

Summary of Responses to Consultation on The Agency's Action Plan on the Promotion of Food to Children

Action Plan	Summary	Respondent	
Food Standards Agency			
<i>General</i>	The proposal is welcomed, and supported has been expressed	ASDA BDA Cancer Research CoC CoOp FA FAW Food Commission FoPH IP379 Leeds CoOp BNF BPC CA NHS-HAD C&H Dieticians FAU FoPH Heinz IP377 NFWI	McCain NCB NCW(GB) RCMA RIPH Sustain The Green Machine NGC NHS Argyll/Clyde NI Education NICVA Southern Health SNAP WFA WFA BMA CPHVA MRC MYP NCC NHSS
	The Action Plan could have been cross-referenced with complementary and evolving Welsh Assembly Government policies and programmes. Clarity is needed between the Welsh National Policy and the UK policy	WFA	
	There is concern that there are not enough resources to implement the Action Plan at a local level	NI Education	
	FSA Scotland have produced specifications for a number of foods, such criteria must be applicable UK wide	Brakes	
	The proposed timescales are seen to be extremely ambitious and unrealistic	BNF Dairy Council	SA Meat Unilever
	The proposed timetable is agreed with	CPHVA	
	There is concern over increased use of artificial sweeteners and flavourings. There should be limits on the use of E numbers, and further guidance should be issued on the safety levels of artificial sweeteners	CoOp IP379	IP381 NCW(GB)
	All food manufacturers and sellers should be licensed by the FSA	Consensus	
	It is believed that children eat much the same products as adults, therefore it has been questioned as to why policy is being developed where it is seen to have a limited impact on improving children's diets.	ASDA BRC	

	This policy suggestion is neither proportionate, accountable, consistent, transparent or targeted, and fails to meet government principals of good regulation	BRC BSDA	
	There is a lack of evidence-base to justify proposed restrictions	BSDA	
	There is concern over current products on the market having to be re-formulated	Somerfield	
	Health claims must only be used once they have been independently scientifically proven	SNAP BMA	
	Policy and legislation is required, guidelines are not sufficient to ensure full "take up"	BDA FoPH IP376 NCW(GB)	NUT SFAC Sure Start (WGC)
	It is felt that legislation may discriminate against "specialist producers" who may, subsequently experience difficulties with manufacturing products	SNAP	
	It is suggested that initiatives should not be limited to children's products, but to all food in general	CoOp NHS-HDA	
	It is suggested that nursery and primary school children should be targeted in this action plan	BDA	
	There is concern that initiatives are not based on evidence and sound science, as this is essential in maintaining the FSA's reputation for objectivity and trustworthiness	BCCCA BNF	Cadbury FDF
	Disappointment has been expressed that the FSA have not taken this opportunity to communicate the benefit of high energy foods as part of a balanced diet, and have instead focused on a series of restrictions	BCCCA Cadbury	
	Along with all proposals, there should be an education programme on improving and increasing knowledge of the importance of a balanced diet	BHA CoOp CPHVA	FDF McCain NI Education
<i>By Autumn 2004 The Agency will develop advice on further action to improve school meals that will cover both the provision of healthy options and how best to promote these options</i>	There is support for this proposal, however, there is need for consideration of this in the wider context; as well as specification on exactly how school meals will be improved	BPC CASH	CH Dieticians Unilever
	Support is expressed for this proposal	RCMA	
	There is a need to educate school catering staff on the importance of balanced diets	MLC NUT	
	There are doubts about the practicality of developing nutrient specifications for school meals	FDF	
	Compulsory standards for school meals must be based on the recommended salt levels that have been set out by SACN.	CASH	
	Drinks aimed at children must also be considered	CH Dieticians	

<i>By December 2004 The Agency will develop guidelines for schools and other publicly funded premises which children visit regularly (such as leisure centres) on healthier choice vending.</i>	Any guidelines proposed, should fit with a "whole school approach" to nutrition and link to DH work	BCCCA BHA BNF CA Cadbury FDF NCC	NHF NHS-HDA NI Education SCC The Green Machine WCC
	Support is expressed for this proposal	RCMA	
	There is concern that children are receiving mixed messages , in terms of what they are taught about nutrition, and what they receive in the school canteen	NI Education	
	The direct and indirect commercial promotion of food and drink high in salt, sugar and fat should be banned	WFA	
	The acceptability of food and drink that is permitted to be brought into school should be specified	WFA	
	A definition for the term "healthier" is required. There is concern about the proposal to classify foods as "more healthy" or "less healthy"	BPC Dairy Council FAU Leeds CoOp NCW (GB)	NHF NHS-HDA RIPH Unilever WFU
	Guidelines must consider that children will need high energy (dense) snacks to maintain their energy and concentration levels	BCCCA BHA Cadbury	FAU FDF
<i>? By March 2005 The Agency will publish nutritional criteria for use by food industry (including the food service sector) that are intended to reduce levels of fat, sugar and salt in foods, product ranges, and meals aimed specifically at children. The Agency will work with stakeholders to develop these criteria, and will subsequently monitor the uptake by the food industry and publish the results.</i>	Publication of Nutritional Criteria is needed for use by the food industry, this would aid in the production of foods which met a certain minimum criteria, thus allowing industry to respond quickly	IP375 RCMA SNAP	
	The concept of nutrient profiling is supported, although there are concerns on how the criteria will be established; portion size should also be a consideration at this stage	BNF McCain	NHS-HDA
	Development of nutrient criteria is seen as a step in the right direction and support for this proposal is expressed	FAW IP375 McCain MRC NCB NCC NHS-HDA	NWFI RCMA SCC SNAP Southern Health WCC
	There is a willingness to work with the FSA to develop such criteria	BFG Somersfield	

	There are no recommendations for levels of sugar and fat (like the SACN levels for salt); therefore the FSA should take a lead on developing these. The SACN should review the population targets for fat.	FoPH NHF NHS-HDA	
	Criteria is required for reduction of fat, salt and sugar	CA	
	Accreditation should be available to industry for producing low fat/salt/sugar goods. This would transfer the onus onto them. Good Practice should be highlighted, showing industry that the FSA is fully behind them. (There should be elements of co-operation and sharing of best practice, as opposed to naming and shaming)	ASDA BCCCA BPC CA Cadbury	Heinz ISBA SNAP
	Criteria must be practical, workable and introduced in stages	Unilever	
	Manufacturers who persistently fail to make appropriate reductions, should be "named and shamed"	CA NHF	RCMA SFAC
	It is unlikely, given the structure of foodservices, with a high proportion of small businesses, that nutritional criteria will be of any practical benefit	BHA	
	Changes to nutrient levels must occur over a number of years to allow consumers to become accustomed to the difference in flavour	BCCCA Cadbury Unilever	
	Formulating food to specific criteria can be a problem for manufacturers, as there are technical constraints and complications in delivering food to such standards	BCCCA Cadbury	Somerfield
	Due to scientific complexities, It is vital that definitions for nutrient profiles are agreed with the support of independent nutrition scientists	MRC NHF Cadbury	
	Support is not expressed for this proposal, and it is hoped that any best practise advice is agreed with the DH and backed by professional nutrition bodies	FAU	
	There is no need to undertake any further initiatives related to these nutrients, as the food Industry already offers a wide range of products with clearly labelled reduced fat and sugar content. Concern therefore exists for the right of choice for the consumers	FDF	
	The FSA should ensure that consistent criteria is used across the food industry, it is not felt that it is appropriate to develop criteria solely for children's food	CA	
	The concept of nutrient profiling has no scientific basis. The proposed EU legislation on Nutrition and Health Claims advises that claims are prohibited on certain foods based on their nutrient profile, this is contrary to the basic principle that there are no good/bad foods, just good/bad diets.	Heinz ISBA	
	There are concerns as to how the nutritional criteria for the use of signposting, will be developed. There is a clear need for scientifically based assessments as opposed to a subjective approach on nutrition	BACC BRC Brakes BNF Heinz	ISBA MLC SFAC Unilever

