

Public Health Nutrition Strategy

1. Introduction

Improving our population's health by ensuring everyone can access affordable, healthy food has never been more important. Dietary intakes fall short of the majority of the [Scottish Dietary Goals](#) (SDG), with little improvement towards achieving them over the past 20 years. This places a huge stress on both the NHS and society in general as the approximate [costs of treating overweight and obesity](#) in Scotland are estimated to be in the region of £363-£600 million, with wider related costs such as loss of productivity suggested to be between £0.9-£4.6 billion.

The strategy formally sets out our revised approach to addressing our statutory objective to improving the diet of the population in Scotland. It signals a greater focus on measures to influence the food environment supporting healthier and more sustainable options for consumers. At present, the food environment heavily incentivises and promotes low cost foods which over-contribute to energy, fat, saturated fat, salt and free sugar intakes. We must take action to stem the tide of unhealthy food. An improved food environment in Scotland will hasten our progress towards the dietary goals.

2. The rationale for the approach

Reducing diet-related inequalities is essential. Our data shows that those from the lower socio economic groups are disproportionately impacted, with less healthy diets and greater prevalence of overweight and obesity. Actions which create a healthier food environment by making sure healthy, affordable options are always available where we live, work and learn have the best chance of reducing inequalities, and help everyone to live longer, healthier lives.

The causes of poor diet and diet related disease are complex and multifactorial. There is no single policy action that will improve diet and health outcomes. Addressing this and influencing tangible dietary improvements is a lengthy process that requires a broad range of both upstream and downstream activities.

It is essential that we work in partnership to achieve our aims, developing achievable long and shorter term actions to support change. Only by working with national and local government, partners, stakeholders and the food industry, can we realise the necessary improvements to Scotland's health, alongside a reduction in health inequalities.

There is also a growing need to focus on actions that support progress towards net zero emissions targets. The food we eat impacts on the environment, with food contributing around [31% of global emissions](#). We cannot consider diet and health without also considering

the environmental impacts of what we eat, however, the two can work together. Following the Eatwell Guide more closely would not only result in health benefits, but could also contribute to [reduced greenhouse gas emissions](#).

3. Our vision: *A healthier and more sustainable food environment*

What surrounds us, shapes us. Our overall vision is for a food environment in Scotland that puts a healthy diet in reach of everyone, with a reduced environmental impact. This contrasts starkly with the current food environment that is flooded with foods high in fat, salt and/or sugar. More must be done to make healthier options easier and more affordable. Critical to shifting the food environment is changes from the food industry, including rebalancing sales and promotions towards healthier options. Legislative change will have a role, with the forthcoming Public Health Bill, but ahead of mandatory change, we want to work with industry to take up a greater level of voluntary action. Besides retail, the food environment also includes the food and drink we purchase and consume out of home (OOH). As 25% of calories are consumed OOH we will drive changes to improve the provision and promotion of healthier options ahead of any mandatory changes such as calorie labelling on menus.

The strategy has been developed to complement delivery of Scottish Government policy on diet as described in the [Healthier Futures Delivery Plan](#) and [Out of Home Action Plan](#), we will continue to work closely with SG to deliver these commitments. The strategy also supports Scotland's [Public Health Priorities](#), specifically, *A Scotland where we eat well, have a healthy weight and are physically active*. We will continue to work closely with Public Health Scotland (PHS) to deliver joint commitments as outlined in the FSS-PHS strategic partnership agreement. We are committed to working with these partners to deliver our common goals, alongside influencing the food industry to support improvements to the food environment.

4. The foundation

The Strategy is built on four pillars, underpinned by science and evidence:

Pillar 1: will build on our existing dietary monitoring programme and develop a monitoring and surveillance framework. This will draw all aspects of the monitoring and surveillance data together; we will use this to publish progress towards the dietary goals. The monitoring data will be supplemented with bespoke commissioned research projects to address evidence gaps.

Pillar 2: draws on the evidence base, using our skills and expertise to ensure that we continue to be the leading authority on public health nutrition in Scotland. We will provide evidence based recommendations and influence policy development in Scotland to improve the food environment.

