

Consultation on Nutritional Requirements for Food and Drink in Schools

Report on responses to the consultation

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INTRODUCTION

An analysis of the responses we received to our consultation on amendments to the 'Nutritional Requirements for Food and Drink in Schools (Scotland) Regulations 2008' has been undertaken. This report sets out the findings.

BACKGROUND TO THE CONSULTATION

Since our school food and drink Regulations were first introduced in primary schools in 2008 and secondary schools in 2009, the scientific and dietary advice on which they were based has changed. This includes the recommendations from the Scientific Advisory Committee on Nutrition (SACN) on Energy¹, Carbohydrates and Health² and Iron and Health³ which led to the Scottish Dietary Goals being updated and accepted by the Scottish Ministers in 2016.

In 2017, a short life technical working group (TWG) was convened to review the current school food and drink Regulations. The TWG put the health and wellbeing of children and young people at the heart of their considerations. Their approach was to bring the school food and drink Regulations in closer alignment with the Scottish Dietary Goals, using the most up-to-date scientific evidence base and knowledge of current school food practices.

The TWG presented their report and recommendations to the Scottish Ministers who were keen to ensure everyone who felt they had something to contribute to this work were provided with an opportunity to do so through a public consultation.

The consultation contained five open questions designed to seek views on four key themes (increase access to fruit and vegetables, reduce access to sugar, set a maximum level for provision of red and red processed meat, and amending the way in which secondary school food and drink is provided) that underpinned the recommendations made by the TWG in their report. The consultation dealt with aspects of the nutritional content of food and drink provided in schools. It did not seek comments about how food and drink is delivered in schools, for example, dining hall facilities, provenance, procurement or length of the school lunch break, which is covered by the guidance document '[Better Eating, Better Learning - a new context for school food](#)'. It also did not seek comment relating to food education, such as cooking skills, which is delivered through Curriculum for Excellence and cannot be addressed by making changes to the school food and drink Regulations. However, these areas were subject to many comments.

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[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/339317/SACN Dietary Reference Values for Energy.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/339317/SACN_Dietary_Reference_Values_for_Energy.pdf)

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[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445503/SACN Carbohydrates and Health.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445503/SACN_Carbohydrates_and_Health.pdf)

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[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/339309/SACN Iron and Health Report.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/339309/SACN_Iron_and_Health_Report.pdf)

OVERVIEW OF RESPONSES TO THE CONSULTATION

A total of 1,359 responses were received and all five questions were open questions. The overwhelming majority of responses (1,280 in total) were submitted by individuals whilst 79 were submitted by organisations. Despite the comparatively small number of organisational responses, there were a wide range of organisations represented with responses from local authorities; NHS Boards; the food and drink sector; parent groups; bodies representing the dental profession and organisations with an interest in diet.

All respondents were given the option on whether they wished their responses to be published; to submit their responses anonymously; or for their responses to be anonymised in reporting. Prior to publication, all responses were moderated to ensure that they contained no inappropriate language or any information which could potentially identify individuals by name.

1,259 out of 1,359 respondents gave consent for their responses to be made public, with 69 out of the 79 organisational responses giving consent for their responses to be published. All published responses have been made available on the consultation hub page on the Scottish Government's website. The consultation hub on nutritional requirements for food and drink can be accessed through the following link: <https://consult.gov.scot/support-and-wellbeing/food-and-drink-in-schools/> .

The consultation questions asked specifically about the nutritional content of school food and drink provision. Comments relating to how food and drink in schools Regulations could be implemented were included in the responses. While these comments will not be used directly to inform decisions about changes to the school food and drink Regulations they will be considered as part of updating the associated guidance to local authorities and schools as they implement the updated school food and drink Regulations locally.

METHOD OF ANALYSIS

The four themes used in the consultation were:

- increase fruit and vegetable provision;
- reduce sugar in school food and drink;
- set a limit for red meat and processed red meat; and
- amend secondary school food and drink provision across the school day.

The first four questions focused on one each of the four themes above were analysed to ascertain whether they agreed or disagreed with the proposal. Where a response did not specify agree or disagree but the comments indicated agree or disagree they were categorised as such. Responses that did not answer the question (instead providing general comment) or it was not clear whether they agreed or disagreed have been categorised as inconclusive. This does not mean the content of this category has been ignored. Instead the general comment will be taken account of in other ways for example when drafting the guidance which will accompany the amended school food and drink Regulations.

The fifth question asked about what further action could be taken to improve the content of school food and drink provision.

Where specific elements of the proposals set out in the first four questions were commented on, a multiple key word search was undertaken across the responses to all five questions and each associated response considered individually in order to provide percentages within the report for each of the specific common elements commented on.

The multiple key word search was done across all five questions to ensure that every comment on the specific elements highlighted in the first four questions were included regardless of where that comment was made. For example a comment about flavoured milk would be included in the percentages reported regardless of whether it was made in response to question four (reducing sugar) or question five (further improvement).

Each response to the consultation has been analysed equally with no additional weighting being afforded to one category of respondents over another.

Where a comment states it relates to primary school provision it has been categorised as such. Where a comment states it relates to secondary school provision it has been categorised as such. Where a comment states it relates to the provision of both primary and secondary school provision it has been included in both categories. Where neither has been stated it has been included in both categories unless information contained in that response indicates it should not be treated as such.

ANALYSIS OF RESPONSES

THEME ONE – ACCESS TO FRUIT AND VEGETABLES

Based on the recommendations of the Technical Working Group (TWG), we proposed to amend the school food and drink Regulations to require a minimum of two portions of vegetables and a portion of fruit to be offered as part of a primary school lunch. In addition, full portions of fruit and/or vegetables must also be made available in any place within the school where food is provided, for example in a tuck shop.

For secondary schools, based on the recommendations of the TWG, we proposed to amend the school food and drink Regulations to require two portions of vegetables and a portion of fruit to be offered as part of a full school lunch. In addition, where secondary pupils are choosing to take a main meal rather than a full lunch, that main meal must include salad or vegetables as part of the meal. Full portions of fruit and/or vegetables must also be made available in any place within the school where food is provided for example a morning break service.

QUESTION ONE

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?

