

Dimbleby Review – National Food Strategy Part 2

1 Purpose of the paper

- 1.1 This paper provides a summary of the recently published part two of the UK [National Food Strategy Part 2](#) (NFS), and to highlight the key recommendations of relevance to FSS goals. The strategy is primarily focused on England, but given the breadth of the report and what it proposes, as well as the work we do alongside UK departments such as Defra and DHSC, we have assessed the report and its read-across and relevance to FSS' agenda.
- 1.2 In broad terms the report assesses how the UK food system works, the damage it is doing to our bodies and our ecosystem, and the interventions that could be made to prevent this damage. It sets out a future strategy, with two key aims:
 - To change the narrative on the food system; and
 - To recommend a set of specific actions to the UK government to begin long-term change.
- 1.3 The NFS positions the food system as a cause of our biggest societal issues – the environment (for example, biodiversity loss, destruction of the ocean, deforestation), health (for example, non-communicable disease, stress on NHS), and climate change. It sets out that these issues also have the greatest negative impact on the least affluent in society. The supporting evidence is 176 slides and is an excellent resource with which to make arguments supporting the main issues highlighted in the report.
- 1.4 One major aspect of the NFS is that it aims to transfer the debate away from putting the onus on individuals and treating the symptoms of the problems to a focus on prevention in order to reduce eventually the incredible economic, societal and individual costs of diet-related disease. This is position that FSS publicly support as it aligns with our aims and statutory responsibility to improve diet.
- 1.5 The focus of the strategy is on system based changes with the aim of improving the health and sustainability of the current food system. This requires a whole systems approach (WSA) where all levels including structural, cultural, local and individuals work more effectively within a system. FSS has longstanding support for this approach. In 2018, *Healthier Futures; Scotland's diet and healthy weight delivery plan*, committed to testing the WSA approach in 3 early adopter areas in Scotland and FSS has worked closely with SG and partners during the development of this work.
- 1.6 The NFS suggests there needs to be increased funding to support prevention that, eventually, should reduce treatment costs. This is a long-term proposed strategy with potential political difficulty. We already collect data on the shifting food chain in Scotland but we need to consider how we might expand this and consider what additional shorter-term markers of change might be collected and analysed to signify progress and then used to support political buy-in.

1.7 The Board is asked to:

- **Discuss and provide a view** on the key recommendations of relevance to FSS outlined below. In particular:
 - Confirm the previous position on a sugar tax;
 - Comment on the proposal for mandatory reporting for large food companies;
 - Express views on FSS's role in influencing education on diet for children and young people;
 - Comment on the proposal for a National Food Data system for Scotland;
 - Support the FSS writing to UK and Scottish Government Ministers to reflect our position.

2 Strategic aims

- 2.1 The FSS [Corporate Plan 2021-2024](#) sets out our goals, including on sustainability, stating that we will *consider environmental and societal impacts when developing and implementing new policies*. Our Corporate Goals support our statutory objective to improve the extent to which members of the public have diets which are conducive to good health and link to some of the NFS recommendations.

3 Background

- 3.1 The NFS was published on 15 July 2021. The geographical scope of the report is England, but many of the findings are relevant to Scotland. This paper therefore identifies which recommendations might have an impact in Scotland should the UKG accept and act on them. The report contains recommendations to address the major issues facing the food system: climate change, biodiversity loss, land use, diet-related disease, health inequality, food security and trade. The 14 recommendations are grouped under four main National Food Strategy objectives:

- Escape the junk food cycle to protect the NHS
- Reduce diet related inequality
- Make the best use of our land
- Make a long-term shift in our food culture

- 3.2 The report notes a need for a long-term effort, with a joined up approach between Government, the food industry and communities. The report suggests a strong framework of legal targets is needed to improve the food system. The report concludes that the UK has a once-in-a-lifetime opportunity to reshape the food system.

- 3.3 The [first report](#) from this independent review was published in July 2020. Henry Dimbleby, the independent reviewer, has engaged regularly with officials from devolved administrations (with the exception of Scotland), inviting comment and discussion. As was the case following the first report from this independent review, UK Government will continue to work collaboratively on all issues relating to the

food system, with regular cross-Government meetings of officials and Ministers to discuss these recommendations and accelerate work on the forthcoming UK Government Food Strategy white paper.

