

NHPC 1299

Attn: Ernie Brown Ernie.Brown@scotland.gsi.gov.uk

Reference: NHPC 1299

**RESPONDENT INFORMATION FORM:
A CONSULTATION ON THE SCHOOLS (NUTRITION AND
HEALTH PROMOTION) (SCOTLAND) BILL**

Please complete the details below and return it with your response. This will help ensure we handle your response appropriately. Thank you for your help.

Name: Biscuit Cake Chocolate & Confectionery Association

Postal Address: 6 Catherine Street, London, WC2B 5JJ

1. Are you responding: (please delete (a) or (b))

(b) **on behalf of** a group/organisation?

go to Q3 and then Q4

ON BEHALF OF GROUPS OR ORGANISATIONS:


3. The name and address of your organisation **will be** made available to the public (in the Scottish Executive library and/or on the Scottish Executive website). Are you also content for your **response** to be made available?

Yes

SHARING RESPONSES/FUTURE ENGAGEMENT

4. We will share your response internally with other Scottish Executive policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for the Scottish Executive to contact you again in the future in relation to this consultation response?

Yes

Biscuit Cake Chocolate &
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28th July 2006

Dear Ernie

Improving the health and nutrition of Scotland's children

Please find to follow a response on the above consultation from the Biscuit Cake Chocolate and Confectionery Association (BCCCA).

BCCCA members are committed to helping children and teenagers choose healthy balanced diets. The sector now offers a wide range of foods to help children achieve this including: reduced fat and lower fat biscuits, portion controlled chocolate bars and sugar-free confectionery.

We do not vend to primary school children and work in partnership with schools to ensure balanced food offers in vending machines in secondary schools.

We would urge the Scottish Executive not to follow the route taken in England of banning most foods in the non-chilled snack sector. Bans do not teach young people to make healthier choices. Young people need to learn how to choose a healthy diet, tailored to their individual needs.

We would like to offer the expertise of the BCCCA membership, which includes all the major companies in the sector along with 70 small and medium sized businesses, many of which are well known Scottish businesses such as Thomas Tunnock Ltd and Simmers of Edinburgh, to help develop a balanced snacking model for schools in Scotland.

Your sincerely,



Alison Ward
Communications Director

IMPROVING THE HEALTH AND NUTRITION OF SCOTLAND'S CHILDREN

- 1. Do you agree that local authorities should be under a duty to ensure that food and drinks which they provide in their schools, including nurseries, meet defined nutrient standards?**

In principle, Yes. However, whether in practice the BCCCA would support specific nutritional criteria depends both on what standards are developed and how it is proposed that they should be applied. If the nutrient standards are developed in order to ensure that children eat a broad range of foods and learn how to choose a healthy and varied diet for themselves, the BCCCA would be likely to support them. Such standards should be applied flexibly and recognise that there is no such thing as an unhealthy foods. What matters is that all foods, eaten in moderation, can form part of a healthy and balanced diet. Any nutrient standards should also recognise that foods high in fat and sugar may also contain valuable micronutrients which may otherwise be under-represented in young people's diets – such as calcium and iron, of which a bar of milk chocolate is a useful source.

It is also important that any proposed nutrient standards acknowledge the role of snacking in the diet of young people. At present there is widespread and understandable concern, which we share, about the increase of sedentary lifestyles amongst young people. However, the fact remains that many young people are very physically active and need frequent energy boosts in order to continue sporting activities. There is also evidence to suggest that snacking helps young people to concentrate on their academic work (see reference 4 on page 5). We believe that a better approach would be to require main school meals to meet defined nutrient standards but not to apply the same standards to informal eating occasions such as vending machines and school shops. Concerns that the availability of other food outlets could undermine a campaign to persuade students to eat a balanced diet in the school canteen could be alleviated by restricting access to other outlets at certain times of day. However, the most important action to take would be to educate young people in how to eat healthily; otherwise if they do not respond to the new food offer in the school canteen they are likely to "vote with their feet" and seek a snack outside the school gates, or switch to packed lunches.

- 2. Where children are attending independent schools and where the provision of food and drinks are arranged, or funded, by a local authority, should the food and drinks meet defined nutrient standards?**

We have no view on this question as this is not our area of expertise.

3. Should local authorities be under a duty to promote uptake of school meals in their schools, including free school meals?

Yes, but within the overall context of educating young people to choose a healthy diet. If their school is providing nutritious meals in the canteen, pupils should be encouraged to take up that option and to learn how to choose foods which match their lifestyle. However, where a pupil expects to take part in a family evening meal, there is no reason why they should not sensibly choose to bring their own lunch to school or to use less formal food outlets such as a vending machine to buy a sandwich and snack foods. Provided that other outlets also offer a range of foods and enable pupils to make healthy choices, they should be encouraged as providing flexibility. Many students are actively engaged in sports and clubs at lunch-time, and prefer to grab a sandwich on the way back from the sports pitch or school society.

4. Should local authorities be under a duty to ensure that those taking free school meals can do so anonymously, as far as is practicable?

We have no view on this question as this is not our area of expertise.

5. Should local authorities have the power to provide children in local authority schools with free drinks, fruit, vegetables, bread or cereal-based snacks, which meet defined nutrient standards?

Yes.