RESPONSES

1344 respondents answered this question. Of those 84% were broadly supportive of this proposal. Specifically, 74% (996) agreed with the proposal outright with a further 10% (138) agreeing but with 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. Less than 0.5% (6) disagreed with the proposal with comments such as the current standard is fine as it is. The remaining 15% (204) answered in a way that meant a conclusion could not be drawn, for example they provided comments on implementation but did not indicate whether they agreed or disagreed with the proposal or they provided general comments about related issues but did not answer the question.

THEME TWO

The second theme focused upon reducing the sugar content of food and drink provided in schools. In particular we proposed introducing a limit on the frequency of provision of sweetened and baked foods typically high in sugar in primary schools at lunchtime, and introducing sugar limits for products such as breakfast cereals, yoghurts, sweetened and baked products across the school day. The aim being to reduce sugar provision over the school day and encourage more consumption of fruit and lower sugar alternatives.

For primary schools based on the TWG recommendations, we proposed to reinforce that for drinks; water, plain lower fat milk and calcium enriched milk alternatives should be the main focus with no added sugar, lower fat milk drinks (for example flavoured milk and hot chocolate) and drinking yoghurts being permitted at the discretion of schools and local authorities to allow additional choice. We also proposed that fruit juice; vegetable juice; smoothies and fruit juice combinations would no longer be on the permitted drinks list, due to their high sugar content.

For secondary schools based on the TWG recommendations, we proposed to reinforce that for drinks; water, plain lower fat milk and calcium enriched milk alternatives should be the main focus with tea; coffee; no added sugar, lower fat milk drinks (for example flavoured milk and hot chocolate); no added sugar drinking yoghurts; and no added sugar soft drinks (excluding high caffeine) being permitted at the discretion of schools and local authorities to allow additional choice. We also proposed that fruit juice; vegetable juice; smoothies and fruit juice combinations would no longer be on the permitted drinks list, due to their high sugar content.

QUESTION TWO

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?

RESPONSES

1348 respondents answered this question, of those 84% were broadly supportive of this proposal. Specifically, 57% (771) agreed with the proposal outright (which includes removing fruit juice, allow no added sugar flavoured milk and in secondary schools allowing only no added sugar drinks), a further 27% (360) were broadly supportive but with caveats for example fruit juice should continue to be allowed occasionally. The remaining 16% (217) disagreed with the proposals commenting for example that the current standards were strict enough.

In addition to general agreement or disagreement to this proposal as a whole set out in the figures above, this question drew common comment on specific elements of this proposal which were also noted in the responses to other parts of this consultation and as such have been calculated based on the total number (1359) responses received for this consultation:

- 13.8% (188) respondents specifically commented that fruit juice and smoothies should remain an option in schools. 2.8% (39) specifically commented that they should not be allowed.
- 10.8% (147) specifically commented that drinking yoghurt, hot chocolate and/or flavoured milk should not be permitted in schools while 0.9% (13) commented that they should be allowed in schools. However, of the 10.8%, a common comment was that flavoured milk has more sugar than fruit juice. This leads us to believe that there may have been some confusion about this element of the proposal. Under the current Regulations this category of drink is permitted to contain a limited amount of added sugar. Under the new proposals, this category of drink cannot contain any added sugar which will contribute to reduced sugar intake but still enable choice.
- 6% (82) specifically commented that sugar free carbonated drinks should be allowed in secondary schools. In contrast, 0.9% (12) specifically commented that they should not.

THEME THREE

This theme focused upon the provision of red and red processed meat. Red meat can provide a good source of vital nutrients such as iron, and inclusion in the school meal menu can contribute to meeting the nutrient standards. However, there is also robust scientific evidence of links between red and red processed meat and potential risk of developing colorectal cancer in later life when eaten in higher than maximum recommended levels. In order to retain the benefits, but minimise the risks to children's health, based on the TWG recommendations we proposed an introduction of a maximum amount for red and red processed meat as part of school food and drink provision across the school week.

QUESTION THREE

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?

RESPONSES

1332 respondents answered this question. Overall 53% were broadly supportive of this proposal. Specifically, 47% (630) agreed with the proposal outright and a further 6% (87) agreed but with caveats such as a good start but doesn't go far enough. 3.9% (52) disagreed with the proposal with comments indicating that they did not believe in the science behind the proposal or that pupils should decide for themselves. The remaining 20% (266) responses did not contain enough information to draw a conclusion, for example, provided general comments but no answer either in support or against the proposal.

This question drew a number of common comments on specific elements of this theme which were also noted in other parts of this consultation and as such has been calculated based on the total number (1359) responses received for this consultation:

- 9.1% (123) specifically commented that meat should be banned from school menus altogether.
- 7.5% (100) specifically commented that only processed meat should be limited
- 5.3% (71) specifically responded that processed meat should be banned altogether

THEME FOUR

The fourth theme focused on the difference between the eating habits of pupils in primary school and secondary school.

For a range of reasons, most secondary school pupils tend to choose to eat across the school day rather than within specific lunch periods. Furthermore, most services sell items individually meaning planning provision to meet the nutrient standards does not always lead to the intended outcome of secondary school pupils choosing a selection of items which will provide them with a nutritionally balanced meal. This makes applying nutrient standards in secondary schools particularly challenging where pupils do not take a set meal. For example, instead of taking a two course lunch which will include a balanced range of nutrients (carbohydrates, protein, etc) they may choose one or two items which include more of one nutrient than others.

Our proposal based on the TWG recommendations was to change the school food and drink regulations so that school meal providers had to demonstrate that young people could still choose and consume a meal which meets their nutritional requirements, whilst simultaneously introducing a wider range of food and drink standards across the full school day.

These additional food and drink standards, for example, a restriction on the number of pastry products, and a restriction on the amount of sugar and fat contained in sweetened and baked goods, aim to bring all food and drinks provided in secondary schools closer to the Scottish Dietary Goals.

QUESTION FOUR

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?

RESPONSES

1304 of respondents answered this question. Overall 71% were broadly supportive of this proposal. Specifically, 54% (707) agreed with the proposal outright with a further 17% (227) broadly agreeing but with caveats. 4.5% (58) disagreed with the proposal commenting for example that secondary school pupils should make their own choices. The remaining 24% (312) responses did not contain enough detail to draw a conclusion.

