



# Getting your voice heard on calorie labelling on menus

# Getting started

- The Scottish Government is seeking your views to help them decide if calories on menus should be made a legal requirement across Scotland. Here is our advice for completing the consultation.
- There are 22 questions.
- You don't have to answer all questions.
- Key relevant questions to answer 1- 10, 12, 18, 22
- You can save and return. Set yourself a reminder to go back and submit!
- It will take between 10 and 45 minutes depending on the length of your responses. If you can include evidence or examples of your experiences within your answers, that will be really helpful.
- Consultation closes 1st July

# Getting started

The form to complete online

[Mandatory calorie labelling in the out of home sector in Scotland – Page 1 of 6 – Scottish Government – Citizen Space \(consult.gov.scot\)](#)

Supporting information

[Ministerial foreword – Out of home sector – mandatory calorie labelling: consultation – gov.scot \(www.gov.scot\)](#)

# Question 1

**The question:** Should mandatory calorie labelling at point of choice, for example, menus, menu boards or digital ordering apps in the OOH sector (as listed in paragraph 1.2) in Scotland be implemented?

**What it means:** Should including calories on menus become the law in Scotland?

## Paragraph 1.2

- Cafes, restaurants, takeaways, pubs/bars, bakeries, sweet and dessert shops, vending machines, workplace canteens, hotels, mobile caterers, leisure and entertainment venues.
- Supermarkets, delicatessens and convenience stores who provide "food on the go".
- Places where we purchase food and non-alcoholic drinks when commuting or travelling.
- Manufacturers and suppliers of food to the out of home sector.
- Food delivery services, including online services.
- Food provided for **staff and visitors** in prisons, military settings, and adult care and health care settings

### **Jargon Alert**

**Point of choice** - the most important place/time that you decide what you are going to buy

**OOH (Out Of Home)** - Anywhere that you can purchase food prepared for you, that you can eat or drink immediately.

# Question 2

**The question:** Should any of the sectors listed in paragraph 1.2 be exempt from mandatory calorie labelling? If yes please explain why.

**What it means:** Should any of these places not have to include calories on menus? If yes, explain why.

Paragraph 1.2

- Cafes, restaurants, takeaways, pubs/bars, bakeries, sweet and dessert shops, vending machines, workplace canteens, hotels, mobile caterers, leisure and entertainment venues.
- Supermarkets, delicatessens and convenience stores who provide "food on the go".
- Places where we purchase food and non-alcoholic drinks when commuting or travelling.
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## Jargon Alert

**Mandatory** – required by law.

# Question 3

**The question:** To which size of business in scope of the policy, should mandatory calorie labelling apply:

All businesses

All except businesses with fewer than 10 employees (micro)

All except businesses with fewer than 50 employees (small and micro)

All except businesses with fewer than 250 employees (medium, small and micro)

None

Other

**What it means:** Which size of businesses should be included within the law to add calories to menus?

## Jargon Alert

**Scope of the policy** – what would be included or excluded within the proposed new law. The Govt. could choose to make exceptions such as not requiring calorie labels on children’s menus or based on business size.

**Mandatory** – required by law



# Question 4

**The question:** We are considering including food provided for residents and/or patients within the following public sector institutions within the scope of the policy. Should food in these settings be included within the scope of the policy?

**What it means:** Should the places listed be required to tell their residents or patients the number of calories that are in their meals? You can answer for each setting listed.

Hospitals

Prisons

Adult care settings

Military settings

## **Jargon Alert**

**Scope of the policy** - what would be included or excluded within the proposed new law. The Govt. could choose to make exceptions such as not requiring calorie labels on children's menus or based on business size.



# Question 5

**The question:** The intention is that PPDS foods would fall within the scope of the policy. Do you agree with that proposal?

**What it means:** Do you agree that food and non-alcoholic drinks that can be consumed immediately without any further preparation, should include calorie information as part of this law?



## Jargon Alert

**PPDS - (Pre-packed For Direct Sale)** - Foods and non-alcoholic drinks that are prepacked on premises that you can eat or drink immediately without any further preparation.

**Scope of the policy** - what would be included or excluded within the proposed new law. The Govt. could choose to make exceptions such as not requiring calorie labels on children's menus or based on business size.