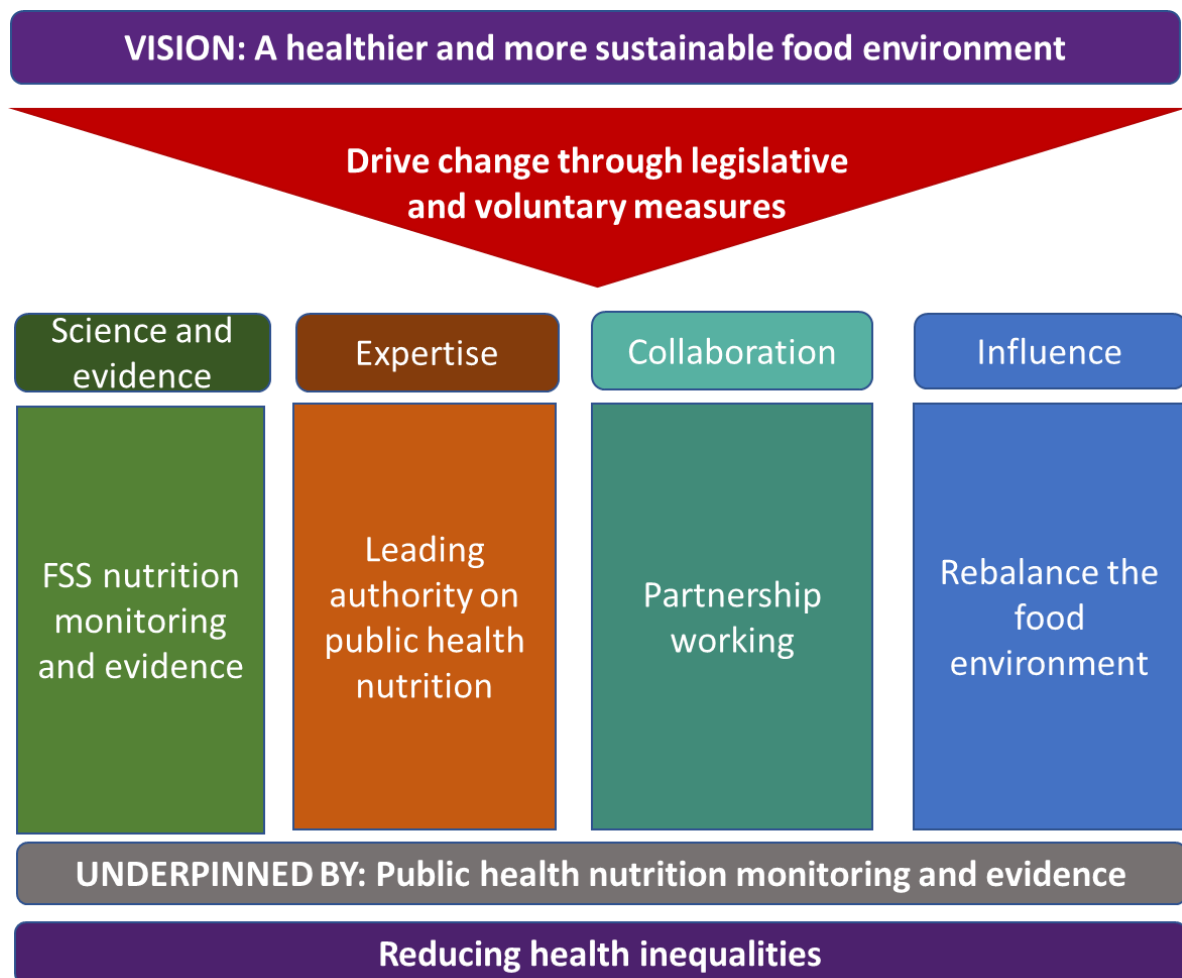
Pillar 3: acknowledges the need for collaboration and partnership working to support progression and implementation of diet policy, we cannot elicit the changes that are required alone.

Pillar 4: details how we will use data to provide the rationale for change by the food industry, including in retail, out of home and manufacturing industries.

Our approach is designed to have a population level effect and reducing diet-related inequalities must be a strategic outcome. We will therefore monitor change over that we require to achieve our vision of a healthier and more sustainable food environment, an overview of the strategy is shown below in Figure 1.