QUESTION FIVE

The fifth question provided an opportunity for people to offer any additional comments they may have about the content of school food and drink provision which they felt was important to note but had not addressed in the first four theme specific questions.

The question asked “Do you have anything else you wish to comment on in relation to the nutritional content of food and drink provided in local authority, and grant maintained, schools in Scotland via the school food and drink Regulations?”

RESPONSES

1186 of those who responded to this consultation took the opportunity to provide comments in relation to this question.

The comments provided under this question in relation to content of school food and drink have been included within the analysis and commentary for questions one to four in recognition that they relate to one of the four themes dealt with by those questions.

The comments provided under this question that relate to implementation will be considered when amending the guidance which will support the amended school food and drink Regulations.

CONCLUSIONS

1359 stakeholders took the time to respond to this consultation which demonstrates the importance that a wide variety of stakeholders place on school food and drink provision.

With 84%, 84%, 53% and 71% respectively being broadly in favour of the four main themed proposals⁴ set out in this consultation, there appears to be broad public consensus for making these changes to the school food and drink Regulations. This will help to ensure that the food and drink served in schools continues to play a central part in ensuring our children can make balanced choices which will support their health and wellbeing both now and in the future.

Four specific elements (provision of fruit juice, flavoured milk, no added sugar soft drinks and provision of red and red processed meat) within two of the themes each received attention from more than 80 respondents and as such have been addressed in more detail within the relevant themes along with contrasting information where available. Comments on these specific elements may have been made in any one of the five questions but for the purposes of this report, have been addressed under the most appropriate theme. Namely provision of fruit juice, flavoured milk and no added sugar soft drinks within theme two and provision of red and red processed meat within theme three.

The consultation invited comment on the content of the school food and drink Regulations and as such only those comments relating to content will be used to inform decision about what changes will be made to the Regulations. For example the frequency that sweetened and baked goods should be provided in schools and whether fruit juice should be removed from the schools permitted drinks lists.

Where comments have been offered on the implementation of the school food and drink Regulations rather than the content, they will not be taken into account when considering what changes will be made to the Regulations for example suggestions of how to encourage pupils to choose more fruit and vegetables that are on offer. However we recognise the value these comments and suggestions have in relation to implementation of any changes and as such they will be considered when updating the guidance document which will support caterers and schools as they implement the updated school food and drink Regulations. We will take the same approach for comments which relate to action already allowed under the current Regulations but highlight a potential need for more action locally for example provision of vegetarian and vegan options and, increased local sourcing.

Where comments did not relate to either the content or implementation but rather to the more general supporting elements of school food provision and also to food education, they will be retained and considered by policy colleagues with the remit to develop future policy in these areas for example changes to home economics classes or creation of 'grow your own' projects at school.

⁴ increase fruit and vegetable provision; reduce sugar in school food and drink; set a limit for red meat and processed red meat and; amend secondary school food and drink provision across the school day

ACTIONS

Following careful consideration of both the recommendations made by the Technical Working group and the responses received in the consultation on proposed amendments to the school food and drink Regulations, Ministers have concluded that the following actions (1 to 35) will be taken forward:

PRIMARY SCHOOL FOOD AND DRINK PROVISION

Within the primary school setting there are three sets of standards that apply:

- **At the school lunch**
- **Out with the school lunch and**
- **Across the school day (both at the lunch and out with the lunch)**

All food provided as part of the school lunch must be analysed to adhere to the nutrient standards.

We will amend the nutrient standards set out in the school food and drink Regulations which apply to primary school lunches to:

1. **Align the values for each nutrient with the Scottish Dietary Goals with the exception of the value for free sugar which will be set at 7.5% of recommended energy requirements for primary school age pupils.**

The school lunch nutrient standards are based on scientific evidence and dietary advice about the amount of energy and nutrients needed by school age pupils and have been calculated to ensure they provide 30% of the daily nutrient requirements of primary pupils.

This amendment will ensure that school lunches continue to provide the correct balance of nutrients taking into account up to date dietary advice for all nutrients as set out in the Scottish Dietary Goals with the exception of free sugar.

The Scottish Dietary Goals for free sugar is for average intakes not to exceed 5% of total energy. However, we recognise that this is a substantial change from current standards and would constrain school menus significantly. As such Ministers have concluded that the free sugar standard will be set at 7.5% of the recommended energy requirements for primary school pupils. This will ensure that free sugar provided as part of the school lunch service is significantly reduced but at the same time recognises the severity of moving to a 5% nutrient standard for free sugar.

2. **Continue to allow nutrient standards for primary menus to be calculated on a weekly basis to allow flexibility in menu design but to now additionally require energy to be calculated daily and within a 15% tolerance.**

This will reduce the variation and extremes in the energy content of school meals meaning that the energy for any given day should be broadly similar to each of the other days in that week instead of having one day where energy content is particularly low or another where it is particularly high as may occur under the current Regulations.

This is in addition to the existing 10% tolerance for weekly energy calculation

3. Require a minimum of two portions of vegetables and a portion of fruit to be offered as part of a primary school lunch.

Currently, the focus on provision of fruit and vegetables in schools is based on 'types'. This means that a variety of fruit and vegetables are provided during the school day but can be provided in amounts less than a full portion. For primary age pupils, a full portion is 40g or up to 15g for dried fruit. The amended standard will now require full portions to be offered as opposed to smaller quantities. This will support the aim of increasing fruit and vegetable consumption.

4. Permit only the following savoury snacks to be provided:
(a) plain savoury crackers;
(b) plain oatcakes; or
(c) plain breadsticks.

Currently only savoury crackers, oatcakes and breadsticks are permitted to be provided at lunchtime (crisps for example are not permitted at lunchtime). Now only plain versions will be permitted. Specifying 'plain' ensures that savoury snacks accompanying lunches will be lower in salt and sugar. Flavoured savoury snacks will no longer be permitted to be provided as part of the primary school lunch service.

5. Ensure no more than 175g of red and red processed meat can be provided over the course of the school week, of which no more than 100g should be red processed meat. All of the 175g amount can be used for unprocessed red meat.

