

Progress with the Public Health Nutrition Strategy and forward look

1 Purpose of the paper

- 1.1 This paper describes progress with the Public Health Nutrition Strategy during 2023 and set outs plans for the following two years.
- 1.2 The Board is asked to note progress on our implementation plan and **approve** the direction of travel for the forthcoming years 2024-6.

2 Strategic Aims

- 2.1 This work supports FSS strategic outcomes: (2) Consumers have healthier diets; (3) Responsible food businesses are enabled to thrive; (4) Consumers are empowered to make positive choices about food and (5) FSS is trusted and influential.

3 Background

- 3.1 FSS has a statutory duty to improve the extent to which people living in Scotland have diets conducive to good health. Our unique position, independent from Ministers, allows us to report and publish evidence to inform policy across a wide range of actions on diet and nutrition. Public Health Nutrition (PHN) has been identified as a priority area for FSS.

4 Update on the Public Health Nutrition Strategy implementation

- 4.1 In March 2023, the Board approved a [new PHN Strategy](#), which represents a significant shift towards action to improve the food environment and places a greater emphasis on how our work can support this alongside climate change considerations. The FSS Public Health Nutrition Strategy supports the FSS's [Science, Evidence and Information \(SEI\) Strategy](#) which was approved by the FSS Board in April 2017, and updated following publication of our organisational strategy for 2021-26.
- 4.2 This paper summarises the progress of the Public Health Nutrition division to support delivery of the PHN Strategy including how this has been disseminated with a broad range of stakeholders, how feedback has been incorporated into our implementation plan and how this supports delivery and application of the science and evidence base under the strategy pillars. The main workstreams and projects are outlined under each of the pillars in Annex A. It should be noted that whilst the diagram shows the work distributed across four equal pillars, many areas of work and staff resource is cut across more than one pillar and therefore the pillars interact with each other. The majority of programme spend is predominantly within the science and evidence pillar (see accompanying science paper).

- 4.3 This paper additionally sets out how we have applied our nutrition expertise and the wider evidence base to advance nutrition policy in Scotland. We also provide an outline of how we will build on our progress to date including where we plan to focus our efforts over the forthcoming years.

Stakeholder engagement

- 4.4 Following Board agreement of the Strategy in March 2023, we commenced a programme of engagement with stakeholders to raise awareness of the Strategy, seek feedback and provide clarity of our role in Scotland within public health nutrition. This stakeholder engagement also provided a vehicle to establish potential collaborations for future work. A summary of those we engaged with can be found in Annex B and included the Minister for Public Health and Women's Health, Scottish Government officials, Public Health Scotland, the food industry (including trade bodies), the third sector, advocacy groups, academia, and independent experts and advisors to government. The feedback received has supported the development of our implementation plan.
- 4.5 Overall, feedback from stakeholders was very positive, welcoming the new approach and aspirations. Using the science and evidence to underpin each of the pillars was recognised as providing the correct justification for our recommendations, advice and further discussions on how to support changes in the future. It was also noted that this type of data will be essential to ensure that sufficient evidence is available to support public health policy development in Scotland.
- 4.6 The shift in Strategy focus towards changing the food environment and away from personal responsibility has not proved to be controversial. In fact, many stakeholders are moving in the same direction with a recognition that concentrating on personal responsibility has been proven to be unsuccessful over decades and that a change of approach is required.
- 4.7 Stakeholders commented on how the strategy complemented their own work and this led to collaborative opportunities to strengthen our reach and impact. The Strategy also served to provide a clear outline of our role in the PHN space, which was welcomed and served to highlight areas of commonality whilst avoiding duplication in a landscape with many different players. As a direct result we have forged new collaborations, for example, with the Food Foundation where we have shared our data and publications and, similarly, they have kept us apprised of progress regarding their work to improve the retail food environment.
- 4.8 Stakeholder engagement is an on-going part of the PHN strategy, and we are making timely progress in developing an engagement plan. For example, parliamentary engagement is building with meetings with MSPs underway. This is taking our engagement to a deeper level than previous which tended to focus on presentations at cross party group meetings. We have also developed a stakeholder map and will use this to help identify who to engage with, how often and in what format, in order in to support achievement of our vision. It recognises that engagement might be at a strategic or technical/operational level – or both.

