

## **Annex D: Draft Regulatory Impact Assessment**

### **1. Title of proposal**

1.1 Food Competency framework: food skills and knowledge for children and young people aged 7-9, 11-12, 14 and 16+.

### **2. Purpose and intended effect**

#### **Objective**

2.1 To set out the options for establishing and encouraging a consensus view on the minimum food skills and knowledge that young people should possess, understand and be able to apply by the ages of 7-9, 11-12, 14 and 16+. The intended effect is to contribute towards helping make it easier for young people to make healthier food choices.

#### **Background and rationale for government intervention**

2.2 The Food Standards Agency's Strategic Plan to 2010 'Putting Consumers First'<sup>1</sup> states the key aim under 'Eating for Health' is to enable consumers to choose a healthier diet and thereby help to reduce diet-related diseases. The strategy specifically sets out what the Agency wants to achieve and includes:

- supporting the health, education and other relevant departments in encouraging adoption of the whole school approach to food hygiene, diet, nutrition and food choice<sup>2</sup>

2.3 In addition, in England, the White Paper 'Choosing Health: Making Healthy Choices Easier'<sup>3</sup>, published in November 2004, sets out a range of current health challenges to be addressed. It explains that while we have seen improvements in health there remain important challenges, many of which, such as levels of obesity, heart disease and some cancers, are affected by diet. This work complements that being taken forward as part of the Scottish Executive's Eating for Health: Meeting the Challenge; the Welsh strategy "Food and Wellbeing" and the proposed Food and Nutrition Strategy for Northern Ireland. In England and Wales the National Institute of Clinical Excellence (NICE)<sup>4</sup> has recently published wide ranging guidance on the prevention and treatment of obesity.

#### ***Dietary Health of Young People***

2.4 The National Diet and Nutrition Survey of young people aged 4 to 18<sup>5</sup> showed that the majority of children and young people were adequately nourished in many respects. However, it identified some areas for concern, notably that young people, like adults were consuming too much saturated fat, sugar (in the form of non-milk extrinsic sugar, NMES), salt and less fruit and vegetables than is recommended. It also identified that young

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<sup>1</sup> <http://www.food.gov.uk/multimedia/pdfs/strategicplan2010e.pdf>

<sup>2</sup> Education departments have ultimate responsibility for school and education policy. In the UK the FSA works closely with Education and Health Departments on a range of activities that contribute to promoting a whole school approach to food and nutrition.

<sup>3</sup> Department of Health. Choosing Health: Making Healthy Choices Easier. TSO, 2004.

Department of Health. Choosing a Better Diet: a food and health action plan. 2005

<sup>4</sup> <http://www.nice.org.uk/guidance/CG43#documents>

<sup>5</sup> Gregory J, Lowe S, Bates CJ, Prentice A, Jackson LV, Smithers G, Wenlock R & Farron M. National Diet and Nutrition Survey: young people aged 4 to 18 years. Volume 1: Report of the diet and nutrition survey. London: TSO, 2000.

people were not meeting the recommendations, at that time, for being physically active. Recent surveys<sup>6,7</sup>, primarily looking at how schools were working towards the existing standards for school lunch, continue to illustrate that young people still tend to choose too many foods containing fat and foods and drinks containing sugar, and too few fruits and vegetables and milk and dairy products.

2.5 The potential health risks associated with such dietary practices have been well documented. Heart disease, stroke, joint problems and the commonest form of diabetes (type 2) for example, are direct effects of obesity and overweight. The National Audit Office estimated that in 1998 there were over 30,000 deaths attributable to obesity<sup>8</sup>. The prevalence of obesity is rising for both adults and children, and more children are being found to have type 2 diabetes<sup>9</sup>. Results from the Health Survey for England (2005)<sup>10</sup> shows that, between 1995 and 2003, the prevalence of obesity among children aged 2 to 10 years rose from 9.9% to 13.7%. COMA consider that high levels of fat intake are implicated in the development of obesity and other associated conditions, such as diabetes, heart disease and some cancers<sup>11,12</sup>.

2.6 A high intake of saturated fat is associated with raised levels of blood cholesterol, a major risk factor for coronary heart disease. Increased blood pressure, or hypertension, is the most common outcome that has been associated with high levels of salt intake, and high blood pressure is a major risk factor in the development of cardiovascular disease. High blood pressure is a cause, or contributing factor, in 170,000 deaths each year in England alone<sup>13</sup>. People with high blood pressure are three times more likely to develop heart disease and stroke and twice as likely to die from these diseases than those with normal levels<sup>14</sup>. In Wales, circulatory diseases (mainly coronary heart disease or CHD and stroke) are the commonest form of death responsible for 40% of deaths in 2000 (over 13,400 deaths)<sup>15</sup>. There is extensive evidence that non-milk extrinsic sugar (NMES) is the most important dietary factor in the cause of dental caries. Although NMES is not directly related to the development of cardiovascular disease or diabetes, increased consumption could increase the intake of food energy<sup>16</sup>. Despite the marked fall over time, Scottish CHD and strokes mortality rates remain amongst the highest in Western Europe (10,331 deaths from CHD and 5,801 deaths from stroke in 2005)<sup>17</sup>. It is estimated that nearly a

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<sup>6</sup> Nelson M et al (2004). School Meals in Secondary Schools in England. Research Report RR557. Department for Education and Skills: London.

<sup>7</sup> Nelson M et al (2006). School Meals in Primary Schools in England. Research Report RR753. Department for Education and Skills: London.

<sup>8</sup> National Audit Office. Tackling Obesity in England. Report by the Comptroller and Auditor General. HC 220 Session 2000-2001: TSO, 2001.

<sup>9</sup> Report of a working party of the Royal College of Physicians, Royal College of Paediatrics and Child Health and the Faculty of Public Health Medicine. Storing Up Problems: The Medical Case for a Slimmer Nation. Royal College of Physicians, 2004

<sup>10</sup> Office for National Statistics. Obesity Among Children Under 11, 2005 (at [www.dh.gov.uk/PublicationsAndStatistics/PublishedSurvey/HealthSurveyForEngland/HealthSurveyResults/fs/en](http://www.dh.gov.uk/PublicationsAndStatistics/PublishedSurvey/HealthSurveyForEngland/HealthSurveyResults/fs/en)).

The report uses the UK National Body Mass Index (BMI) percentile classification to describe childhood overweight and obesity among children aged 2-10. Explanation of this measure and details of how overweight and obesity are categorised are given in the technical annex of this report

<sup>11</sup> Department of Health. Dietary Reference Values for Food Energy and Nutrients for the United Kingdom. London: HMSO, 1991. ( Report on Health and Social Subjects, No. 41)

<sup>12</sup> Department of Health. Nutritional Aspects of Cardiovascular Disease. London: HMSO, 1994. (Report on Health and Social Subjects, No. 46)

<sup>13</sup> Scientific Advisory Committee on Nutrition. Salt and Health. London: TSO, 2003

<sup>14</sup> Department of Health. The Annual Report of the Chief Medical Officer of the Department of Health, 2001

<sup>15</sup> National Assembly for Wales. Health in Wales, Chief Medical Officer's Report 2001/2002

<sup>16</sup> Department of Health. Dietary Reference Values for Food Energy and Nutrients for the United Kingdom. London: HMSO, 1991. ( Report on Health and Social Subjects, No. 41)

<sup>17</sup> Scottish Public Health Observatory (ScotPHO) at [http://www.scotpho.org.uk/web/site/home/Healthwell-beinganddisease/chd/CHD\\_keypoints.asp](http://www.scotpho.org.uk/web/site/home/Healthwell-beinganddisease/chd/CHD_keypoints.asp)

third of the population of Scotland aged 16 years and over has a raised blood pressure or a history of high blood pressure<sup>18</sup>.

### ***Influences on food choice and behaviour***

2.7 Personal choice and behaviour are important as they help to make us who we are. These individual traits, though, have potential to directly impact upon the levels of disease in society<sup>19</sup> and hence become very important when considering how to tackle public health issues. Young people are developing in numerous ways and their behaviour towards food and the choices they make represent only part of a myriad of decisions which will influence their immediate and future well being and potential health. These decisions are influenced by many different factors, some of which are fixed, for instance genetic make-up and some of which are modifiable, for instance lifestyle, social and community networks, education, socio-economic, cultural and environmental factors.

2.8 The extent to which most people can change their behaviour is not just related to influencing factors, but also the barriers they face when attempting to engage with change. Hence, engaging young people in changing their food choices requires us to work towards minimising the barriers and helping young people to explore opportunities and to learn the skills and understanding around food. This includes knowing what foods to eat and why; how to read food labelling information and what it means; and why we need to prepare and cook food safely. This implies that young people have access to healthier choices, as without them their ability to act is potentially limited. This is an issue which highlights the requirement for individuals, public services, government, media, businesses and society at large to take responsibility. Progress is being made in part, through ongoing improvements to food provision at schools and reformulation of manufactured foods.

### ***Providing opportunities***

2.9 Most young people spend a significant period of their formative years, at school, in formal education. Schools provide young people with many opportunities to learn about food and health and positive whole school learning experiences exist within the curriculum and potentially before school at breakfast clubs; break time when using vending and tuck shops; lunch time; and after school activities, which may include growing clubs/food and cooking clubs/ and sport clubs. Across the UK there are healthy school programmes, which are helping schools to develop food related activity and policies. However, there is still variation in relation to the availability, depth and extent of opportunities from school to school – some of which is linked to the facilities and services the school can access.

