

## **FDF Scotland Response to the Consultation on Amendments to the ‘Nutritional Requirements for Food and Drink in Schools (Scotland) Regulations 2008’**

This submission is made by the Food and Drink Federation (FDF) Scotland. FDF Scotland represents the food and drink manufacturing industry in Scotland. We are Scotland's largest manufacturing sector, accounting for 30% of total manufacturing turnover and our gross value added to the economy is £3.8bn, representing 29.7% of Scottish manufacturing value added. We have 1,015 food and drink manufacturing businesses, employing 45,000 people, which represents 25% of the Scottish manufacturing workforce. In 2017, all food and drink exports from Scotland have increased by 11% to £6bn.

FDF Scotland welcomes the opportunity to make comments on issues relevant to industry that are raised in the draft amendments to the ‘Nutritional Requirements for Food and Drink in Schools (Scotland) Regulations 2008’ consultation. Our members are committed to contributing healthier meals and many have taken steps to reformulate products to help caterers’ menus achieve the current school food standards.

### **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?**

FDF Scotland supports this initiative and recognise the importance of supporting pupils to eat more fruit and vegetables.

To increase school meal uptake and achieve an increase in fruit and vegetable consumption, school meals need to be varied, innovative and appealing to children. FDF Scotland recommends that the provision of fruit and vegetables at lunchtime should include those provided as part of composite dishes and fruit based desserts. This will support children to increase their fruit and vegetable intakes, particularly for those who do not currently choose to eat many whole fruit or vegetables. The Regulation should be clear that composite dishes and fruit based desserts containing a full portion of fruit or vegetables can count towards these food-based standards. In addition, the Regulation should be clear that all forms of fruits and vegetables can count including fresh, frozen, dried and canned, as well as pulses such as beans and lentils.

To support children to increase their fruit and vegetable intake, fruit juice, vegetable juice, smoothies and fruit combination drinks make an important contribution and should therefore also count. FDF Scotland do not support the proposal to ban these drinks (as set out in question 2). Fruit juices and smoothies can play a valuable role in helping children to achieve the 5 A DAY recommendation and provide a valuable source of micronutrients. For more information, please see our response to question 2.

## **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?**

FDF Scotland welcome the pragmatic approach the Technical Working Group have taken in recommending that the standard for free sugars be set at 7.5% of total calorie intake. This represents a significant reduction in free sugars from the existing standards but recognises that the population target of 5% energy from free sugars is very challenging.

### ***Proposal to introduce new nutrient-based standards for breakfast cereals, yogurts and sweetened and baked products and revised nutrient-based standards for total sugars in milk based drinks and calcium enriched drinks.***

FDF members fully support the aim to help pupils reduce their sugar intake and achieve dietary guidelines. To reflect this, our members have successfully reduced sugars in the average shopping basket by 12.1% over the last five years and are currently working towards the Public Health England sugar reduction targets for 2020, which includes reformulation of breakfast cereals, yoghurts and sweetened baked products. We are also working closely with the Scottish Government on a package of support to help Scottish SMEs to reformulate their products with a focus on improving public health.

We recognise the proposed nutrient-based standards for cereals, yoghurts and sweetened baked products aim to support children to reduce their sugars intake. However, these products can also make positive contributions to children's diets including fibre, fruit and a variety of micronutrients. We would ask that SG undertake modelling of these proposed standards to ensure they do not negatively impact on achievement of the Scottish Dietary Goals including micronutrient intake.

We are concerned that the criteria for sweetened baked products may be overly restrictive, particularly for secondary schools. This may inhibit many fruit based desserts which support pupils to increase their fruit intake. Further to this, legislation does not authorise sweeteners to be used in sweetened baked products, which limits opportunities for sugar reduction in this category. This needs to be highlighted in the guidance, to ensure that caterers are aware.

In relation to yoghurts, we are aware some FDF members are currently working towards an 11g total sugars content within their reformulation work. By increasing the sugars criterion for yoghurt from 10g to 11g per 100g you would allow a wider variety of reduced sugars yoghurts to be made available in schools, whilst still ensuring the majority of the market is restricted. Yoghurts are a great snack or dessert for pupils as they provide a rich source of calcium. Considering 11% of teenage boys and 22% of teenage girls are below the LRNI for calcium<sup>1</sup>, providing an appealing and innovative range of yoghurts in schools provides an opportunity to boost calcium intakes. Similarly, the revised nutrient-based standards for milk based drinks and calcium enriched drinks may restrict options and unintentionally reduce intake of drinks which provide a valuable source of calcium.

