VOX Scotland's response to the consultation on 'Mandatory calorie labelling in the out of home sector in Scotland'

Who We Are
VOX Scotland is a national members' led mental health charity which ensures that people with lived experience (PWLE) of mental health problems have a voice in shaping mental health policy and practice in Scotland.

Our members are comprised primarily of individuals with lived experience of mental health problems, as well as local organisations which support them. VOX Scotland represents members' experiences across a wide range of national forums to ensure that lived experience is at the heart of driving improvements to mental health care and support.

Member Consultation
VOX Scotland sent a short survey to our members asking if they believed the policy should be introduced and what potential implications it may have. 26 people participated in this survey. Of these, 13 said they had experience of an eating disorder (n=6) or disordered eating (n=7). Of those who did not have experience of an eating disorder or disordered eating, 3 stated that they had a family member or close friend who has or has had an eating disorder, and 1 stated they were a caregiver for someone who has or has had an eating disorder.

VOX members from across the following areas participated in the survey: Glasgow, Lothian, Lanarkshire, Renfrewshire, Highlands and Islands, Central Scotland, Dunbartonshire and Argyll & Bute, Grampian, Fife, Tayside.

Overview
A majority of respondents to VOX's survey stated they did not think that mandatory calorie labelling should be implemented in Scotland, citing a range of mental health implications. Our response to this consultation outlines key themes which highlight why we believe this policy should not be introduced, but also captures the variety of views shared by our members.

The commentary within the key themes detailed below brings together the perspectives of our members and provides the basis and rationale for VOX Scotland's answers to the following questions set out in the consultation:

Question 1 – 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?
No

Question 7 - Should menus marketed specifically at children be exempt from calorie labelling?
Yes (if the policy is introduced)

Question 10 - 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 (if the policy is introduced), however we believe that a better approach is to make menus with calorie information available on request to prevent the negative impact of exposure to calorie information for those with eating disorders and disordered eating behaviours. Accessing calorie information should be 'opt in', with menus that don't contain this information being the 'default'.

Impact on Mental Health

VOX members highlighted a range of ways in which the introduction of mandatory calorie labelling in the out of home sector could impact their mental health, or the mental health of others. In particular, members told us the policy would 'cause more eating disorders', 'encourage people to have negative relationships with food and eating', and result in 'reduced self-esteem.' Others told us that increased exposure to calorie information in OOH settings would be 'anxiety-inducing' and trigger negative thoughts: 'it takes a lot of willpower and strength to forget about calories and enjoy eating with friends and having calories there reminding you would trigger those negative thought patterns'.

The negative impact of this policy for people who currently experience eating disorders and disordered eating behaviours was clearly emphasised by members, and we also heard concerns that this policy may contribute to the development of disordered eating behaviours more widely: 'If they introduce this policy, then I think it will just make life worse for people with eating disorders, it might tip some people into disordered eating. It will reinforce horrible ideas about fat people and individualises food injustice'.

One member shared their recovery journey, and highlighted a range of concerns with the proposed policy:

> 'I think it will have a very negative impact on people generally but especially those of us with a history of disordered eating. Diet culture and fatphobia are huge threats to my mental health. I have come across cafes etc which include calorie count in their menu and I don't go in those places. A narrow focus on calories reinforces negative ideas about food that distorts people's relationships with food, with their bodies and with themselves. What about the overall nutrition of food, as well as seeing food at enjoyable, as an aspect of culture and community? I've worked hard to get away from harmful ideas of having to "earn" the right to eat certain foods, from feeling really upset if I "slip" and from feeling out of control as my weights goes up and down through dieting. I am now focused on food being a pleasure and source of nutrition and joy; on moving my body because it feels good and to do important things in my life. I don't want to have to navigate calories when I am treating myself to a meal out. I don't want other people to suffer either. Disordered eating and eating disorders are appalling to experience and to witness.'

We heard that the introduction of the policy would 'add to feelings of depression, low self-worth and may also lead to purging to feel less guilty' and that it 'may overwhelm those who do not recognise triggering conditions within their mental health. Their views of their body image may continue to be maladaptive with unpredictable coping as a result. This may worsen present body-related concerns and calories may be used as a calculation to manage these'.

