

**Consultation on proposals to improve the Out of Home food environment in Scotland  
Food Standards Scotland**

**Response from the Royal College of Physicians of Edinburgh**

**Question 1**

**Do you agree that the businesses listed above should be included within an Out of Home strategy for Scotland?**

Yes

No

If No, please explain.

**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 of are available as an alternative to packs containing multiple servings

excluding very high calorie menu items

Other (please specify)

Please explain your answer/s.

It is vital that the public can make informed choices about food. Improved informative labelling should be given more emphasis so that the consumer is aware of how many calories and adverse food sources are in out of home foods.

The College is keen to support positive action to encourage and/or reward out of home outlets serving healthier foods/labelling informatively rather than have only punitive options. There could be encouragement on reducing unnecessary additions to prepared foods, such as mayonnaise on sandwiches, sauces on restaurant dishes, dressings on salads etc. On a menu, instead of low fat or reduced fat listed on sauces or dressings, direct the consumer to lower fat as standard and label

others as full fat or high fat as the exceptions.

### Question 3

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

Yes

No

Please explain your answer.

As suggested by the World Health Organisation, "as the rates of overweight and obesity have increased over the last several decades, so too have portion sizes in restaurants, supermarkets and homes suggesting that larger portion sizes may play a role in the obesity epidemic " (1). It would therefore seem reasonable to promote access to smaller portion sizes.

(1) WHO

[https://www.who.int/elena/bbc/portion\\_childhood\\_obesity/en/](https://www.who.int/elena/bbc/portion_childhood_obesity/en/)

### 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

No

Please explain your answer.

This would help to enable the public to make informed choices about food.

### Question 5

~~As a food business, would MenuCal help you to provide calorie labelling?~~

~~Yes~~

~~No~~

~~Please explain your answer.~~

### Question 6

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

### Question 7

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

**X Yes**

No

Please explain your answer.

As stated in response to question 4, enabling the public to make informed choices about food is vital. Research has shown that displaying “calorie labels on restaurant menus impacted food choices and intake” (2).

(2) [Am J Public Health](#). 2010 February; 100(2): 312–318. doi: [10.2105/AJPH.2009.160226](#)

### Question 8

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

Yes

**X No**

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

Businesses should not be exempted; however micro-businesses should be supported to implement these requirements and offered an additional implementation period. There must be incentives for small businesses to “buy into” these initiatives, with positive marketing rather than wholly negative instruments. A gradual process of change is also likely to be most effective, underpinned by there being a clear rationale and evidence for the suggested changes, positive alternative models and financial support if necessary.

### 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?

**X Yes**

No

Please explain your answer.

The information in the proposed table is set out in a clear manner, with both summary and more detailed data available for those who require it.

#### Question 10

Where nutrition information is provided online or 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.

This would seem a logical proposal. In order for the public to make more informed choices about food, nutritional labelling must be clear, consistent and easily understood.

#### 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.

A combination of enabling the public to make informed choices and promotion of healthy items, rather than less healthy, is likely to make most impact. There should be initiatives used and positive choices emphasised.

#### Question 12

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

Local authorities have a significant role to play in this issue. It is local authorities who grant licences for street trading and late night catering etc, and for permits and consents that may be required for hot food take-aways and restaurants. Careful consideration should be given by local authorities to the applications that are granted in the vicinity of 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.

In general, this would be a positive step and a move towards freshly cooked and prepared food would be welcome. There should be a particular focus on discretionary "treat" foods, which have no nutritional value.

### Question 14

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

Yes

No

If yes, please outline your views on the key components required for a flexible recognition scheme(s)

The College is very supportive of positive change, and recognition schemes can play a valuable part in this. Any schemes must be flexible to take into account different business types and offer genuine recognition to encourage participation.

If no, what other approaches would enable businesses to make the changes needed?

### 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

**X Yes**

No

Please explain your answer.

The public sector should be leading the way in the provision of healthy food. These actions seem reasonable and given that question 2 sets out a number of measures that "should be taken to reduce excessive calorie contents of food and drinks eaten outside the home", the public sector would presumably also come under that descriptor.

### 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.

The College has no particular comment on this question.

### **Question 17**

**Please outline any other comments you wish to make.**

Consideration should be given to food and other retail/entertainment promotions, such as the purchase of a cinema ticket plus sweets/drink/popcorn.