

John Dyson: British Hospitality Association

The British Hospitality Association is the National Trade Association for the Hotel and Catering Industry with membership which includes the major Food and Service Management businesses, every listed Hotel group, Restaurant Chains, Suppliers, Distributors and Retailers

Front of pack, signpost labelling for Food

We do not support the FSA's Traffic Light proposals but have for some considerable time supported GDA's which we believe give more information to consumers on achieving a balanced diet rather than the confusing information provided by Traffic Lights which have been adopted by the retailers in various guises thus adding to the confusion.

The application of nutritional labelling to the out of home, service and hospitality sector

The FSA's scheme for calories on menus has limited application in catering businesses and for sound practical reasons is unlikely to be adopted by mainstream caterers. We do however believe that information presented to consumers in the right way can be helpful and caterers can be encouraged to adopt healthy cooking practices. I was Chair of the working group which developed the Healthy Living Award for caterers in Scotland which has over the last two years been awarded to over 800 businesses. The award has been sponsored by the Scottish government and Consumer Focus and has been supported by the Scottish FSA. A higher level award has now been developed and will be launched shortly. We are aware that English and Welsh Local authorities would like to develop a Heart Beat Award based on the Scottish model which would go across public and private sectors and we will support this approach. The Department of Health has decided to use a different Healthmark for food service in the public sector in England.

We support initiatives to improve the diet of schoolchildren however believe that the school meal service should be radically over hauled and be free to all children in the belief that if you encourage children to have a healthy diet and thereby their parents this will make substantial contribution to the fight against obesity.

Labelling of alcohol to improve awareness of units, guideline limits and pregnancy advice

Our members generally serve alcohol in settings which do not encourage over consumption and the problems which occur as a result. It is unlikely that labelling will have much effect on wine served at the table however we do recognise that this is a major public health problem and action is needed to regulate retail sales together with a programme of education through social marketing initiatives.

Reformulation to reduce salt, saturated fats and sugar on an industry-wide basis

Reformulation is a complex area. We have long supported the reduction in salt intake and have encouraged our members to take steps to reduce the salt served in food in catering establishments. Reformulation by the food industry benefits our member organisations but our members report that even relatively small changes produce a negative reaction from consumers. There are technological issues with respect to the reformulation of saturated fat. In summary this is a matter of taking consumers with the industry and encouraging them through social marketing and gradual changes to reduce their intake of salt, saturated fat and calories.

The reduction of average portion sizes

This is an area where our members report some difficulties and clearly there are perceived value for money issues in family restaurants and therefore competition issues. Nevertheless our restaurant chain members realise that this is an area where progress needs to be made and there is potential for progress on children's menus. We have had early discussions with the FSA on what can be done but so far there has been little progress as it appears that the FSA's resources are concentrating on Calories on menus.

The responsible management of advertising and how this is best achieved for a) Food b) Alcohol

We see no reason to extend the work carried out by Ofcom in this area.

David Poley: The Portman Group

Labelling of alcohol to improve awareness of units, guideline limits and pregnancy advice

The alcohol industry recognises that labels provide an opportunity to educate the consumer through succinct messaging.

To this end, all nine Portman Group member companies (collectively manufacturing over 60 percent of the alcohol sold in the UK) unit label their drinks, promote a responsible drinking message and the Drinkaware website address on their labels and advertising. As a result, this website is now the main source of full and reliable sensible drinking information for consumers in the UK – attracting 100,000 unique visitors per month.

Furthermore, some of our members have also implemented the other two elements of the Department of Health's labelling format, namely the daily drinking guidelines and pregnancy advice. Others, however, have concerns over the provision of such detailed information on the side of drinks containers. The lack of evidence means that some have not yet been convinced that these elements of the voluntary labelling initiative will make a meaningful impact on consumer knowledge and behaviour.

In view of the considerable progress that has already been made by the drinks industry in voluntarily including educational information on labels, and the lack of current evidence to suggest that mandatory health-information labels of the type proposed by the Department of Health would significantly impact on knowledge or behaviour, we disagree that there is a need to make it a legal requirement for companies to carry health and unit information on all bottles and cans.

Any move to make the standard label mandatory through legislation should be based on a full and accurate evaluation of levels of industry adoption of the voluntary agreement. In fact, any move to introduce legislation is actually likely to slow down the process. This is because as soon as the Government indicates its intention to legislate companies are likely to put implementation decisions on hold and wait to see the outcome of the legislation. In particular they will want to find out whether there are differences between the legislative requirements and the current voluntary agreement so they avoid implementing two costly label changes. Legislation would also have to be referred to the European Commission for consultation with other member states. Furthermore, it is also likely that labelling legislation would recognise the industry's legitimate request for a 12 to 18 months transition period to permit existing non-complying packaging to be sold through.

The responsible management of advertising and how this is best achieved for a) Food b) Alcohol

Drinks producers are already comprehensively regulated by the Portman Group's Code of Practice on the Naming, Packaging and Promotion of Alcoholic Drinks and the BCAP/CAP Advertising Codes which are overseen by the Advertising Standards Authority.

These codes (except for the BCAP Advertising Code) are self-regulatory and are therefore sometimes referred to as "voluntary". This term needs to be clarified, however, as it is potentially misleading. The codes are voluntary in so far as the industry has volunteered to impose the restrictions on itself. As is explained below, however, compliance with the codes is mandatory; there is no opt-out for any drinks manufacturer.