2.10 Whilst schools represent a vital learning opportunity young people have plenty of experiences, outside school, to learn about food and health. Outside the school setting experiences about food include for example eating out, shopping, television, magazines, cooking at home, part time jobs, youth/volunteering activities and going on holiday. The various opportunities to learn about food and health each provide part of the learning for young people.

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<sup>18</sup> Scottish Health Survey 2003

<sup>19</sup> [http://www.hm-treasury.gov.uk/media/E43/27/Wanless04\\_summary.pdf](http://www.hm-treasury.gov.uk/media/E43/27/Wanless04_summary.pdf)

## ***Developing the food competences***

2.11 This RIA deals with establishing a consensus view (across National and local Government, Non-Government Organisations, Educationalists, Parents and Young People) on a framework that conveys a view of the food skills and knowledge that young people should know, understand and be able to apply by the ages of 7-9, 11-12, 14 and 16+ years. These skills and knowledge are framed within four themes of diet and health; consumer awareness; food preparation and food safety (see appendix 1). It also deals with how these will be implemented.

2.12 The framework of skills and knowledge for children and young people aged 7-9, 11-12, 14 and 16+ years builds upon previous Agency led work, in England, (this group comprised the Agency, Design and Technology association, Department for Education and Skills - DfES, Department of Health, National Healthy Schools, Health Development Agency, Qualifications and Curriculum Authority - QCA, Children and Young People's Unit and Planet Science) that developed food competences (Getting to Grips with Grub) for 14-16 year olds<sup>20,21</sup>. Following the development of these competences the Cook it! programme (out of school hours cookery clubs) evolved and was successfully piloted. We are rolling out this programme, now titled 'What's Cooking', in the North East of England. A similar scheme is being piloted within Scotland with a view to a potential further roll out. The aim is to provide practical opportunities for young people to learn more about food and to work towards the competences. DfES has actively supported the existing competences – this has led to the QCA using the competences when reviewing specifications and assessments components for GCSE Food Technology<sup>22</sup> and Home Economics. This was further supported by OfSTED in their report evaluating food technology in secondary schools<sup>23</sup>. Learning Teaching Scotland is using a similar framework to review its curriculum content.

2.13 We know, from evaluation of our cooking club pilot, in England, that the development of opportunities for young people to learn about food and cooking does have a positive impact on aspects of their food knowledge<sup>24</sup>. Our evaluation identified that young people's knowledge and understanding of healthy eating improved – there was also an improvement in their food preparation and handling skills and a greater awareness of food hygiene.

2.14 Developing the food competences to extend to younger children allows us to create a visible set of building blocks. Such a framework will provide a consistent, progressive and cumulative approach that recognises the development needs of young people. Importantly the proposed matrix of minimum skills and knowledge are not tied to any school or education structure or process. To create a clear pathway the associated age ranges do broadly reflect learning outcomes within UK education system. Young people are actively learning about food within and outside of school and wider food experiences, such as through family life, are invaluable for developing practical life skills. This allows for flexibility in how the food competences are used and young people should, depending upon their individual circumstances, have the confidence to accumulate skills and knowledge at their own pace.

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<sup>20</sup> <http://www.food.gov.uk/multimedia/pdfs/gggresearchpaper20.pdf>

<sup>21</sup> <http://www.food.gov.uk/consultations/ukwideconsults/2003/gripswithgrub>

<sup>22</sup> <http://www.qca.org.uk/secondarycurriculumreview/downloads/qca-07-3048-pos.pdf>

<sup>23</sup> <http://www.ofsted.gov.uk/assets/4167.pdf>

<sup>24</sup> Edcoms (2005). Cook it! Cookery Clubs evaluation.

2.15 The available evidence on the dietary habits of young people indicates that a range of action is needed if as a nation we are to tackle and improve the health of young people now and for the future. Eating habits are often set early in life and hence infancy, childhood and young adulthood are critical stages in the development of eating behaviours that will affect people's health in later life. Influencing behaviour and securing a concerted change is a slow process and there are lots of examples of activity aimed at helping to improve the dietary health of young people, such as DH/DfES Food in Schools initiative in England, implementation of standards to provide healthier food in UK schools, healthy schools programmes in Scotland, OfCOM activity to regulate food promotion to children and food/cooking activities including the Agency's Cooking Bus and What's Cooking and in England the School Food Trust's Lets Get Cooking<sup>25</sup>. In England the minimum entitlement to cook<sup>26</sup> will also provide opportunities for young people at secondary school to learn more about food and how to cook.

2.16 Empowering young people so that they can understand information, relate to such activities and apply these to their own circumstances is essential. The framework itself will provide a consensus view of what young people need to know and should be able to do in order to achieve a healthy diet both now and in the future. It also acts as a basis for young people to assess their own abilities along-side their parents and other interested individuals, such as teachers. This can assist in bridging any gaps in their knowledge and skill-base thus better placing them to make informed and reasoned healthier lifestyle choices. We know that young people learn through a variety of ways and at differing paces. The framework of food competences will also help parents, Government, schools, voluntary and community sector agencies to develop innovative and sustainable activities that build upon the learning experiences provided through the education system.

### **3. Consultation**

3.1 The Agency has commissioned the British Nutrition Foundation to develop the food competency framework and to assist with the informal and formal consultative process as appropriate and within Cabinet Office guidelines. The Agency has previously consulted on its Getting to Grips with Grub Food Competences for young people 14-16<sup>27</sup>.

#### ***Informal***

3.2 The Agency has informally consulted, on the draft competency framework, with a number of main stakeholders within the education, food and nutrition sectors that have an interest in the development of young people. The Agency held a workshop on 6 October, with a selection of these stakeholders, including representation from some UK Education and Health departments, School Food Trust in England, Focus on Food, Food and Drink Federation and Primary and Secondary School teachers. In November we sent the second draft framework of competences to these stakeholders as a consensus view. We also invited a range of other stakeholders to provide their initial comments and input – these included Scolarest, Sodexo, The Nutrition Society, Association of School and College Leaders and Consumers Association. The purpose of this informal consultation was to feed into the development of the competences. It also provided an opportunity to explore and acquire input into issues such as the intended audience, cost of implementation and

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<sup>25</sup> [www.letsgetcooking.org.uk](http://www.letsgetcooking.org.uk)

<sup>26</sup> [http://www.dfes.gov.uk/pns/DisplayPN.cgi?pn\\_id=2006\\_0121](http://www.dfes.gov.uk/pns/DisplayPN.cgi?pn_id=2006_0121)

<sup>27</sup> <http://www.food.gov.uk/multimedia/pdfs/summrespgrigrubs.pdf>

mechanisms for delivery. Refer to the British Nutrition foundation report on the developmental approach at appendix 2 for further information.

3.3 Informal 4C's<sup>28</sup> consultations (workshops held July - December 2005) indicated considerable enthusiasm for using food-based activities within schools as well as out of school, but that their inclusion was not assisted by the relatively low profile and curriculum expectations. The proposed key competences could thus come to raise the profile and uptake of food-based activities.

### ***Formal***

3.4 The formal elements of developing this consensus framework of competences involves a 12 week UK-wide public consultation. This seeks input into development of the competency framework and this draft regulatory impact assessment. The interested party list is attached at appendix 3.

3.5 It is recognised that young people are hard to engage and to interest in such consultations. As such, the Agency is utilising its network of 9 school councils in England to capture the views and ideas of primary and secondary aged young people. We will also work with Fairbridge a charity who support and work with inner city young people and St. Andrew's Youth Club in London to explore issues relating to how these young people develop their food skills and knowledge. During 2007, this work will be extended in Scotland – a parallel school council network will be developed with both primary and secondary school representation.

## **4. Options**

4.1 We have identified three broad options:

- Do nothing;
- Publish the consensus view of food competences and encourage a voluntary adoption of their use across all sectors;
- Government to legislate to ensure that young people's food learning experiences (within and external to the curriculum) satisfy the minimum competences set out for each of the four age bands

### ***Do nothing***

4.2 This would mean the Agency taking no further action to support the Getting to Grips with Grub food competences for 14-16 year olds. Effectively this approach would result with these competences standing alone without a progressive framework to support younger children. Other schemes of food competences do exist, such as those produced by the British Nutrition Foundation and those being developed by the Scottish Executive Education Department through Learning Teaching Scotland.

4.3 This RIA concerns the development of a consensus view on the minimum competences and hence will add value to frameworks developed for more specific

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<sup>28</sup> the 4Cs (cleaning, cooking, cooling and avoiding cross-contamination) <http://www.food.gov.uk/multimedia/pdfs/4cstrategydoc.pdf>

purposes. Not taking action at this time presents a risk in that we could see the development and promotion of inconsistent and potentially confusing approaches. This has the potential to undermine work being taken forward to improve young people's education and opportunities to learn about food, diet and health.

### ***The Voluntary Option***

4.4 This option is for UK national and regional Government departments, educationalists, Non-Government organisations and private business to be encouraged to adopt and sign up to the consensus view of food competences. This is the current approach taken with the food competences for young people aged 14-16, which, in England, has seen the Department of Education and Skills support the competences by asking the Qualifications Curriculum Authority (QCA) to use them when reviewing appropriate elements of the curriculum. In developing the competences dealt with in this RIA we have consulted informally with a wide range of key partners. This not only enables the Agency to encourage those involved to use the competences, but importantly has broadened the potential for such organisations and individuals to buy-in to the competences without further encouragement.

