

Summary of the Food Standards Scotland Local Authority Workshop
on the
New Scottish Government Diet and Obesity Strategy,
A Healthier Future- action and Ambitions on Diet, Activity and Healthy Weight.

Background

Workshop date : 7th December 2017

Workshop location: Apex City Quay Hotel, Dundee.

Attendees: Food Standards Scotland, Scottish Government Diet and Obesity Team, Scottish Food Enforcement Liaison Committee, Royal Environmental Health Institute of Scotland and 21 Scottish Local Authority Environmental Health Departments (Aberdeen City Council, Aberdeenshire Council, Angus Council, Argyll & Bute Council, City of Edinburgh Council, Dundee City Council, East Ayrshire Council, East Dunbartonshire Council, Falkirk Council, Fife Council, Glasgow City Council, Inverclyde Council, North Ayrshire Council, North Lanarkshire Council, Renfrewshire Council, Scottish Borders Council, South Lanarkshire Council, Stirling Council, West Dunbartonshire Council, West Lothian Council)

Workshop Aim: The aim of the workshop was to complement the overall engagement process been undertaken by Scottish Government on the new strategy and provide the Scottish Food Enforcement Community in Scotland an opportunity to discuss and contribute their insights and views on the matter.

Workshop Programme: The workshop programme included two introduction presentations and three themed workshops. The delegates were introduced to the new strategy in a presentation by Claire Hislop from the Scottish Government Diet and Obesity Team, whilst Alana McDonald and Heather Peace, from the FSS Nutrition Science and Policy team followed with an update on the Out of Home food environment. The presentations were followed by 3 consecutive workshops on the Out of Home food environment, the planning system and the food environment and finally leadership and transforming the food environment. During each workshop the delegates were given all two/three associated questions which they were instructed to discuss on their tables and record their response, the response were collected at the end of each workshop.

Feedback Methodology: This document is a collation of the delegate feedback from the workshop on the 7th December 2017 by FSS*. The feedback has been grouped by workshop and subsequently by question. For each question, and to help with the review of the feedback, the responses have been organised by subject, which were decided by FSS, and duplications of responses have been removed. All the responses recorded in this document are those that were provide by delegates unless otherwise stated, where appropriate FSS have provide summary of the key points.

This document has been reviewed and approved by the Chair of the Scottish Food Enforcement Committee.

Workshop 1 Delegate Responses - Out of Home

Q 1. (a) Given your experience of working with the OOH sector, what are your views on the incorporation of the outlined actions into an OOH strategy? b) What other actions could be included?

- Agree in principal with all the outlined actions, but feel will be challenging to implement without legislation.
- Co-ordinated – must have strategy all LA's doing same, level playing field.

Calorie Labelling

- Calorie labelling essential – accurate, simple, one rule for all, compulsory.
- Good in theory – need statutory requirements. Alternative to “calorie options” use “lighter option”.
- Calorie labelling to be mandatory – some consumers will still ignore but others will take heed. Food businesses will not provide the information to the consumer, i.e. less healthy choices. MenuCal beneficial tool.
- Calorie labelling – Difficulty getting this implemented with smaller businesses, good idea however.
- Standardised tool, e.g. MenuCal, which is a beneficial tool.
- Calorie display is a good way forward – if legally required this would automatically require portion control.

Summary – Calorie labelling is a good idea, however mandating the action should be considered for maximum impact.

Portion Size/Calorie Caps

- More information and education required on portion size- what is a recommended portion size? What does it look like? Selling point for a number of businesses.
- Public knowledge poor.
- Difficult to see how it would be implemented and regulated, more of an issue for SMEs than big corporations.
- Portions size is selling point for a number of businesses this might eliminate competition to include as much as possible.
- Waste reduction element to be considered, increased cost of waste control may reduce the portions due to the cost of waste disposal.
- Encourage smaller size portion option, pay for size of portion.

Summary – There is a general lack of understanding and information on portion size , as a proposed action to improve diet it is viewed by LA's to be difficult to implement and regulate.

Promotions/Marketing

- Action required on promotion and marketing re “more bang from your buck” biggest portions available too.

- Promotions aimed at school children, lower income families (bucket meals) – need to be legislated so fair playing field.
- Consider banning of the unhealthy and promotion of the healthy.
- Age restriction on sale of energy drinks.