<i>? By March 2005 The Agency will publish best practice advice on signposting of foods, meals or snacks high in salt, sugar or fat and of healthier options. This advice will be for use by the food industry (including the food service sector). Guidance will also be provided on the use of high, medium and low descriptors on nutrition labelling panels. The Agency will work with stakeholders to develop this advice, and will subsequently monitor uptake by the food industry and publish the results.</i>	Enforcement action is required on Best Practise advice for signposting foods high in salt/fat/sugar	BDA NFWI NHF RCMA	
	There is a need for a consistent approach, to avoid misleading consumers	CA	
	The used of cosmetic food additives in low nutrient foods should be reviewed	WFA	
	Attempts to do this in the past have not been successful. There is little published data about the effectiveness of Signposting schemes, few of these schemes have been properly evaluated	BNF FAU FDF	
	This is seen as a negative marketing message. Emphasising positive behaviour (such as increasing consumption of fibre etc) is seen to be more motivating to customers and have a positive effect on longer term behaviour	4Children ASDA BPC FAU	FDF McCain Unilever
	It may be more feasible to develop a robust range of key nutrients which are of relevance to public health	BNF	
	Signposting should be visually appealing to children	SCC	
	Clearer and more accurate labelling is required as well as signposting as a quick method of distinguishing food stuffs	BMA IP254 N Lanks Council	RCMA Stretch-n-grow WCC
	There is concern that "signposting" foods will mislead consumers, if it does not take into account the total nutrient content of a food or the nutritional requirement of different age groups of the populous	ASDA AVA BCCCA BNF BPC BRC BSDA Cadbury Dairy Council	FAU FDF Heinz ISBA McCain SCC SFAC Unilever
	There will be problems with labelling foods with descriptors, as often, they may not comply with guidance but are valid for child's diet	ACS ASDA	BFG Somerfield
	The proposal for signposting foods is not supported	SA Meat	
	There is concern that the proposal for signposting foods may be too simplistic	BPC	
	The government should push for signposting schemes to be included as part of a review of the EU nutrition labelling directive	CA	
	Support is expressed for this proposal	BHF CA	SCC WCRF

	There is a need for clearer definitions of "high/medium and low salt/fat and sugar", and they should be set by the FSA not industry	BSDA CH Dieticians Heinz NFWI	N Lanks Council PBH2 RIPH
<i>? By March 2005 The Agency will publish best practice advice on the use of nutrition and health claims on food aimed specifically at children. The Agency will work with stakeholders to develop this advice, and will subsequently monitor uptake by the food industry and publish the results.</i>	Additional UK requirements on top of soon to be EU legislation would further disadvantage British businesses against EU competition	BCCCA Cadbury FDF	McCain Unilever
	In order for the FSA to fulfil this action point, it is necessary to have access to nutrition expertise	FDF VEGA	
Schools / other public funded premises			
<i>General</i>	There is support for all these proposal	NCW (GB) NFWI	
	The recommendations of the "House of Commons Health Committee, Obesity, Third Report of Session 2003-04" - are supported	WFA	
	There is a specific need for regulation in this area. The Childrens Food Bill adopts a more robust position on this	Food Commission NUT	Sustain WCRF
	Children should not have to purchase water, due to the demise of freely available drinking fountains in parks and school playgrounds. Bottled water is of similar cost to soft drinks, children inevitably choose the latter	NUT	
	Initiatives such as fair-trade products can be used to improve global awareness of foodstuffs and stimulate interest in children	RCMA	
	School curriculum should include critical viewing skills, to enable children to interpret advertisements	BMA Dairy Council	NFWI
	There should be incentives for support of FSA guidelines	RCMA	
	Awareness amongst children of all ages must be encouraged, i.e. the use of workshops/debates/projects	BHF NFWI	
	Children need to be educated- Food Technology/Home Economics should be a permanent feature in schools and should be one of the first instances where children learn about balanced diets, from year 1 onwards (5+)	ASDA BDA BDA56 BHF Cadbury CASH CH Dieticians CoC CO14 FDF MLC NFWI NHFC255 NHS-HDA	NIAC NICVA NI Education N Lanks Council RCMA Stretch-n-grow The Green Machine Unilever VEGA WRCF WFA WCC

	It is vital to reinforce healthy eating messages at "tuck shops" and points of sales, not only vending machines and school meals	BDA CH Dieticians NUT	PHB256 SCC
	Advertising near school premises should be considered	CH Dieticians	
	OFSTED (and/or DfES and equivalents) must be involved with implementing the action plan and monitoring it as part of their inspection criteria	BDA CH Dieticians MLC NCC	NHF NHS-HDA WFA
	The whole school dining experience needs to be revised, to include better environment, better catering equipment, longer lunch hours etc	WCC WFA	
	Publicly funded bodies and facilities should promote healthy foods	Leeds City Council	
<i>? Schools (and other publicly funded premises such as leisure centres) should ensure that vending machines offer healthier options</i>	Vending machines are a source of revenue for schools; therefore it must be financially viable to opt for healthier options. Children should be encouraged to be involved in this area when it comes to stocking the machines	BDA BNF FAW RCMA	SNAP Southern Health WCC
	This is wholly welcomed, however, action is required now	NGC	
	Vending, tuck shops and breakfast clubs should all be subject to statutory standards framed around appropriate nutritional criteria	NHF	
	If vending machined solely stock healthy snacks, there is the danger of children leaving school in order to purchase unhealthy products	BHA The Green Machine	
	Vending machines must only offer healthy food items	CA CASH CH Dieticians FAW	GCC(NI) NHF WFU
	Choices should also include higher energy dense foods, as children who are more active need to be considered	Cadbury FDF	
	The FSA must work with the Automatic Vending Association. There is a need to clarify the criteria for "healthier" foods, which would be allowed in vending machines	AVA BCCCA Cadbury	FAU RIPH
	Government must ensure that financial or quality guidelines and specifications permit, encourage and demand reference to health standards, otherwise the cheapest or most profitable option is chosen	Leeds City Council	
<i>? Schools (and other publicly funded premises such as leisure centres) should not accept vending machines with branding associated with foods, meals or snacks high in fat, sugar or salt.</i>	Branded vending machines selling unhealthy options should not be permitted in schools	BHF BMA FAW IP254 NHF	NUT SNAP SFAC RCMA
	There is concern that "guidance" is not sufficient to ensure full take up	CA	
	Guidance is required, as well as support for schools who take action	NIAC	
	This is a matter of choice, and should continue to be so	Cadbury	FDF
	Any removal of branding from machines, should not disadvantage the vending machine against tuck shops and other points of sales	AVA	

? Schools should provide and promote a range of healthy options at mealtimes and develop incentives to support them in accordance with the Agency's guidelines.	All school meals should meet certain nutritional criteria and there should be policies in place to support this	CoC NCB NFWI	NUT RCMA
	Schools need an increased budget in order to provide healthier options for school meals	NCB	
	There is a need to educate children on balanced diet and choice	BHA Cadbury	FDf McCain
	There is a need for other settings (youth and community centres, Paediatric/NHS establishments) to be considered	NCB	
	It would be of value if the FSA could estimate the costs and benefits of provision of free nutritious school lunches, as compared to other costs (i.e., cost of obesity)	WFA	
	In theory, this should already be the case-due to the publication of "Nutritional Standards for School Lunches" in 2000. The fact that this matter still needs to be addressed shows that there is a clear need for greater investment in this area	CA MLC	
	Healthy School meals / fruit / milk should be free of charge; subsidised or at low cost, to ensure full take up by children	BMA IP254 N Lanks Council Southern Health	Stretch-n-grow Unilever WCC WFA
	It may not be appropriate to achieve the promotion of healthy foods by publicly funded bodies through regulation. A gradual and carefully planned change is required, as there are concerns that children will just look elsewhere for alternative products	Leeds City Council McCain	
	The use of tokens should be considered, to avoid stigma for children taking free school meals, as well as linking to interactive schemes that reward a healthier choice of food	FAW WCC	
	Increased school budgets will enable schools to provide healthier options.	NCB	
Government and Ofcom (the broadcast media regulator)	Tax advantages for advertising should be removed	CoC	
<i>General</i>	The recommendations of the "House of Commons Health Committee, Obesity, Third Report of Session 2003-04" - are supported	WFA	
	Legislation should be introduced to protect children from advertising and promotions directly targeted at them	SCC	
	VAT should be charged on unhealthy snack foods with little nutritional value	IP379 VEGA WFA	
	There is a need to establish a framework to develop overall coherence and strategic thinking, and cross cutting action across all relevant policy areas at all levels	WFA	
	The Government should consider establishing National/Regional Youth Food Assemblies, so young people can contribute to developing healthy food policy	WFA	

