UNISON Scotland’s response to Dr Richard Simpson’s Consultation on the proposed Limit on Trans-Fats (Scotland) Bill – Improving Scotland’s Diet and Protecting Public Health

April 2009
Executive Summary

- UNISON Scotland has long campaigned for safe and healthy workplaces across Scotland

- UNISON Scotland’s Food for Good charter in 2003 emphasised our commitment to healthy, locally sourced food to be introduced across Scotland’s public services

- UNISON Scotland is pleased to support the aims of this Bill to limit trans fats and so reduce cholesterol levels and the number of premature deaths due to coronary heart disease.

- A reduction in trans fats would contribute to a reduction in heart disease, obesity, diabetes and strokes across the whole country.

- UNISON believes that all sectors of society would benefit from the proposals outlined in the Bill

- The National Health Service would benefit as fewer people would require treatment for the diseases mentioned above allowing money to be transferred to other priorities.

- If the Scottish Parliament was serious about limiting trans fats, then we believe that the 1% limit would be more appropriate.

- UNISON believes that the legislation should be implemented as quickly as possible.

- If there had to be a transition to the legislation, we believe this should be as short as possible.

- UNISON believes that the main benefits would be to government, with potential savings to the health service due to better health and less requirement for treatments.

- UNISON agrees that the limits should be enforced by Trading Standards Officers in the first instance as they could use their existing enforcement procedures.
Introduction

UNISON is Scotland’s largest public sector trade union representing over 160,000 members delivering public services, more than 60,000 of whom work in the NHS. We represent the majority of employees in the National Health Service in Scotland and in Scottish Local Government, administrative and technical staff in colleges, and universities, police staff and the voluntary sector. UNISON Scotland welcomes the opportunity to comment on the Dr Richard Simpson’s Limit of Trans Fats (Scotland) Bill - Improving Scotland’s Diet and Protecting Public Health

General Comments

UNISON Scotland has long campaigned for safe and healthy workplaces across Scotland, particularly in the public sector and we were proud of the role we played in the promotion of the ban on smoking and the introduction of healthy food, including fruit into schools. Whilst UNISON Scotland’s Food for Good charter, produced in 2003 did not specifically address the main issue of the Bill, it did highlight our commitment for healthy, locally sourced food to be introduced across Scotland’s public services.

http://www.unison-scotland.org.uk/healthcare/chefs/charter.html

UNISON Scotland is pleased to support the aims of this Bill to limit trans fats and so reduce cholesterol levels and the number of premature deaths due to coronary heart disease. We believe that raising the level of awareness of the existence of trans fats in the food we eat can help change attitudes of the public about unhealthy eating and their general diet.

Scotland’s health problems are well documented and are often linked to poverty, but our traditional poor diet can often transcend social classes and a reduction in trans fats would contribute to a reduction in heart disease, obesity, diabetes and strokes across the whole country.

Consultation Questions

Q.1 What, in your opinion, are the benefits and disadvantages of limiting the trans fat content of foodstuffs?

UNISON believes that all sectors of society would benefit from the proposals outlined in the Bill. As stated above the Scottish public would benefit due to better health with a reduction in incidents of heart disease, obesity, diabetes and strokes and other diseases which can often be caused as a result, such as arthritis, stomach and back problems.

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The National Health Service would benefit as fewer people would require treatment for the diseases mentioned above allowing money to be transferred to other priorities.

As Scotland has well documented inequalities in health between rich and poor, this would help more deprived communities, although as stated above, Scotland’s poor diet can often transcend social classes. We would have a concern however, if the proposals led to an increase in the price of basic foodstuffs as this could affect poorer communities and UNISON has many low paid members who could then be disadvantaged by this.

The proposals would also benefit those food companies who have voluntarily started to reduce or eliminate trans fats in their food products as they would be in a better position to market their products without having to start the process, following the legislation.

Q.2 My proposal seeks to set a legal limit for trans fats contained in ingredients. What would be an appropriate limit and why?

If the Scottish Parliament was serious about limiting trans fats, then we believe that the 1% limit would be more appropriate. We understand that other countries, such as Denmark and Switzerland have chosen a 2% limit, but believe that new production methods make the 1% attainable in the future.

Q.3 How quickly should legislation be implemented?

UNISON believes that the legislation should be implemented as quickly as possible.

Q.4 If there is to be a transition to ‘trans fat free’, how long should that transition period be?

If there had to be a transition to the legislation, we believe this should be as short as possible.

Q.5 What do you think are the potential costs, economic benefits and other consequences (e.g. to business, to government) involved in legislating as proposed on the use of trans fats in Scotland?

UNISON believes that the main economic benefits would be to government, with the potential savings to the health service due to better health and less requirement for treatments. There could be costs in the implementation of the
legislation, with possibly extra staff, training, etc. needed in Trading Standards Departments, but this could be offset by fines given to offenders.

**Q.6 How should regulation of trans fats be enforced in Scotland?**

UNISON agrees that the limits should be enforced by Trading Standards Officers in the first instance as they could use their existing enforcement procedures.

**Q.7 Are there any equal opportunities or human rights issues that arise from this proposal?**

UNISON is not aware of any specific equal opportunities or human rights issues that would arise from the proposal, however, as the vast majority of our members are women, many of them part time and low paid, we would be concerned if the Bill increased prices as this could disadvantage these members.

**Q.8 Do you have any other comments or suggestions in relation to this proposal?**

UNISON is happy to support the proposals.

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