This is a new standard and is based on the Scottish Dietary Goal for red and processed meat which is underpinned by scientific evidence based dietary recommendations to limit intakes of these foods to 70g per day with the purpose of reducing the risk of colorectal cancer associated with consumption in excess of those limits. Dietary advice highlights red meat as a major source of iron and zinc which can contribute to meeting the recommended nutrient intakes for primary school lunches.

Scientific advice is that nitrites remain safe when used in accordance with regulatory limits prescribed in food additives legislation.

Setting a maximum amount for provision of red processed meat in schools will help ensure that pupils levels of exposure to nitrites is reduced compared to current provision permitted by school food legislation.

We acknowledge the wide ranging views shared in the consultation which included 'no restriction on quantity' through to a 'complete ban of all red meat'. We have taken the decision to allow a maximum amount of red and red processed meat to be provided in schools in order to retain choice and at the same time protect the health of our children.

It is important to ensure that if children choose to consume red and red processed meat products, school meal menus play a part in teaching them how to include these products as part of a balanced diet.

The maximum amounts have been based on the fact that primary school pupils will only have access to red and red processed meat at lunchtime and as such have been set to 50% of the recommended maximum daily amount with the remaining 50% being reserved for consumption out with the school day for example during an evening meal.

Scientific evidence in relation to risk is stronger for red processed meat and as such an additional restriction has been placed on provision of these products. This means that while the overall amount is 175g per week, no more than 100g can be red processed meat. This means that if caterers choose to remove red processed meat products altogether they will be free to use the full 175g amount to provide unprocessed red meat products in their menus. However if they provide red processed meat (for example ham sandwiches) in their menus they can do so up to 100g with the remaining 75g being used for unprocessed red meat products (such as steak pie).

Decisions relating to how and when to include these products in school menus will continue to be the responsibility of local authorities which we expect to be taken in consultation with pupils and parents to ensure that menus reflect as wide a range of dietary choices as is appropriate to the schools within each local authority.

When designing menus, local authorities should also take into account their duty to consider guidance issued by Scottish Ministers on the application of the principles of sustainable development when providing food or drink or catering services in school. This includes the use of fresh, local and sustainable produce and is applicable to all food and drink including meat.

6. Permit sweetened and baked products to be served no more than three times per week. When served they should contain no more than 15g of total sugar per portion.

This is a new standard for school lunches and will include items such as muffins, icecream, sponge pudding and biscuits. Alongside the new standard for sweetened and baked products served at other times of the day (no more than 7g of total sugar

per portion), this is designed to significantly reduce the amount of sugar that is accessible over the course of the school day.

The level set recognises that while it is preferable for pupils to consume more of their sugar allowance as part of the school lunch than at other times of the school day. Providing these products more frequently may discourage pupils from choosing fruit or lower sugar alternatives with their lunch.

We will amend the School food and drink Regulations which apply to provision of food outwith the primary school lunch service (for example breakfast clubs and tuckshops) to:

- 7. Require full portions of fruit and/or vegetables to be made available in any place within the primary school where food is provided, for example in a tuck shop.**

Currently, the focus on provision of fruit and vegetables in schools is based on 'types'. This means that a variety of fruit and vegetables are provided during the school day but can be provided in amounts less than a full portion. For primary age pupils a full portion is 40g or up to 15g for dried fruit. The amended standard will now require full portions to be offered as opposed to smaller quantities. This will support the aim of increasing fruit and vegetable consumption.

- 8. Require sweetened and baked products to contain no more than:**
 - 7g of total sugar per portion**
 - 13g of fat per portion**
 - 4g of saturated fat per portion**

This is a new standard for provision of food outwith the school lunch and will include items such as muffins, icecream, sponge pudding and biscuits. Alongside the new standard for sweetened and baked products served at lunchtime (15g of sugar per portion no more than 3 times per week), this is designed to significantly reduce the amount of sugar that is accessible over the course of the school day in comparison to current permitted standards which do not specify criteria or limit these items other than prohibiting the inclusion of confectionery (for example chocolate chips).

Cereal bars will be added to this category, having been removed from the definition of 'confectionery', provided they meet the specified criteria. This is in recognition of the range of product innovation for these products meaning there are varieties of this product now on the market which fit within the acceptable limits in relation to sugar, fat and salt. Allowing those varieties which fit the specified criteria will allow additional choice without compromising the focus on a balanced diet.

The current standard prohibiting confectionery at any time of the day in primary schools will continue to apply.

9. Permit plain savoury crackers, plain oatcakes and plain breadsticks to be provided and other pre-packaged savoury snacks to be provided where they meet the following criteria:

- **Pack size of no more than 25g**
- **No more than 22g of fat per 100g**
- **No more than 2g of saturates per 100g**
- **No more than 600mg of sodium per 100g**
- **No more than 1.5g of salt per 100g**
- **No more than 3g of total sugar per 100g**

The wording for this standard will be amended to be consistent with the amended savoury snack standard for lunchtime. Currently savoury snacks (plain or flavoured) are permitted out with the school lunch service provided they meet specified criteria. Plain savoury crackers, plain oatcakes and plain breadsticks will continue to be permitted but without needing to meet a specified criteria and all other savoury snacks will continue to be permitted only where they meet the specified criteria.

10. Exclude red and red processed meat from being served at any other time of the school day (than lunch).

This is a new standard and has been added to provide clarity over provision of red and red processed meats during the primary school day. Provision of red and red processed meat at times other than lunch is currently not common practice in primary school, and we want to ensure this remains the position moving forward.

The new maximum amount set for primary schools is calculated based on provision of these products at lunchtime only.

This is particularly important where breakfast clubs are being run on school premises but not by local authorities and could give rise to differences in provision. By setting this standard, we can help ensure that where a pupil attends a breakfast club run on school premises (by local authority or privately) they will not be able to access red or red processed meat in addition to that offered at lunchtime and therefore remain within the overall recommended maximum amounts.

We will amend the School food and drink Regulations which apply to provision of food across the whole school day (including breakfast, break times, lunchtime and afterschool) to:

(If providing any of the following as part of the lunch service it must be included in the nutrient analysis.)