4.5 A voluntary approach does not perhaps appear as far reaching as full regulation and some organisations may choose not to incorporate the competences into their policies and activities. However, if key players (such as school and community food policy and those involved in development and proliferation of educational resources and food learning experiences) take a lead then this would provide a platform for development and encouragement of skills and knowledge. Organisations may wish to use the competences as a quality assurance for such activities.

### ***The legislative approach***

4.6 Under this option legislation would be introduced to ensure that young people's food learning experiences satisfy the minimum competences set out for each of the four age bands or those which are applicable. Developing a workable system would itself require consultation and discussion with stakeholders. This could potentially involve a significant undertaking and such a system would need to encompass a broad framework that applies equally to learning experiences at home, societal and community experiences and those through formal education.

4.7 If we considered putting such an undertaking into action we would need to assess the potential role of statutory authorities, such as local authorities and Government Offices in helping to implement and maintain standards within their local and regional communities. Local authorities and Primary Care Trusts have a wide role in the community and as local policy makers they potentially have a significant role in any move to introduce minimum competences within community based food learning experiences. Monitoring and maintaining such a broad consideration would require either self regulation or active enforcement. This has potential to place extra burden on those statutory bodies responsible for inspecting compliance.

4.8 The competences are targeted to support a wide range of activities, though any move to legislate would certainly result in overlap with education and curriculum policy. UK Education departments have responsibility for establishing standards relating to

education and they have taken steps to minimise burdens on the education system – something that such a consideration could impact upon.

4.9 It is evident, however, that positive steps are being taken to ensure that young people have access to healthier food provision whilst attending school. Indeed all four of the UK countries are developing policies with regard to education. In England the Education and Inspections Bill has received Royal assent. In Scotland, the Health Promotion and Nutrition Bill is in final stage for consideration by the Scottish Parliament. The Welsh Assembly has consulted on its Appetite for Life Bill and Northern Ireland have similarly completed consultations on nutritional standards.

4.10 A legislative approach would potentially affect private business involved in provision of food based resources and activities for young people as under such an approach these would have to meet the requirements. This could affect businesses in the food and hospitality sector that either provide part of the school food offer and/or operate such education programmes.

4.11 Ultimately the food competences represent a minimum framework and it is our intention that they are used to add value to and complement statutory standards and frameworks rather than act as a statutory element in their own right.

## **5. Costs and benefits**

### **Sectors and groups affected**

5.1 The development and application of a consensus framework of food competences can help, as part of the wider activity to tackle young people's lifestyles, provide benefit to young people's current and future dietary health. It also has the potential to provide benefits in terms of learning opportunities for young people through use by Education departments in curriculum development. In addition, this work would support each of the four UK countries Healthy School programmes, through contributing to the whole school approach to health, which includes healthier eating.

5.2 Other key sectors and groups affected could include educationalists (teachers, examination bodies, curriculum authorities and Inspectorate bodies), non-government bodies, local and regional government. Health Services primarily Primary Care Trusts provide community learning opportunities, though SureStart and Children's Centres in England and Healthy Living Centres in Scotland may also have a role. Health and regeneration initiatives might also have a role to play through Health Action Zones in Northern Ireland, Beacon Councils, Excellence in Cities and other community initiatives.

5.3 It could also have potential to affect businesses such as those in the food and hospitality industry – particularly those involved in school food provision and those with active programmes aimed at supporting food education and learning opportunities for young people.

5.4 We do not consider that developing a consensus view of the food competences for young people, or the options we may consider for encouraging the use of the framework, would have any disproportionate adverse impacts on, or disadvantage to, any particular racial or social group. The framework is intended for use or application by a broad range of



groups/individuals and is equally applicable within the school, family and wider community setting.

5.5 We have considered the potential for impact upon rural populations and consider that the food competences, and options we may consider for encouraging the use of the framework, will not have a different or disproportionate impact on people living in rural communities.

## **Costs**

### ***Do nothing***

5.5 Under this option we would not take any further action to support the Getting to Grips with Grub food competences for 14-16 year olds. This option is unlikely to provide further support or add value to work to develop food curriculum in the four UK countries and or work to develop community food learning programmes. Those organisations, including the Agency, that are applying the existing competences may still have minimal costs though it is envisaged that these are pre-planned and hence budgeted. Therefore there will be no change in cost to the existing measures in place. There are no administrative costs associated with this option.

### ***The Voluntary Option***

5.6 This approach would see stakeholders voluntarily adopting the food competences and using them to steer delivery of their food activity related to young people.

5.7 Cost associated with a voluntary approach may become evident when organisations begin to explore their activity and the potential it has to deliver all or some of the competences as appropriate to the age group. The potential for impact upon resources and cost will vary depending upon the nature of the organisation or individual and the activity it is undertaking or developing<sup>29</sup>.

5.8 A voluntary approach could potentially affect a business either directly or indirectly. If appropriate to its activity a business may choose to voluntarily adopt the food competences and use them to either steer their product development, which for example could be an education based resource and/or food product(s). They may also consider using the competences to inform their future strategy. A food business whose produce are marketed at young people could potentially be indirectly affected by changes in the food choices made by young people. Our informal consultation identified the latter effect as a possibility, though did not identify any specific cost, for example re-formulation of produce, which organisations may incur in reacting to such developments.

5.9 The Agency considers that under this option any potential development costs can not be attributed to this policy option alone and any cost would only be incurred on a voluntary basis. Organisations regularly review their policies and activity and the food competences represent only a small element of the activity to help improve young people's health through empowerment with skills and knowledge.

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<sup>29</sup> The Education department in England asked the Qualifications Curriculum Authority to use the existing competences for young people 14-16 year in its review of GCSE examinations and development of the Food technology element of the Design and Technology curriculum at key stage 3. The former strand of work included consultation with a group of key players, which cost a £9k.

5.10 The food competences framework can be applied to all learning experiences. In order to contribute effectively to young people's learning there is a potential need to consider the skills of those who may be involved in helping to deliver elements of the framework. Through a voluntary approach it is an organisational responsibility to consider the extent to which they develop their workers. There will be cost and time attached to this development. Whereas schools have responsibility for teacher and support worker development there is not the same support or professional development for others, such as family members, who are involved in empowering young people.

5.11 There is the potential of administrative cost resulting from this option. It is likely that such a cost could manifest itself when organisations, such as local authorities consider using the competency framework. Typically this may involve exploring and assessing the likelihood of their activity and messages delivering the skills and knowledge to young people and therefore some restructuring of their operations (both content and staff wise) may be required. The minimum expectation is that individuals and organisations wishing to use the competency framework will need to read and familiarise themselves with its content. Such action and reference to the framework will involve administration costs. However, as these costs are incurred voluntarily they do not constitute a burden on business or individuals.

### ***The legislative approach***

5.12 Under a regulatory approach food learning experiences aimed at young people would have to be structured so as to meet the food competences (at appropriate age) as proposed in the consensus framework. Those providers of such activities that are not already working towards meeting the competences would therefore incur costs primarily from identifying the gaps and refining their approach accordingly. Providers may also incur associated costs due to training and development of staff/volunteers involved in delivery. Compliance would need to be monitored and enforced, though it would seem reasonable to consider an implementation period so as to manage impact upon cost.

5.13 The total cost of this option would be significantly higher than if adopting a voluntary approach as it offers limited flexibility for development and because it would demand a change across a wide range of stakeholders, including food related businesses. In terms of the national curriculum in English primary schools a statutory revision process, requiring political action, would be needed to make the competences statutory. This would impose large burdens on the Education department, QCA and the 18,000 primary schools.

5.14 This option would also impose administrative costs on Government and regulatory authorities for implementation, monitoring and enforcement and business who produce and market the food. Businesses, due to a legislative approach, would incur administrative costs as they would be required to collate evidence and demonstrate their compliance. Currently we have not acquired actual data on the implied cost of a legislative approach and hence we would encourage those in business, NGOs and enforcement to tell us what these costs maybe by responding to question vi in the consultation letter.

### **Unintended cost and unintended consequences**

5.15 If widely adopted and used as part of an approach to improve children's health we could potentially experience a swing change in young people's food choices towards the healthier options. This could have potential cost implications for those food and retail

businesses with lines aimed at young people. At ages 14-16 there are examples of students being provided with opportunities to gain formal qualifications in food hygiene and nutrition. Such activities which would be associated with progression through the competences framework can lead to a recognised qualification and transferable skills to enhance future employment opportunities.

## Benefits

5.16 The food competences support the wider Government work aimed at improving the health of young people and the 'whole school approach' to promoting healthy eating. It links in effectively with the latest guidance for schools on prevention and treatment of obesity as published by the National Institute for Health and Clinical Excellence NICE<sup>30</sup>. The benefits in terms of health and the reduction in costs to the exchequer are potentially significant; there are direct costs to the NHS and indirect costs to the wider economy from diet-related diseases.

5.17 In England, for the population as a whole, the economic costs of obesity were estimated by the National Audit Office to be around £1 billion a year to the NHS and a further £2.3 to £2.6 billion in indirect costs<sup>31</sup>. In 2002 the House of Commons Health committee updated this estimate to £3.3 – 3.7bn for obesity and suggested that people being overweight may cost the economy a further £3.3 – 3.7bn, resulting in a total cost of £6.6 – 7.4bn per year<sup>32</sup>. Separately it has been estimated that the costs of coronary heart disease, including productivity losses, in the UK in 2003 were £7.9bn (the costs of obesity include only the portion of these costs estimated to arise from obesity)<sup>33</sup>. Additionally, the direct health care costs alone of stroke are estimated to be £1.7bn in 1999 prices<sup>34</sup>. It has been estimated that for the year ending March 2002, obesity and its consequences cost the NHS in Scotland approximately £171m per year<sup>35</sup>. Inclusion of competences that relate to good food hygiene practices could also contribute to a reduction in the level of foodborne disease in the UK. It has been estimated that in 2005 there were over three quarters of a million cases of foodborne illness in England and Wales, at a cost of almost £1.5bn<sup>36</sup>.