For more information, please see workshop 3 question 1.

Advice on healthier processes

- More education for food businesses required, businesses need training but there is a cost implication.
- There are perceived cost implication for healthier options, need to overcome this.
- Not difficult to change the business views if you can convince them small changes can have benefits to their business and added potential positive health impact. e.g. larger cut chips or salt shakes with smaller holes.

Nutritional Standards for public sector procurement

- Education on any implemented standards would be required
- Standards need to go further than just the public sector.
- Manufacturers standards e.g. processed meat preparations, eg sausage, burger, kebab.
- Healthy Living Award, Grocers Federation Award not recognisable by public – not sought after by SMEs**.
- The Healthy Living Award is suitable for the business types currently involved, eg Public Sector. Not considered suitable for SMEs e.g. any scheme should be designed around the poorer quality takeaways to drive up standards**.

****These response might be more relevant to workshop 3 questions 2.**

(b) What other actions could be included?

- Other Actions;
 - Standards for children's menus,
 - Recognition scheme to incentivise SMEs to make improvements,
 - Online websites need to be considered as a way to drive up e.g. Groupon, Just Eat
 - Consideration of infrastructure of OOH (clustering of premises),
 - Licensing/enhanced registration,
 - Food delivery services e.g. Just Eat – delivery to schools, etc.,
 - Keep children in school and avoid lunch time purchasing.
- Regulation and prescription needed where possible for implementation of measures.
- Use Food Standards Enforcement for improvement, e.g. compliance notices
- Include a nutritional factor in the Food Hygiene Information Scheme.
- Consistent approach – all businesses same (no-one wants to be first).
- Action could be more successful if financial incentive.

Q 2. (a) From your understanding of the skills, knowledge and resources available to small and medium businesses in the OOH sector, to what extent will business require to support to achieve the actions outlined in the document?

- Significant support needed for both LA's and food businesses.
- Before skills, knowledge and resources are needed motivation needs to be considered – big problem.
- Has to be a benefit to business – e.g. help profit by cutting portion size.
- Priorities need to be clearly outlined and correspond to the level support provided.

(b) What would the nature of that support be?

- Uniform approach nationally.
- Support from an informed/trained food law officer in relation to nutrition to assist in (signposting) information – require EHO's to receive more training in nutrition.
- LA funding to come with it (like smoking ban enforcement).
- Consider training days in conjunction with FSS for SME's to be invited to seminars.
- Grants to support businesses to change.
- Resources for both food businesses and LA's to access.
- Good practice advice/guidance toolkit(could be included as CookSafe inserts);
 - Promote existing guidance
 - Reformulation can make savings as less/different ingredients.
 - Portion control to minimise waste, use less ingredients.
 - Cooking Methods for specific establishment types e.g. takeaway dishes
 - Opportunity for suppliers/manufacturers to provide healthier options.
 - MenuCal or an App to provide information for SME's.
- Training for Food Businesses;
 - Could be implemented into existing training programmes e.g. Elementary Food Hygiene Training,
 - Online training– more courses online,
 - MenuCal training,
 - Available in a wide range of languages,
 - Specific and tailored training for – different cooking methods.
 - Implement into catering college courses.
- Simplifying language used and consider translated information.
- Appropriate IT support, e.g. tablets for officers to educate the business.

Summary – Support is required for both food businesses and LA's in a variety of forms, e.g. guidance, training, and funding.

3. (a) Is there a role for LA/Food Officers to be involved in driving an OOH strategy? (b) What would that role be?

(a) Is there a role?

- Agreement there is role - officers best placed to deliver as they are in premises and have a role to provide education.
- In particular engagement with SMEs – over 43,000 interventions per year with caterers.
- National approach and development of the strategy – important to be involved in this.
- FSS will need to provide priorities and guidance for LAs – include in framework Agreement for Audit of LA's, research on OHH Environment.
- Potential for EHO's provide to support with “baseline measurement”? – Sampling.
- Consider a completely new role in LA's to deal with strategy e.g. smoking ban officer.

(b) What would that role be?