	Levies should be applied, to recover the production subsidies for oils, sugar and dairy fats. The levies should be used to subsidise the distribution and marketing of fruit and vegetables	WFA	
	The outcome of the Ofcom review should not take precedence over the Hastings Review	NHS-HDA	
	Lobbyists will resist government intervention if they perceive that profits will be affected	SNAP	
<i>? Government departments and agencies should not endorse promotional campaigns that encourage children to consume foods, meals or snacks high in fat, sugar or salt.</i>	Campaigns which encourage unhealthy snacking should not be endorsed	BDA NHS-HDA	NI Health RCMA
	Caution is expressed in the "demonising" of certain foods, 80% of children are of normal weight, and this needs to be considered	BHA BPC Cadbury	FDF MLC Unilever
	Strong support is expressed for this proposal	CA	
	Objections from Industry that classification of food leads to "demonising" foods are not convincing, as there are ways of dealing with anomalies	NCC	
	There is a need for consistency in action by government, who say that they do not wish to encourage school children to eat chocolate in order to obtain sports equipment, however, are now endorsing another similar campaign by a leading manufacturer	MLC NUT	
	The existing guidance on government associations with schemes and products does not make specific reference to food promotions. The FSA should work with the Cabinet Office to update and publicise the guidance more widely	NHS-HDA	
	It is important to consider "indulgent" food products, which are usually known by the consumer to be eaten in moderation	Cadbury FoB	
	Macronutrients need to be considered, and snacks high in fat/sugar can be a source of such nutrients	BCCCA Cadbury	
	There should be support from Government and agencies for campaigns that encourage healthy eating	FoB	
<i>? Government should continue to press for the following changes to EU rules:- 1.mandatory nutrition labelling on all foods to include energy, fat, saturated fat, sugar and salt information (rather than sodium) 2.arrangements to prohibit use of nutrition and health claims on foods with adverse nutritional profiles</i>	The labelling of sodium as "salt" is unscientific and misleading. Companies should label sodium, but in addition how much salt that the sodium represents	BCCCA	
	Support is expressed in principle, for this proposal	BBCw	

	Full support is expressed for these proposals	CA NHF WCC	
	In the absence of legislation, FSA guidance on health claims aimed at children is desired	CA	
	Labelling should be written in a language and style that is accessible to children and young people and families, using non-technical language and stating clearly the nutritional content and providing proven and accurate health/nutritional claims.	4Children NCB	WCC WCRF
	Clearer labelling is welcomed and support is expressed	FAU SA Meat	
	If packs are small, companies should be afforded the option of providing the information by other means, such as websites, care-lines or leaflets.	FDF FoB	MLC Unilever
	There is concern for this proposal (2nd point), as it may act as a disincentive for industry to innovate and produce wider range of foods with additional health benefits	FDF FoB	
	There is concern for this proposal (2nd point), as it is felt that there could be a negative impact on children's diet (because of foods like cheese, whole milk, dried fruit etc)	BBCw BFG Dairy Council FAU	FDF FoB MLC Unilever
	Consumers may not be aware of the different types of sugars in foods, whilst education is the key, stricter guidelines are required to prevent industry misleading the consumer	IP382	
	Support is expressed for this proposal	CASH FAW	
<i>? Government should also press for the following change to EU rules: - an improved format for nutrition labelling, including use of high/medium/low descriptors for fat, saturated fat, non-milk extrinsic sugar and salt.</i>	Support is expressed for this proposal	BBCw CASH NCB	NFWI WCC
	This proposal is not supported; food is complex and consumers needs are varied. Information should be clear and concise, in order to enable the consumer to make an informed choice	Unilever	
	The term non-milk extrinsic sugar is not used in the EU, and there is no evidence that there is a difference in the dental or nutritional effect of intrinsic and extrinsic sugars	BCCCA Cadbury	FDF FoB
	The list of nutrients is inconsistent with that of the DH document "Choosing Health", which includes fibre. Inclusion of fibre will create problems with interpretation (high fibre is associated with health)	ASDA BNF	
	Intrinsic milk sugars should be included as part of labelling of sugar content in foods	IP383	
	There is concern from the perspective of developing a coherent and scientifically robust approach that is relevant across industry.	BNF	

<p>? Government and Ofcom should note the Agency's view that:- action to address the imbalance in TV advertising of food to children is justified</p> <p>- action on advertising during children's TV slots would be likely to have some beneficial effect and that wider action might also be justified, depending on the evidence generated during Ofcom's review</p> <p>- action on the relative amounts of advertising for foods, meals or snacks high in fat, sugar or salt and for healthier foods, and the times at which these adverts are scheduled, is likely to be the most effective option to address the imbalance. Further consideration of possible actions will however follow Ofcom's recommendations.</p>	<p>There is concern about the extent to which television advertising in its content, frequency or scheduling has been demonstrated to exert a meaningful influence on children's diets</p>	<p>BACC BSDA Dairy Council FAU FDF</p>	<p>FoB Heinz ISBA MLC</p>
	<p>Government and Ofcom should do more than just "note" the Agency view that various actions should be taken on advertising</p>	<p>SFAC</p>	
	<p>The conclusions of the Hastings report (2003) are deemed to be unsound in terms of being the basis for policy making. The FSA should focus on the other factors such as parental attitudes and taste</p>	<p>FAU FDF FoB</p>	<p>Heinz ISBA</p>
	<p>The FSA is urged to resist any suggestions that action should be delayed, pending further research. It is more appropriate for the FSA to assign the burden of proof to the food and advertising industries to demonstrate that their activities do NOT contribute to problems in children's diet/health</p>	<p>NHF</p>	
	<p>It must be recognised that expectations must be tempered as to what influence the change in television advertising, regulation and scheduling will have to changes to the overall health of children and influencing a healthier diet.</p>	<p>BACC BPC Cadbury FAU FDF</p>	<p>FoB Heinz ISBA MLC</p>
	<p>Ofcom should be taking more initiative in this area.</p>	<p>FAW</p>	
<p>? Ofcom should also note that: - it should review arrangements for regulation of sponsorship of programmes</p>	<p>There is no objection to this review, however loss of sponsorship by certain manufacturers might lead to a loss of quality programmes which have been traditionally sponsored by the food industry</p>	<p>FAU FDF FoB</p>	
	<p>Government should recognise and acknowledge that the foods promoted to children are dominated by those that are high in sugar/fat/salt; and that children have the right to grow up, free from commercial pressures to buy such foods</p>	<p>Food Commission Sustain WCC</p>	
	<p>There is full support for this proposal</p>	<p>Food Commission NCC</p>	<p>Sustain</p>
	<p>It is recommended that Ofcom include a new section with rules and guidance on children and food advertising</p>	<p>NHF</p>	
	<p>Advertising regulation should reflect both public policy and concerns, it is appropriate to take a more urgent view of the key risks involved and for advertising regulation to adopt a more precautionary approach</p>	<p>NCC</p>	
	<p>Legislation should be introduced, to protect children from advertising and promotions, directly targeted at them</p>	<p>Food Commission SCC</p>	<p>Sustain WCC</p>