There will be challenges to overcome to deliver the progress that we want to see. The cost of living crisis is affecting everyone, from consumers to the food industry as well as our own capacity to deliver. We need to focus carefully on actions that are likely to have most impact in the long term. Other significant challenges remain too, such as recovery from Covid, managing change as a result of EU exit, and supply chain issues. time to evidence improvements to the food environment. This is essential to support the changes

Figure 1: Overview of the FSS Public Health Nutrition Strategy



5. The 4 Pillars – how we will deliver the strategy

Pillar 1: Science and evidence

Ambition: A world class monitoring and surveillance programme

a. *Develop an FSS dietary surveillance programme*

Monitoring the diet of people living in Scotland allows FSS to assess the impact of policy against the Scottish Dietary Goals and provide expert, evidence-based public health nutrition advice to partners and consumers. Our dietary surveillance programme was instigated in 2004. Since then, both the food environment and data collection methods have radically changed. To meet these new demands and opportunities, we will develop and publish an updated dietary surveillance programme. This will bring together all the strands of our dietary monitoring work, allowing us to identify gaps, commission new surveys and research where possible and use our existing data in new ways.

b. *Strengthen our national dietary intake monitoring programme to maximise the use of Intake24*

We are the only government organisation in Scotland to publish and interpret national data on dietary intake and purchases to inform policy development. We use this data to monitor the impact of policy against the Scottish Dietary Goals and provide recommendations to government based on the most up-to-date consensus science from the advisory committees and drawing from the broader published research evidence base. We have an ambition to grow our role in this space and we will continue to commission surveys to address evidence gaps.

In recent years, we have invested in an online tool, Intake24, to measure dietary intakes and compare estimated dietary intakes with the Scottish Dietary Goals, identify population groups that may be more at risk as a result of their dietary intake and provide an assessment of how this is changing over time. With Scottish Government, we aim to embed Intake24 in the next Scottish Health Survey programme, assuring large-scale, nationally representative surveys of dietary intake. This will allow us to make the most of dietary data collected on a three yearly basis. We can provide Scottish Government and partners with up-to-date analysis of dietary intake in Scotland and advise on policy to improve dietary intake across the population and among disadvantaged groups.

Our broader dietary monitoring programme will address the evidence gaps that we have in relation to dietary intakes, for example in children and young people. We will also look to expand the dietary monitoring programme to include other factors such as climate change impacts, so that we can advise on sustainable healthy diets. To address diet-related inequalities, we will explore ways to ensure that more deprived and lower income population groups are sufficiently represented in Intake24 surveys to inform policy actions to reduce inequalities.

c. A more agile approach to using consumer purchase data

Given the financial constraints that we are facing, we will look to consolidate our requirements for consumer purchasing panel data across Scottish Government and Public Health Scotland, to ensure best value for money. Many teams across Scottish Government use consumer panel data and we will explore how data can be acquired and shared to maximise benefit from the datasets across all three organisations.

Our surveillance programme will be expanded to meet requirements to monitor and evaluate the Out of Home food environment. As set out in the Out of Home Action plan, longer term, this will include calorie reduction as the key indicator of success. We will build on our previous work to capture the energy content of sweet discretionary products by exploring the use of other nutritional data sets for out of home foods. We will alternate our commissions each financial year between retail and out of home data, which will reduce programme and staff requirements.

d. Harnessing digital

In order to make the greatest impact with the data, we will use novel ways of communicating key information drawn from the data including linking data sets and visualising the outcomes using dashboards and infographics. We will champion the use of digital means so that our data has greatest impact to influence dietary policy development, monitoring and evaluation as well as influencing industry to make improvements to the food environment in both retail and out of home.

Intake24 helps us to fulfil digital ambitions, as online data collection and analysis is far quicker and more dynamic than previous methods. We are able to see and share results much more quickly and create data dashboards, such as those created for the [Scottish Health Survey](#), thereby making our work more accessible for others.

We will increase our ability for additional data analysis, both in-house and through external suppliers. We aim to upskill the team in statistical analysis and provide staff with software required for analysis and visual translation of our intake data. The ability to quickly answer policy questions using our data will further enhance our role as the leading authority on public health nutrition in Scotland. With this additional capability, we will be more effective in directing and influencing Scottish Government policies in diverse areas such as retail promotions, the out of home environment and climate change mitigation.

Pillar 2: Expertise - Leading authority on public health nutrition

Ambition: Extending our reach as the ‘go to’ organisation for evidence and advice on public health nutrition.

a. Maintain and enhance our leading role with partners and stakeholders

The Nutrition Science and Policy team comprises of Registered Nutritionists (Public Health), with extensive nutrition qualifications and experience. We will maintain this expertise through continued professional development. Collectively and individually, FSS’ experience and expertise is highly respected within government, academia and influential partners. We have developed excellent partnerships with a wide range of stakeholders from industry, academia, to the third sector.