4 Key Recommendations for Discussion

- 4.1 For the following recommendations the Board is asked to consider the possible implications for FSS both in terms of the potential outcome(s) as well as what is required from FSS (if anything). A full set of the report recommendations is provided in Annex A. The text in italics are excerpts from the NFS part 2 report.

R1-7: Escape the junk food cycle and protect the NHS

- 4.2 **R1. Introduce a Sugar and Salt Reformulation Tax:** *The Government should introduce a £3/kg tax on sugar and a £6/kg tax on salt for use in processed foods, restaurants and catering businesses. This is aimed at encouraging reformulation and where products were not reformulated would pass the additional cost onto the consumer. The tax would apply to all sugar and other ingredients used for sweetening (such as syrups and fruit extracts, but not raw fruit). In order to stop food manufacturers relocating overseas to avoid these taxes, imports of processed food should also be taxed according to sugar and salt content when they enter the UK.*
- 4.3 The NFS lays out the health facts very clearly. It also provides evidence that programmes which have required individuals to change their behaviour generally have *not* worked well. In addition, it describes how voluntary policies on manufacturers tend to reduce their effectiveness. Whilst the UK has previously seen some success with voluntary salt sugar reduction programmes, the soft drinks industry levy has been the most impactful measure to be introduced thus far.
- 4.4 The UK Soft Drinks Industry Levy (SDIL) became law in April 2018. It applies a levy on manufacturers and importers of soft drinks with added sugar. There are two levy rates – 18p per litre for drinks containing between 5g and 8g sugar per 100mls and 24p per litre for drinks containing more than 8g sugar per 100ml. PHE data in Oct 20 showed that, for retailers and manufacturer branded products, the sales weighted average sugar content of SDIL drinks per 100ml reduced by 43.7% between 2015 and 2019. Volume sales have increased by 14% over the same time period. Similar reductions have been seen in the eating out of home sector. The reductions in sugar purchased, and increased spend on SDIL products, are similar across all socio-economic groups with an estimated 36,000 fewer cases of obesity in children and teenagers in England. Reducing sugar in drinks is more straightforward than for some food categories because, in drinks, sugar generally does not provide functionality beyond taste.
- 4.5 The SDIL can only have a finite impact due to the relatively narrow range of products that it covers and therefore a wider sugar tax would have a greater impact on reducing sugar in people's diets and health. A tax places the onus on businesses and creates a level playing field; evidence shows that this is has a positive economic benefit that tends to be broadly supported by the public.

- 4.6 The document then goes into details about the impact on lower income families (largest impact but most positive health benefit) and is mitigated to some extent by recommendations R4-5. They provide models of the possible impact & costs/benefits.

Discussion on R1

- 4.7 The FSS monitoring programme shows that the UK and Scottish reformulation programmes to date have not had sufficient impact to support achievement of the Scottish Dietary Goals. A graduated approach to taxation would be more likely to spur reformulation in a broad range of foods just as it did for soft drinks.
- 4.8 It is also important to reflect on the purpose of the levy which is not to introduce a financial inequality but drive health improvement. The tax would be applied only to products which exceed certain levels of sugar content and therefore doesn't reduce consumer choice. The concept of the sugar tax is to encourage reformulation and to create impetus behind reformulation programmes. And the evidence from the SDIL shows that it works.
- 4.9 As the Board may recall when this was considered previously in 2016, the Board view was that the soft drinks tax was too narrowly focused and there should be consideration of the creation of a price differential through taxing sugar as an ingredient in food. The Board agreed that a sugar tax should be considered and recommended that SG and FSS officials 'consider how a sugar tax may be introduced and at what rate'. This action was subsequently superseded with the introduction of the SDIL in 2018. The clear inconsistency with the SDIL means that there are products with more sugar than soft drinks which are not subject to a levy, but clearly consumers would benefit from the same impetus around reformulation of products beyond soft drinks.
- 4.10 Despite the Prime Minister already appearing to rule this option out, the Board is asked to discuss and confirm whether its previous position on a sugar tax remains valid (or comment on what might have led to a change in view), confirm that the FSS should continue to support and make the case for a broader sugar tax.
- 4.11 **R2. Introduce mandatory reporting for large food companies.** *All food businesses with over 250 employees should have a legal duty to publish annual data on their sales of various product types and food waste:*
- *HFSS foods and alcohol*
 - *Protein by type*
 - *Fruit; vegetables*
 - *Fibre, saturated fat, sugar, salt*
 - *Food waste*
 - *Total food and drink sales*
- 4.12 It is proposed that food company data would be reported through an online portal, managed by FSA and reported to Parliament annually. The aim is to encourage transparency and accountability, by monitoring progress over time. The ultimate aim of the proposal is to change sales and consumption patterns for the foods for which reporting is required.