5.18 These total costs cannot be attributed entirely to young people's food choices and dietary health. However, education and supporting opportunities for young people to learn about food and health, whether in school or wider community (of which the consensus view of food competences represents a contributing tool) is one element in wider ranging work to improve their current and future health and thereby reduce the prevalence of diet related diseases and even a small reduction would result in substantial economic benefits.

5.19 **Benefits for 'do nothing'.** There are no benefits if we do nothing.

5.20 Young people will still have the opportunity to learn about food through their education and wider societal and community experiences. Also there are other

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<sup>30</sup> <http://www.nice.org.uk/guidance/CG43/quickrefguide/pdf/English>

<sup>31</sup> National Audit Office. Tackling Child Obesity – First Steps : TSO, 2006.

<sup>32</sup> House of Commons Health Committee: Obesity; third report of session 2003-04; May 2004

<sup>33</sup> Petersen S, Peto V, Rayner M, Leal J, Luengo-Fernandez R and Gray A. European cardiovascular disease statistics. British Heart Foundation: London, 2005

<sup>34</sup> Liu JLY, Maniadakis, Gray A and Rayner M. The economic burden of coronary heart disease in the UK. *Heart* 2002; 88:597-603.

<sup>35</sup> Walker A. The cost of doing nothing - the economics of obesity in Scotland. *Robertson Centre for Biostatistics, University of Glasgow*, June 2003)

<sup>36</sup> [www.food.gov.uk/multimedia/pdfspro061001.pdf](http://www.food.gov.uk/multimedia/pdfspro061001.pdf)

independent drivers to influence young people's food choices. These include progress on improving school food and wider approaches to tackling health issues, such as obesity. These independent actions will have an impact upon young people and as with the food competences will contribute to the potential health benefits outlined in paragraph 5.16.

**5.21 Benefits for voluntary approach.** This approach would increase the potential for developing a consistent framework of food skills and knowledge for young people. Encouraging the voluntary use of the competences, in educational and societal settings, will enable interested parties to identify elements pertinent to their aims and activity and hence present them with a more amenable task of development and revision than compared with a legislative approach.

**5.22** A voluntary approach has the benefit of being flexible and is one which allows organisations to adopt the food competences and fit them in with their current approaches/practices. The approach allows them to use their participation with the food competences to their benefit, thus giving them the opportunity to promote their activity as helping young people work towards the food competences.

**5.23** This has obvious potential benefit for engaging young people especially as it is our intention to develop materials specifically aimed at promoting the competences to young people, parents and teachers. Helping young people to learn more about what they should know about food and helping those who work with young people to become more aware of the skills and knowledge young people need to learn is an obvious benefit.

**5.24** We expect that a voluntary approach should provide significantly more health benefits than doing nothing. This approach provides organisations with the opportunity to adopt the food competences and hence we would expect this to filter down and benefit young people. The Department for Education and Skills, School Food Trust and British Nutrition Foundation have already indicated their intention to work positively with this initiative.

**5.25 Benefits for legislative approach.** A legislative approach should bring about the maximum inclusion of the food competences into food learning opportunities aimed at young people. However, as outlined in paragraphs 4.6-4.11, developing a legislative approach compatible with the ethos and aim of the food competences also has the potential to be very complex and burdensome to private, public and voluntary sector.

**5.26** This RIA suggests that a voluntary option provides the best balance of cost and likely benefit.

### **Equality, Sustainability and Environmental Impacts**

**5.27** In considering the sustainability of this proposal we assessed the potential economic, social and environmental impact. Whilst, the economic impacts have been detailed earlier in section 5 we carried out a short sustainability assessment to specifically assess the social and environmental impacts (see appendix 4).

**5.28** There is a direct benefit of this proposal to young people in that it will help empower young people with food skills and knowledge. This can help them make healthier food choices and hence has potentially significant positive benefit to the current and future

health of young people. This may have wider influence on young people's behaviour within the community and could positively influence choice of activity within their leisure time.

5.29 Our informal consultation has considered the different approaches and issues in UK countries. It is our view that the competences represent a minimum framework and that this enables local action to build upon them and deliver them as priorities dictate. The proposal has potential to equally benefit all communities and therefore it is our view that there is not any specific implication for any one such community. However, this proposal does disproportionately affect young people in the community, though as this RIA explores it is our view that this is considered a positive factor.

5.30 The food competency approach encourages young people to have the opportunity to explore and learn about a broad range of foodstuffs. However, we recognise that for a variety of factors some communities will experience food access issues and hence they may not have the opportunity to access a broad range of food. There is potential that the supply and demand effects of the competences could mean that these issues diminish as the proposal is implemented.

5.31 We considered that the competences could help young people and parents to become more aware of food issues, particularly those relating to the food chain, manufacturing and the impact upon the environment. We recognise that young people have potential access to a range of information about food and the environment. The effect of this proposal is hence unlikely to be distinct from the effects of wider activity to improve UK population's food choices and lifestyles.

5.32 We consider that there exists potential significant health benefit for young people and other benefits, such as helping young people acquire food skills and knowledge. Weighing this up against the potential impact, including that on cost, the Agency feels that a voluntary approach could be seen as a relatively sustainable option.

### **Small Firms Impact Test**

6.1 The food competences for young people will, alongside other public health initiatives, help young people make healthier food choices. In considering the potential impact of the food competences upon small businesses the Agency considers that the potential impact and cost could manifest itself in a number of ways, for example it could place a demand upon small businesses to change consumer information, which may include labelling and it may also reinforce the call for manufacturers to re-formulate products. The Agency considers that small firms could adopt the ethos of the food competences over a period of time. This flexible approach would help them control and manage any potential cost associated with implementing policies to account for future trends in the food choices of young people.

6.2 In order to obtain information on the potential impact upon small firms we consulted initially with the Forum of Private Business. Their view was that this would primarily impact on the educational sector and that it was difficult to discern how this would impinge upon the business world. Their preference was for the Agency and other Government partners to encourage a voluntary approach.

6.3 The Agency's Action Plan on Food Promotions and Children Diets, published in 2004<sup>37</sup>, included a wide range of activity to help make it easier for parents and children to make healthier food choices. In developing this action plan the Agency conducted a small firm impact test, which included telephone interviews with a range of small retailers, manufacturers and caterers. It also took into account consultation responses including that from the Association of Convenience Stores.

6.4 The issues covered (labelling and consumer information, re-formulation, promotional activity and impact in schools) were similar to some of those that we anticipate this proposal to have a contributory impact upon. For instance a potential outcome of this proposal could be that young people demand healthier food choices, including during the school day. The small firm assessment explored cost associated with re-formulation and impact on small business operating within the school sector. The assessment found that small manufacturers identified that there was scope to make reductions in fat, salt or sugars content and that minor changes could be made at relatively low costs. Small catering firms providing the food service in schools indicated that they would negotiate contracts based on schools wanting to achieve the desired school food standards and thus accommodate any cost incurred by making changes to dishes.

6.5 In assessing the potential impact on small firms, on the basis of our small firms consultation, the Agency considers that this proposal will not have a significant negative impact in terms of potential cost. We have consulted the Small Business Service who are content with our approach.

6.6 We encourage further participation and are particular keen to hear views from small firms or trade bodies on the cost impact of these proposals – see question v in the consultation letter.

## **7. Competition assessment**

7.1 We consider that this policy has negligible potential for affecting competition within the education and food sectors (see appendix 5). Taking a voluntary approach would mean that the consensus framework of food competences was equally available to all those sectors who were aware of it. Organisations with an interest in products for young people will have an ongoing market and development strategy so should be in an equal position to utilise the food competences thus minimising any impact on potential competition.

## **8. Enforcement, sanctions and monitoring**

8.1 The 'do nothing' and 'voluntary' options would require no enforcement and carry no sanctions, as the action required is voluntary. A legislative approach would require implementation and monitoring at some level, which would impose a burden on schools, local authorities and other Government departments.

## **9. Implementation and delivery plan**

9.1. Under the preferred voluntary option, which would see adoption of the food competences delivery rests with those organisations and individuals providing aspects of food learning opportunities to young people.

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<sup>37</sup> The Regulatory Impact Assessment can be viewed at <http://www.food.gov.uk/multimedia/pdfs/fsa040705a4.pdf>

9.2 It is envisaged that the Agency will encourage organisations to adopt the food competences. The Agency invites further input from respondents to the formal consultation as to how best to do this.

## **10. Post-implementation review**

10.1 The Agency will consider how best to review the food competences in light of consultation comments on implementation.

## **11. Summary and recommendation**

11.1 This is a draft regulatory impact assessment. However, having considered the nature of the food competency framework and the fact that it builds upon a similar existing framework it is of the Agency's opinion that a voluntary approach is the one, which is most likely to yield health benefits in the absence of government induced costs. We would welcome views, as appropriate, on this approach.

### **Contact point**

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Nutrition Policy and Advice  
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[foodcompetences@foodstandards.gsi.gov.uk](mailto:foodcompetences@foodstandards.gsi.gov.uk)

## Appendix 1 - Food Competences

- The competences are a minimum benchmark.
- The competences are progressive and cumulative from one age phase to the next.
- They could be met at home, school or through other activities.
- They show essential knowledge and capability – they are neither a curriculum nor an examination specification.
- The competences reflect UK-wide practice.
- Their aim is to help children to develop the skills and knowledge to make and implement healthy food choices.

