

## **Consultation on Nutritional Requirements for Food and Drink in Schools: Report on responses to the consultation and actions agreed to be taken forward by Ministers**

**To:** All Chief Executives, Main Contacts and APSE Contacts in Scotland. For information only in England, Northern Ireland and Wales.

### **Key Points**

Scottish Government released a consultation on amendments to the Nutritional Requirements for Food and Drink in Schools (Scotland) Regulations 2008 that attracted a total of 1,359 responses – 1,280 from individuals and 79 from organisations. Scottish Government have released a follow-up report with an analysis of the responses and actions that they plan to take on school meals. This briefing will cover:

- Overview of the results of the survey
- New dietary goals and actions agreed to be taken forward by Ministers
- Analysis and commentary involving the individual responses by local authorities

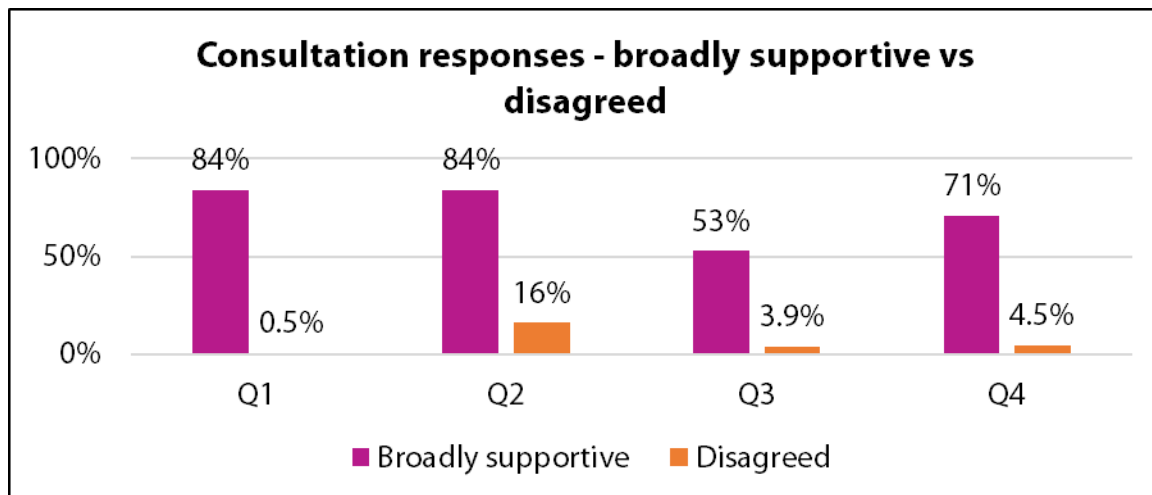
[Click here](#) to view the full report online. [Click here](#) for the full archive of published responses to the consultation.

### **1.0 Background**

A consultation was released by Scottish Government on a range of potential changes to the nutritional elements of the school food and drink regulations. Since their introduction, the advice they were based on has changed, and a short life technical working group was formed to align the regulations with the [Scottish Dietary Goals](#). The consultation had five open questions with four themes:

- Increase fruit and vegetable provision
- Reduce sugar in school food and drink
- Set a limit for red meat and processed red meat
- Amend secondary school food and drink provision across the school day

## 2.0 Consultation question results



As seen above, the majority of respondents to the consultation were broadly supportive of the proposals. The only question that attracted a significant number of respondents disagreeing with the proposal was question 2 on access to sugar. The full breakdown of the results is shown below:

### 1. What are your views on our intention to amend the current school food and drink Regulations to ensure children and young people are able to access more fruit and vegetables as part of their school day?

- Number of respondents – 1334
- Broadly supportive of the proposal – 84%
  - Agreed with the proposal outright – 74%
  - Agreed with the caveats such as the proposal was a good start but doesn't go far enough or the ratio between fruit and veg should be more flexible – 10%
- Disagreed with the proposal (with comments such as 'the current standard is fine as it is') – Less than 0.5%

- Conclusion could not be drawn from response given – 15%

**2. What are your views on our intention to amend the current school food and drink Regulations to ensure the amount of sugar children and young people can access over the course of the school day is reduced?**

- Number of respondents – 1348
- Broadly supportive of this proposal – 84%
  - Agreed with the proposal outright (which includes removing fruit juice, allowed no added sugar flavoured milk and in secondary schools allowing only no added sugar drinks) – 57%
  - Broadly supportive but with caveats for example fruit juice should continue to be allowed occasionally – 27%
- Disagreed with the proposals commenting for example that ‘the current standards were strict enough’ – 16%

**3. What are your views on our intention to amend the school food and drink Regulations to set a maximum for red and red processed meat in primary school lunches and for overall provision in secondary schools?**

- Number of respondents – 1332
- Broadly supportive of this proposal – 53%
  - Agreed with the proposal outright – 47%
  - Agreed but with caveats such as a good start but doesn’t go far enough – 6%
- Disagreed with the proposals with comments indicating that they did not believe in the science behind the proposals or that pupils should decide for themselves – 3.9%
- Conclusion could not be drawn from response given – 20%