11. Permit only breakfast cereals meeting the following criteria to be provided:

- **No more than 15g of total sugar per 100g.**
- **No more than 440mg of sodium per 100g.**
- **No more than 1.1g of salt per 100g.**
- **At least 3g of fibre per 100g.**

While breakfast cereals are currently permitted, this new standard sets out criteria which must now be met when providing these products. The new sugar, salt and fibre criteria will contribute to a reduction in access to sugar and salt across the school day but continue to allow pupils to benefit from the fibre that breakfast cereals can contribute.

12. Require all bread and bread rolls served across the school day to contain a minimum of 3g of AOAC fibre per 100g.

AOAC is the standard methodology used in product analysis and food labelling for calculating fibre. Currently, a fibre content is not specified where bread is provided in schools. This change will help ensure that bread served across the school day will have a minimum fibre content requirement and contribute towards meeting the nutrient standard for fibre which has been brought into line with the recommendations set out in the Scottish Dietary Goals.

13. Ensure pastry and pastry products are provided no more than twice a week across the school day.

This new standard includes savoury and sweet items such as pies, croissants and Danish pastries. These products are currently permitted to be provided every day. Placing a restriction on frequency will prevent a product in this category being provided every day or regularly across the week. This will help ensure that access to sugar is reduced and pupils are given the opportunity to see these products as occasional items to be included as part of a balanced diet rather than a product which should form part of our day to day intake.

This standard applies across the school day combined, meaning if products from this category are provided at morning break twice during the week, they cannot be provided at any other time of the day during that same week (for example lunchtime).

14. Permit only sweetened yoghurt, fromage frais or other milk based desserts meeting the following criteria to be provided:

- **Maximum portion size of 125g.**
- **No more than 10g of total sugar per 100g.**
- **No more than 3g of fat per 100g.**

Yoghurts, fromage frais and other milk based products are currently permitted and are recognised as a good source of calcium, however they can contain high levels of sugar. In order to retain the benefits of these milk based products but support a reduction in access to sugar and excess fat across the school day, only products meeting the criteria in this new standard will now be permitted.

We will amend the definitions in the school food and drink Regulations to:

15. Remove cereal bars from the confectionery category and sugared and yoghurt coated products to be added.

Confectionery is currently not allowed to be provided in schools at any time of the day either as a standalone item (for example chocolate bars) or as an element of any other item provided in schools (for example in breakfast cereal or cupcake toppings). This will continue to be the position in schools but the definition will change.

Sugared and yoghurt coated products have been added to the definition of confectionery to reflect the wider range of products now on the market which would not have been covered by the previous wording.

Cereal bars will be removed from this category and will instead be permitted under the sweetened and baked products category for across the school day provided they meet the specified criteria. This is in recognition of the range of product innovation for these products meaning there are varieties of this product now on the market which fit within the acceptable limits in relation to sugar, fat and salt. Allowing those varieties which fit the specified criteria will allow additional choice without compromising the focus on a balanced diet.

Remaining standards applicable to primary school food provision.

The remaining standards in the current Regulations applicable to food and drink provision in primary school will not be amended, namely, oil and spreads, table salt and other condiments, confectionery (although the definition has changed) and fried foods.

Changes to scientific advice or dietary recommendations did not give rise to amendments being proposed to the current standards for these items. In addition, no other justification for amending them was identified when they were reviewed.

We will amend the School food and drink Regulations which apply to provision of drinks across the primary school day (for example breakfast clubs, lunch service and tuckshops) to:

16. Permit only the following drinks to be provided at any time during the primary school day:

- Water (still or sparkling)
- Plain lower fat milk and calcium enriched milk alternatives

- No added sugar, lower fat milk drinks (eg flavoured milk and hot chocolate) and no added sugar, lower fat drinking yoghurts

All education authorities are under a duty to provide children and young people with access to free drinking water across the school day. Education authority caterers can provide additional water by other means if they choose.

Water and plain lower fat milk should continue to be the main focus of provision.

Lower fat milk drinks (including flavoured milk, hot chocolate and drinking yoghurts) will continue to be on the permitted drinks list but will no longer be permitted to contain any added sugar. Instead no added sugar varieties will be permitted where caterers feel this is appropriate to encourage pupils to consume more milk as part of a transition towards plain milk or to teach pupils how to incorporate occasional items as part of a balanced diet. Permitting, not requiring, these drinks will mean that caterers can choose the occasions on which to offer them. They can also choose not to offer them at all.

Juice (including fruit juice, vegetable juice, smoothies and fruit juice combination drinks) will be removed from the permitted drinks list for primary schools.

We recognise that juices can contribute towards achieving our 5 a day recommendation and we have carefully considered the comments that we received in the consultation. One small carton of fruit juice contains more sugar than the entire recommended sugar intake for a primary school pupils lunch. While we believe juices can contribute to a balanced diet, we do not feel it can be justified in a school setting where we are trying to maximise the use of the recommended maximum sugar intake to ensure children are offered a wide range of food and drink which will contribute to habit formation and nutrient intake.

SECONDARY SCHOOL FOOD AND DRINK PROVISION

We will amend the nutrient standards set out in the school food and drink Regulations which apply to secondary school analysed lunches to:

- 17. Align the values for each nutrient with the Scottish Dietary Goals with the exception of the value for [free sugar](#) which will be set at 7.5% of recommended energy requirements for secondary school age pupils.**

The school lunch nutrient standards are based on scientific knowledge and dietary advice about the amount of energy and nutrients needed by school age pupils and have been calculated to ensure they provide 30% of the daily nutrient requirements of secondary pupils.

This amendment will ensure that school lunches continue to provide the correct balance of nutrients taking into account up to date dietary advice for all nutrients as set out in the Scottish Dietary Goals with the exception of free sugar.

The Scottish Dietary Goal for free sugar is for average intakes not to exceed 5% of total energy. However, we recognise that this is a substantial change from current standards and would constrain school menus significantly. As such Ministers have concluded that the free sugar standard will be set at 7.5% of the recommended energy requirements for secondary school pupils. This will ensure that free sugar provided as part of the school lunch service is significantly reduced but at the same time recognises the severity of moving to a 5% nutrient standard for free sugar.