- 4.13 The authors state the action is likely to take three forms: (1) Increasing the availability of healthier products, which are currently lacking across a number of product categories. For example, only 0–9% of pasta, ready meals and sandwiches on sale are high in fibre. Businesses wanting to improve their figures may invest in new products that are healthier and more sustainable. (2) Reformulating existing products, to reduce sales of less healthy foods and drive up sales of healthier ones. Some retailers are already taking steps in this direction. Reporting requirements will create incentives for further such progress. (3) Improving the marketing of healthy products. Currently less than 2% of food and drink advertising spend goes on vegetables.
- 4.14 As explained in the report, the rationale is to have disclosure of data and the public as well as investor scrutiny that comes with it. The report provides the example of the Carbon Disclosure Project with transparency by itself incentivising companies to improve. Reporting data makes it easier for investors to know what is going on in the companies they own, and to pressure management for change.

Discussion on R2

- 4.15 The advantage of this proposal is that more transparency will help increase pressure for change. Scotland has a greater proportion of SMEs and therefore how pertinent R2 is for Scotland specifically will depend on the nature and number of companies of this size operational in Scotland, but we do not hold this data. However large companies spanning Great Britain will include Scotland.
- 4.16 Initial Board views are welcome on the NFS proposal. If in favour, whether action on a joint UK-wide basis would be sufficient or whether Scotland might want to do something different to the rest of the UK. Once the Board has given a steer, the Executive will develop our thoughts further.
- 4.17 **R3. Launch a new “Eat and Learn” initiative for schools.** *The Eat and Learn initiative is a package of measures designed to take food education seriously through curriculum changes, accreditation schemes, inspection, funding and recruitment of food teachers.*
- 4.18 Education is of course a devolved area to Scottish Government and the report recommendation therefore applies to England-only. The authors comment that food education remains a second-class subject and needs to be taken more seriously throughout the education system in England. The concepts include: (1) Sensory food education/exploration for early years. (2) A proper qualification (A-level) in food and nutrition beyond GCSEs. The new A-level should include learning about the food system and where our food comes from, and how the food we eat affects the environment and our health. (3) A review of other qualifications such as T Levels in Science and Catering provide and provide a progression route for students after GCSEs. This is particularly important in light of the post- EU Exit skills shortage in hospitality. (4) Accreditation (bronze, silver & gold awards for Schools) and inspection around a “whole- school approach” to food - meaning integrating food into the life of the school.
- 4.19 They expect the initiative to yield the following benefits: (1) Increased uptake rates of school and nursery meals; (2) A reduction in food waste; (3) At least 90% of children leaving primary school having been taught all elements of the Design and

Technology Curriculum on Cooking and Nutrition. (4) At least 90% of children leaving secondary school able to prepare and cook at least five healthy savoury dishes using a range of cooking techniques. (5) All staff working in school and nursery kitchens having received training to deliver high-quality, nutritious meals. (6) More children leaving secondary school with passes in food GCSE and A-levels. (7) More teachers who are qualified to teach food courses.