- Signposting/ Advisory/ monitoring role.
- Engaging with / Representing businesses on Working Groups.
- Extension of Food Standards work to include nutrition.
- Enforcing regulations e.g. min nutrition standards/calorie information.
- Key player in Obesity Strategy work within LA - consider training, funding and priorities within LA.
- Support via indirect communication methods, e.g. social media, mail drops, etc.

Summary – There is strong agreement that LA Food Officers have an advisory/monitoring role to play, especially in the OOH environment due to their unique relationship and position in food businesses.

Workshop 2 Delegates Responses - The Planning system and the food Environment

Q1. (a) In your opinion, how could the planning system better support and/or influence a healthier food environment? (b) What are the specific challenges?

- **Current Situation;**
 - Not health focussed – V Economic Development.
 - Planning conditions currently noise, smell, etc., could there be other criteria, eg nutritional/type of food – public health impact.
 - Planning system is designed for environment not a health – legislation changes.
 - Over provision and clusters of premises.
 - Local plans do look at “over provision” of certain types of premises – fast food, coffee shop. Not enforced strictly.
- **Opportunity;**
 - Should be controlled around schools and routes to schools.
 - Competition – business may be happier with less.
 - Restrict opening hours for certain business around schools – licensing.
 - Promote/restrict certain types of businesses in a local area for the future.
 - Incentives for healthier business.
 - Public health impact assessment with planning application.
 - Agreeing type of food provision with food business as part of licence.
 - Could tie planning and enhanced registration together.
- **Other considerations;**
 - Scottish Government has to take the lead, central planning is important and clear guidance would be required e.g. exclusion zones etc.
 - Requires legislation – fair trading challenges.
 - Will need engagement with planners but there should be EH involvement.
 - SND can provide information on current situation.
 - Planning may require extension to powers.

(b) Specific challenges

- Planning Vs. Economic Development - LA's more interested in Economic Development in current economic environment.
- Clothes retailers moving to selling snacks/still retail.
- Councils just giving in to business to fill units.
- Planning strategy only influenced from higher level – pressure from Government could influence.
- Remoteness of planning section within LA can cause poor communications.
- Currently planning applies to premises (not business) at one point time, can't control what the plot is used for after first occupant e.g. space planned for Hairdressers but the next owner converts to Takeaway.
- Consider planning Enforcement (businesses operating with wrong consent).
- Must have adequate internal communication between sections.
- Educating planning on nutrition LAs more interested in Economic Development in current economic environment.
- Currently planning applies to consent from premises (not business) at one point time.

Summary – The current planning system do not address health in relation to food. Planning was considered a good route to influencing the food environment but there would be challenges e.g. economic factors.

Q 2. (a) What role do EH services currently play in informing planning policy? (b)Is there an opportunity for EH to play a greater role?

(a) Role

- Variable levels of involvement depending on LA, ranging from some to none.
- Current involvement is on Environmental planning, environmental impact, noise, late hours licences, air quality, etc. – public protection.
- No involvement on advising on type of food premises or foods offered.

(b)Is there an opportunity for EH to play a greater role?

- Yes but only if remit and priorities set from a higher power, legislation would need to be considered.
- How;
 - Support with public health impact assessments.
 - Opportunity through Elected Members lobbying - increase access/liaison with Elected Members/Chief Executive who approve Planning Policy and local plans.
 - Could be included as part of licence process.
 - More access to planning system.
 - Use legislation to force change – amend approach to stipulations in late hours catering licences. Food compositions.

Summary – LA Food Officers currently do not have a lot input into informing planning policies, but it was acknowledged they could do more.

**Q 3. (a) Could licensing be used as a mechanism for improving the food environment?
(b) How?**

(a) Could licensing be used?

- Yes it could offer a quick fix, it could set some standards that could be enforced.
- E.g. Civic licensing control in Dundee, - late hours/street traders in Dundee have to be an FHIS pass – could attached other conditions, e.g. provide calorie information or a certain percentage of food or fruit water having healthier items at eye level.
- Licence conditions need to be set on a national level and implemented locally.

(b) How would it work?