	Support is expressed for the Review commissioned by Ofcom, there is also willingness to consider age-limits of target audiences	Unilever	
	The FSA should recognise Ofcom's leadership and expertise in this area	BCCCA Cadbury FAU FDF	FoB Heinz ISBA
Broadcasters / Media			
<i>General</i>	The recommendations of the "House of Commons Health Committee, Obesity, Third Report of Session 2003-04" - are supported	WFA	
	There are concerns as to how much influence can be brought to bear on the various agencies to implement the proposals	SFAC	
	Disappointment has been expressed that there are not specific actions to reduce direct marketing to children of foods, which are high in fats, salt and sugar.	Leeds City Council	
	Care is needed over the definitions of "healthy" and "healthier" , in terms of promotion	Leeds City Council	
<i>? Public sector and commercial broadcasters should exploit programming opportunities to promote healthy eating to children</i>	The media should be utilised more to promote healthy eating, and education on nutrition as well as highlight persistent failings of industry / certain manufacturers	4Children BHF BMA NCC	NFWI RCMA Southern Health WCC
	There is potential in this proposal, it would be of value to evaluate the effectiveness of such initiatives	MoL	
	Programme makers should write healthy eating practises into children's programmes	NI Health (one respondent)	
	There is support for this proposal	CA SCC	
	A government led multimedia public health campaign in which the food industry's marketing skills could be utilised, has been proposed	BHA Cadbury FAU FDF FoB	Heinz ISBA NCC NFWI Unilever
	Revenue is made from advertising, a strategy is needed to prevent TV channels from advertising unhealthy products	SNAP	
	There must be clear guidelines for which foods fall into which categories, in terms of what will be allowed to be advertised at what time of day	BACC Heinz	ISBA
<i>? Others should follow the example of the BBC Worldwide initiative to consider introducing nutritional criteria for use of characters from its children's programmes</i>	This proposal is fully supported	BHF CA GCC(NI) NFWI	RCMA SNAP WCC
	Further information about methods of vetting food products, for children of all ages, would be welcomed	CLOs	
	There is an understanding of the need to improve children's diets, however a clear lead from Government is required.	CLOs	

	Definitive guidance from an independent body (i.e., FSA) is required, as to what sorts of food and drink products are suitable for promotion to children	CLOs	
	Restricting or banning the use of characters from some food advertising would be a missed opportunity to use them in promoting a positive diet	BACC	
	Character licensing organisations would welcome a concise update on the current state of play on children's food composition, recommended daily allowances etc	CLOs	
	Voluntary agreements alone will not achieve the best results, statutory legislation is required	Food Commission NHF	NUT Sustain
	This is not seen as practical, in light of the difficulties foreseen in developing nutritional criteria	FDF FoB	
	It is recommended that the FSA and the WHO determine the criteria for character licensing	NHF	
The ASA			
<i>General</i>	The recommendations of the "House of Commons Health Committee, Obesity, Third Report of Session 2003-04" - are supported	WFA	
	Sponsorship of programmes should be strictly regulated to ensure the "big five" (confectionery, pre-sugared cereals, fast food, soft drinks, and savoury snacks) do not get prime time viewing. The timing of adverts should be regulated/monitored	4Children CA CASH CoC IP376	NCF NHS Argyll/Clyde RCMA RIPH
	Advertising and marketing of unhealthy products to children should be banned, there is growing public support for controls on target marketing to children	CASH Food Commission Leeds City Council NCB NFWI NHF	NUT N Lanks Council Stretch-n-grow Sustain WCRF
	The ASA should be replaced by an independent national body, that examines claims and adverts for foodstuffs	VEGA	
	There must be clear guidelines on the wording permissible for promotion of foodstuffs to children	BHF	
	Action is required to strengthen the ASA codes and ensure that the Ofcom codes do not differ	NHS-HDA Unilever	
	There is concern that there will be limits to the advertising of new innovative products, which would limit their success	Cadbury	
	Legislation is required to protect children from advertising and promotions, directly targeted at them	Food Commission NFWI	NUT Sustain
	Health professionals should work with advertising agencies	BMA	

? <i>The Advertising Standards Authority should keep the arrangements for regulation of food advertising to children using new media such as internet and mobile phones under review</i>	Controls of promotion should go beyond that of advertising, guidelines should advise against target marketing including the use of subliminal advertising, and the use of SMS/Internet- which need tighter regulations	4Children BDA56 CASH FAW Food Commission	GCC(NI) NHF NUT RCMA Sustain
	There is full support for this proposal	BHF	SCC
	The ASA should positively discourage the use of new media	SFAC	
	It is outside the remit of the ASA to monitor website content	ASA	FAU
	Government should also be involved in monitoring new media	CA	
	It would be seen as discriminatory to prevent foods/selected products from being advertised	MLC	
<i>In the mean time, advertisers should use new media opportunities to promote healthier foods</i>	The use of mobile phones as a means of advertising to children is not agreed with	ASDA	BNF
	There is scepticism about the likely effectiveness of the promotion of healthier foods	NHS-HDA	
Food Manufacturers/Retailers/ Food Service			
<i>General</i>	Support is expressed for all proposals, however, concern exists	BNF	RCMA
	Strong support is expressed for these proposals	NI Health	Southern Health
	Best practise advice is also required for adults	RIPH	
	Appropriate legislation is required to ensure full uptake of proposals	BHF Food Commission NHF	NUT Sustain WFA
	Pricing strategies need to be considered, i.e. reversing the price difference between white and wholemeal bread by cross-subsidisation	FoPH	
	The FSA are urged to recognise the wide range of initiatives which industry have already undertaken	BPC	
	Industry has already taken action in many of these areas for example, removal of confectionery from checkouts, developed child and normal ranges which follow strict criteria (Whitbreads), have conducted trials for reducing percentage fat in products (Brake Brothers)	BRC Cadbury	CoOp FoPH
	Consideration must be given to the acquisition of new stores, which may delay conformation with policy	CoOp	
	Initiatives which have been pioneered by retail initiatives will now have policy in place with the backing of the FSA, which will be helpful for implementation across industry	CoOp	
<i>The Agency should work with food manufacturers and retailers to develop and encourage uptake of best practice advice on:</i>			
<i>General</i>	Health professionals should work with Manufacturers	BMA	
	Financial incentives should be offered - i.e. tax breaks/ grants / loans should be offered to industry to ensure support from the beginning	Hull City Council NCC	SNAP

	The use of Guideline Daily Amounts (GDAs) on packs is preferred. Along with improvements in labelling, this will give the consumer the choice	BFG BHA	Unilever
	It is of great concern that in trying to force a cultural change in consumer attitudes to food; product placing and the availability of fresh produce in stores may be considered. This may cause problems for small stores	ACS	
	It is important to look at portion size of foods	FoPH NHS-HDA	
	A best practise plan is required (i.e. specific targets for salt/fat/sugar reduction) to assist with the Action Plan, manufacturers are more likely to take advice on commercially viable healthier products.	CH Dieticians	SNAP
<i>use of front of label signposting of foods or snacks high in fat, sugar or salt and of healthier children's choices</i>	There is concern, in particular, about the reliance on developing nutrient criteria and product signposting as a means of delivering behavioural change	ACS	BNF
	Fully support this proposal, and is pleased that a competitor is trialing the system that was initially used by CoOp	CoOp	
	This should apply to all foods, not just foods aimed at children	CA N Lanks Council	
	There are practical issues to consider such as colour coding of foods. If signposting is purely colour based, people with red/green colour blindness and other visual imparities will be at a disadvantage	Unilever	
	Such descriptors could lead to misconceptions due to the variables involved (age/health/portion size/ level of activity of children)	AVA Cadbury FDF	FoB McCain Unilever
<i>reducing the amounts of fat, sugar and salt in foods and product ranges aimed specifically at children</i>	This should be part of a wider initiative to address all food products	CoOp NHF	
	Strong support is expressed for this proposal	NHF	
	Convenience "lunchbox" meals should be assessed, as they contain high levels of salt	CA	SNAP
	Consideration needs to be given to other regulations which state compositional criteria for foods such as chocolate, which is required to have at least 25% fat	Cadbury	
	Convenience operators are severely limited in their ability to influence the content of fat, sugar and salt in stocked products, as many local stores do not retail "own brand" foods	ACS	
	There are organoleptic (taste) factors to consider with this proposal	SA Meat	
	Support is expressed for reduction of salt in children's products	CASH	NFWI
	Salt reduction is achievable, but must be balanced against shelf life/food microbiological safety issues	SA Meat	SFAC