# Question 6

**The question:** Should the foods and drinks listed above be exempt from calorie labelling? (please state your view for each of the above)

- Non-standard menu items prepared on request
- Alcoholic drinks
- Menu items for sale 30 days or less
- Condiments added by consumer

**What it means:** Should the foods and drinks listed in the question not have to include calorie labelling?

Non-standard menu items prepared on request (Any food or non-alcoholic drink prepared on request)

Alcoholic drinks

Menu items for sale 30 days or less

Condiments added by consumer



## Jargon Alert

**Non-standard menu item** – Any food or non-alcoholic drink prepared on request

# Question 7

- **The question:** Should menus marketed specifically at children be exempt from calorie labelling?
- **What it means:** Should menus for children not have to include calorie labelling? Explain why you feel this way.

# Question 8

- **The question:** Should businesses be required to provide calorie information about options on children's menus to parents and carers on request?
- **What it means:** Should businesses providing food and drink have to provide calorie information for options on children's menus to parents and carers when they ask for it?

# Question 9

**The question:** What are your views on the proposed requirements shown below for display of calorie information required at each point of choice?

- All points of choice
- In same font and size as the price
- State kcal info only and not also kJ
- Include reference statement of “adults need around 2,000 calories a day”

**What it means:** Do you think calorie information should be provided in the following ways:

- At every point of choice (i.e., a paper menu or touchscreen for ordering)
- In same font and size as the price
- State kcal info only and not also kJ
- Include reference statement of “adults need around 2,000 calories a day”

# Question 10

**The question:** Should businesses be **required** or **have the option** to have menus without calorie information available on request of the consumer?

- It should be a requirement for businesses
- It should be an option for businesses
- Don't know

**What it means:** Should it be compulsory for businesses to provide menus without calories on if the customer asks for it, or should it be up to them?

- It should be a requirement for businesses (they should have to do it by law)
- It should be an option for businesses (it should be up to the businesses whether to do this)

# Question 12

**The question:** What other mitigating measures could be adopted for consumers who may find calorie information upsetting?

6.9 We understand there may be some people who may find calorie information upsetting, for example, people with disordered eating, eating disorders, distress around eating or people with a higher weight. We would like to hear what mitigations could be put in place to reduce any potential difficulty the presence of calorie information in the OOH sector may cause. For example, in England, the regulations permit businesses to provide a menu without calories on request, but they are not required to provide this so it is at the discretion of each business if they choose to have this available.

**What it means:** If calorie labelling is introduced, what can businesses do to lessen the impact on those who may find calorie information upsetting?



**Jargon Alert**

**Mitigating measures** – options to reduce the risk or level of harm that the proposed changes could have, including in relation to eating disorders

# Question 18

**The question:** What impacts, if any, do you think the proposed policy would have on people on the basis of their: age, sex, race, religion, sexual orientation, pregnancy and maternity, disability, gender reassignment and marriage/civil partnership? Please consider both potentially positive and negative impacts and provide evidence where available. Comment on each characteristic individually.

**What it means:** What impacts, if any, do you think calories on menus would have on people based on characteristics listed below. Consider both positive and negative impacts and provide evidence where available. You don't have to comment on all characteristics.

Age

Sex

Race

Religion

sexual orientation

pregnancy and maternity

disability

gender reassignment

marriage/civil partnership

# Question 22

Please outline any other comments you wish to make on this consultation.

This can include any other points you haven't yet had a chance to make, and reiterate any key points from earlier answers.

# Submitting

- Questions? Email [campaigning@beateatingdisorders.org.uk](mailto:campaigning@beateatingdisorders.org.uk) and we can help.
- You can save and return, but remember to submit before 1<sup>st</sup> July!
- You'll receive a copy of your responses via email once you submit. If you feel comfortable to do so, send us a copy to [campaigning@beateatingdisorders.org.uk](mailto:campaigning@beateatingdisorders.org.uk) so that we can incorporate key points into our organisational response.
- You can also sign our open letter standing against calories on menus here: [Say 'NO' to calories on menus in Scotland - Beat \(beateatingdisorders.org.uk\)](https://beateatingdisorders.org.uk)