- 4.20 The curriculum in Scotland already includes teaching of practical food skills, as well as knowledge and understanding of food, nutrition and health from age 3 to 15 as part of the broad general education. The Scottish Government has funded a food education programme for the last 9 years which provides funding for schools to enhance their food education offering (the food for thought fund). It has also funded a number of other programmes to support food education, for example, FDF Scotland Futures in Food which promotes careers in the food industry, and the Royal Highland Education Trust which supports school farm visits and a farm to fork curriculum.
- 4.21 Scotland already have qualifications available for schools to deliver in food and health technology at level National 3 right up to Advanced Higher. Hospitality courses are also available at National 3-5.
- 4.22 The whole school approach to food is part of the Scottish inspection programme and is carried out by specialist Health and Nutrition Inspectors. They also inspect compliance with the School food Regulations which cover provision of all food and drinks in school settings. Education Scotland have recently published a framework to support self-evaluation of Food in Schools.

Discussion on R3

- 4.23 Education has a vital role in the prevention of diet related health outcomes. As outlined above, Scotland is already in a better position than other parts of the UK in this regard. Furthermore, SG has recently committed to a renewed focus on early years. Programme for Government has made £650,000 available this year for Health Boards and local partners, to fund support services which encourage and reinforce good nutrition, healthy eating habits and physical activity for children under five and their families.
- 4.24 FSS has a role to ensure that the correct messaging on a healthy balanced diet is embedded throughout the education system, from teaching about nutrition and health to learning to cook healthy meals. We have provided SG with expert advice which has underpinned legislation including the technical specifications for the school food regulations. We also provide support for schools in the form of digital teaching resources. The Board is asked to give views on how we can provide greater support in this area to influence dietary choices and behaviour in the school age and pre-school population. Consideration could be given to how we further build relationships with key players such as Education Scotland.
- 4.25 **R7. Trial a “Community Eatwell” Programme, supporting those on low incomes to improve their diets:** A Community Eatwell Programme giving GPs the option to prescribe fruit and vegetables, alongside food-related education and social support to patients suffering effects of poor diet and food insecurity. Primary Care Networks (PCNs) invited to bid to design their own pilot programme. Funds

could also be used to invest in local infrastructure and facilities that make healthy and affordable eating easier, such as community kitchens, fruit and vegetable street markets, community farms and box schemes, and community cafes. If the evidence shows that these trials significantly improved participants' diets and health while lowering medication costs, the Community Eatwell Programme should be implemented in all 1,250 PCNs in England.

- 4.26 This recommendation proposes focusing spending on prevention rather than treatment; providing fruit and vegetables for free as this will be less expensive than paying for the billions needed for diet-related disease treatments. The mechanism is to establish and fund local networks that drive this change. These could be modelled on the best pilot programmes trialled over a 3-year period. Asking the government to commit a large part of the health budget towards social investment is significant request but this should be the direction of travel. What the appropriate mechanism for this in Scotland would be is unclear.

Discussion on R7

- 4.27 While it is not an area for us to lead on, we could work with SG and PHS partners to support communities in Scotland with a specific focus on provision of fruit and vegetables to improve dietary intakes.

R8-12: Make better use of our land

- 4.28 R10. Define minimum standards for trade, and a mechanism for protecting them. The government should, as a matter of urgency, draw up a list of core minimum standards which it will defend in any future trade deals. These should cover animal welfare, environment and health protection, carbon emissions, antimicrobial resistance and zoonotic disease risk. It must then set out which mechanisms it intends to use to protect these standards.

Discussion on R10

- 4.29 Progress has already been made here with the Ministerial request to produce for the Scottish Parliament an Annual Report on Food and Feed Safety and Standards as well as comment on trade deals as appropriate. We also know from our pre-Brexit consumer attitudes surveys that from a consumer perspective this is of significant interest. We will continue to understand the attitudes of consumers to these food standards and this then may inform changes to areas such as labelling and product information that could be provided. Outwith the Annual Report cycle the Executive will also consider how and when we communicate consumer attitudes so there is greater visibility beyond the Annual Report to Parliament.

R11-14: Create a long-term shift in our food culture

- 4.30 R11. Invest £1 billion in innovation to create a better food system. Establish a £500m fund managed by UK Research and Innovation, to invest in healthy and sustainable diets, including £75m for alternative proteins. A further £50m to support

an innovation 'cluster' to test and scale up alternative proteins. £200m for two 'What Works' Centres, the first to improve farming, the second, between Defra and Department of Health and Social Care (DHSC) to improve policies and business practices to encourage a large-scale shift towards sustainable and healthy diets. Centres should be independent of government, but closely linked. It would be important to ensure FSS has representation as part of any centre looking at 'what works' for healthy diets.