FSS has a history of making recommendations which are taken on board by government, for example our work on improvements to diet and folic acid fortification have led to real change in policy direction and legislation. Moving forward, we aim to have similar influence on new and emerging issues such as climate change mitigation and the creation of the first Good Food Nation national plan.

We will focus on enhancing the reach and use of our data by continuing to publish shorter briefing style papers summarising our research in a way that is accessible to a wider audience. We will release results of research proactively and aim to ensure they reach appropriate audiences.

b. Strengthen our academic relationships

Our research findings and evidence reviews will be widely disseminated to the scientific community, to increase engagement with academics and contribute to the evidence base. Our data will be presented at scientific conferences to showcase our research findings and the evidence base on diet and nutrition. Alongside this, we will help to maximise the policy impact of Scottish Government RESAS (Rural and Environment Science and Analytical Services) projects to ensure they address policy needs and share the research outputs to support appropriate next steps.

We will continue to ensure that the findings of the Scientific Advisory Committee on Nutrition (SACN) and the Committee on Toxicity (COT) are reflected in diet policy in Scotland. Furthermore, we will highlight and ensure emerging areas of importance identified during FSS and SG horizon scanning are reflected in the SACN forward look (e.g. ultra-processed foods). We will advise Scottish Government and others as required on how SACN risk assessments impact real-life risk management.

c. Maintain and enhance our public profile

We are exploring further ways of bringing our data to life for a wider audience and making our expertise and evidence more visible and accessible. We shall ensure best value in our methodology and maximise the use and reach of existing assets, networks and tapping into social media channels to reach consumers. We will also raise awareness of our evidence and policy recommendations by presenting externally at public events, webinars and conferences.

We will continue to deliver consistent dietary advice using existing FSS tools such as Eat Well, Your Way, incorporating wider influences on diet where possible, for example affordability and the broader impact of the cost of living crisis. We will maximise the impact by reaching out to existing networks to increase awareness and use of the tools rather than focusing on expensive large scale public consumer campaigns.

We will use existing stakeholder networks to disseminate FSS materials and campaigns. This will support increased brand identity to enhance our influence and impact. Alongside our reactive media work, we will proactively engage with Scottish press and publish blogs and thought pieces. When communicating reactively, we will ensure consistency of messaging on a more sustainable, healthy balanced diet and the science and evidence base.

Overall, we will take a bold and assertive approach to external communications on the results of our analysis, data findings and the evidence base. We will challenge the status quo and tailor the tone of the messaging to the audience to ensure maximum impact. We will assert our influence on the SACN to ensure that areas of Scottish policy interest are tabled and addressed by the committee so that evidence based dietary policy recommendations in Scotland are founded on scientific rigour.

Pillar 3: Collaboration and partnership working

Ambition: We will work collaboratively across Scotland and the UK and stakeholders to champion policy to improve the food environment

a. Use evidence to provide rationale for approach to influence and monitor public health policy in Scotland

To be effective in influencing the upstream drivers that support a healthier and more sustainable food environment, we have to work in partnership. The implementation of public health nutrition policy recommendations relies on a close working relationship between FSS and Scottish Government. Pre-existing policy documents demonstrate commitment to joint working with Scottish Government and Public Health Scotland. To further this commitment, we will provide technical expertise to support the development of the Eating Out, Eating Well Framework, the Code of Practice for Children's Menus and Setting the Table, nutritional guidance and food standards for early years childcare providers. We will also continue to support the progression of the Public Health (Restriction of Promotions) Bill.

Public Health Scotland is a delivery partner, with a role in implementing policy changes at local level. Our strategic partnership agreement further demonstrates our organisational intent to support this and many of our joint actions are detailed within the joint plan.

There are a number of additional areas where we have opportunity to influence Scottish Government on diet policy, including the Good Food Nation Act. We will use our expertise to impact across multiple policy areas such as food and drink, mental health, food fortification and supplementation, spatial planning, education, early learning and childcare, sustainability and climate change mitigation. We will raise awareness of the public health nutrition impacts, to ensure cohesive policy-making.

b. Use evidence to provide rationale for approach to influence public health policy across the UK

We already collaborate across UK and devolved government departments to share learning and align policy approaches where possible. For example, we work closely with the Department of Health and Social Care (DHSC) to provide expert advice on monitoring the impact of fortifying flour with folic acid and to share learning on dietary assessment and with Defra (Department for Environment Food and Rural Affairs) on new policy development such as the Food Data Transparency Partnership.