- 4.9 The Board should **note that** the stakeholder engagement plan will be further developed and deployed in support of our objectives.

Public Health Nutrition Strategy delivery and forward look

- 4.10 The Nutrition Science update in the separate accompanying Board paper highlights FSS' recent key achievements in delivery of our dietary monitoring programme and supporting consumers to have healthier diets. This work predominantly supports the Science and Evidence pillar of the Strategy governed within the Food and Health Research Programme (FHRP).
- 4.11 The Science and Evidence pillar forms the foundation of the PHN strategy, building on our dietary monitoring programme to bring all aspects of data together and using this to publish progress towards the Scottish Dietary goals and inform policy development. Our key outputs and reports published this year are summarised in Annex C.
- 4.12 Developing the plan for delivering the strategy is brigaded within three main areas of activity:
- Improving the food environment;
 - Influencing the food industry;
 - Delivery of consistent messaging on a healthy diet.

Improving the food environment

- 4.13 The PHN Strategy has a greater focus on measures to influence the food environment, supporting healthier and more sustainable options for consumers. The food environment includes all aspects of where we purchase and eat food, the structural architecture in shops and highstreets, other influences including promotions, and marketing and advertising also influence our choices. The current food environment heavily incentivises and promotes low-cost foods which over-contribute to energy, fat, saturated fat, salt and free sugar intakes in retail and out of home settings. We need to rebalance this to a food environment that supports healthy options for everyone. The following sections outline what parts of the food environment we will focus on influencing change to support healthier choices, building on our successes.
- 4.14 **Restricting promotions:** the evidence base indicates that the most effective way to improve the food environment and create a level playing field is to introduce mandatory measures. Restricting promotions of high fat salt/sugar foods (HFSS) in shops and supermarkets is an effective way to improve the food environment, particularly if promotions on healthier foods are increased. We previously recommended this measure to SG and in May 2023, the Minister for Public Health and Women's Health [announced](#) that the Scottish Government will proceed directly to consult on proposed regulations to restrict promotions of HFSS products and plans for implementation in autumn 2025.

- 4.15 **Our next steps** are to use our evidence to support Scottish Government with the development of this further consultation. Additionally, we will work closely with PHS colleagues to contribute towards the development of a monitoring and evaluation framework for the policy going forward.
- 4.16 **Mandatory calorie labelling:** we previously recommended that mandatory calorie labelling be considered by Scottish Government to support a healthier out of home food environment. During 2021/22 we undertook a significant suite of work to support Scottish Government to undertake a consultation on mandatory calorie labelling in the out of home sector. An analysis of the responses to the consultation was published in May 2023. At that time, the Minister also announced a pause on further progress on mandating calorie labelling to allow consideration of the outcome of research to understand the experiences of those with lived experience of an eating disorder. We have been part of the PHS research advisory group that commissioned this work which we anticipate will be published in early 2024. In May 2023, we published [best practice guidance](#) for businesses who wish to implement providing calorie information to their customers on a voluntary basis. This signposts to our MenuCal tool as well as ensuring they meet legal requirements.
- 4.17 Our **next steps** are to update our analysis of the evidence base for calorie labelling and provide advice to the Minister on how best to proceed with policy action to support a healthier out of home food environment. In doing so, we will need to ensure that mental health issues associated with eating disorders and wider population level public health issues are not conflated.
- 4.18 **Out of home action plan:** we are working to deliver several actions included within the SG Out of Home Action Plan in collaboration with PHS. This is one of the key mechanisms to influence food provision in the out of home environment across Scotland. These include development of a voluntary Eating Out, Eating Well (EOEW) framework and Code of Practice (COP) for children's menus to support outlets to provide healthier and more sustainable foods. To inform the development of the framework, during 2023 we engaged widely with the industry and commissioned [research within small and independent outlets](#) to identify barriers and facilitators to change. We also provided the technical expertise for the development of the criteria for the framework and COP.
- 4.19 Our **next steps** are to pilot the framework and COP in early 2024 and later next year, review the findings from the externally commissioned evaluation to support PHS to develop final proposals for implementation. We'll also seek to influence the reach and impact of the framework through inclusion in Good Food Nation national and local plans, prioritising uptake by the public sector and emphasising the need for this to be a mandatory requirement in those settings.
- 4.20 **Whole systems approaches:** during 2023, we participated in a short life working group to develop legacy resources for whole systems approaches to diet and healthy weight. This includes publication of the [Innovation and Practice](#) and [Local Levers for Diet and Healthy Weight](#) reports within which many FSS resources such as MenuCal and Healthier Catering guides are featured. We also appraised options for a national roll-out of whole systems across all areas of Scotland.