	By the age of 7-9, children should:	By the age of 11-12, children should:	By the age of 14, pupils should:	By the age of 16+, students should:
Diet and Health	<p>... be aware that we all need a balanced and varied diet to grow, be active and maintain health.</p> <p>... be familiar with the concept that we all need to eat at least 5 portions of fruit and vegetables every day.</p> <p>... recognise that food and water are basic requirements of life.</p>	<p>... know that a healthy diet is made up from a variety and balance of different food and drinks.</p> <p>... be aware of the importance of a healthy and balanced diet, as part of an active lifestyle.</p> <p>... know that a variety of food is needed in the diet because different foods provide different substances for our health, namely nutrients, water and fibre.</p> <p>... be aware that food needs change and that some people cannot eat certain foods, e.g. allergy or religious belief.</p>	<p>... use current healthy eating advice to plan their own diet, as part of an active lifestyle.</p> <p>... know that food provides energy and nutrients in different amounts; that they have important functions in the body; and that people require different amounts during their life, e.g. pregnancy.</p> <p>... understand the implications of dietary excess or deficiency, e.g. malnutrition.</p>	<p>... apply current healthy eating recommendations, and understanding of peoples' needs, to their own diet and others'.</p> <p>... be able to maintain a healthy weight throughout life, understanding the relationship between diet and physical activity.</p>



	By the age of 7-9, children should:	By the age of 11-12, children should:	By the age of 14, pupils should:	By the age of 16+, students should:
Consumer Awareness	<p>... recognise that all food comes from plants or animals.</p> <p>... recognise that food can be grown at home or purchased from markets, shops and supermarkets.</p> <p>... be able to talk about which foods they like or dislike through tasting sessions.</p> <p>... know that people choose different types of food, based of preference, time and occasion.</p> <p>... be aware that some foods have labels which provide information to help make a choice.</p>	<p>... research where and how their food is produced and sold.</p> <p>... consider different prices of food when helping to cook.</p> <p>... be aware that advertising can influence food choices.</p> <p>... know that people around the world choose different types of food and that this may be influenced by availability, need, cost, culture, religion and peer-pressure.</p> <p>... read and make use of the main information on food labels to help make a choice.</p>	<p>... know that food is produced, processed and sold in different ways, e.g. conventional and organic farming.</p> <p>... compare the cost of food when planning to eat out or cook.</p> <p>... understand the influence of food marketing, advertising and promotion on their own lifestyle.</p> <p>... understand that people eat or avoid certain foods according to religion, culture, ethical belief, health need or personal choices.</p> <p>... be aware that food choice depends on many personal and lifestyle factors, e.g. role models, body image.</p> <p>... use nutrition information on food labels to help make informed food choices.</p>	<p>... consider a wider range of factors when making food choices, e.g. seasonality, local food, sustainability.</p> <p>... apply costing skills to make good food selections for health when eating out or cooking.</p> <p>... make informed choices about food in order to achieve a healthy, varied and balanced diet.</p> <p>... interpret and apply food labels to inform healthy eating choices.</p>

	By the age of 7-9, children should:	By the age of 11-12, children should:	By the age of 14, pupils should:	By the age of 16+, students should:
Food Preparation and Handling Skills	<p>... recognise a range of familiar ingredients, e.g. fruit, vegetables, cereals, dairy, meat, eggs.</p> <p>... name and use a range of basic tools safely, e.g. small knife, chopping board, measuring spoon.</p> <p>.. use a range of food preparation skills, e.g. peeling, slicing, scooping, grating, spreading.</p> <p>... with help prepare a range of recipes safely and hygienically.</p>	<p>... name and prepare a broader range of ingredients, e.g. couscous, lychee.</p> <p>... select and use appropriate tools and equipment safely when preparing and cooking food.</p> <p>... demonstrate an increasing range of food preparation skills, e.g. accurate weighing and measuring, kneading, mixing;</p> <p>... be able to prepare and cook a wider range of dishes confidently.</p> <p>... know how to store, prepare and cook food safe to eat.</p>	<p>... use a broader range of preparation techniques when cooking, e.g. stir-frying, simmering, blending.</p> <p>... use equipment safely, being aware of others' safety.</p> <p>... with guidance modify recipes and cook dishes that promote current healthy eating messages.</p> <p>... understand and use good food safety practices.</p>	<p>... apply skills and understanding competently to plan, prepare and safely cook dishes for a healthy, varied and balanced diet.</p> <p>... modify dishes to promote health through altering or substituting ingredients, and/or by using healthier cooking methods, e.g. removing salt, grilling, steaming.</p> <p>... apply good food safety practices when buying, storing, preparing and cooking food.</p>

	By the age of 7-9, children should:	By the age of 11-12, children should:	By the age of 14, pupils should:	By the age of 16+, students should:
Food Safety	<p>... recognise the importance of preparing and cooking food safe to eat.</p> <p>... be able to get ready to cook, e.g. tie back long hair, wash hands, wear an apron.</p> <p>... be aware that food is stored in different ways to keep it safe, e.g. fridge, freezer.</p>	<p>... know that food safety means preventing contamination, spoilage and decay when handling and storing food, so that it is safe to eat;</p> <p>... understand that raw food may contain micro-organisms that can cause spoilage and food poisoning – proper handling will prevent risks associated with these;</p> <p>... demonstrate good food safety practices when getting ready to store, prepare and cook food.</p> <p>... use information on food labels to store food correctly.</p>	<p>... understand the principles of cleaning, preventing cross-contamination, chilling, cooking food thoroughly and reheating food until it is piping hot.</p> <p>... plan and carry out, using good food safety practices, storage, preparation and cooking of food.</p> <p>... understand and use date-mark and storage instructions on food labels.</p>	<p>... implement good food safety when handling, preparing, cooking and serving food, e.g. keeping raw and cooked food separate to avoid cross-contamination;</p> <p>... apply food safety information on food labels when buying, storing and consuming food.</p>

# A Report to the FSA on the Development of Core Food Competences for Children Aged 5 to 16 Years

January 2007

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## 1.0 Executive Summary

- The FSA *Getting to Grips with Grub* competences were used as the basis to develop further competences for children aged 5 to 16 years.
- A review of different curriculum requirements, as well as meetings with teachers and government organisations, helped to shape the first draft.
- A one-day working event was held with invited key stakeholders to review and discuss the draft competences. This included representation from government, schools, professional organisation, charities and industry.
- The one-day event established that there was a consensus that the competences were age appropriate, allowed progression and covered pertinent key facts and skills.
- The group indicated that:
  - support resources would be required to help individuals apply/teach the competences;
  - any language/terminology used should not date the document;
  - it should be appropriate for all children throughout the UK.
- Building on the one-day event, letters inviting comments on the revised competences were sent to a wider group of stakeholders. This included non-government organisations and industry.
- Feedback indicated that there was support for the competences. In addition, advice was provided on:
  - ensuring greater progression of understanding;
  - use of appropriate language;
  - food competence coverage of important issues.
- Groups also expressed interest in using the competences to help pitch their own information to different age groups in the future.
- The competences were further reviewed with the expert advice provided, ready for formal consultation.

## 2. Aim

To define the core food competences that children should know, understand and apply by the ages of 7, 11, 14 and 16 years.

### 2.1 Objectives

- To define and draft core food competences.
- To convene a one-day working event to ratify the competences.
- To provide FSA with competences, and basis of consultation package for a public consultation.
- To collate responses from the consultation, making changes to the competences where necessary.
- To deliver the competences, and a report of the work, to FSA.

### 3.0 Work

The work to review, develop and draft core competences is to ensure that children throughout the UK can make healthy food and drink choices. The competences:

- help to define essential knowledge and capability through minimum expectations;
- provide consistency, through a progressive and cumulative framework;
- reflect UK practice, yet allow for regional differences.

### 3.1 Competences

Based on the original FSA *Getting to Grips with Grub* competences (see Annex 1), BNF drafted core food competences that children should know, understand and apply by the ages of 7, 11, 14 and 16. The scope of the competence review was not to dictate entire curriculum/examination content, but rather to help set out key knowledge and understanding to enable to children make healthy food choices for life. The competences were based on the following 4 themes:

- Diet and health;
- Consumer awareness;
- Food preparation and handling skills;
- Food hygiene and safety.

The draft competence statements were also drawn from a number of key documents and discussions:

- the curriculum requirements for England, Scotland, Wales and Northern Ireland;
- the Key Stage 3 review (especially the proposed Programmes of Study for food technology);
- the recommendations made in the *Future Content and Assessment for Food Based GCSE Subjects* report to DfES;
- Learning Teaching Scotland (3-18 competences for Home Economics);
- British Nutrition Foundation *Food – a fact of life* competences.

The competences were drafted and circulated to representatives at FSA for initial comment and review. Minor tweaks were made to ensure consistency in style.

### **3.2 Competence Workshop Day**

In order to consolidate the core food competences, BNF convened, on behalf of FSA, a one-day working event with a selected audience of key stakeholders for pupils aged 5 to 16 years from around the UK. The one-day event was held at FSA, London on Friday 6 October 2006. (See Annex 2 for list of invited key stakeholders.)

The event, with its work shop opportunities, allowed interested parties to comment on the draft competences. The aim of the day was to establish a consensus from the interested parties that the competences are age appropriate, allow for progression and cover pertinent key facts. (See Annex 3 for the Agenda for the day.)