	Practicality of manufacture, acceptability of the end product and an acceptable return on investment are essential factors to consider when changes are made to products	McCain	
	Where self-regulation proves ineffective, the government should reserve the right to compel reductions through stronger regulations	4Children CoOp	Leeds
	Industry always responds to and is committed to consumer needs; and already offers a range of products with reduced / no added sugar (fat and salt in relation to foods). There is a need to consider the very diverse needs of the populous	BSDA FAU	FDF FoB
	Caterers need to be educated about the nutritional needs of children	BHA Brakes	MLC NUT
	Forcibly reducing fat, sugar and salt may not be appropriate for consumers who do have a balanced diet and healthy lifestyle	BHA	Unilever
	Care is needed in terms of addressing the calorific and nutrient requirements of children, who have different needs at different ages	ASDA BBCw Brakes	BSDA Dairy Council
	Encouragement from government would help deliver objectives, which have previously been met with difficulties and opposition from suppliers	CoOp	
	Clear universal guidelines are needed for recommended amounts of fat, sugar and salt levels in products	CoOp FoPH	
	Reduction of either fat or sugar can often see an increase in the other, in some products. The potential difficulty in maintaining product profiles must be considered	CoOp Unilever	
	The alteration of fat/sugar content of certain foods, must be accompanied by education about dietary balance	CoOp FAU	
	The use of artificial sweeteners may encourage consumption of sweet foods, therefore do not necessarily offer a solution to reducing sugar in foods	CoOp VEGA	
<i>use of high, medium, and low descriptors for fat, sugar and salt on foods aimed at children</i>	There is concern that this concept cannot be achieved without compromising micronutrient intake in the overall diet, or possibly escalating eating disorder habits	BCCCA BFG BNF Cadbury FAU FDF	Heinz ISBA MLC Unilever VEGA
	This is strictly opposed as it is thought that the cost to small retailers would be significant	ACS	
	This is accepted and achievable, in the absence of specific legislation, advice from the Coronary Prevention Group was followed	CoOp	
<i>use of nutrition and health claims on foods aimed at children which are high in fat, sugar or salt</i>	Such descriptors could lead to misconceptions and remove the element of choice for the consumer. There is lack of clarity on how this proposal aligns with the EU proposal on nutrition and health claims	Cadbury FDF	FoB MLC
	Claims are aimed at the purchaser, the parent. This is a useful route of communication for relaying important information	MLC	
	The process of identifying healthy and unhealthy foods should be made easier and simpler for children, young people and their families.	NCB	
<i>The Agency should work with the food service sector to develop and encourage uptake of best practice advice on:</i>			

<i>general</i>	Restaurants should offer smaller portions of "adult" food, as opposed to the relatively unhealthy "kids" options	BDA	NHS Argyll/Clyde
	It is hoped that the FSA/DH document "Catering for Health" is incorporated into any best practise advice	BNF	
	Restaurants etc should have commendations for offering healthy options, not just for children - but on the whole menu.	BHF	NFWI
<i>reducing the amounts of fat, sugar and salt in meals aimed specifically at children</i>	How would such foods be defined? It may have to be defined by brand and marketing strategies which would threaten commercial sensitivities	FAU	
	This should apply to all foods, not just foods aimed at children	ASDA CASH CoOp	Dairy Council NCC RIPH
<i>use of menu/notice signposting of meals high in fat, sugar or salt and of healthier children's choices</i>	Children have differing nutrient requirements according to their age	BBCw Brakes	Dairy Council
	There are practical difficulties for small businesses, and it is thought that confusion may arise due to misunderstanding signposts	BHA	
	Support is expressed for this proposal	CASH NFWI	WCRF
Food manufacturers, retailers and the food service sector are encouraged to:			
<i>use promotions which encourage children to make or request repeat purchases (free gifts, token collect etc) for healthier foods</i>	Instore offers for healthier products should be promoted	CH Dieticians FAW	RCMA SCC WCRF
	There are concerns about the maintenance of choice for customers	Leeds CoOp	
	The investment from brands is essential for delivering improvements and promoting physical activity through different mediums. The benefits of promotional campaigns (such as collecting tokens from chocolate) , and research, which follows, should be considered.	Cadbury	
	The food industry will continue to abide by advertising and marketing rules, which ensure that all activity is done responsibly. Willingness to participate in reviewing existing provisions has been expressed, including the promotion of healthier diets and lifestyles	BHA Cadbury	FDF FoB
	Safety issues must be considered when offers of gifts and toys are associated with food products. This may not be practical and is not allowed with store policy	CoOp	
<i>use new media such as mobile phones and the internet to promote healthier foods</i>	This promises to be an effective promotional tool, but it would be more effective to use such techniques to promote healthier diets and what healthier lifestyles entail	FDF GCC(NI)	MLC
<i>use sponsorship (for example, of sporting events for children) only for brands associated with healthier foods</i>	The food industry will continue to abide by advertising and marketing rules, which ensure that all activity is done responsibly. Willingness to participate in reviewing existing provisions has been expressed, including the promotion of healthier diets and lifestyles	BHA Cadbury	FDF
	There is full support for this proposal	CA	
<i>use celebrities, characters and cartoons to encourage children to eat healthier foods</i>	There should be realistic exceptions to this, in relation to "treat" foods, such as cakes / novelty foods	CoOp	

Food retailers are encouraged to:			
<i>General</i>	The issue about schools having limited resources and being persuaded to work with industry (i.e. offers of equipment for purchasing certain foodstuffs) needs to be addressed	BHF CASH	FAW NUT
<i>use in-store promotional techniques, such as reduced prices, for healthier products when promoting to children</i>	It is believed that food promotions should be determined according to company policy, and not regulated by the FSA	BRC	Leeds CoOp
	Retailers may not specifically reduce prices for healthier products aimed at children, other than promotional systems that are currently operated	Somerfield	
	Healthier foodstuffs are more expensive than the unhealthy options, it is difficult to eat well when financial barriers exist	CPHVA FoPH IP379 NCB	NICVA RIPH WFU
	There is a need for controls on how products are displayed and promoted in shops	NFWI	
	Offers should not be allowed on unhealthy foodstuffs	BDA IP254 IP380	SCC Stretch-n-grow WCRF
<i>remove confectionery products from checkouts and, wherever practicable, replace them with healthier options such as fruit</i>	There would be significant problems in removal of confectionery from supermarket checkouts, due to small store lay outs and store policy (reduction of theft, and easy visibility for consumers). Store size should be a consideration for this proposal	ACS CoOp Leeds CoOp	Somerfield
	There is a need to include other snacks and beverages in this proposal		Food Commission
	There is full support for this proposal	CA FAW Food Commission NFWI	NHS-HDA RCMA SCC Sustain
Celebrities and those who license characters and cartoons			
<i>General</i>	There should be guidance or rulings which should be put in place to make it difficult for celebrities to endorse unhealthy products	BHF FAW NCB	NFWI NHF RCMA
	The recommendations of the "House of Commons Health Committee, Obesity, Third Report of Session 2003-04"- are supported	WFA	
	It is necessary to consider what would be the penalties if guidance on the use of celebrities endorsing products, sponsorship of events etc where not upheld?	Stretch-n-grow	
	Celebrities must be made aware of the implications of their actions when promoting unhealthy products	BDA BHF	Southern Health
	Celebrities and the use of characters, must be banned from encouraging the consumption of unhealthy foods	CASH	N Lanks Council
	Sports bodies should encourage / endorse the promotion of healthy foodstuffs	BACC	SNAP