18. Require the energy from a minimum of a two choice two course analysed lunch to be calculated daily and within a 15% tolerance.

This will reduce the variation and extremes in the energy content of school meals meaning that the menu for any given day should be broadly similar to each of the other days in that week instead of having one day where energy content is particularly low or another where it is particularly high as may occur under the current Regulations.

This is in addition to the existing 10% tolerance for weekly energy calculation.

19. Require a minimum of a two choice, two course analysed lunch each day which meet the weekly nutrients standards and is clearly marketed as doing so.

The current Regulations for secondary school provision are set out in the same way as for primary school provision where lunchtime provision is based on the assumption that all pupils will take a two course set meal. However, we recognise that in reality, young people in secondary school use the school catering service in a different way to primary school children. Some young people will choose to purchase what they are eating for lunch during morning break (for example, if attending a lunch time club). Items are most often priced individually so young people can pick and choose what they have, meaning that they might only choose a sandwich or a drink which falls short of their greater energy requirement. For this reason we will require a minimum of two choice, two course lunch to be offered each day which will also ensure that young people, including those entitled to a free school lunch, could be assured of being able to select a minimum of a two course lunch that meets the nutrient standards. These lunches must be clearly identified.

This will be in addition to the changes made to provision of other food and drink across the school day, for example sugar content, which will also apply to the school lunch service.

20. Require not less than two portions of vegetables and not less than a portion of fruit to be offered as part of an analysed secondary school lunch

Currently, the focus on provision of fruit and vegetables in schools is based on 'types'. This means that a variety of fruit and vegetables are provided during the school day but can be provided in amounts less than a full portion. A full portion is 80g for secondary age pupils or up to 30g of dried fruit. The amended standard will now require full portions to be offered as opposed to smaller quantities. This will support the aim of increasing fruit and vegetable consumption.

We will amend the nutrient standards set out in the school food and drink Regulations which apply to secondary school lunches (not including the 2 course analysed lunch) to:

- 21. Require a secondary school main meal to include salad or vegetables as part of the price (or as part of a free school meal entitlement) where pupils are choosing to take a main meal rather than a full lunch.**

This new requirement will ensure that pupils who choose not to take a 2 course lunch will be provided with salad or vegetables as part of the meal they choose without relying on a pupil choosing to pay (or use their free school meal entitlement) for them in addition to that meal. For example, currently pupils can choose to purchase single items such as a pasta dish and may have the option to purchase a side salad or vegetable side dish separately. This new standard will ensure that pupils who purchase a pasta dish will receive that side salad or vegetable side dish as part of the price (or part of a free school meal entitlement). This will support the aim of increasing vegetable consumption.

A main meal would include, for example, lasagne, a panini or a baked potato.

We will amend the School food and drink Regulations which apply to provision of all food across the secondary school day (for example breakfast clubs, lunch service, tuckshops and vending machines) to:

- 22. Require full portions of fruit and/or vegetables to be made available in any place within the secondary school where food is provided, for example in a tuck shop.**

Currently, the focus on provision of fruit and vegetables in schools is based on 'types'. This means that a variety of fruit and vegetables are provided during the school day but can be provided in amounts less than a full portion. For secondary age pupils, a full portion is 80g or up to 30g for dried fruit. The amended standard will now require full portions to be offered as opposed to smaller quantities. This will support the aim of increasing fruit and vegetable consumption.

- 23. Require all bread and bread rolls served across the school day to contain a minimum of 3g of AOAC fibre per 100g.**

AOAC is the standard methodology used in product analysis and food labelling for calculating fibre. Currently, a fibre content is not specified where bread is provided in schools. This change will help ensure that bread served across the school day will have a minimum fibre content requirement and contribute towards meeting the nutrient standard for fibre which has been brought into line with the recommendations set out in the Scottish Dietary Goals.

24. Permit plain savoury crackers, plain oatcakes and plain breadsticks to be provided and other pre-packaged savoury snacks to be provided where they meet the following criteria:

- **Pack size of no more than 25g**
- **No more than 22g of fat per 100g**
- **No more than 2g of saturates per 100g**
- **No more than 600mg of sodium per 100g**
- **No more than 1.5g of salt per 100g**
- **No more than 3g of total sugar per 100g**

Currently the only savoury snacks permitted at lunchtime in secondary schools are savoury crackers, oatcakes or breadsticks (plain or flavoured). Crisps, for example, are not currently permitted at lunchtime but are permitted at other times of the day provided they meet specified criteria. To reflect the new model of provision in secondary schools, the savoury snack criteria will now apply across the secondary school day and will permit plain savoury crackers, plain oatcakes and plain breadsticks to be provided in addition to other savoury snacks where they meet the specified criteria. This will help ensure that fat, salt and sugar levels will continue to be restricted but choice will continue to be supported.

25. Ensure no more than 230g of red and red processed meat can be provided over the course of the school week, of which no more than 130g should be red processed meat. All of the 230g amount can be used for unprocessed red meat.

This is a new standard and is based on the Scottish Dietary Goal for red and processed meat which is underpinned by scientific evidence based dietary recommendations to limit intakes of these foods to 70g per day with the purpose of reducing the risk of colorectal cancer associated with consumption in excess of those limits.

Scientific advice is that nitrites remain safe when used in accordance with regulatory limits prescribed in food additives legislation.

Setting a maximum amount for provision of red processed meat in schools will help ensure that pupils levels of exposure to nitrites is reduced compared to current provision permitted by school food legislation.

This standard applies to school lunches and other times of the day combined meaning that the amounts set out will apply as a total to all meal occasions throughout the school day (for example breakfast, morning break, lunch and after

school clubs). This means if dishes containing red and red processed meat products totalling the maximum amounts are offered as part of the breakfast provision during the week, no dishes containing red or red processed meat could be offered at other times of the day for that same week (for example morning break or lunchtime).

We acknowledge the wide ranging views shared in the consultation which included 'no restriction on quantity' through to a 'complete ban of all red meat'. We have taken the decision to allow a maximum amount of red and red processed meat to be provided in schools in order to retain choice and at the same time protect the health of our young people.