- 4.21 Our **next steps** are to support SG as they consider options for rolling out the whole systems methodology for diet and healthy weight to all local areas.
- 4.22 **Nutritional guidelines for early learning and childcare settings** need to support young children to develop good eating habits early. We are presently updating the nutritional guidance for 1-5 year olds, [Setting the Table](#). We contribute to the working group established by SG to lead the review alongside a wide range of other organisations including Education Scotland, Care Inspectorate, National Childminding Association, National Day Nurseries Association, NHS Boards, and PHS. Since May, we have been (with other experts) revising and updating the nutrient and food and drink standards, taking account of the Scientific Committee on Nutrition (SACN) report [Feeding young children aged 1-5](#) which was published in July 2023. We have provided the scientific rationale for the recommended changes and are currently producing a report documenting this. The updated guidance is expected to be published in spring 2024 and will apply across all early learning and childcare settings in Scotland.
- 4.23 Our **next steps** are to work with SG to agree a plan for wider implementation of the SACN Feeding young children aged 1-5 report recommendations across all policy and guidance pertaining to that age group.
- 4.24 Ongoing critical collaboration will continue with counterparts across many UK government departments. To date this has included knowledge sharing with FSA NI, consulting with SACN on a number of areas including ultra-processed foods and on our analysis of the potential impact of the climate change committee recommendations. We meet regularly with colleagues from the Office of Health Improvement and Disparities (OHID) to share information on the National Diet and Nutrition survey and other policy areas including reformulation, the current risk:benefit assessment of plant based drinks, vitamin D and the development health metrics within the food data transparency partnership. We are also the main scientific contact for mandatory fortification of flour with folic acid within the bread and flour regulations liaising regularly with Defra, our next steps are to lead the four nation monitoring group to explore how the impact of the policy will be assessed across the UK.

Influencing the food industry

- 4.25 The food industry have a vital role in supporting the transition towards a food environment that supports healthier and more sustainable options for everyone. However, this is also one of the most difficult areas to influence consistently without legislation to mandate changes across the different parts of the industry including retail, manufacturing and out of home.
- 4.26 **Reformulation:** following commitment in the [Healthier Futures Delivery plan](#), SG have funded a Reformulation for Health programme, managed by Food and Drink Federation Scotland (FDFS) since March 2019. The programme helps small to medium sized food companies make their products healthier. PHN has been part of the steering group for the programme and contribute to the annual workplans of the project since inception, helping to direct its work and focus. This year we also

provided £50k of grant funding to establish a Healthier Bakery Fund to support reformulation of bakery products in response to findings from our research on sweet discretionary products sold out of home.