<i>Celebrities and those who license characters and cartoons should use their influence to encourage children to eat healthier options rather than foods, meals or snacks high in fat, sugar or salt.</i>	FSA should encourage celebrities to promote healthier foods, there is potential in this proposal, as there is a need for education on what a healthier diet/lifestyle entails. Differences in nutrient requirements also need to be considered	BACC BNF Cadbury	CH Dieticians FDF WCRF
	There is support for this proposal	GCC(NI) GSK NCB NCC	NCW(GB) RIPH SCC WCC
	This is best dealt with under the Ofcom review	Unilever	
	It is implausible to enforce bans on celebrity endorsement, as it must be considered what the definition of a celebrity is	FA	
	It is not possible to control what individuals (football players for e.g.) endorse, as often commercial relationships are formed with "celebrities".	FA Food Commission	Sustain
Sponsors of events and activities			
<i>General</i>	Health audits of direct and indirect commercially sponsored materials for schools, youth clubs, clinics etc, should be conducted	WFA	
	A voluntary levy of fast food organisations contributing towards supporting sporting activities, in exchange for a lighter regulatory touch, is seen as unacceptable	WFA	
	The recommendations of the "House of Commons Health Committee, Obesity, Third Report of Session 2003-04"- are supported	WFA	
<i>Organisers of events such as sporting events should only accept sponsorship for brands associated with healthier foods.</i>	There is full support for this proposal	CH Dieticians NCC RCMA	RIPH SCC
	Legislation or regulation prohibiting sports sponsorship by food companies would be opposed	FA	
	The investment from brands who sponsor events and celebrities, is essential for delivering improvements and promoting physical activity. Within guidance that allows for benefits of a promotional campaign to be weighed against potential drawbacks, such activities should continue to be permitted	BHA Cadbury FA FAU	FDF GSK Unilever
	It is recommended that organisers of sporting events are encouraged to adopt nutritional criteria in determining sponsorship agreements	NHF	
	There may be a risk that if sponsorship is restricted to healthy brands, organisations which offer choice may become excluded	Leeds City Council	
Other Comments			
<i>general</i>	A separate section is required to address "action for parents/carers" - It is vital to involve them at this stage	BHF NUT	
	Poor diet can result due to trauma, i.e. comfort eating, and the presence of 2 family influences due to marriage break-ups. The matters of social and emotional wellbeing also needs to be recognised	BRC FDF	IP378
	The role of small businesses should be considered, (as they are able to react to market changes at a faster rate) the form of assistance they may need to achieve this should be considered.	ACS Leeds City Council	

	The FSA and other organisations should work together to promote models for effective local production and distribution of healthy affordable food - and should not portray this issue negatively, in terms of cost implications	Leeds City Council	
	Would like to see more opportunities for young people to be active citizens in their community and to engage and support policy and practice development in this area.	NCB	
	Would like to see more mention of how the voluntary section can contribute in the action plan.	NCB	
	Trade associations can play an important role in promotion of healthy eating. Website activity; direct mail and the use of third party endorsement should be considered	FoB	
<i>lifestyle changes</i>	The key to a successful programme lies in education on a national scale (A broader Public Health Campaign), and change in lifestyle patterns, to include a need to address the importance of physical activity	4Children ASDA BHA BNF BPC BSDA CoOp Heinz Hull City Council FA FAU FDF FoPH	GCC(NI) ISBA MLC MoL NCB NCC NFWI NUT RIPH Unilever WCA WCRF
		WCC NI Education	
<i>affordability</i>	There is disappointment that there is little mention of affordability, except in relation to promotions. The FSA should be making an input into benefit and allowance levels	Leeds City Council	

Public Consultation on the Agency's Action Plan on The Promotion of Food to Children:-

Comments on the Action Plan

Content of Action Plan	Summary	Respondents	
Is it appropriate	The Action Plan is broadly welcomed, and it is thought that the correct areas have been covered, however there is need for constructive comments to be taken on board, in order to improve it and ensure full success	CH Dieticians FAW IP377 NHSS	NHS Argyll/Clyde RCMA WFU
	The title of the plan should reflect that actions are more wide ranging than just the promotion of foods to children	SA Meat	
	There is little direct evidence of the health benefits that may be derived, therefore the impact of the Action Plan should be evaluated qualitatively and quantitatively	MRC	
	It should make reference to existing/proposed strategies, to ensure that it is accepted fully and to reduce the chance of duplication of work e.g. The DH initiatives, NHS, Food in schools etc	BHA BNF IP377 FDF MoL	NHSS SA Meat SCC SFAC
	No reference has been made to the allocation of resources required to underpin the actions	SA Meat	
	This should be part of a single national health action plan, co-ordinated at possibly Cabinet level	BNF	
	It should be made clear that poor diet is only one of the issues which affect obesity, reference should be made to other factors	SA Meat	
	Nutrition targets need to be considered	IP375	
	There is no consideration of consumers with metabolic disorders	VEGA	
	It is believed that the Action Plan focuses too narrowly on aspects of the Food and Health debate, is advisable to promote good health amongst children	FDF	
	The plan is unduly draconian and the overall tone is negative with respect to resolving the issue	Heinz	
Is it addressed to the right people	The plan needs to take into account the wider community- EU and non EU societies may have research and policy models which may be of value.	CoC	
	It is felt that the correct parties have been addressed	CPHVA MRC NHSS	Unilever WFU

	The plan needs to take into account community centres / groups and healthworkers/ public health nutritionists	BDA BNF CoC	IP377 RCMA
	The promotion of foods to adolescents must also be considered	BMA	
	Other Government Departments, who the Action Plan will impact on need to be considered (Treasury, DEFRA, DH, NHS and devolved administrations). There is a need for a "joined up" government approach to the Action Plan	BHA BNF Cadbury FAU FoPH IP377 McCain	MRC N Lanks Council SCC SFAC WFA
	There is a specific need to address parents, as well as children and teaching staff (including head teachers and school governors) and also take into account extended family	AVA BDA56 BHA BHF BNF BSDA Consensus CPHVA IP378 MLC MYP	NCF NCW(GB) NIAC RCMA RIPH SA Meat Sch Nursing/Midwifery Stretch-n-grow Unilever
Areas of Review	Schools/caterers/workplaces and community centres should all be involved, to improve consumer knowledge	CH Dieticians CoC	RCMA
	Physical education, and exercise needs to be considered or the benefits of the Action Plan will not be achieved	4Children CoOp CPHVA FA GCC(NI)	Heinz MoL NHS-HDA Somerfield Unilever
	EU / non EU research and policy should be drawn upon	BCCCA	CoC
	Awards and accreditation for Industry should be a consideration	RCMA	
	FSA should consider preparing an action plan on contaminants in food, as part of a comprehensive approach to improving children's health	Scot CIEH	
	Questions still remain, i.e.- How will success be measured, who will monitor the progress and who is responsible for ensuring the Action Plan is implemented?	CA	RCMA
	Legislation for caterers providing food to schools needs to be considered	RCMA	
	It would make it easier for industry to respond if there were nutrition level targets i.e. zero tolerance on added sugar/artificial colours etc	IP375	

	Parents/carers need to be educated on balanced diets	Consensus IP378	RIPH
	Glycaemic index levels need to be set	IP375	
	Mineral and amino acid fortification of nutrients lacking in the GB diet should be considered at this stage	IP375	
	Ofsted should be involved in monitoring and assessing the ongoing work associated with the Action Plan in schools	IP377	
	There is a need to work closely with other government departments such as DfES, DEFRA, NHS and Treasury	ASDA BCCCA BSDA	Cadbury Heinz IP377
	There is also a need to take a stronger approach at addressing the extent of food promotions to children, especially pre-school children	NHS-HDA	
	The Action plan needs to be more ambitious and take into account the need for reform in transport policy, working hours, a greater provision of nursery care and open spaces	ASDA CoC	Heinz MoL
<u>Effectiveness of Action Plan</u>			
Will It have a positive effect on children's diets?	Yes, but only if the programme is implemented with full support of all stakeholders and continual appraisal and evaluation occurs	Dairy Council MYP NHS Argyll/Clyde NI Health	Scot CIEH RCMA WCC
	It is thought that the plan is wide ranging and may be difficult to achieve	SA Meat	
	Although the best practise guidance could have some effect, the belief is that the Action Plan will not have a positive influence on children's diets.	IP377	
	Yes, an overall positive effect on children's diets will be achieved.	Consensus CPHVA Leeds CoOp	N Lanks Council SFAC WFU
	There is concern that the concept of high, medium and low fat/sugar/salt may cause confusion and lead to unbalanced diets	BHA	
	The Action Plan will not be effective if it is not applicable to consumers for leading daily lives	Unilever	
	Partnership and the need for a co-ordinated strategic approach with a range of key stakeholders is seen as a pre-requisite, for successful implementation	NI Education NI Health	
	It is necessary to make aspects of the Action Plan more specific	CH Dieticians	
What can the Agency do to promote uptake by stakeholders?	Set out clear framework stating who is responsible for developing what	NHS-HAD RCMA	Unilever
	FSA should consider conducting national surveys to monitor the effectiveness of the	Scot CIEH	