The day comprised:

- Welcome and introduction – Stephanie Valentine, BNF
- Presentations from:
  - FSA Overview, Gill Fine, FSA
  - Getting to grips with grub, Jamie Blackshaw, FSA
  - Food competences – rationale and review, Roy Ballam, BNF
- Primary, secondary and cross-phase workshop groups to discuss the competences in detail (See Annex 4).
- Feedback and discussion opportunities.

Comments about the competences, along with feedback from the groups, can be found in Annex 5.

#### **3.2.1 Review to competences**

In light of the advice given by the group (and others), further modifications were made to the draft competences.

### **3.3 Further consultation**

All invited stakeholders to the meeting were sent a letter of thanks and a revised draft of the competences mid-November 2006 (see Annex 6). In addition, a letter inviting comment on the competences was sent to a wider group of stakeholders in mid-November (see Annex 7).

The letter specifically asked for feedback on the competences based on the following questions:

- Are the competences broadly reflective of what you would expect young people of these ages to achieve?
- Who would you envisage communicating these competences to?
- What cost, if any, would you foresee falling to you in helping to promote the food competences?

Feedback from the wider group was compiled (see Annex 7) and discussed with representatives from FSA. In light of the feedback and discussions, further modifications to the competences were made.

### **3.4 Formal Consultation**

FSA will formally put the core competences out for public consultation for a 12 week period. BNF will provide the report, which provides details for the basis of consultation, along with the competence statements. BNF can help to draft the feedback form, if required.

BNF can collate responses from the consultation, if appropriate. BNF acknowledges that feedback will be provided to the FSA in the first instance (and that some of these responses may not be available for BNF to view). BNF will liaise with FSA on changes to competences (based on responses seen), and make any changes agreed.

## 4.0 Recommendations

- Draft competences should be made available to an open public consultation for consideration.
- The final competences should be actively promoted to different agencies and organizations throughout the UK. For example, it is vital that different regional government offices and departments, awarding bodies, schools and others with an interest in food education are informed. This promotion would (1) let them know about the existence and use of the competences and (2) help them planning/monitoring their own work.
- The competences should be written to appeal to a number of different audiences. For example, they could be revised to be written for use by children, parents, industry and educational publishers.
- The competences should have supporting advice and guidance to help facilitate understanding of each statement and uptake nationally. To ensure that guidance is up-to-date, it should be made available through an online resource. For example, each competence statement could be linked to a support page, featuring advice, photographs and sources of further information.
- The work to date looked at competences in four areas of learning for pupils aged 5 to 16 years throughout the UK. Work should be undertaken to look at how these competences could be applied to preschool settings and post-16 education (16-19 years).



## **Annex**

1. FSA Getting to Grips with Grub
2. Invited stakeholders to 6 October 2006 Event
3. Agenda for day
4. Workshop groups
5. Feedback from day
6. Letter to Group 8/11/06
7. Letter to extended group
8. Feedback from further consultations

### **FSA Getting to Grips with Grub Competences**

#### **Diet and Health**

- An understanding of the relationship between food, good health, growth and energy balance throughout life.
- Knowledge about the components of, and the proportions in, a healthy diet.
- Knowledge about what constitutes a healthy weight and how it relates to diet, general health and physical activity.

#### **Consumer Awareness**

- The capacity to make informed choices about food in relation to a healthy diet.
- The need to achieve a balanced and varied diet through wise choice of foods.
- Awareness of seasonality of, for example, fruit and vegetables, and implications for food miles.
- Knowledge about the comparative cost of different foods/preparation and cooking methods.
- Understanding of the food labelling information provided by manufacturers.
- Awareness of the influence of food advertising and promotion.

#### **Food Preparation and Handling Skills**

- Skills to plan a varied and healthy diet.
- Practical capability to be able to prepare and cook a variety of dishes/meals to achieve a healthy diet.
- Knowledge of how cooking methods can affect the nutritional and sensory qualities of food ingredients.
- Application of food hygiene principles to food preparation, cooking and storage.

#### **Food Hygiene and Safety**

- Knowledge and understanding of the principles of food safety.
- Awareness of hygienic procedures to follow when preparing, cooking and storing food.

## Annex 2

### Invited Stakeholders to Meeting on 6 October 2006

Delegate	Organisation
Judy Hargadon	School Food Trust (England)
Colm Carty	Department for Education and Skills (England)
Janet Dallas	Department for Education and Skills (England)
Dr Peter Toft	Office for Standards
Ian Williams	Qualifications and Curriculum Authority
Joe Monks	Department for Health
Sara Jayne Staynes	Academy of Culinary Arts
Jenny Elms	Hertfordshire LEA
Jane Wheeldon	Teacher?
Maria Guest-Naharnowicz	Teacher?
Abigail Rossi	FDF
Anne Barnett	BNF Education Consultant
Anita Cormac	Focus on Food
David Meighan	Scottish Executive Education Department
Elma Watson	Learning and Teaching Scotland
Chris Willingale	Shenfield High School, Essex
Gill Fine	FSA Director
Sarah Jayne Rowles	FSA Wales
Maria Tocher	FSA Scotland
Maria Jennings	FSA Northern Ireland
Sue Hattersley	FSA
Stephanie Valentine	BNF Education Director
Roy Ballam	BNF Senior Education Officer
Claire Theobald	BNF Education Officer
Louis Levy	FSA Nutrition
Tamara Beckett	FSA Nutrition
Pippa Eames	FSA Nutrition
Jamie Blackshaw	FSA Nutrition

### Unable to attend

Graeme Findlay	Scottish Qualifications Authority
John Valentine Williams	<i>Qualifications, Curriculum and Assessment Authority for Wales</i>
Glynis Henderson	Council for the Curriculum, Examinations and Assessment (Northern Ireland)
June Reain	Southern Education & Library Board
Ali Farrell	FoodForum
Wesley Till	University of Central England
Rachel Barlett	Stream Woods JMI and Nursery School
Ruth M'Creadie	Longstone Special School
Elaine Ridgway	Streetfield Middle School
Susan Freeman	Notre Dame High School
Mike Lewis	Mike Lewis
Nicola Wilde, MLC	Meat Livestock Commission

## Annex 3

### Food Competences

## Agenda

### 6 October 2006

- 10:00 Registration and coffee
- 10:15 Welcome and introduction  
Stephanie Valentine, British Nutrition Foundation
- 10:25 FSA Overview  
Gill Fine, Food Standards Agency
- 10:35 *Getting to grips with grub*  
Jamie Blackshaw, Food Standards Agency
- 10:50 Food Competences – rationale and overview  
Roy Ballam, British Nutrition Foundation
- 11:10 Consultation and workshops  
Stephanie Valentine, British Nutrition Foundation
- 11:15 Workshop groups
- 12:15 Lunch
- 12:45 Feedback from the groups
- 13:30 Development of competences - group discussion
- 14:00 Next steps

## Annex 4

### Food Competences - Working Groups

Primary 5-11	Secondary 11-16	General 5-16	General 5-16
1. Tamara Beckett 2. Colm Carty 3. Jenny Elms 4. Louis Levy 5. Sara Jayne Styles or Clemmy Manzo 6. Claire Theobald * 7. Jane Wheeldon	1. Roy Ballam * 2. Maria Guest-Naharnowicz 3. Abigail Rossi 4. Sarah Jayne Rowles 5. Maria Tocher 6. Ian Williams	1. Jamie Blackshaw * 2. Anne Barnett 3. Anita Cormac 4. Pippa Eames 5. Maria Jennings 6. David Meighan 7. Colin Nobel	1. Sue Hattersley 2. Judy Hargadon 3. Joe Monks 4. Elma Watson 5. Stephanie Valentine* 6. Chris Willingale

\* *facilitator*

### Working Group Tasks

#### General

- Please appoint a person to scribe and feedback group comments. Your group will need to feedback 5 key points for the discussion. However, all your comments will be fed into the consultation.
- Allow time for the group to read the prompts below, as well as the draft competences.
- Ensure that everyone in the group has an opportunity to contribute.
- Please keep any notes, comments or modifications to the draft competences.
- You have 1 hour to discuss the competences and the prompts below.

#### Discussion prompts

- Do the competences set the right tone for the age group you are addressing?
- Are the competences realistic/achievable? (Are they appropriate to the age of the child?)
- How could such competences be used throughout the UK?
- Does any represent a real barrier?
- Are the competences clear? Would they be understood?
- Are there any *essential* competences missing? (Remember, these will be UK wide and are a statement of minimum competence.)
- Do the competences capture a UK flavour, while leaving room for regional interpretation?
- Will the competences be useful to educationalists, teachers, parents and/or children?
- Will any support/resources be needed to deliver/help children achieve the competences?
- What is the best form of wording for the competences, e.g. ' *Children aged 5-7 should:* ', ' *You will be able to ...* ', ' *I am able to ...* '?
- Any suggestions for a title for the competences? The original competences were called *Getting to Grips with Grub*.

## Annex 5

### Feedback from Competence Workshop Day

- Examples should be more general (with backup guidance)
- Support activities/resources – training of teachers, support for governors, examples for teachers, equipment
- Different versions of the competences document, e.g. pupil friendly, teachers, government
- More specific mention of range of food, e.g. fresh, seasonal and processed
- Balance of Good Health name – not used in Scotland
- Good that the model is being used
- Use of words – how are they going to do some activities? Make suitable for people who have less opportunities to cook.
- Outcome is about achievement and experiences
- Think about other uses, e.g. the brownies and children in care
- Link to Every Child Matters
- Need to take on board young peoples voice
- Ensure that document is not dated – might be difficult – reference to specific documents?
- Second level document with examples?