It is important to ensure that if young people chose to consume red and red processed meat products, school meal menus play a part in teaching them how to include these products as part of a balanced diet.

The maximum amounts have been based on the assumption that secondary school age pupils will have access to red and red processed meat across the school day for example choosing to consume these products at morning break and again at lunchtime. For this reason the maximum level has been set at 2 thirds of the recommended maximum daily amounts for these products with the other third being reserved for consumption out with the school day, for example, during an evening meal.

Scientific evidence in relation to risk is stronger for red processed meat and as such an additional restriction has been placed on provision of these products. This means that while the overall maximum amount is 230g per week, no more than 130g can be red processed meat. This means that if caterers choose to remove red processed meat products altogether they will be free to use the full 230g to provide unprocessed red meat products in their menus. However if they provide red processed meat (for example ham sandwiches) in their menus they can do so up to a maximum of 130g with the remaining 100g being unprocessed red meat products (such as steak pie).

Decisions relating to how and when to include these products in school menus will continue to be the responsibility of local authorities which we expect to be taken in consultation with pupils and parents to ensure that menus reflect as wide a range of dietary choices as is appropriate to the schools within each local authority.

When designing menus, education authorities should also take into account their duty to consider guidance issued by Scottish Ministers on the application of the principles of sustainable development when providing food or drink or catering services in school. This includes the use of fresh, local and sustainable produce and is applicable to all food and drink including meat.

26. Permit sweetened and baked products to be served only when they meet the following criteria:

- **No more than 10g of total sugar per portion.**
- **No more than 19g of fat per portion**
- **No more than 6g saturated fat per portion**

This is a new standard and will include items such as muffins, icecream, sponge pudding and biscuits. This is designed to significantly reduce the amount of sugar that is accessible over the course of the secondary school day. It will also help ensure that pupils are given the opportunity to see these products as occasional items to be included as part of a balanced diet rather than a product which should form part of our day to day intake.

Cereal bars will be added to this category, having been removed from the definition of 'confectionery', provided they meet the specified criteria. This is in recognition of the range of product innovation for these products meaning there are varieties of this product now on the market which fit within the acceptable limits in relation to sugar, fat and salt. Allowing those varieties which fit the specified criteria will allow additional choice without compromising the focus on a balanced diet.

27. Permit only breakfast cereals meeting the following criteria to be provided:

- **No more than 15g of total sugar per 100g.**
- **No more than 440mg of sodium per 100g.**
- **No more than 1.1g of salt per 100g.**
- **At least 3g of fibre per 100g.**

While breakfast cereals are currently permitted, this new standard sets out criteria which must now be met when providing these products. The new sugar, salt and fibre criteria will contribute to a reduction in access to sugar and salt across the school day but continue to allow pupils to benefit from the fibre that breakfast cereals can contribute.

28. Permit only sweetened yoghurt, fromage frais or other milk based desserts meeting the following criteria to be provided:

- **Maximum portion size of 175g.**
- **No more than 10g of total sugar per 100g.**
- **No more than 3g of fat per 100g.**

Yoghurts, fromage frais and other milk based products are currently permitted and are recognised as a good source of calcium, however they can often contain high levels of sugar. In order to retain the benefits of these milk based products but

support a reduction in access to sugar and excess fat across the school day, only products meeting the criteria in this new standard will now be permitted.

29. Restrict pastry and pastry products to be provided no more than twice a week across the school day.

This new standard includes savoury and sweet items such as pies, croissants and Danish pastries. These products are currently permitted to be provided every day. Placing a restriction on frequency will prevent a product in this category being provided every day or regularly across the week. This will help ensure that access to sugar is reduced and pupils are given the opportunity to see these products as occasional items to be included as part of a balanced diet rather than a product which should form part of our day to day intake.

This standard applies across the school day combined, meaning if products from this category are provided at lunchtime twice during the week, they cannot be provided at any other time of the day during that same week (for example morning break).

30. Require the definition of confectionery to be amended to remove cereal bars from this category and include sugared and yoghurt coated products.

Confectionery is currently not allowed to be provided in schools at any time of the day either as a standalone item (for example chocolate bars) or as an element of any other item provided in schools (for example in breakfast cereal or cupcake toppings). This will continue to be the position in schools but the definition will change.

Sugared and yoghurt coated products have been added to the definition of confectionery to reflect the wider range of products now on the market which would not have been covered by the previous wording.

Cereal bars will be removed from this category and will instead be permitted under the sweetened and baked products category provided they meet the specified criteria. This is in recognition of the range of product innovation for these products meaning there are varieties of this product now on the market which fit within the acceptable limits in relation to sugar and fat. Allowing those varieties which fit the specified criteria will allow additional choice without compromising the focus on a balanced diet.

Remaining standards applicable to food across the school day (including breakfast, morning break, lunch service, tuckshops and vending machines)

The remaining standards in the current Regulations applicable across the school day in secondary school will not be amended, namely, oil and spreads, oily fish, table salt and other condiments, confectionery (although the definition has changed) and fried foods.

Changes to scientific advice or dietary recommendations did not give rise to amendments being proposed to the current standards for these items. In addition, no other justification for amending them was identified when they were reviewed.

We will amend the School food and drink Regulations which apply to provision of drinks across the secondary school day (for example breakfast, morning break, lunch service, tuckshops and vending machines) to:

31. Permit only the following drinks to be provided at any time during the secondary school day:

- Water (still or sparkling)
- Plain lower fat milk and calcium enriched milk alternatives
- Tea and Coffee
- No added sugar, lower fat milk drinks (eg flavoured milk and hot chocolate) and no added sugar, lower fat drinking yoghurts
- Sugar free drinks (excluding high caffeine – more than 150mg per litre)

All Education authorities are under a duty to provide children and young people with access to free drinking water across the school day. Education authority caterers can provide additional water if they choose.

Water and plain lower fat milk should continue to be the main focus of provision.