	initiative		
	A complete reform of consumer education is required to accompany the measures implemented by industry	BBCw CoC	
	A Nutrition Council is needed to co-ordinate action	CA	
	It is necessary for the FSA to monitor uptake of all recommendations		Cancer Research
	Ongoing dialogue is required between stakeholders		MRC
	In order to be fully effective, it is necessary to set legislation and policy where parties are failing to meet their obligations	4Children Cancer Research IP376 IP377	SA Meat N Lanks Council Sure Start (WGC)
	Issuing awards, "Naming and Praising", accreditation and endorsements would ensure that in terms of credibility and implementation of the Action Plan, it would be in the best interest of stakeholders to stay ahead of their competitors	Dairy Council IP377	MLC
Are there any implications for specific ethnic groups?	Only where cultural / dietary requirements need to be taken into account	RCMA	
	There will be implications for different ethnic and cultural groups, when considering food preparation and acceptable alternatives	CPHVA	
	Different cultures have differing ideas about which foods are important in the diet or not, this must be considered if there are plans to deem foods as "unhealthy"	BHA FDF	N Lanks Council WFU
	Ethnic groups, like other groups have their own culture, but do not need special treatment. Different nutritional requirements are dependent upon genetic make-up	NCW(GB)	
	There will be problems with labelling foods with high/med/low descriptors, as often, they may not comply with guidance but are valid for child's or a vegan/vegetarian diet	ASDA	
	Yes - It is also necessary to include vegetarians / vegans / special diets / special needs, and it is thought that maybe this should be covered as a separate topic in the Action Plan	Consensus IP376 IP377	MYP Sure Start (WGC)
<u>Timescales of Action Plan</u>			
Are they appropriate to set for action by other parties?	Yes, Sufficient time is required to negotiate and consult with stakeholders to ensure that realistic timescales are imposed; and they need to be agreed by both parties (FSA and stakeholder)	4Children CH Dieticians Heinz IP377 MRC	N Lanks Council RCMA SFAC Scot CIEH
	No, it is not appropriate at this stage	Dairy Council	
<i>General</i>	It should be possible to set "end" dates which are enforceable by law	NCW(GB)	
	Clear frameworks and deadlines are required	CPHVA	
	Schools will not be able to implement any guidelines unless they are published immediately - bearing in mind the planning of school term	MLC	

	Different timescales apply, for example:- Bans on advertising; immediate Nutritional standards for schools; 6 months (with audit, 6 months later) Reduction in salt; a 10% reduction each year to achieve FSA target of 6g/day	CASH NHF	
	Complete implementation should be made possible within 2 - 5 years	RCMA	
	Shorter timescales are recommended for healthier choice vending	CA	
	A more realistic timeline would be towards the end of 2005/beginning of 2006 (it would take longer than 6 months to take into account lead times and consumer research)	Unilever	
	Timescales should be set for other parties which should be similar to the stakeholders. There is a need for unity, to ensure realistic support in order to manage the change	CPHVA	
	Shorter timescales should be imposed for more progressive stakeholders, and special rewards should be available for this	RCMA	
	Prompt responses should be required within 30 days, to emphasise the importance of implementation of the plan.	IP377	
	A broadly supported set of criteria could take up to 18 months	4Children FoPH	Heinz
	Action must be taken as soon as possible	WFU	
	There needs to be a period of time for product recipes to be adjusted	Heinz Unilever	
	Given the magnitude of the obesity crisis we would urge that such timescales be viewed as a guide for the last possible date for action, and that wherever possible, action should be completed well in advance of those deadlines.	NFWI NHF	
	It would be prudent to publish agreed best practise guidance on signposting as soon as possible, to avoid inconsistency and expense	MLC	
	They should be short, with unambiguous interim targets which covers behaviour of the consumers in addition to action by manufacturers	IP376	
	It is encouraged that any timetable is consistent with those emerging from the governments "Choosing Health" white paper	BHA Cadbury	FDf
What is an appropriate time for the Agency to examine and report on uptake/action by other stakeholders?	The FSA would need to review its original timetable in order to complement arrangements for stage two of Healthy Schools, which DH and DfES hope will be implemented in April 2005.	NCB	
	On a 6 monthly and per annum basis with monthly updates on the website	RCMA	
	The plan must be reviewed annually, possibly more at the early stages	MRC	
	18 months, to allow time for recommendations for action to be implemented	FoPH	
	As soon as industry submit, a report should be produced, 10 days after the closing date	IP377	
	We would expect to see a report within one year of the launch of the Action Plan.	NFWI	
	Short assessments could be made 4 times a year, with a more significant appraisal on an annual basis	4Children	

IMPACT OF PROPOSAL: Public Consultation on the Agency's Action Plan on The Promotion of Food to Children: - Comments on Regulatory Impact Assessment

TYPE	RESPONDENT	OPTIONS/ FACTORS	COST	BENEFITS	RELATED ISSUES AND THOSE NOT CONSIDERED IN RIA
PUBLIC HEALTH BODIES	FoPH			Cross subsidisation of goods, by reversing the price difference of goods is cost neutral (i.e., white and wholemeal bread) -thus reducing cost of the healthier option	
	BMA				It is impossible to quantify the cost of health to children against the potential loss of revenue in advertising using the proposed cost/benefit analysis
CONSUMER ORGANISATIONS	RCMA			The long term benefit to society outweighs any cost issues for specific areas of industry	For Industry, the reduction of revenue from unhealthy products, would be picked up by increased spending on healthy products
				Local food procurement could be secured	Many schools do not have the capacity or time to deliver the Action Plan on their own
					Small Businesses - new

					areas of business will be opened, as well as threats that new nutritional requirements will bring
MANUFACTURES and TRADE ASSOCIATIONS	Heinz		A "one-of" solution is not foreseen		There is concern about the management of the use of the criteria across industry. FSA should have control
			If the change is minor, and can be included in the next artwork change with no write off costs, approx. £50K per annum		No real benefits are foreseen, as it is believed that consumers only require a limited amount of information on a product (brand and product being the primary factors)
			If the change is major, i.e. significant label change, with no write offs, approx. £80K - £1M per annum		There should be a significant reduction in the amount of information currently required on the pack, so as not to overwhelm the consumer
			If change of labels has to be within the year, incremental costs of £1M are forecasted		
			Reformulation of products are not achievable in one go, costs therefore estimated at £200K per annum		
	FDF	Action for Schools	The FSA should not assume that the returns from vending machines selling healthier foods can be comparable to "full selection" machines (as was the case for the healthier vending machines)		FSA should consider nutrition principles, consumer purchase behaviour and commercial markets before embarking on the Action Plan
			Industry is against nutrient specification for foods, this may result in price increases for school meals or the feasibility of supplying to		

			schools may be brought into question		
		Action for Government and Ofcom	If full nutrition labelling (big 8) becomes mandatory, companies who do not use that format may experience some financial costs. It is vital to maintain several options for provision of nutrient information		
			There may be a disincentive to innovate if products cannot practically reach criteria cut of points for fat/salt/sugar. Having definite criteria does not allow for gradual reduction of macronutrients		
			If claims are restricted on the basis of an adverse nutritional profile, whereby labels have to be amended, companies may experience a fall in market share.		
			Any limitations on advertising may affect small/new companies who may not be able to compete in a fair and competitive environment. It is possible that restrictions would make no difference to current market shares and that any restrictions in advertising would lead to a loss of programming quality.		
		Action for Broadcasters	If foods lower in fat/salt and sugar are not already promoted as being part of a balanced diet and useful for active lifestyles, the cost of involving them in advertising would be significant		
			Regarding nutritional criteria for use of characters, industry cannot sustain production of products that do not sell		
		Action for food manufacturers / retailers and food service sector	Reformulation of products would create increased costs to industry, particularly if action is voluntary. There is concern for reduction in innovation of products, due to not meeting strict criteria		
			Manufacturers who change product recipes drastically may experience a drop in market share, as the taste is noticed by consumers		
			Any option requiring analysis of menus is deemed unpractical; this would be a burden on small businesses and be disproportionate		