6. Should there be a duty on Scottish Ministers and local authorities to endeavour to ensure that all local authority schools are health promoting schools?

Yes – it is important that young people learn how to prepare meals, choose a healthy and balanced diet which matches their own lifestyle, and the importance of regular exercise.

However, we would question whether a school can truly be described as a health-promoting school if it limits the range of foodstuffs available to its pupils or even seeks to ban certain foodstuffs all together.

A comprehensive review of the literature relating to parental feeding styles and their effect on child eating and incidence of being overweight found that while general feeding controls (e.g. provision of a structured choice of foods for the child or allowing small amounts of more energy-dense foods when requested) were not associated with increased child eating and incidence of being overweight. Instead, parental feeding restriction (forbidding foods from the everyday diet) was more likely to result in the child overeating the restricted foods and becoming overweight.¹

It is also very important to involve the pupils themselves in the development of school food policies. The School Food Survey, carried out by Carrick James Market

¹ Fisher JO and Birch LL (1999): Restricting access to foods and children's eating. *Appetite* 32: 405-19

research in November 2005, found that only 3% of young people and their parents believed that government should have the main say about food eaten in school; most pupils thought that they should have the main say in what was available.

7. Additional comments

It is difficult to respond to this policy intention without more detail of what the nutritional standards are likely to be. We would have grave concerns about any policy which results in the banning certain foods from school cafeterias, shops and vending machines. Such a move would not be workable and probably counter-productive, for the reason noted above: banning something makes it more attractive, particularly when a ban cannot be effective.

We also believe that a ban on foods such as biscuits, cake and confectionery would:

- remove a source of beneficial energy for active young people
- encourage banned products to be brought from home (research shows that 70% of teenagers bring confectionery to school from home rather than purchasing it themselves) or bought elsewhere, a practice which could only be stopped by intrusive searches, placing these foods on a par with drugs or weapons
- if it includes sugar-free products, prevent students benefiting from oral healthcare provided by a range of products such as chewing gum and mints.

The Evidence Base

Academic research has found no link between increased consumption of BCCC products and obesity in young people: analysis of NDNS data shows that children with the highest consumption of BCCC are not more obese or overweight than medium or low consumers². This is perhaps not surprising given that the consumption of BCCC products in the UK has been static for more than a decade.

Physical activity and sedentary behaviours are more important predictors of overweight and obesity in young people than diet.³

Studies have also demonstrated that there is no link between the purchase of confectionery products by young people from vending machines and poor dietary or lifestyle habits.⁴

Studies have also shown that snacks including biscuits, cake, chocolate and confectionery can have positive benefits on mental and physical performance of young people in school.⁵

Studies do not demonstrate that restricted choice will lead to healthier food choices:

A study by Fisher & Birch suggests that restricting foods among young children can in fact make the food more desirable.⁶

In addition, results from a School Food Survey¹, found that if faced with a ban on snacks such as sweets or chocolate only 3% of teenagers said they would eat more fruit. This is supported by research which shows that confectionery does not replace fruit consumption as they are separate eating occasions.⁷

Consumption of BCCC products

The consumption of biscuits, cakes and confectionery, by volume, has remained broadly static for the past 15 years (precisely the period in which the incidence of obesity has begun to increase) during which time incidence of obesity has begun to increase dramatically. The growth areas of the sector are savoury biscuits and sugar-free products such as gum. Traditional products such as sugar confectionery and biscuits have seen slight declines in consumption.

² Gibson, S., J. Lambert, and D. Neate, Associations between weight status, physical activity, and consumption of biscuits, cakes and confectionery among young people in Britain. *British Nutrition Foundation Bulletin*, 2004. **29**: p. 301-309.

³ IOC Consensus Statement: *Journal of Sports Sciences*, 22, No.1

⁴ Livingstone and New, *Public Health Nutrition*, 2003: 6, pp.497-504

⁵ Kanarek RB, Swinney D (1990). *Appetite* 14: 15-27, Busch CR, Taylor HA et al (2002). *Physiol Behav* 77: 333-340, Benton D, Slater O, Donohue RT (2001), *Physiol Behav* 74: 559-571

⁶ Fisher JO and Birch LL (1999): *Restricting access to foods and children's eating. Appetite* 32: 405-19

⁷ Gibson SA (2001) Are fruit and vegetables displaced by biscuits, cakes and confectionery in the diet? Further analysis of data from the National Diet and Nutrition Survey (NDNS) of Young People aged 4 to 18 years. Report prepared for the BCCCA.

Industry action

BCCCA members have already taken action to work in partnership with schools. This includes:

- Offering a range of portion sizes
- Offering reduced fat, reduced sugar and sugar free alternatives
- Responsible vending practices including: branded or unbranded machines, machines with a wide range of foods offered, plus some vending operators offer new technology which allows the vending machines to operate at specific times of the day.

We agree we need to create a healthier food environment, but believe rather than seeking to restrict pupils' access to particular foodstuffs that food policies should encourage young people to choose food and drink which meets their energy and nutritional requirements and to learn how to balance their food intake with their activity levels. Biscuits, cake and confectionery can be enjoyed as part of a balanced diet and food companies offer a range of foods in schools.

A positive, constructive approach to food choice will not only enable young people to choose their foods sensibly when they are adolescents, but also develop good habits which will benefit them throughout their life.