#### Barriers suggested by group

- Curriculum requirements
- Initiative overload
- Skills of teachers
- Lack of resources in some schools
- Food preparation totally depends on the facilities of the school

#### Support/resources suggested by group

- Study periods – ask 6<sup>th</sup> formers to take part in peer mentoring
- Cross curricular opportunities
- Broader than just schools
- Link with licence to cook
- Present to a variety of audiences

## Annex 6

Dear

Re: Food Competences for Children aged 5 to 16 years

We invited you to a workshop at the FSA on the 6 October 2006 to discuss Food Competences for Children.

We would like to thank you for your input into the development of the competences. We have considered all the comments and suggestions received and used these in the second draft of the competence framework, attached for your information.

Our intention is to consult on this version of the competences as a consensus view of those who were invited to the workshop on 6 October. We also intend to publish a list of the participating organisations in the consultation document.

We have written to a number of other stakeholders in order to obtain their initial views on these competences.

We plan to prepare for public consultation in the New Year and we will also consult with young people through our school council network.

Yours

## Annex 7

3663 First for Foodservice  
Association of School and College Leaders (ASCL) Headquarters  
Association for Science Education  
Association of Teachers and Lecturers  
BDA  
Clubs for young people  
Consumers Association  
ContinYou  
GirlguidingUK  
National Primary Headteachers' Association  
Health Education Trust  
Hospitality Training Foundation  
National Consumer Council  
National Governors' Association  
National Confederation of Parent Teacher Associations (NCPTA)  
People1st  
Planet Science, Nesta  
Scolarest  
Sodexo UK Ltd  
The Scout Association  
Sustain  
UK Public Health Association  
THE NUTRITION SOCIETY



## **Annex 7 (cont)**

To Whom It May Concern:

Re: **Food Competences for Children aged 5 to 16 years**

The Food Standards Agency is currently further developing the 'Getting to Grips with Grub' competences for children aged 14 – 16 years. A copy of these is enclosed for your reference. The Food Standards Agency have commissioned the British Nutrition Foundation to take forward work to extend these further and 'Define the core food competences that children should know, understand and apply by the ages of 7, 11, 14 and 16 years'. This work will ensure that there is a progressive approach to a child's food and nutrition knowledge, enhancing their nutritional wellbeing.

Your organisation was involved in the previous consultation on food competences (Getting to Grips with Grub) and we would therefore value your initial comments and views on our approach before we consult more widely on the competences through a UK public wide consultation in the New Year.

The scope of the competences is not to dictate entire curriculum/examination content, but rather to help set out key knowledge and understanding to enable children to make healthy food choices for life. We would welcome your comments on the draft competences enclosed. Please could you send comments by Wednesday 22 November to:

At this point it would be particularly useful if you could provide information on the following:

Are the competences broadly reflective of what you would expect young people of these ages to achieve?

Who would you envisage communicating these competences to?

What cost, if any, would you foresee falling to you in helping to promote the food competences?

I would like to thank you in advance for your input and welcome the comments and expertise that your organisation can bring to this process. I look forward to developing a set of useable competences which will not only aid policy makers and educationalists but young people and their parents.

Yours faithfully

## Annex 8

### Feedback from further consultation

#### Working Group Comments

Some concerns about progression as described for some areas, as these do not always follow the awareness,.... knowledge, ....application..... evaluate

A mix of these with progression depending on the concept 7-14)

- Knowledge – factual, recall and recognition
- Comprehension – translating, interpreting and extrapolating
- Application – to situations that are new, new slants

By 16

- Analysis – breaking down into parts, forms
- Synthesis – combining elements into a pattern not clearly there before
- Evaluation – according to criteria and state why

### Comments received from Extended Group Consultation

#### 1. Are the competences broadly reflective of what you would expect young people of these ages to achieve?

- The areas that seemed to me missing to me were within the Consumer awareness section although depending on how you read what's already there you could say they are already included.
- Issues such as:
  - Food production eg: social justice/organic/GM/animal welfare etc
  - Packaging eg: types of/waste reduction/recyclability etc (a major Government issue at the moment)
- The expectations of the children in the other age categories are correct: there should not be a raise in expectations at all levels.
- Current health messages be included in the guidance on practical application of the competences, but that the competences themselves should only state that there is a need for children to be able to identify the appropriate kinds of food to select for a healthy diet.
- Like to see awareness of the need to be physically active in order to maintain health mentioned in the youngest category.
- Children younger than 14 years old should be aware of the consequences of dietary excess and deficiency.
- The competences as stated make sense and seem reasonable for children of the ages in question. However, one might wonder about the use of this approach, which always leads to a set of graded competences that require careful reading to understand the nuances of the different statements for the different levels. On the whole these have managed better than most to set genuinely different goals, but are still a bit tortured in their language. It may be that more emphasis should be given to the capacity to prepare food from fresh ingredients and to enjoy cooking and eating such meals.
- General approach is sound, but linking points in overall plan elements would be useful. An example would be Food Hygiene and Safety where for instance at age

16 linking to level 1 Food Hygiene Certificate would be useful for understanding and industry needs.

## **2. Who would you envisage communicating these competences to?**

- These competences will be useful for ourselves to allow any requests for presentations to schools to be pitched at the correct level and will influence the content of communication to stakeholders and staff.
- Welcome the recent increased emphasis on healthy eating in schools and colleges and suggested that greater efforts should be made to promote healthy eating by young people when out of school and college. And of course we should all like to see young people leave education with habits of cooking and eating that will help them to lead a healthy life. However, the point made above - not to simply expect schools to do more and more with limited resources - has to be addressed.

## **3. What cost, if any, would you foresee falling to you in helping to promote the food competences?**

- Unable to give figures but increased demand for nutrition services beyond current provision could lead to an increase in support services within the operational cost of running a school meals contract.
- Message is not delivered as another regulation/directive that schools/workers and volunteers MUST comply with.
- Competences need to be designed in a way that they can help those people who are working with young people to deliver the message of healthy eating more easily and effectively.
- Mapping the competences onto other elements of the curriculum including, where possible, cross-curricular delivery is of great importance.
- The messages being taught should be reinforced outside of the classroom, meaning that everyone working with the school, e.g. caterers and Parent Teacher Associations, as well as the teachers, should be aware of the competences.

## Appendix 3

3663 First for Foodservice  
Academy of Culinary Arts  
All Saints Educational Trust  
All Wales Dietetic Advisory Committee  
Allergy Action  
Allergy UK  
Anaphylaxis Campaign  
Association for Science Education  
Association of School and College Leaders (ASCL) Headquarters  
Association of Teachers and Lecturers  
Belfast Education Library Board  
Boys Brigade NI  
Brake Bros  
British Dietetic Association  
British Heart Foundation  
British Heart Foundation Scotland  
British Nutrition Foundation  
Chamber Training  
Chartered Institute of Environmental Health  
Children & Young People in Public Health  
Children's Commissioner for England  
Children's Commissioner for Wales  
Clubs for young people  
Coeliac UK  
Community Dietitian for Schools  
Community Dietitians in Wales  
Consumers Association  
ContinYou  
Council for Catholic Maintained Schools  
Council for the Curriculum, Examinations & Assessment (NI)  
Department For Education & Skills (England)  
Department For Education Northern Ireland  
Department for Education, Lifelong Learning, and Skills (Wales)  
Department of Education (NI)  
Department of Health (England)  
Department of Health (NI)  
Development Education Association  
DFES Food Partnerships Regional Trainers  
Department of Environment, Food and Rural Affairs  
Education and School Improvement Service (south Wales)  
Estyn (office of Her Majesty's Chief Inspector of Education and Training in Wales)  
Focus On Food  
Food and Drink Federation  
Food Commission  
Foodaware  
Forum for Private Business  
GCFT Food, Hospitality and Tourism  
General Consumer Council NI  
General Teaching Council for NI  
General Teaching Council for Wales  
Girlguiding Ulster  
GirlguidingUK  
Girls Brigade NI  
Governors Wales  
Headteachers' Association of Scotland  
Health Education Trust  
Health Promotion Agency (Health Promoting Schools)  
Health Promotion NHS  
HM Inspectorate of Education  
Hospitality Training Foundation  
Hungry for Success Network  
Improve  
Institute of consumer Sciences  
Kid's Club Network  
Learning Teaching Scotland  
Livestock & Meat Commission  
Meat and Livestock Commission  
Mind  
National Association of Advisers & Inspectors in Design & Technology  
National Association of Head Teachers Cymru  
National Children's Bureau  
National Confederation of Parent Teacher Associations (NCPTA)  
National Consumer Council  
National Federation of Women's Institute (Wales)  
National Federations of Women's Institutes  
National Governors' Association  
National Healthy School Co-ordinators (England)  
National Healthy Schools Programme (England)  
National Heart Forum  
National Primary Headteachers' Association  
National Union of Teachers  
National Youth Agency  
NHS Health Scotland  
NI Children & Young Persons Commissioner  
NI Council for Integrated Education  
Northern Eastern Education & Library Board  
Nutrition Society  
Office for Standards in Education, Children's Services and Skills  
People 1st  
Planet Science, Nesta  
Professional Association of Teachers  
Qualifications and Curriculum Authority  
Regional Food and Health leads (England)  
Rowett Research Institute  
School Food Trust  
Scolarest

Scotland's Commissioner for Children and Young People  
Scottish Consumer Council  
Scottish Executive Education Department Support for  
Learning Division  
Scottish Executive Health Department Food and Health  
Branch  
Scottish Food and Drink Federation

Scottish Health Promoting Schools Unit

Scottish Qualification Authority  
Sodexo UK Ltd  
Soil Association  
South Eastern Education & Library Board  
Southern Education & Library Board  
Sustain  
The Caroline Walker Trust  
The Co-operative Group  
The Design and Technology Association  
The Food Safety Promotion Board NI  
The Kids Cookery School  
The Princes Trust  
The Scout Association  
The Whitehouse Consultancy Ltd  
UK Public Health Association  
University of Aberdeen  
University of Surrey  
Wales Centre for Health  
Wales Consumer Council  
Welsh Assembly Government  
Western Education & Library Board  
YMCA England & Wales  
Youth Council (NI)  
Youth Net (NI)

## Appendix 4 – Short Sustainability Assessment

### SHORT SUSTAINABILITY ASSESSMENT

Consider whether your proposed policy/activity/initiative will have any impacts for the following areas and note whether the overall effects are deemed to be significant or not and why, **bearing in mind that ‘significant’ impacts can be positive as well as negative**. Indicate your evaluation by ticking the appropriate box and explain your reasoning alongside. Where a number of impacts are identified against a particular question, assess whether the overall effect is significant or not. The table allows you to indicate where the impact is not known.