			to the net effect of a meal eaten on a less frequent basis		
			Manufacturers/retailers may experience loss of sales if promotions are removed from popular products. Companies that do follow FSA advice may be at a competitive disadvantage to companies who do not		
	ACS	Action for food manufacturers / retailers and food service sector	Investing in refrigeration (for replacement healthier products at the checkout), the supply chain and the space required for credible fresh and chilled foods is not appropriate and affordable for all stores		
	Unilever	Action for food manufacturers / retailers and food service sector	Multiple traffic lights is preferred to single code, however, the inclusion of colours which may not be present on a pack presents additional costs. The colour may not show up on all backgrounds		If additional costs result in benefits to the consumer, they are believed to be justified
			Having definite criteria does not allow for gradual reduction of macronutrients, leading to the consumer to alter choice and potentially add more salt to food		
	McCain	Action for food manufacturers / retailers and food service sector	It is important that any labelling requirements take into account the difference in size, of packaging. Some flexibility may be required in respect of small formats both to maintain legibility and intellectual property rights		
			Incremental costs would be minimal if consideration is given to allow for labelling requirements, package re-design, product re-formulation and a sufficient transition period for re-labelling		
	Cadbury	Action for food manufacturers / retailers and food service sector	A simple reformulation will cost between £35 - £50K per product, complex reformulation (reducing saturated fat) £100K +		
			Many products are manufactured abroad, British manufacturers will lose out to overseas competitors		
INTERESTED PARTIES	IP375		Sections of manufactured foods would not be permitted	Increased innovation would occur, encouraging healthier nutrient profiles	

				The cost of processed foods would increase, thus providing incentive not to purchase.	
	NCW(GB)			The long term benefit to society outweighs any cost issues for specific areas of industry	
ADVERTISING and MEDIA	BBCw	Government and Ofcom	Cost of analysing products to produce required data, and implementation of revised labelling falls upon the licensees who produce products branded with BBC Worldwide characters. Costs are estimated to be minimal providing there is an adequate transitional period		
		Action for Broadcasters	In the short term, the discontinuance of certain foods ("treats") from the portfolio will adversely affect turnover in the first 2 years. A net loss of business remains projected and the initiative is a commercial risk for BBC Worldwide	It is hoped that the introduction of "staple" foods will redress the majority of lost business by the 3rd year	
		Action for food manufacturers / retailers and food service sector	"Healthier" foods must be practical to manufacture, acceptable to the customer and cost effective in terms of manufacturing and marketing		It is important that reformulation and changes are accompanied by expert and co-ordinated efforts to re-educate children's eating habits
			It is important that any labelling requirements take into account the difference in size, of packaging. Some flexibility may be required in respect of small formats both to maintain legibility and intellectual property rights		
			The use of promotions for healthier foods would be considered if the promotions would be revenue-neutral at worst and revenue generative at best		
	ASA	Action for Advertising Standards Authority	It is not anticipated that additional costs will arise		

FOOD RETAILERS					
	BRC	Action for food manufacturers / retailers and food service sector	Approximate cost per product is £25K Approximate cost of labelling is £1K		The FSA should conduct a consumer cost benefit analysis
			It will take 5 years to fully implement the proposals in the Action Plan (with new products with having new labels)		
			Estimated cost of implementation of proposals in Action Plan, within a year is £50M		
				Products imported from Member States may have a competitive advantage, and the products we export may face regulatory boundaries	FSA is called to obtain clearance from the Commission

Public Consultation on the Agency's Action Plan on The Promotion of Food to Children :- List of Respondents

TYPE	CODE	ORGANISATION
CONSUMER ORGANISATIONS	CA	Consumers Association
	CoC	Cultures of Consumption
	Consensus	Consensus Software for FoodCounts
	FAW	Foodaware
	Food Commission	The Food Commission (Publisher of the Food Magazine)
	GCC(NI)	The General Consumer Council for Northern Ireland
	NCC	The National Consumer Council
	NCF	National Consumer Federation
	NCW(GB)	The National Council of Women of Great Britain
	NFWI	National Federation of Women's Institutes
	NICVA	Northern Ireland Council for Voluntary Action
	SCC	Scottish Consumer Council
	SFAC	Scottish Food Advisory Committee
	Sustain	Sustain - The Alliance for better food and farming
	VEGA	Vega Research
	WCC	Welsh Consumer Council
	WFA	Welsh Food Alliance
WFU	Women's Food and Farming Union	
INTERESTED PARTIES	Cancer Research	Cancer Research UK
	IP254	Fi Bird
	IP375	Steve Wright
	IP376	Neville Cramer
	IP378	Gill Ward
	IP379	Saskia Middleton
	IP381	Jo Wright
	IP382	Rosamund Cawte
	IP383	Terry Clay
	RCMA	Riverside Community Market Association
	WCRF	World Cancer Research Fund
MANUFACTURER and TRADE ASSOCIATIONS	ACS	The Association of Convenience Stores
	AVA	Automatic Vending Association
	BCCCA	Biscuit cake chocolate and confectionery Association
	BHA	British Hospitality Association
	BMPA	British Meat Processors Association
	BPC	British Potato Council
	Brakes	Brakes Ltd
	BSDA	British Soft Drinks Association
	Cadbury	Cadbury Schweppes PLC
	Dairy Council	The Dairy Council
	FDF	The Food and Drink Federation
	FoB	Federation of Bakers
	GSK	GlaxoSmithKline Nutritional
	Heinz	H. J. Heinz Company Ltd
	McCain	McCain Foods (GB) Limited
SA Meat	Scottish Association Meat Wholesalers	
Unilever	Unilever UK	
FOOD RETAILERS	ASDA	ASDA Stores Limited

	BFG	The Big Food Group
	BRC	The British Retail Consortium
	CoOp	The Co-operative Group
	Leeds CoOp	Leeds Co-operative Society Limited
	Somerfield	Somerfield
	The Green Machine	The Green Machine (healthy vending machine products)
PUBLIC HEALTH BODIES	BDA	British Dietetic Association
	BHF	British Heart Foundation
	BMA	British Medical Association
	BNF	British Nutrition Foundation
	CASH	Consensus Action on Salt and Health
	CH Dieticians	Dept of Nutrition and Dietetics (City and Hackney Dieticians)
	CPHVA	The Community Practitioners' and Health Visitors' Association
	FoPH	Faculty of Public Health (of the Royal Colleges of Physicians of the UK)
	MRC	Medical Research Council
	NHF	National Heart Forum
	NHS Argyll/Clyde	NHS Trust Argyll and Clyde
	NHS-HDA	NHS Health Development Agency
	NI Health	Collective responses from Northern Ireland Health and Social Services Boards
	PHB256	DPA Protected ID
	RIPH	Royal Institute of Public Health
	Sch Nursing/Midwifery	School of Nursing and Midwifery
	Scot CIEH	Scottish Centre for Infection and Environmental Health
	Southern Health	Southern Health and Social Services Board
ADVERTISING and MEDIA	ASA	Advertising Standards Authority
	BACC	Broadcast Advertising Clearance Centre
	BBCw	BBC Worldwide
	CLOs	The collective comments from a range of Character Licensing Organisations
	FAU	Food Advertising Unit
	ISBA	The Voice of British Advertisers
CHILDREN/YOUTH INTEREST GROUPS	4Children	4Children (formerly Kids' Clubs Network)
	MoL	Children and Young People Unit, Mayor of London's Office, GLA
	MYP	Medway Youth Parliament
	NCB	National Children's Bureau
	NGC	National Governors Council
	NHSS	National Healthy Schools Standard
	NI Education	Collective responses from Northern Ireland Education and Library Boards
	NUT	National Union of Teachers'
	SNAP	SNAP (School Nutrition Action Plan)
	Stretch-n-grow	Stretch-n-Grow
	Sure Start (WGC)	Sure Start West Green and Chestnut
SPORTS BODIES	FA	The Football Association
OGDs / NDPBs / DEVOLVED BODIES	MLC	Meat and Livestock Commission
	NIAC	Northern Ireland Advisory Committee
LOCAL GOVERNMENT / ENFORCEMENT INTERESTS	Hull City Council	Hull City Council

	Leeds City Council	Leeds City Council - Department of Social Services
	N Lanks Council	North Lanarkshire Council