**4. What are your views on our intention to amend the school food and drink Regulations to enable caterers to provide a service which better supports secondary age pupils to make balanced and nutritious food and drink choices as part of their school day?**

- Number of respondents – 1304

- Broadly supportive of this proposal – 71%
  - Agreed with the proposal outright – 54%
  - Broadly agreeing but with caveats – 17%
- Disagreed with the proposal commenting for example that secondary school pupils should make their own choices – 4.5%
- Conclusion could not be drawn from response given – 24%

### **3.0 Dietary Goals**

The technical working group and the consultation focused on the Government's manifesto commitment to align school food regulations with the National Dietary Goals. Overall the population consumes too many calories, too much fat, salt and sugar. The original 2008 guidance was based on the nutritional goals at the time. The new goals will focus more on reducing sugar, increasing fibre and reducing red meat and therefore the proposed nutritional standards are aimed at aligning this. This means:

- Giving more fruit and veg with all meals, while reducing fruit juice drinks. This is designed to maintain the fibre content while reducing the free sugar in the fresh fruit drinks.
- Restricting the amount of red and processed meats being offered as part of the weekly menu, this is aimed at reducing nitrites which are linked to cancer. Any reduction of iron levels in the diet would need to be offset using other options within the meals.
- Proposals aimed to further increase fibre through further restricting baked goods while setting higher fibre levels for products sold. This means the current range of bread, rolls, wraps and home baking available will reduce as only high fibre options will meet new standards.
- Chocolate, crisps, cakes, drinks and snack options are already restricted at lunch and these will be further restricted at all times e.g. breakfast clubs, interval and after school settings.

Ministers agreed to take forward 35 actions in total and these are outlined in full within the consultation responses document. Please [click here](#) to be taken directly to the full list

of actions. In order for these actions to be taken forward, legislative changes will need to be approved by Scottish Parliament, with indications that the guidance will be expected in June 2020 and all local authorities would then be expected to implement by Autumn 2020.

### **3.0 APSE Comment**

APSE is committed to helping local authority catering departments in Scotland to share knowledge and best practice through our regular advisory group meetings for officers and councillors. For more information on these meetings please [click here](#).

While there appears to have been broad consensus among respondents in favour of the four main proposals in the consultation, an analysis of the publicly available responses from local authorities suggest that making many of these changes to improve the nutritional quality of school meals may actually have a negative impact on the uptake of school meals and may not have the desired outcome. [Aberdeenshire Council](#) noted in their response, “if we don’t supply products they can bring in or go out; competing against the high street/snack vans where no restrictions are set is proving very challenging. Again, you are pushing our customers out beyond the school gate, not supporting them.” [East Renfrewshire Council](#) commented “whilst this is the correct step to reduce sugar over the course of a school day, however this will not stop children and young people purchasing from shops/home.” [Aberdeen City Council](#) agreed, saying “setting stricter school meal regulations alone will not result in change to the consumption of healthier options for children and young people.” [Highland Food & Health in Schools Group \(Highland Council / NHS Highland\)](#) said “there is a risk that the further removal of or restrictions on specific foods and drinks will result in more pupils consuming more sugar, fat and salt because they will not come into the school canteen.”

Comments from local authorities and staff members of local authority catering teams while generally supportive spoke of the lack of a level playing field for schools versus the high street and snack vans, and raised concerns about the potential increase in food waste (since increasing availability of fruit and vegetables will not necessarily see the same

increase in uptake). Local authorities, as part of responses also asked Scottish Government to clarify:

- If increased access to fruit and vegetables would be accompanied by funding?
- If sample menus could be provided to show how energy levels can be achieved (from a nutritional, cost and appeal perspective)?
- If there were any plans to regulate the high street / snack vans from providing meals that don't meet the nutritional criteria?

APSE welcomes the involvement of ourselves and ASSIST FM in the development of the new guidance and both organisations will continue to work with Scottish Government and other stakeholders to support effective implementation of the updated guidance.

APSE recognise Local Authority Caterers commitment and willingness to continue to promote school meals as an exemplar of tasty, healthy and nutritious food and recognise positive dietary changes should be promoted in all settings. As noted in the feedback and consultation from Local Authority members the proposals may however create a number of potential unintended consequences and wider implications around increased cost and reduced income, limiting choice for young people and timescales around practical implementation require further assessment and consideration. Discussions between COSLA and Scottish Government are also ongoing in relation to the cost implications for local authorities and APSE/ ASSIST FM will continue to provide assistance in relation to these discussions where required.

Local Authority caterers serve almost 350,000 meals per day to children across Scotland and can play an important role in improving young people's healthy choices. However, if dietary improvements are seen by young people as further restrictions, we will drive them away from this source of nutritious food towards options such as packed lunches and the high street. These options will continue to allow higher fat, higher sugar and higher salt food.

The changes to the nutritional standards as well as affecting catering services will also have a significant impact on school run activities, breakfast services and after school

providers as the guidance is being extended to cover the full school day and will need consideration across Councils.

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