reluctance from government to be held to account. The values FSS have identified must be agreed upon by all departments and parties and form the basis of the scrutiny provided by FSS.

15. Do you agree or disagree that the six goals and activities identified in the strategy reflect Scotland's priorities for public health and consumer protection relating to food over the next 5 years? (Section 8)

Strongly agree

Agree

Neither agree or disagree

Disagree

Strongly disagree

Don't know

Comments

It is positive to see more emphasis on consumer protection in the strategy. It is essential that bold actions are needed to translate evidence into real change in the food system. As mentioned above, specific goals such as enabling and supporting the Food Promotions Bill due in Scottish Parliament next year, ensuring Covid-19 adaptation and recovery enables and supports an improved out of home sector and helping deliver reduced advertising and marketing of unhealthy foods in Scotland, are some of the key specific actions that need to be taken.

16. Do you have any additional comments you wish to include about the FSS Strategy 2021-26?

No