**ISSUE BEING CONSIDERED: Food Competency framework: food skills and knowledge for young people aged 7-9, 11-12, 14 and 16+ years**

**DATE:**

	Significant	Not Significant	Not Known	Comments
<b><i>Economic Impacts (Guidance at paras</i></b>				
1. Are there financial implications (costs or receipts) for the public sector (central or local govt, NHS, NDPBs)?		✓		Yes. Potential indirect cost benefit for NHS as young people empowered to make healthier food choices; Administration cost to Government and other parties who embed the competences into their activity and strategy, including curriculum reviews
2. Will it impact on consumers or affect the cost, quality, availability or choice of food or other consumer goods?		✓		Potential impact upon strategies of interested food companies and retailers. Likely beneficial effect to consumers through provision of healthier food choices is indistinguishable from wider activity, such as food provision within schools influenced by UK Education departments, move to improve front of pack labelling and public health initiatives to halt obesity.
3. Are there implications in terms of costs or burdens for businesses or the voluntary sector (including the effects on competition and investment both into the UK and overseas) or in terms of the development of new technologies?		✓		Cost to private businesses of this policy is minimal – any cost of reformulation/future products likely to be more influenced by wider public health strategies. Effects on competition are negligible. Charities and voluntary sector that are actively involved with food education and young people may incur minimal cost if they choose to embed the competences within their activity. Such cost would be minimised by assuming a longer term implementation plan.
<b><i>Social Impacts (Guidance at paras 44 –</i></b>				
4. Are there health-related impacts and	✓			There is potentially significant positive benefit to the current and future health of young people. The health benefit of this

safety at work implications including effects on diet & exercise and access to health services?				policy contributes to the impact of wider public health activity. If young people actively make healthier food choices then this has potential for a healthier workforce. Also there is potential for a positive knock on effect to their peers/parents and carers, thus resulting in wider impact on the workforce and services they utilise. The likelihood of impact at work is minimal especially as this policy is aimed at young people. There are aspects associated with this policy that if embedded into activity may have wider impacts on workers helping to deliver the activity – such as use of food preparation equipment and cooking (for example knives).
5. Will it deter or encourage crime (e.g. does it create new offences)?		✓		No, despite popular belief the scientific evidence available provides no basis for a positive statement.
6. Are there other social impacts e.g. for education, skills, housing, culture & leisure?		✓		There will be direct benefit to young people's life skills, such as planning, buying, handling and cooking food. Working to empower young people so that they can make healthier food choices may contribute to influencing wider choices, such as activities within their leisure time. Improving food knowledge may have potential positive benefit to young people's health, behaviour and concentration which could facilitate more effective learning in school or in wider community/society. Participation in such experiences also has potential to encourage young people to adopt positive lifestyle approaches and has potential to inspire them in wider areas of the community.
7. Will there be specific implications for rural communities?		✓		Competences are equally applicable to all communities and therefore there should not be any specific implications for rural communities. There may potentially be food access issues for some communities whether rural or inner city or socially disadvantaged – these are not a consequence of this policy though of potential importance when we consider that trying different and a range of food is to be encouraged. However, supply and demand effects that the competences may have could mean that food access issues diminish as the policy is implemented.
8. Will there be specific implications for devolved countries and particular regions?		✓		UK considerations have been taken on board during the development of the food competences. The competences represent a minimum framework of skills and knowledge therefore local action will build upon them and contribute to meeting specific priorities as appropriate.
9. Will it impact disproportionately (whether positively or negatively) on human rights, deprived or particular income groups, particular genders or		✓		The food competences are specifically aimed at those young people aged 16 and under. Hence, it will impact disproportionately on this age group though in a positive manner. However, we consider that the food competences apply equally to all groups as appropriate to this age group.

age groups, particular races or faiths, or people with disabilities?				
<b>Environmental Impacts (Guidance at</b>				
10. Could it impact on climate change such as a change in emission of greenhouse gases or be vulnerable to the effects of climate change e.g. flooding, drought?		✓		We consider that the food competences have a negligible direct impact upon climate change. Indirectly the food competences could have a positive benefit as young people and their parents become more aware of food, food manufacturing and the impact the food chain has on the environment.
11. Will it affect air quality, landscape, land use, waste management, biodiversity or noise?		✓		We consider that the food competences have a negligible impact upon such environmental effects.
12. Will it impact on water supply including water quality?		✓		We consider that the food competences have a negligible impact upon water supply.
<b>Legal Impacts (Guidance at para 80)</b>				
13. Is legislative change required or would it be affected by existing legislation?		✓		No our proposed position prior to formal consultation is for a voluntary approach.
<b>Other (Guidance at para 81)</b>				
14. Will the policy option have any effect on animal welfare?		✓		We consider that the food competences have a negligible direct impact upon animal welfare. However, the competences cover ethical issues hence young people may potentially become more knowledgeable which may in turn have a positive impact on animal welfare etc via their food choices.
15. Are there any other impacts not identified above?		✓		No.
<b>Overall Comments/ Conclusions:</b>		Impact of the food competences is dependent upon follow through of stakeholders and is likely to act as a positive contributing factor to the wider activity to tackle young people's dietary behaviour and health. Local action based upon or using the food competences may have potential to positively impact upon this criteria and produce local effects greater than those assessed in this assessment. When we plan evaluation of the use of the food competences we will consider inclusion of this assessment criteria.		



## Appendix 5

### Competition Assessment

#### **In any affected market, would the proposal:**

A. Directly limit the number or range of suppliers?

This is likely to be the case if the proposal involves:

- the award of exclusive rights to supply
- procurement from a single supplier or restricted group of suppliers
- the creation of a form of licensing scheme
- a fixed limit (quota) on the number of suppliers

**No. The food competences will not directly limit the number or range of suppliers. By suppliers this could include retailers and manufacturers with products aimed at young people. It may also include charities and NGOs who provide young people with opportunities for learning about food, handling and preparing food.**

B. Indirectly limit the number or range of suppliers?

This is likely to be the case if the proposal significantly raises the costs:

- of new suppliers relative to existing suppliers
- of some existing suppliers relative to others
- of entering or exiting an affected market

**No. It is unlikely that the food competences will result in significant cost to suppliers and is unlikely to indirectly limit the number or range of suppliers. It is likely that there will be administration cost associated with using the food competences to develop learning/education activity and/or applying to future strategy as appropriate. However, it is likely that any such action, whether by local authority or a business, will only be partly attributable to the food competences. Actions regarding young people's public health are under greater influence from wider initiatives and policy drives to tackle young people's diet and lifestyles, such as obesity.**

C. Limit the ability of suppliers to compete?

This is likely to be the case if the proposal:

- controls or substantially influences
  - the price(s) a supplier may charge
  - the characteristics of the product(s) supplied, for example by setting minimum quality standards
- limits the scope for innovation to introduce new products or supply existing products in new ways
- limits the sales channels a supplier can use, or the geographic area in which a supplier can operate
- substantially restricts the ability of suppliers to advertise their products
- limits the suppliers' freedoms to organise their own production

processes or their choice of organisational form

**No. It is unlikely that the food competences will limit suppliers' ability to compete in the market place.**

**Providers of food learning opportunities to young people will be encouraged, voluntarily, to use the food competences so as to benefit their activity. Not choosing to use the food competences in developing/delivering a food activity will not necessarily limit a provider's ability to provide such an activity. In such an instance they could indicate how their activity works toward the competences. Hence, we consider impact on ability to compete as low.**

**The food competences are a holistic view of food skills and knowledge and aim to help interested organisations, businesses and individuals to influence the behaviour and food choice of young people. This could influence young people to make food choices in line with Government recommendations and this has potential to impact upon businesses through consumer demand. It is likely that any such effect would be only partly due as a consequence of the food competences. We would envisage most businesses and suppliers to have some form of procedures in place to monitor consumer behaviour as part of their routine marketing and development strategy so any effect would be minimal.**

D. Reduce suppliers' incentives to compete vigorously?

This may be the case where a proposal:

- exempts suppliers from general competition law
- requires or encourages the exchange between suppliers, or publication, of information on prices, costs, sales or outputs
- increases the costs to customers of switching between suppliers

**No. The food competences should not reduce a suppliers' incentive or capability to compete vigorously.**