- 4.27 Our **next steps** are to support publication of case studies for these projects and continue to provide strategic support for this programme for the duration of the SG funding. We will also provide input at the FDFS hosted reformulation showcase event in February 2024.
- 4.28 Since becoming Peas Please pledgers in April 2022, we have fulfilled and will continue to meet our commitments under the pledge as a systems influencer. We submitted our final Peas Please progress report in August 2023. We also supported the recent [national veg summit](#) held by Nourish in October and provided an input to outline how policy makers can make it easier for everyone to eat more vegetables in a Good Food Nation.
- 4.29 Our **next steps** are to gain further commitments across the food system to support the pledge as we deploy our stakeholder engagement strategy.

Delivery of consistent messaging on a healthy diet

- 4.30 Our ambition as laid out in the Strategy is to extend our reach beyond the strong relationships already established with Government, partners such as PHS and in the academic communities to be the 'go to' organisation for evidence and advice on public health nutrition. To do this effectively we apply the evidence base and translate our findings for a variety of different audiences and via different media.
- 4.31 **Healthy Eating Resources:** while we have shifted our focus from individual responsibility, we continue to have a role to provide consumers with consistent evidence based information on a healthy balanced diet. We achieve this through our [EWYW](#), [Healthy Eating tutorial](#) and [eat well everyday](#) resources. This year, we have enhanced the EWYW resource to address affordability of a healthy diet including signposting to the SG cost of living portal, Citizens Advice Scotland, Community Food and Health websites.
- 4.32 Our **next steps** are to deploy an engagement and dissemination plan developed for EWYW with the aim of having the resource embedded within as many credible external resources and training materials as possible. We will also support work to update the evidence based resources for teachers to deliver learning in line with our advice on diet, health and sustainability.
- 4.33 **Consumer tracking data:** alongside our evidence on dietary intakes and purchasing patterns, surveys of consumer attitudes and behaviours also inform our communications and policy development. Our most recent survey on consumer attitudes focused on the cost of living, out of home and sustainability and was [published in June](#).
- 4.34 **Our next steps** are to use this evidence to inform additional research needs, including new research to examine the impact of promotions on out of home digital food ordering platforms. Furthermore, the survey questions will also be used in future pulse/tracker surveys to allow us to monitor changes over time.

- 4.35 The **cost of a healthy diet** is an important influence on consumer behaviour, particularly given the cost of living crisis. We will soon publish the results of our rapid literature review to explore the methods used to assess the cost of diets. This explored published literature on methods and we have also [completed work to provide an estimate costs of a healthy diet](#) and test a potential methodology for collecting this information.
- 4.36 Our **next steps** are to widely disseminate the results from both projects and the results will be used to inform our future work to ensure that we take costs associated with eating healthily into account.
- 4.37 **Vitamin D campaign:** our previous digital campaign ran from November 2022 to February 2023 where we reached out to our networks to maximise the impact of the campaign, with a focus on groups at an increased risk of deficiency. Evaluation found that around a third of the sample had seen at least one element of the campaign, and of these more than 70% had taken action as a result, we aim to achieve similar success this year.
- 4.38 Our **next steps** are to run a further digital campaign on Vitamin D in winter 23/24 to raise awareness of the current advice and encourage the uptake of vitamin D supplements throughout the winter months. As there is no budget for this, we are using existing campaign assets (which are now available in 7 additional languages) to continue to raise awareness through our social media channels and existing networks.
- 4.39 Throughout the year, we have worked hard to increase our engagement with a broad wide range of stakeholders and audiences to disseminate our research, data, and policy positions. We have achieved this through a variety of media including webinars, podcasts, conference presentations, participating on panels, publication of blogs, thought pieces and press releases. This has greatly extended the reach of our work (see Annex C).