Lower fat milk drinks (including flavoured milk, hot chocolate and drinking yoghurts) will continue to be on the permitted drinks list but will no longer be permitted to contain any added sugar. Instead no added sugar varieties will be permitted where caterers feel this is appropriate to encourage pupils to consume milk as part of a transition towards plain milk or to teach pupils how to incorporate occasional items as part of a balanced diet. Permitting, not requiring, these drinks will mean that caterers can choose the occasions on which to offer them. They can also choose not to offer them at all.

Tea and coffee will continue to be permitted as they are under the current Regulations as they provide additional choice for secondary age pupils and the dietary advice for these products has not changed.

Juice (including fruit juice, vegetable juice, smoothies and fruit juice combination drinks) will be removed from the permitted drinks list for secondary schools.

We recognise that juices can contribute towards achieving our 5 a day recommendation and we have carefully considered the comments that we received in the consultation. One small carton of fruit juice typically contributes 100% of the free sugar allowance at the school lunch and would contribute excess sugar consumption throughout the day. While we believe juices can contribute to a balanced diet, we do not feel it can be justified in a school setting where we are trying to maximise the use of the recommended sugar intake to ensure young people

are offered a wide range of food and drink which will contribute to habit formation and nutrient intake.

We have listened carefully to the consultation responses on the issue of reintroducing sugar free drinks to the permitted drinks list for secondary schools and we agree that regular consumption of these drinks should continue to be discouraged. However, we recognise that secondary schools can play a key role in shaping the choices young people make not only during the school day but also when they leave school. For this reason we are permitting (not requiring) these drinks to form part of the school menu but on the understanding that caterers use this as an opportunity to educate young people how to include them as occasional items as part of a balanced diet. We have not specified how frequently these products should be provided (where caterers choose to offer them at all) as we believe this decision is best taken at a local level taking account of local circumstances and in consultation with pupils and parents. We will however be providing guidance on how reintroduction of sugar free drinks can be managed practically in order to support caterers and schools.

We will update the ‘Healthy eating in schools – a guide to implementing the nutritional requirements for food and drink in schools (Scotland) Regulations 2008’ document to reflect the changes set out above in order to support caterers and schools with practical implementation of the amended school food and drink Regulations.

SATISFACTION WITH THE SURVEY

There were two questions which asked respondents to tell us how satisfied they were with the consultation survey. The first question on satisfaction asked respondents how satisfied they were with this consultation, whilst the second questions asked how satisfied they were with their experience of using Citizen Space to respond.

How satisfied were you with this consultation?

Answer	No. of respondents	% of respondents
Very Satisfied	462	34
Slightly Satisfied	374	28
Neither Satisfied nor Dissatisfied	339	25
Slightly Dissatisfied	88	6
Very Dissatisfied	68	5
No answer	28	2
Total	1,359	100

Almost all respondents provided an answer to this question. Of those not answering the question, one response said they did not feel they could answer the question yet.

A sizeable majority of respondents said they were either very satisfied or slightly satisfied with the consultation. The comments from those respondents who were very satisfied varied from complements about the consultation being easy to understand to an appreciation of the Scottish Government showing an interest in children’s health and giving the public an opportunity to give their views on this very important issue. Of those slightly satisfied, views included a desire to have seen multiple choice responses and others noting the questions were too long but were otherwise content.

The absence of multiple choice questions also featured among responses from those who said they were neither satisfied or dissatisfied, whilst others responding in this way said they would want to wait and see what will be done following the consultation before deciding whether they are satisfied with it.

There was a small minority of respondents who were either slightly dissatisfied or very dissatisfied with the consultation. Responses from those dissatisfied included complaints about a lack of publicity of the consultation, that the wording of the questions were too long and that the aims of the survey did not go far enough and the questions were too limited.

How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?

Answer	No. of respondents	% of respondents
Very Satisfied	655	48
Slightly Satisfied	320	24
Neither Satisfied nor Dissatisfied	243	18
Slightly Dissatisfied	30	2
Very Dissatisfied	70	5
No answer	41	3
Total	1,359	100

Almost all respondents provided an answer to this question. Of those not answering the question, one response said that whilst the platform was easy to use they would like to have seen all the questions shown upfront at the start.

Just over three quarters of respondents said they were either very satisfied or slightly satisfied with their experience of using Citizen Space to respond to the consultation. Respondents saying they were very satisfied focus strongly on Citizen Space being easy to use and navigate and that it was user-friendly. Those who were slightly satisfied felt that using the Citizen Space platform was fine although it was a bit slow or was difficult to complete was accessing it on a mobile phone.

The response speed was also highlighted among responses from users who were neither satisfied nor dissatisfied. Other responses included a feeling that it was set up in a way which leaned towards people providing positive answers. However, even in this category, nobody reported a negative experience of using the platform.

As with the previous question on satisfaction on the survey itself, a small number of respondents reported that they were either slightly dissatisfied or very dissatisfied with the Citizen Space platform. Those responding they were very dissatisfied may have selected this option in error, as the comments actually noted Citizen Space's ease of use.

Only one comment did appear to express dissatisfaction, which said they hoped the consultation had been made available to the wider public through other media. Of those responses saying they were slightly dissatisfied, the time taken to complete the questions or the generic nature of the questions although the latter response would have been more suited to the first question on the survey itself.

The following organisations consented for their responses to this consultation to be published with their name:

Action on Salt
Action on Sugar
Barkes
British Association for the Study of Community Dentistry
British Dietetic Association
Children in Scotland
Childsmile National Executive
CONNECT
Edinburgh Community Food
Ella Drinks Ltd.
Fife Council
Food Lore CIC
Go Vegan Scotland
Moray Council
Natural Hydration Council
NHS Dumfries and Galloway Directorate of Public Health
NHS Fife Health Promotion Service and Nutrition and Clinical Dietetics Department
North Ayrshire Council
Orkney Islands Council
People for the Ethical Treatment of Animals
Plant Based Health Professionals UK
Royal College of Paediatrics and Child Health
Royal Highland Education Trust
Scotland Excel
Seeds for the Soul Ltd.
Shetland Islands Council, Children's Services Department
Tayside Nutrition MCN
The Faculty of Dental Surgery of the Royal College of Physicians and Surgeons of Glasgow
The National Parent Forum of Scotland
The Public Health Collaboration
The Scottish Cancer Prevention Network
Wee Isle Dairy Ltd.



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