

Anna Mayne  
DEFRA, Food policy unit,  
Area 7E, Millbank  
c/o Nobel House  
17 Smith Square  
London  
SW1P 3JR

24 January 2011

Dear Ms Mayne,

External review on Impact Assessment for Government Buying Standards for Food and Catering products

**I am writing on behalf of the National Heart Forum (NHF) to endorse the detailed submission made by *Sustain: the alliance for better food and farming* to the above review.**

As a coalition of health and non-governmental organisations concerned with the prevention of avoidable chronic diseases - such as cardiovascular disease, cancers and type 2 diabetes - the NHF believes that robust Government Buying Standards (GBS) for foods and food services will play a vital role in ensuring that healthy and sustainable public sector food is procured making a significant contribution to a healthier nation. Healthy public sector meals for all, especially people who need nutritional support such as children, pre-school children in state-run nurseries, hospital patients, and elderly care home residents, will help to reduce the economic burden of diet-related ill-health costing the NHS an estimated £6billion every year.<sup>1</sup>

We would like to highlight some of the major concerns identified by Sustain about the proposed standards, namely that they:

- fail to clarify how standards will be implemented and enforced;
- do not link standards to clearly defined health and sustainability objectives;
- either do not exceed minimum legal requirements, or are not sufficiently ambitious or progressive;
- do not have criteria for which credible and transparent reasons have been presented;
- do not require the labelling of foods with calorie, saturated fat and salt contents at an entry level;
- need to incorporate and be supported by training and appropriate communications;
- will not be mandatory across the public sector;

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<sup>1</sup> Food Matters: Towards a Strategy for the 21<sup>st</sup> Century, Cabinet Office, 2008  
<http://www.ifr.ac.uk/waste/Reports/food%20matters,%20Towards%20a%20Strategy%20for%20the%2021st%20Century.pdf>

- do not include sufficient minimum requirements for the provision of fruit and vegetables.

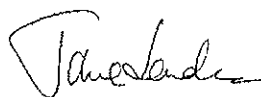
In addition, the NHF supports the recommendation that the development of GBS is informed by lessons from the development of school food standards in recent years; specifically that standards have little impact unless the nutritional quality of the whole meal is tackled. We would also endorse the following comments regarding the detail of the GBS nutrient and health based criteria:

- they contain criteria for nutrients which are not based on a transparent, effective, evidence-based model which covers all food categories and all the most important nutrients/food components relevant to healthy diets;
- they do not allow for specific nutritional needs of specific population groups, such as toddlers, children or the elderly. For example the nutritional balance of meals appropriate to care homes for older people undergoing medical treatment is different from that applicable to staff canteens. Therefore, the NHF believes that specific nutritional and cultural needs of diverse customer groups needs to be built into food standards. We agree with Sustain that the specialist nutrition charity The Caroline Walker Trust's guidance should be used to inform the GBS nutrient and health based criteria.
- There is no clear rationale presented for some of the maximum levels or reduction targets – some are either missing, or else seem to be randomly allocated and are inconsistent with other existing schemes (eg FSA's traffic light labelling, the School Food Trust school meal standards or the FSA/Ofcom nutrient profiling model).

Effective implementation, monitoring and review are vital to ensure that standards deliver change. We support Sustain's view that the standards must be supported by public reporting by public institutions, timely review (recommended after one year, not three) and a clear statement of actions that will be taken if standards are not met.

The NHF agrees with Sustain that these GBS for food and food services need to be made mandatory not only for a third of the food purchased by the public sector, but for all food purchased by the public sector especially hospitals and hospital foundation trusts as well as all schools including the newly created academy schools. We strongly believe that food purchased in all areas of the public sector with taxpayers' money must be required to meet the same mandatory standards as food purchased in central government.

Yours sincerely,



Jane Landon  
Deputy Chief Executive  
National Heart Forum