- No Licence, no business – incentive to comply, licence won't be renewed/gained if don't comply.
- Public health considered for liquor licence so could do for food business licensing - could consider setting five food licensing objectives like alcohol licensing.
- Allows for early intervention/communication to discuss/advise/support businesses.
- Use licencing conditions for:
 - Healthier choices - Percentage of offering to be healthier options.
 - Restrict selling of unhealthy options at certain times.
 - Restrictions on meal deals, etc.
 - Portion size.
 - Training/education can be incorporated as licence.

Summary – There was strong support for the potential benefits of using licensing as a mechanism to improve the food environment.

Workshop 3 Delegate Response - Transforming the food environment

Q 1. (a) Beyond what has been discussed already today, what are our views on the other proposed actions outlined for transforming the food environment?

Promotions

- Agreement the action is required on promotions
- Promotions need to be more balanced, more inclusion of healthy deals, incentivising good practice, wholesaler/retailer guidance, better labelling/highlighting of less healthy deals.
- Promotions – nutritional standard for promotions, too heavily focussed on “unhealthy” foods.
- Suggested actions included;
 - Include high sugar milk based/fruit based drinks in measures e.g. soft drink levies.
 - Restrictions on promotions on products being promoted e.g. minimal salt content.
 - Every offering should be complimented with a promotion on a healthier option.
 - Restrict promotion of HFSS foods.
 - Limit portion size in promotions.
 - Limit upsizing - Stop "go large" options.
 - Rewarding promotions for healthier options, fruit and veg.
 - Make salad add-ins free and charge for chips, etc.

- Cheaper meal deals if healthier foods – fruit instead of crisps/chocolate “healthy meal deal”.
- Buy one get one free only allowed on low fat/salt/sugar.

Advertising

- Remove targeted advertising of unhealthy foods for children from television.
- Informal advertising needs to be considered, TV advertising – Football stadiums – social media - Just Eat app, etc.
- Consider sponsorships of events, ethical sponsorships (brand promotion), i.e. McDonalds – Olympics.
- Restrict product placement.

Labelling

- Existing labelling options;
 - Making the traffic light system on pre-packed food mandatory.
 - Remove exemptions from labelling so it applies to caterers and retailers.
 - More control on health claims e.g. if low fat/high sugar
 - Control of current claims that can be misleading - fat free but full of sugar claims should not be allowed (misleading).
- Opportunity for labelling;
 - Scoring mechanism similar to front of pack labelling in restaurants.
 - More visual warning on packages - health warning and pictures – similar to tobacco.
 - Health claims – RAG status should be cumulating, eg if low fat/high sugar.
 - Make FoP labelling easier to understand (why green but for ¼ pack when you would really eat a full pack).
 - Mandatory nutrition info for loose foods (catering) – use MenuCal.
 - Calorie info on alcohol.
 - Labelling – more realistic serving sizes/information easier to understand.

Reformulation

- Reformulation of recipes need to be easy and achievable steps for SMEs e.g. smaller portions, healthier ingredients.

Food and drink levies

- VAT on unhealthy options across the board.
- “Tax” on businesses that manufacture unhealthier goods – revenue generated put back into public education, NHS, etc.

(b) Is there anything else that should be included?

- EH to have involvement in these proposed actions.
- Food in social care – adequate menus – nutrition in care sector
- Increasing sampling budget to test/sample products to support in enforcement.
- Involve Business Gateways, Primary Authority (type) involvement/trade federation.
- Home Economics should be brought back to be a mandatory class, with free ingredients.
- Consider EHO’s to work with approved establishments/manufacturers on recipes/ingredients, etc.

Summary – There is an aspiration from LA Food Officers for transforming the food environment through the actions outlined in the strategy, which is demonstrated by radical actions suggested.

Q 2. Leadership and Exemplary Practice - What do you think about Environmental Health having a role in making obesity a national priority?

- Very important role, 32 LA's in businesses daily – lots of leadership opportunity.
- EHO's in unique position to provide leadership - relationship with food businesses, existing trust.
- EHO's working to health agenda already.
- Public health professionals (Local NHS, public bodies, etc.) need to be on board with Environmental Health involvement, joint working group is key.
- EHO's involvement needs to be set by government – Key leader.
- Value in being involved in development and communications throughout –can provide technical input on behalf of some aspects SMEs and the food industry.

Summary – There appears to be a large appetite from the LA Food Officers to be involved, with a clear proposal for leading from within the OOH and SMEs sectors.