We will strengthen our working relationships with other devolved administrations by seeking alignment with policy areas and direction of travel, where appropriate. This will include exploring opportunities where we can jointly provide advocacy for UK-wide measures to improve public health such as further restrictions on advertising of

products high in fat, sugar or salt, and further taxation. We will use our leverage from relationships with consumer organisations, third sector and the food industry to amplify our voice and maximise our influence on government to implement policy change.

Pillar 4: Influence – Steer the food industry to rebalance the food environment to support health

Ambition: To influence improvements by the food industry through legislative and voluntary change

- a. *Use our evidence to drive the food industry towards creating a healthier and more sustainable food environment through **voluntary** measures*

The food industry, including retail, manufacturing, wholesalers and out of home sectors, have a vital role in shifting the food environment to one that supports healthier and sustainable options for everyone. The only way we will see the scale of change required to improve dietary intake is through changes in the composition, sales, advertising, marketing, availability, affordability and distribution of food in the retail and out of home environments.

We will support improvements to the out of home food environment, encouraging industry to provide calorie information on menus ahead of any legislative requirements by promoting our voluntary guidance for businesses. Through the Eating Out, Eating Well Framework, we will use our data to develop measurable indicators and provide a benchmark for industry which in turn will seek to demonstrate a reduction in calories provided out of home. Alongside this, we will support the promotion and uptake of the Eating Out, Eating Well framework and Code of Practice for Children’s Menus by the out of home sector and specifically in priority areas such as low income communities and outlets visited most frequently. We will use our influence to encourage mandatory uptake of the framework if the impact does not align with our ambitions.

We will support healthier product reformulation in Scotland through the Reformul8 partnership pledge with Food and Drink Federation Scotland. We’ll do this by promoting reformulation in Scotland through our website and social media, and signpost food manufacturers and suppliers to the Reformul8 programme for free assistance and guidance. We will also support UK wide reformulation commitments as outlined by Public Health England/DHSC, to ensure a joined up approach across the UK. We will build on our existing relationship with retailers to establish a set of retailer commitments to improve the sales of healthier food, linking and aligning with the Defra led, Food Data Transparency Partnership that is currently in development.

Government can play a role in ensuring a level playing field through mandatory changes however there is more that each of the sectors can do to facilitate positive change. Ahead of regulation to restrict promotions of foods high in fat, sugar or salt, we will liaise with the retail sector encourage commitments to promote and increase sales of healthier options. We will work with Public Health Scotland to provide recommendations as to how the Scottish Grocers Healthy Living programme criteria can be expanded to include a broader range of food and drinks in smaller local

retailers. As a systems influencer, we will continue to take forward our commitments to support the Peas Please initiative to increase the purchase and consumption of vegetables by promoting the initiative, including when working with the food industry.

b. *Use our evidence to drive the food industry towards creating a healthier and more sustainable food environment through **mandatory** measures*

Mandatory measures imposed by government have been shown to have the greatest impact to influence consistent change across the food environment. For example, the positive progress in a reduction in sugar from drinks in response of the industry to the soft drinks industry levy (SDIL). Our data shows that the impact of the levy has resulted in a 17% decrease in sugar coming from soft drinks between 2014-2018. The UK-wide voluntary reformulation programmes for sugar have not seen the same success however, with the reduction and reformulation programme achieving far less impact with an overall 5% reduction, compared with the goal of a 20% reduction.

There is scope for much more to be done to address the commercial determinants of diet and health. Economic growth is the primary driver of the food industry which does not necessarily align with goals for improving health and sustainability. We will encourage industry to rebalance promotions in the retail food environment towards healthier foods alongside action to improve the out of home food environment and we will monitor the impact of change by industry. If our monitoring data indicates insufficient progress we will present the case for mandatory actions. For example to restrict unhealthy food promotions, to include calorie labelling on out of home food and drink and adoption of mandatory reformulation targets.

We will continue to make bold use our data to ensure that Scottish Government progress mandatory measures to drive food businesses to improve the food environment. Furthermore, we will champion further mandatory measures by UKG, for example by building on the success of the SDIL and including a broader range of drinks within the scope of the levy.

6. In summary

The approach outlined is ambitious and puts FSS at the forefront of public health nutrition in Scotland. While we remain committed to providing consumers with consistent messaging around a healthy balanced diet, we will be building our efforts in supporting positive changes to the food environment, using high quality evidence to drive and monitor improvements. This is a five year strategy and we will review it regularly.