5 Forward Look

- 5.1 The extensive engagement process that we have undertaken has highlighted a number of areas within our remit which we are prioritising as we develop our forthcoming actions. In addition to the work already outlined above and in the accompanying Board paper on nutrition science priorities, we plan to progress new areas of work to build on our progress.
- 5.2 The key priority areas to support delivery of the PHN strategy are:
- Data and digital transformation (as described in the science Board paper)
 - Preparation for a new Government on reserved policy areas
 - Scottish Government regulatory change to improve the food environment
 - Further advancement of the Scottish Government's out of home policy
 - Deploy our stakeholder engagement plan and wider dissemination of our data
 - Provision of consistent consumer advice on a healthy balanced diet

- 5.3 A key theme that was highlighted on a number of occasions through our engagement on the strategy was our unique role and expertise in the field of public health nutrition. We aim enhance our influence using our data and publications by focussing on the appropriate audience to have the greatest impact providing a constant 'drumbeat' of publications in a variety of different formats to suit differing audiences. We will also produce outputs jointly with other organisations to amplify our messaging and profile further.
- 5.4 Over the past year we have built on our existing public profile and will use this to focus further on how we influence a broader range of stakeholders. A key part of this is ensuring that we have sufficient political influence to ensure that our advice, role and remit is known across all political parties. We have started this process and will drive this further in Scotland with the support and guidance of our Head of Public Affairs. This could extend to our influence of policy at a UK level in reserved areas where we have provided evidence based recommendations for change, such as taxation and restrictions on HFSS product advertising. If we are to pursue this, it would require senior staff input including from SLT including the CEO and our Chair and Board champion(s) in order to have sufficient gravitas.
- 5.5 At a local level, we currently work collaboratively with PHS to support initiatives and will continue to build on this and develop outputs to increase our influence on these schemes. We will use our experience from the Whole Systems Approaches (WSA) early adopter phase and the legacy resources produced to influence action at a local level, and provide strategic oversight and influence to the move to a national roll out of WSA, as appropriate. For example, we'll provide support for businesses in a local pilot using MenuCal to improve local out of home businesses to provide healthier menus.
- 5.6 The Good Food Nation national plan is due for publication imminently by SG. We will continue to provide support for the development of the SG's ambitious and wide ranging work by providing advice on indicators or other measures by which progress in achieving the outcomes may be assessed. We will also seek opportunities to recommend the SG includes policies driving healthier, sustainable diets through national and local plans as they are developed.
- 5.7 Lastly, we have worked with Frameworks UK, PHS and our comms team to use evidence based language and tone to influence different audiences to understand the need to address the food environment rather than relying on personal responsibility alone. We will continue to develop and apply this approach to our reports, publications, presentations and narratives.

6 Identification of risks and issues

- 6.1 Resourcing continues to present the most significant risk to our ability to deliver the PHN strategy, the FSS strategy for 2021-26 and to support public health nutrition sufficiently given that it was identified as a priority area following the prioritisation exercise. This includes both programme and staff resource limitations.

- 6.2 Resource requirements and timescales associated with the procurement process for projects and frameworks to delivery science also pose risks to timely delivery of PHN strategy objectives.
- 6.3 Our lack of legislative mandate on public health nutrition is a further risk and limitation to our ability to progress implementation of our recommendations.

7 Equality Impact Assessment and Fairer Scotland Duty

- 7.1 Equality Impact Assessment (EQIA) and Fairer Scotland Duty (FSD) requirements do not apply to the information presented in this paper. However these assessments are incorporated into the development of projects and policy actions.

