

BDA Scotland Board response to consultation on Nutritional Requirements for Food and Drink in Schools (Scotland) Regulations 2008 amendments

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?

The BDA Scotland Board very much support improved access to fruit and vegetables for children and young people as part of their school day. We welcome the proposal to increase the minimum portions of vegetable and fruit to be offered at school lunch, also availability of full portions of fruit and/or vegetables at other times of the school day where food is provided. We realise there is potential risk of waste so believe monitoring should be put in place to evaluate whether the increase in fruit and vegetables used in school meals and snacks reflects an increase in intake and minimises waste.

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?

The BDA Scotland Board appreciate the intention to amend the regulations to reduce the amount of sugar provided by food and drink at lunchtimes and at all other times of the day. We support the proposal to limit the frequency of provision of sweetened and high sugar baked goods. We would ask for consideration to be given to portion size as well as frequency of these goods. In relation to introducing sugar limits for products such as breakfast cereals and yoghurts the BDA Scotland Board recommend caution. Breakfast cereals and yoghurts may contain high levels of sugar, however they also include a range of valuable nutrients for children and young people, namely iron, calcium and folate. The National Diet and Nutrition Survey has indicated low status of iron, calcium and folate particularly for children and young people. As breakfast cereals (due to being fortified with additional vitamins and minerals) and yoghurts are good sources of these nutrients as well as popular food choices amongst children and young people it would be important not to stigmatise such foods. If such foods are to be reduced, a focus needs to be placed on ensuring other foods offered as part of school provision are high in iron, calcium and folate.

In relation to the proposed changes to the lists of permitted drinks, the BDA Scotland Board are in full agreement to reinforce the messages that water, plain lower fat milk and calcium enriched milk alternatives should be the main focus. However, we are hesitant at the suggestion for other drinks to be permitted at the discretion of schools and local authorities. Allowing no added sugar, flavoured milks, hot chocolate and drinking yoghurts, (and sugar free drinks (excluding high caffeine) for secondary

schools), appears to be conflicting with other messages within the regulations and without clear limits or agreed standardisation could lead to inconsistencies in implementations across schools. We would like clarification on the criteria which will be used to permit drinks. Also clarification on definition of high caffeine. We are surprised at the recommendation for fruit juice, vegetable juice, smoothies and fruit juice combinations to no longer be on the permitted drinks list. We find this recommendation difficult to endorse as fruit and vegetable juices along with smoothies offer valuable nutrients (particularly vitamin C) and may be the only form of fruit or vegetables a child takes. This issue may be better tackled with measures addressing portion size and frequency rather than complete removal. The BDA Scotland Board advise rather than not permitting these drinks, the regulation should be aligned with current government messaging which is limit fruit juices and smoothies to a combined total of 150ml a day.

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?

The BDA Scotland Board have concerns with this intention. Red meat is one of the main valuable sources of dietary iron as well as including zinc, selenium and vitamin B12. The National Diet and Nutrition Survey has demonstrated poor intakes of these nutrients for children and young people. Further nutritional issues with processed meat are the questionable protein quality along with often high fat content. The BDA Scotland Board would like further consideration and clarification on determining and setting maximum levels. We would also like to know how other dietary sources of iron, zinc, selenium and vitamin B12 will be incorporated. The BDA Scotland Board are conscious that setting constraints will result in restricting intake further for fussy eaters, a common issue amongst children and young people. We request consideration be given on how to ensure nutritional adequacy of food provision in schools, particularly in relation to dietary iron intake.

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?

The BDA Scotland Board understand the challenge of applying nutrient standards in secondary schools. We welcome introducing a wider range of food and drink standards across the full school day. However, we are mindful of the need to ensure the proposed standards are realistic and allow for ease in implementation. We are aware of the poor uptake of school meals due to various factors. Practicalities in providing and promoting appetising and appealing healthy food needs to be considered. Healthy school meals and school food can only contribute to a healthy lifestyle if children eat the meals or food.

Question Five

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?

The BDA Scotland Board supports the intention to update and align the regulations to current nutrition scientific evidence and government policy. We would appreciate the focus of the update being on restriction of empty calorie foods (foods with little or no nutritional value), rather than restricting foods which make valuable nutrient intake contributions for children and young people. Any changes to policy must keep the children and young people at the forefront to ensure that there is a net improvement in nutrient intake rather than a reduction in school meal uptake.

We are concerned the suggested amends may have unintended consequences in relation to inequalities, especially for lower socioeconomic families who are less likely/able to offer their children a varied diet. Over restriction on school food provision may result in children and young people from lower socioeconomic families being less likely to choose food at school, instead choosing to go to nearby shops, fast food outlets and thereby actually spend more money on food during the school day.

We request consideration is given to children and young people on the autistic spectrum who have special dietary requirements. Also, children and young people who may have sensory difficulties around food. Over restriction and in some cases unnecessary restriction on food provision for such children and young people could result in extra burden in relation to time and money for parents / carers to provide foods the child / young person can or will eat.

The nutritional content of food and drinks needs to match the differing dietary recommended intakes for schoolchildren and young adults, which will vary across the age range of pupils in a school. We would advocate for a simplified system for schools which provides clarity, encourages ease in implementation and reduces inconsistencies and misinterpretations.

The BDA Scotland Board appreciate this consultation deals with only the nutritional content of food and drink in schools. However, we recommend a whole school approach is adopted to include issues such as environment and access to food choices at school as well as adequate inclusion of food skills and nutrition education within the curriculum.