One member told us that encountering calorie information when eating out 'would trigger old feelings of not being good enough, of needing to punish myself […] Also if I do restrict calories, I can go hypomanic very quickly which then leads to a huge depressive crash'. Another said: 'It would put me off eating as I would be too busy counting the calories'.

However, some members did cite potential mental health benefits in terms of decision-making and agency: 'For my mental health it would help. I struggle to make decisions and when is too difficult to figure out how healthy a food is I get overwhelmed, panic and either end up not eating or making an unhelpful choice' / 'It may help recovering individuals feel more comfortable eating out of home, give them a level of control'.

Choice and Awareness

For the minority of respondents who supported the policy, arguments in support tended to focus on the benefits of greater choice and awareness. They felt that the policy would 'assist those

who lack nutritional knowledge to make healthier [and] more informed choices', give people 'more confidence in the reliability [about the nutritional information eaten out of the home]', and enable others to 'take more notice of what passes their lips, and feel better in themselves'. One member told us they 'gain weight easily' due to being on weight positive medication, and felt that greater awareness of calorie content would be positive for their weight management. Another said they 'have a large stomach which depresses [them]' and 'eat[s] more to feel better' and felt that being able to 'choose less calories' would be of support.

Considering already-existing nutritional information requirements on pre-packed food, one member felt that the availability of this information may similarly benefit them in OOH settings: 'I can only comment on my experience of disordered eating, more calorie information easily available, like the red amber green used in supermarkets, is really helpful. When I need to make quick decisions it's easier to make the right choices when I can easily see the calorie info'.

Even amongst some members who either opposed the introduction of the policy, or were 'unsure' as to whether it should be introduced, there was an acknowledgment that increased information may be helpful for others: 'It's difficult to say, as someone who's been both bulimic and anorexic in the past and being left with a fairly unhappy relationship with food, I find it disquieting when I see it now, but I appreciate that it could/would/should be useful'.

However, many told us this increased awareness brings negative consequences: 'I would feel worse about myself and unhappy about the choices that I make'.

Feelings of Shame and Guilt

A key theme highlighted by respondents was the feelings of shame and guilt that the introduction of this policy could trigger: 'People feeling ashamed for eating food they want to eat […] Shame is not a healthy tactic to change eating habits' / 'I feel like putting calories on the menus will make people feel shamed and bad for eating' / 'Increased risk of calorie information causing sufferers (former and present) to query what they're eating and the importance of the calories to their body perception'.

One member told us: 'I feel worse about myself and unhappy about the choices that I make', and another described the policy as a 'nightmare for sufferers'.

We heard that increased exposure to caloric information can lead to increased feelings of guilt:

'From experience, whenever I have come across places that have the calories, my immediate thought is not to look at the food and think about how it will taste and how I will enjoy the taste and flavour, but to only see the numbers and the guilt and disgust that comes from looking at it. It makes me feel disgusting and only increases my body dysmorphia.'

Indeed, the policy was seen as actively encouraging feelings of guilt: 'People that are on the brink of suffering from an eating disorder are more likely to be encouraged to continue down a negative track of worrying about what they're eating. I feel it encourages guilt and negativity which are negative factors in mental health'.

Experience of OOH Settings

Members highlighted the negative impact the introduction of mandatory calorie labelling would have on many people's experiences of eating in OOH settings.

One member told us that the Scottish Government should 'forget the idea' of introducing mandatory calorie labelling, stating: 'People with eating disorders already know their calorie count but seeing [this information] actually on a menu would be disaster. Others out for a meal

might be put off a nice dinner due to calorie content! Just enjoy the meal without eating yourself up from the inside'.

Indeed, it was felt that the introduction of this policy would lead to some people 'avoid[ing] Out of Home eating' entirely as it may have a detrimental effect on their recovery: 'I feel that exposure to listed calories will put people with past or current experience of eating disorders off of going to restaurants and will make going out for [food] stressful which will cause people with eating disorders to become more isolated and not enjoy what should be positive experiences spent with family and friends'.