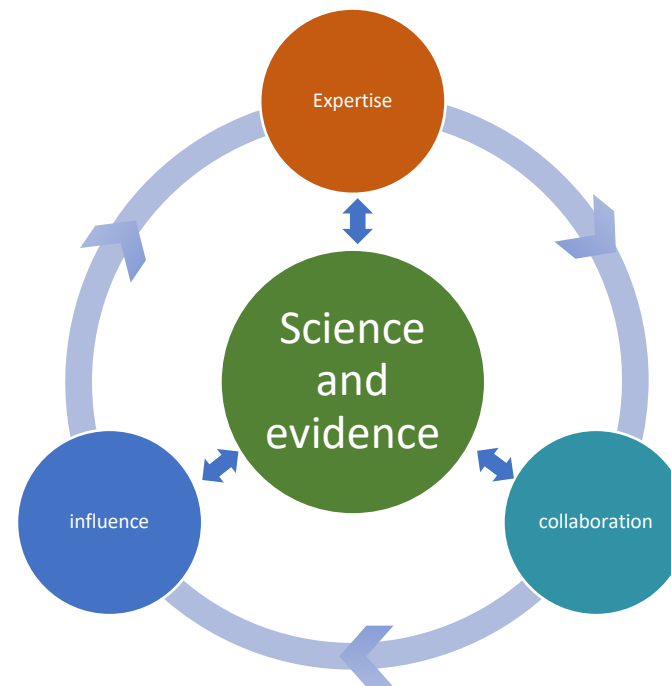
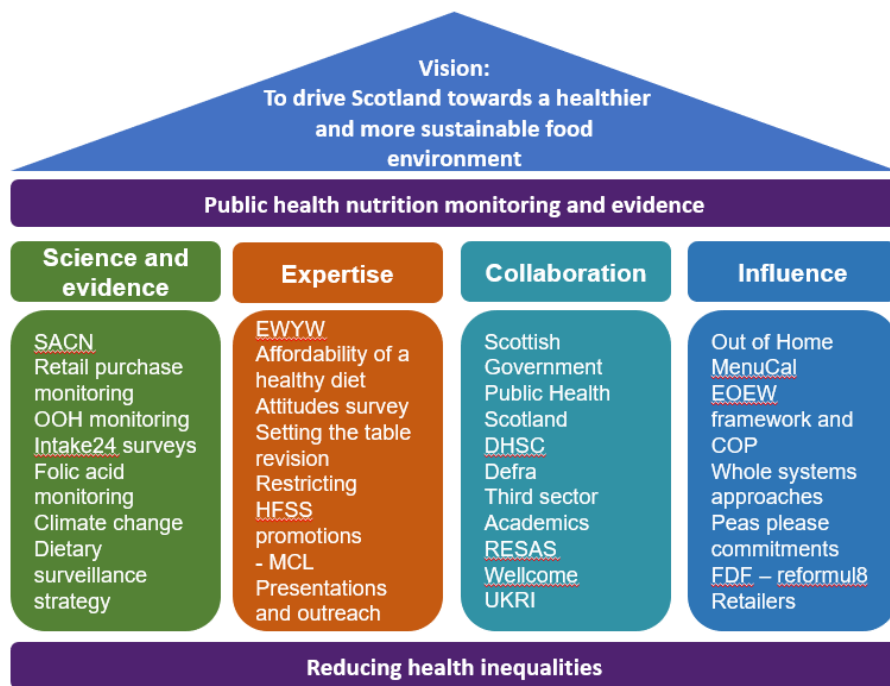
8 Conclusion

- 8.1 The Board is asked to:
 - **Consider and provide views** on our PHN activities for 2025-6 to support delivery of our PHN Strategy noting the body of work and achievements delivered so far.

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Annex A – Public health nutrition delivery areas by pillar



Strategy Pillar interactions

Abbreviations

- DEFRA** Department of Environmental, Food and Rural Affairs
- DHSC** Department of Health and Social Care
- EWYW** Eat Well, Your Way
- FBO** Food Business Operator
- FDFS** Food and Drink Federation Scotland
- EOEW** Eating out eating well framework

- MCL** Mandatory Calorie Labelling
- COP** Code of Practice (children’s menus)
- OOH** Out of Home
- PHS** Public Health Scotland
- SACN** Scientific Advisory Committee on Nutrition
- RESAS** SG Rural and Environment Science and Analytical Services Division
- UKRI** UK Research and Innovation

Annex B – List of stakeholders engaged with the new Public Health Nutrition Strategy

Minister for public health and women's health

Scottish Government

Public Health Scotland

Food and Drink Federation (FDF) and FDF Scotland

Public Health Nutrition Group

Nesta

Food Foundation

Obesity Action Scotland

Which?