***Proposal to introduce a limit on the frequency of sweetened and baked foods across the school day to no more than 3 times per week in primary schools at lunchtime.***

In light of previous industry reformulation work, there are now many lower sugars or lower fat variants of sweetened baked foods which can provide a useful source of energy and nutrients. As an example, fruit based desserts and products made with wholegrain ingredients can provide a great source of fibre for pupils. Given that only 10% of those aged 1.5 - 10 years and 4% of those aged 11 - 18 years<sup>1</sup> are currently consuming the recommended intake of fibre, these options can make a valuable contribution to increasing fibre intakes – one of the Scottish Dietary Goals.

For many children, particularly those from lower income households, the school meal is the main meal for the day and these foods can contribute a valuable source of energy. Rather than imposing a limit on the frequency of sweetened and baked foods in primary schools, FDF Scotland suggests that portion size guidelines should be emphasised to support school caterers in providing appropriate energy and nutrients for the age group. This approach will support children to learn about appropriate portion sizes of foods and drinks that have higher levels of calories and/or fat, sugars and salt within a balanced diet.

***Proposal to ban fruit juice, vegetable juice, smoothies and juice combination drinks***

FDF Scotland does not support the proposal to ban fruit juice, vegetable juice, smoothies and fruit juice combinations. Fruit juices and smoothies are only consumed in small amounts but can play a valuable role in helping children to achieve the 5 A DAY recommendation and increase their micronutrient intake. From dietary survey data, we know that only 8% of children aged 11 - 18 years are meeting the 5 A DAY target, with around half of children consuming less than 3 portions per day<sup>2</sup>. In Scotland, households in the most deprived areas consume significantly less fruit and vegetables (including juice) than households in the least deprived areas<sup>3</sup>. With a quarter of children's current fruit and vegetable intake coming from fruit juice<sup>2</sup>, it is vital that these drinks are not restricted in schools, as this could further reduce already low intakes and widen inequalities between the most and least deprived.

Fruit juices and smoothies also contribute to children's micronutrients intake. Latest dietary survey data<sup>2</sup> shows that in children from 18 months to 18 years, fruit juice and smoothies contribute:

- 4% of potassium recommendations
- 3% of magnesium recommendations
- 5-6% folate recommendations

Many children are consuming below the lower recommended level for these micronutrients, as demonstrated by the survey, which showed;

- 25% of children aged 11 to 18 years had potassium intakes from food sources below the lower recommended level (LRNI)
- 40% of children aged 11 to 18 years had magnesium intakes from food sources below the lower recommended level (LRNI)
- 8% of girls aged 11 to 18 years had folate intakes from food sources below the lower recommended level (LRNI)

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<sup>1</sup> [NDNS Years 7 and 8 Combined](#)

<sup>2</sup> [NDNS Years 7 and 8 \(combined\)](#)

<sup>3</sup> [Food Standards Scotland, Estimation of Food and Nutrient Intakes in Scotland, 2001 - 2015](#)

Pure fruit smoothies are also a good source of fibre. Recently published research from Leeds University shows that smoothies retain their fruit cell wall structures after production and that the dietary fibre naturally present has potential health benefits<sup>4</sup>. The percentage of children meeting the AOAC fibre recommendation is only 10% of those aged 1.5 - 10 years and 4% of those aged 11 - 18 years<sup>5</sup>. Banning these drinks could therefore result in even fewer children achieving their recommended fibre intake.

Banning any food or drink demonises consumption and does not recognise that they can be consumed as part of a balanced diet. Moreover, it makes no attempt to educate children on the consumption of drinks as part of a healthy lifestyle. Proper hydration in children is essential and FDF Scotland believes this is best achieved through offering a variety of drinks in schools. School caterers are also competing with vendors outside of the school gates (particularly secondary schools).

FDF Scotland recommend that fruit juice, vegetable juice, smoothies and juice combination drinks should continue to be permitted in schools. We suggest that the standards are revised to include reduced portion size guidelines from 200ml (current standard) to 150ml for juice and smoothies and for juice combination drinks to contain no more than 150ml fruit juice. This will align the Scotland school food and nutrition standards with 5 A DAY guidance and continue to support pupils to meet this dietary goal.