The Portman Group's Code regulates a drink's naming, packaging, point-of-sale advertising, brand websites, sponsorship, branded merchandise, advertorials, press releases and sampling. The Code, which is supported throughout the industry, seeks to ensure that drinks are marketed in a socially responsible way and to an adult audience only. The Code has an open and accessible complaints system. Complaints under the Code are ruled on by an Independent Complaints Panel. If a product is found in breach of the Code a Retailer Alert Bulletin is issued asking retailers not to stock the offending product unless and until it has been amended to comply with the Code.

The ASA's regulations prevent television alcohol advertisements from appearing whenever the proportion of child viewers reaches 20% above the national average. This regulation applies 24 hours a day, seven days a week and means that TV alcohol adverts are never placed within programmes aimed at, or with particular appeal to, children. This system of audience profiling is a more targeted and reliable method of protecting under-18s than the imposition of a blanket 9pm watershed, particularly in today's TV-on-demand media environment which allows viewers to record what they like and watch programmes at any time.

Restrictions also apply to the placement of non-broadcast advertising. This does not mean though that alcohol advertising cannot ever be placed in media where under-18s might see it, which would effectively prevent any print or poster advertising for alcohol. Instead, the rules adopt a standard that no more than 25% of the audience should be under-18. We believe that this provides an appropriate balance between the protection of children and advertiser freedom.

The reason drinks companies advertise is to encourage brand switching. Studies have demonstrated that responsible advertising can have a powerful effect on the type of alcohol people prefer but does not encourage either the onset of drinking or potentially harmful drinking behaviour.

The University of Sheffield's report, commissioned by the Department of Health last year, into the relationship between alcohol price, promotion and harm concluded that "there is some uncertainty over the mechanisms linking advertising to consumption, and thus it is unclear whether advertising restrictions can be expected to have an immediate effect on consumption."

Melanie Leech: Food and Drink Federation

Front of pack signpost labelling for Food

The UK has led the debate in Europe on front of pack labelling thanks to the voluntary efforts of food and drink manufacturers and retailers. FDF supports monochrome front-of-pack labelling based on Guideline Daily Amount (GDA) information. Over 80 companies are now using a visually consistent monochrome GDA system in the UK and GDA labels can be found on more than 20,000 SKUs in supermarkets. GDAs are progressively being rolled out across Europe in all 27 EU member states and form the basis for the European Commission's proposals for front-of-pack labelling in the draft Food Information Regulation currently under discussion. .

Industry has invested millions of pounds in the UK to introduce GDA labels and to raise consumer awareness and understanding of them. Our evidence to date shows that consumers have welcomed the introduction of GDA labelling: research carried out by The Mirror amongst its readers shows that 90% are aware of GDA labels and 85% find them easy to understand. 62% claim to have used the labels – to check what's inside the pack they are buying; to pick the product with the lowest amount of a particular nutrient or to compare different products in the same category.

The application of nutritional labelling to the out of home, service and hospitality sector

FDF welcomes the voluntary action by 18 major food retailers to introduce calorie information per portion at point of sale. We support the recognition by government and the Food Standards Agency of the importance of calorie information in tackling obesity: universal calorie labelling is a natural starting point in the debate about how we improve the food literacy of consumers. Calorie per portion information is a core element of the GDA labelling system, but is not recommended for use in the so-called traffic light scheme.

Labelling of alcohol to improve awareness of units, guideline limits and pregnancy advice

We have no particular comments to make here, other than to note that calorie information on pack is also relevant to alcohol from the perspective of tackling obesity.

Reformulation to reduce salt, saturated fats and sugar on an industry-wide basis

The food and drink manufacturing industry is now widely recognised as leading the world when it comes to reformulating products and extending consumer choice. FDF members are committed to continuing to reduce levels of fat, salt and sugar in products, as well as providing lower fat, lower salt and lower sugar options where technologically possible, safe and acceptable to consumers. A recent survey of FDF members confirms that the recipes used for at least £15bn worth of foods have less fat, sugar and salt, compared with 2004. In addition, a further £11.5bn worth of products have been launched as 'lower in' versions.

Whilst our members are committed to continuing their voluntary efforts as individual companies to enhance their product portfolios to provide healthier choices for consumers, it should be noted that competition law constrains the extent to which this can be driven forward as a collaborative effort.

The reduction of average portion sizes

FDF recognises that portion size plays a key role in healthy eating and energy balance and our members are committed to exploring new approaches for individual portion sizes to help reduce over-consumption. By providing a wide range of portion sizes of food and drink products, the industry is offering consumers a choice of products to suit the population's varying nutritional needs and tastes.

The same comment on competition law applies to any efforts to work collaboratively across companies on portion size.

The responsible management of advertising and how this is best achieved for a) Food b) Alcohol

FDF members are committed to marketing their products responsibly. Industry has demonstrated this commitment through adherence to one of the strictest co- and self-regulatory regimes in the world. We believe that policy-making has focused over-much on a negative agenda – seeking to demonise certain products including for example through the use of the FSA's flawed nutrient profiling model. FDF has long been an advocate of genuine partnership between Government and industry to use positive messages to encourage consumers to eat better and to exercise more. We welcome and are encouraged by the early signs from the DH Change4Life social marketing programme, which suggest that this approach can be effective.