Institute of Grocery Distribution (IGD)

UK Hospitality Scotland

Scottish Retail Consortium

Scottish Wholesale Association

Nourish Scotland

Scottish Obesity Health Alliance

Kantar

Office for Health Improvement and Disparities, DHSC

Food Standards Agency

Scotland Food and Drink

SG Rural and Environment Science and Analytical Services Division

Rowett Institute

UK Research and Innovation

Wellcome Trust

University of Edinburgh

University of Aberdeen

University of Dundee

New York University

Asda

Annex C– FSS public health nutrition publications and media highlights 2023

Publications

- *Analysis of the energy content of sweet discretionary products in the OOH sector in Scotland in 2022*, published February 23 [An analysis of the energy content of sweet discretionary products in the out of home sector in Scotland in 2022 | Food Standards Scotland](#)
- *Health Inequalities Impact assessment for Eat Well Your Way (EWYW)*, published March 23 [Health inequalities impact assessment scoping workshop for Food Standards Scotland's Eat Well, Your Way resource | Food Standards Scotland](#)
- *JRS consumer evaluation of EWYW*, published March 23 [Eat Well, Your Way resource early feedback and evaluation | Food Standards Scotland](#)
- FSS Public Health Nutrition Strategy, published March 23: [Public Health Nutrition Strategy | Food Standards Scotland](#)
- *Consumer attitudes towards the diet and food environment in Scotland research report*, published June '23: [Consumer attitudes towards the diet and food environment in Scotland research report | Food Standards Scotland](#)
- *Voluntary Calorie Labelling Guidance*, published May '23: [Voluntary calorie labelling guidance | Food Standards Scotland](#)
- *Estimating the cost of a healthy diet: testing an approach based on nutritionally analysed meal plans*, published June '23: [Estimating the cost of a healthy diet: testing an approach based on nutritionally analysed meal plans | Food Standards Scotland](#)
- *Report on the consumption of discretionary foods and other categories of concern in adults*, published August '23: [Consumption of discretionary foods and drinks and other categories of dietary concern in adults \(16+ years\) | Food Standards Scotland](#)
- *Exploration of the current out of home landscape within small and independent outlets in Scotland*, published September 23 [Exploration of the current out-of-home landscape within small and independent outlets in Scotland | Food Standards Scotland](#)

Media and outreach highlights

- FSS hosted an online webinar to disseminate key findings from recent publications on retail and OOH purchasing patterns, and eating behaviours inside the home using data from Kantar.
- Press release on the vitamin D campaign published on 15 February (used the findings on the uptake of vitamin D supplements in the 2021 Scottish Health Survey as the hook)
- Press release and social media to promote the webinar on purchasing and eating patterns in Scotland.

- Press release on FSS signing up as a Reformul8 partner and publication of sweet discretionary products report (February 2023)
- Press release for attitudes survey: [Survey reveals concerning links between cost of living crisis and eating and shopping behaviours | Food Standards Scotland](#)
- Blog on ministerial update on Restricting promotions: [Celebrating success in public health – restricting the promotion of high fat, salt and sugar foods | Food Standards Scotland](#)
- Podcast for Healthier Bakery Fund:
[The deadline for the Healthier Bakery Fund - open to bakers, butchers and food-to-go makers - is fast approaching \(bakeryandsnacks.com\)](#)
- Press release with quote for Healthier Bakery Fund: [A baker's dozen of Scottish businesses awarded funding to make their recipes healthier | Food Standards Scotland](#)
- Social media posts on vitamin D advice for pregnant women, breastfeeding women and infants and young children to support Scottish breastfeeding week.
- Alana McDonald was a panel member for the discussion on 'Cheap food and mental health' as part of the Festival of Politics (August 2023)
- Laura Wilson participated in an editorial webinar entitled *The impact of reformulation: health hazard or brand boost?* hosted by Bakery and Snacks magazine. There were over 2300 sign ups in advance.
- A press release was issued to coincide with the publication of the Discretionary Foods report which received good pick up across various national press (August)
- Quote in a press release by FDFS to announce successful applicants for the Healthier Bakery Fund (July)