Discussion on R11

- 4.31 We welcome further investment into healthy and sustainable diets but the focus should be on implementation of existing diet policy alongside exploration of new mechanisms for driving change. We have concerns that such investment (if it occurs) is kicking the can down the road rather than focusing on implementation of existing diet policy.
- 4.32 Tackling Scotland's diet has, in effect, two main elements: the first is the cost of treatment of the health consequences of poor diet which is costing the NHS £600m a year. The second is what can be done around prevention to facilitate changes to the food system and impact on our food culture. It could be argued that the issues are inter-generational and to some extent the behaviours of some older generations will be very hard to change and influence and therefore dealing with the consequences means accepting the on-going NHS cost burden. What that also implies though is at what point and where can we influence dietary choices and behaviour? And where might it be more possible to focus on prevention? There are clearly difficult messages here but the board is asked to consider and give views on whether the Executive should do more work on being more overt on the importance of focusing on prevention. This does not mean abandoning the monitoring and surveillance work or programmes such as Out of Home but it would or could mean reviewing our current data collection and how we communicate and focus our efforts.
- 4.33 **R12. Create a National Food System Data programme.** Collection of data so that businesses and other organisations involved in the food system can track progress and plan ahead. This expands on data collected through R2 with FSA to be involved in delivery. Suggested data to be contained within the programme include childhood obesity metrics, food insecurity, animal welfare, National Diet and Nutrition Survey, environmental outcomes, system resilience and trustworthiness of food. Chief Scientific Advisors from Defra, DHSC, Department for Business, Energy and Industrial Strategy (BEIS) and FSA to establish a team of civil servants to manage the programme. The proposal covers a very broad range of metrics and there will be FSS interest in methods that enable food source and distribution to be properly tracked. Where does what we eat/drink come from and such traceability underpins validation of information that could be provided around source, environmental impact and welfare issues. A significant amount of data is already captured in relation to food in Scotland, but there is no single programme that brings it all together. The recommendation includes agencies assigned to certain types of data and we could explore how this reads across to FSS and other partners.

Discussion on R12

- 4.34 This is an expansion of R2. Collection, availability and analysis of such data is essential to understand and evidence the possible inter-relatedness of these areas. We consider that it would be useful to initially have hypothesis-driven approaches to define what is being tested between specific datasets (as mentioned for intersection of early years consumption/health data), so more strategic combinations should be targeted first and over time the connections analysed could be increased depending on resource. Collection/storage of the data should be supported if not already the case.

5 Conclusion/Recommendations

- 5.1 The report provides a compelling argument for the need to focus efforts on improving the food system to drive healthier and more sustainable food choices and outlines recommendations on how to achieve this goal.

- 5.2 The Board is asked to:

Discuss and provide a view on the key recommendations of relevance to FSS outlined below. In particular:

- Confirm the previous position on a sugar tax;
- Comment on the proposal for mandatory reporting for large food companies;
- Express views on FSS's role in influencing education on diet for children and young people;
- Comment on the proposal for a National Food Data system for Scotland;
- Support the FSS writing to UK and Scottish Government Ministers to reflect our position.

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Date: 08/09/21

Annex A – Table of Recommendations

Recommendation	Details
<i>Escape the junk food cycle and protect the NHS</i>	
1. Introduce a Sugar and Salt Reformulation Tax	The Government should introduce a £3/kg tax on sugar and a £6/kg tax on salt for use in processed foods, restaurants and catering businesses. This is aimed at encouraging reformulation and where products were not reformulated would pass the additional cost onto the consumer. The sugar tax would replace the current Soft Drinks Industry Levy. These taxes should be introduced through Primary legislation in the 2024 Finance Bill, with 3 succeeding years for implementation.
2. Introduce mandatory reporting for large food companies	<p>All food businesses with over 250 employees should have a legal duty to publish annual data on their sales of various product types and food waste:</p> <ul style="list-style-type: none"> • HFSS foods and alcohol • Protein by type • Fruit; vegetables • Fibre, saturated fat, sugar, salt • Food waste • Total food and drink sales <p>Data to be reported through an online portal, managed by FSA and reported to Parliament annually. The aim is to encourage transparency and accountability, by monitoring progress over time</p>
3. Launch a new “Eat and Learn” initiative for schools	The Eat and Learn initiative is a package of measures designed to take food education seriously through curriculum changes, accreditation schemes, inspection, funding and recruitment of food teachers.
<i>Reduce diet-related inequality</i>	
4. Extended eligibility for free school meals	The Government should: Raise the household earnings threshold for free school meals (FSMs) from £7,400 to £20,000. Extend eligibility to children who are undocumented or have No Recourse to Public Funds (NPRF). Enrol eligible children for free school meals automatically
5. Fund the Holiday Activities and Food programme for the next three years	The Holiday Activities and Food (HAF) programme offers a free holiday club to children who normally receive free school meals.