Another member told us they 'would be reluctant to eat out if calories were labelled as [they] would experience anxiety', and others shared how increased exposure to calorie information would affect their social life and recovery: '[It would] take away the positives on my mental health I get from socialising whilst eating out, [and I would] focus on calories rather than being relaxed' / 'I think it will be incredibly harmful, and an obstacle to being able to recover and experience out of home eating and socialising – a major part of ED recovery'.

Lack of Positive Impact

A range of members were sceptical of the policy having a positive effect on nutritional health. One member told us there was 'no evidence' underpinning the policy, stating it is a 'horrible, fatphobic policy that takes no account of the experiences of people with experience of disordered eating'.

Some told us the policy would make 'no difference', that 'for most, [the policy would have] little [impact]', and would ultimately be 'a waste of time and money.'

One member, citing a previous public health intervention, questioned whether mandatory calorie labelling would achieve its desired effect: 'As with the failure of the alcohol minimum pricing policy, I believe introducing calorie labelling will not deter people from eating high calorific meals. The policy will just cause small businesses to suffer'.

The policy seeks to address health issues amongst the general public, but it was felt by one member that the potential to positively influence population health was far lower than the potential to negatively impact people with eating disorders: 'I feel the groups the government aim to reach with this policy are the group it will have the least impact on and that it will have much more of an impact on vulnerable people who struggle with eating disorders and this will be a negative impact, which leaves no real positive reason to have this policy in place'.

Indeed, this perspective echoes the research work undertaken by the UK's Eating Disorder charity, Beat, who state: 'there's very little evidence that calorie-labelling helps you get healthier. But the research does show that it harms people with eating disorders'.[1]

Another member told us: 'I think it is ill thought out, harmful, and will not have an effect on the population's health'.

Alternative Approaches

We heard from members that the intervention was 'overly simplistic' and they felt that there needed to be a different public health approach to improving nutritional health.

In particular, members highlighted the need for healthy food to be more accessible in Out of Home settings: 'Positively [the policy] may make people more aware of what they are eating and help them to make healthier choices, however it can also make people feel bad about eating,

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[1] https://www.beateatingdisorders.org.uk/support-our-work/campaign-for-beat/current/say-no-to-calories-on-menus-in-scotland/

increase food waste (people ordering food and not eating it all). Why don't they encourage healthier food to be made rather than making people feel bad about eating high calorie foods?' / 'Don't [implement the policy]. Make healthy food cheaper and more accessible' / 'Restaurants should be encouraged to make their foods healthier instead'.

Wider social measures to improve Scotland's health were further emphasised: 'I think affordable and easy access to healthcare, therapy and exercise is a better approach from the government to focus on' / Why is this being proposed? If it is to try to combat obesity I would respectfully suggest there are better ways of achieving this. For instance healthy school meals and universities, educational campaigns, increase in basic incomes to enable the poorest in society to be able to afford healthier food'.

Conclusion and Recommendations

VOX Scotland wishes to emphasise that the negative impact of this policy – particularly for those with eating disorders and disordered eating behaviours – would significantly outweigh any potential public health improvements, for which there is limited evidence.

We also recognise that some of our members told us they would benefit from increased choice and information. So we would urge that, if calorie labelling information is to be made more widely available in OOH settings, then it should be optional – with the consumer having to 'opt-in'. For example, restaurants could offer a separate menu which includes calorie information that diners could access on request. We believe the 'default' option should never include calorie information.

As a mental health organisation, we are concerned that this policy will cause further distress for many people across Scotland. We heard from our members that increased exposure to calorie information would have a detrimental impact on their recovery and mental health, and would prevent some people with eating disorders and disordered eating behaviours from going to OOH settings as a result.

More broadly, we fundamentally believe in building a healthier society in Scotland with regards to both mental and physical health. We do not believe calorie labelling is an effective mechanism to achieving this and urge The Scottish Government to instead pursue other public health measures such as boosting household incomes, making healthier food and exercise activities more affordable and accessible, and accelerating improvements to healthcare.