6. Expand the Healthy Start scheme	Expand the Healthy Start voucher scheme to all households earning under £20,000 with pregnant women or children under five.
7. Trial a “Community Eatwell” Programme, supporting those on low incomes to improve their diets	A Community Eatwell Programme giving GPs the option to prescribe fruit and vegetables, alongside food-related education and social support to patients suffering effects of poor diet and food insecurity. Primary Care Networks (PCNs) invited to bid to design their own pilot programme. Funds could also be used to invest in local infrastructure and facilities that make healthy and affordable eating easier, such as community kitchens, fruit and vegetable street markets, community farms and box schemes, and community cafes. If the evidence shows that these trials significantly improved participants' diets and health while lowering medication costs, the Community Eatwell Programme should be implemented in all 1,250 PCNs in England.
<i>Make the best use of our land</i>	
8. Guarantee the budget for agricultural payments until at least 2029 to help farmers transition to more sustainable land use	Defra should guarantee the budget for agricultural funding until 2029, maintaining it at its current level of £2.4bn (in real terms). It should ring-fence £500m–£700m of this money for natural carbon removal and restoring semi-natural habitats.
9. Create a Rural Land Use Framework based on the three compartment model	Defra should devise a Rural Land Use Framework, to be in place by 2022.
10. Define minimum standards for trade, and a mechanism for protecting them	Core minimum standards for trade, and a mechanism for protecting them - the government should, as a matter of urgency, draw up a list of core minimum standards which it will defend in any future trade deals. These should cover animal welfare, environment and health protection, carbon emissions, antimicrobial resistance and zoonotic disease risk. It must then set out which mechanisms it intends to use to protect these standards.
<i>Create a long-term shift in our food culture</i>	
11. Invest £1 billion in innovation to create a better food system	Establish a £500m fund managed by UK Research and Innovation, to invest in healthy and sustainable diets, including £75m for alternative proteins. A further £50m to support an innovation ‘cluster’ on alternative proteins. £200m for 2 ‘What Works’ Centres, the first to improve farming, the second, between Defra and DHSC to improve policies and business practices to encourage a large-scale shift

	towards sustainable and healthy diets. Centres should be independent of government, but closely linked.
12. Create a National Food System Data programme	Collection of data so that businesses and other organisations involved in the food system can track progress and plan ahead. Expands on data collected through recommendation 2. FSA to be involved in delivery. Suggested data to be included childhood obesity metrics, food insecurity, animal welfare, National Diet and Nutrition Survey, environmental outcomes, system resilience, trustworthiness of food. Chief Scientific Advisors from Defra, DHSC, BEIS and FSA to establish a team of civil servants to manage the programme.
13. Strengthen Government procurement rules to ensure that taxpayer money is spent on healthy and sustainable food	The Government should redesign the Government Buying Standards for Food (GBSF), to ensure that taxpayer money is spent on food that is both healthy and sustainable. It should use the updated reference diet, discussed below in Recommendation 14, to set these standards. They should be made mandatory for all public sector organisations.
14. Set clear targets and bring in legislation for long-term change	A Good Food Bill and formal extension of the powers of FSA. FSA remit to include tackling climate change, nature recovery and promoting health. The Bill would commit the Government to establish a Reference Diet to be used by all public bodies in food related policy-making and procurement. Harmonising of food labelling systems to include environmental impacts. Reference Diet to be updated every 5 years.