### **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?**

FDF Scotland recognises the importance of updating the Regulations to reflect new dietary guidance. The [SACN 'Iron and Health' report \(2010\)](#) advises that adults with relatively high intakes of red and processed meat (90g/day or more) should consider reducing their intake to 70g/day, but does not provide guidance on intakes for children.

Red meat can form part of a healthy diet, providing a good source of protein, vitamins and minerals, particularly iron, zinc and vitamin B<sub>12</sub>, which are less available from plant sources. More than half of girls (54%) aged 11 - 18 years have a low iron status, including 9% effected by iron deficiency anaemia<sup>7</sup>. Furthermore, 18% boys and 27% girls (aged 11 – 18 years) have low intake of zinc and there is also evidence of low vitamin B<sub>12</sub> status in girls<sup>8</sup>. Restricting red meat availability in schools could unintentionally lead to further reduced intake of these key vitamins and minerals. The findings from the Food Standards Scotland Report on estimated food and nutrient intakes in Scotland show that red and processed meat consumption has significantly reduced over the last 15 years and average consumption meets the Scottish Dietary Goals<sup>6</sup>.

The current Regulations include a minimum iron content target for school meals (3mg). FDF Scotland request that the SG undertake modelling of the revised standards for red meat and

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<sup>4</sup> Chu et al (2017). [Fibrous Cellular Structures are found in a commercial fruit smoothie and remain intact during simulated digestion](#). Journal of Nutrition and Food Sciences 7:1.

<sup>5</sup> [NDNS Years 7 and 8 Combined](#)

<sup>6</sup> [Food Standards Scotland, Estimation of Food and Nutrient Intakes in Scotland, 2001 - 2015](#)

red processed meat to ensure that the nutrient-based standard for iron within the Regulations are still achievable and that intakes of micronutrients are not negatively impacted.

#### **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?**

FDF Scotland are not responding to this question.

#### **5. 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?**

FDF Scotland recognises the need to update the Scottish school food and drink standards to reflect changing dietary advice. However, by focusing on specific goals e.g. reducing intake of sugar and red meat, this may lead to demonization of many foods that are nutrient dense and a healthy component of a child's diet. As previously indicated, we are concerned that the wider dietary contribution of some products has not been considered; for example, fruit juice, smoothies, yoghurts, breakfast cereals and red meat all play a valuable role in children's diets and nutrient intake. By defining a very specific focus for the revised standards, the potential wider impact of these changes has not been fully considered, particularly in light of low intakes in teenagers<sup>7</sup> (11-18) of:

- Calcium – 11% of boys and 22% of girl's intake is below the LRNI
- Iron – 54% of girls have low iron intakes and there is evidence of both iron deficiency anaemia and low iron stores in 9% of older girls
- Vitamin B12 – there is evidence of low vitamin B<sub>12</sub> status in girls
- Zinc – 18% boys and 27% girls have low intakes
- Fruit and vegetables – only 8% are meeting the 5 A DAY target
- Fibre – only 4% are consuming the recommended amount

We therefore ask that modelling work is undertaken to consider the wider dietary impacts of these proposed standards and to ensure they do not further widen health inequalities between the most and the least deprived.

We also believe it will be beneficial to develop portion size guidance to support schools. Clearly the served portion of food will impact the amount of food a child eats, and so we think it is important that alongside the nutrient standards caterers are supported to ensure that meals and snacks are size appropriate to the age range of children to ensure adequate nutrition, including an appropriate amount of energy.

We acknowledge that the Scottish Government has updated the standards to include a new nutrient-based target for free sugars (in place of NMES) to reflect the revised dietary guidelines. Whilst this will not impact our members, we would like to comment that estimating free sugars

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<sup>7</sup> [NDNS Years 7 and 8.](#)

is technically challenging and often requires detailed information from raw material specifications. This makes the calculation labour intensive and commercially sensitive. It can be particularly challenging to determine free sugars for products containing a mixture of intrinsic and free sugars, such as yoghurts containing fruit puree or products such as soups and pasta sauces which contain mashed texture ingredients. We highly recommend that the Scottish Government undertake a review with Nutritional Software companies to see how analysis programmes can be adapted to facilitate calculations of free sugars.

## The Scottish Food and Drink Manufacturing Industry

- Employs around 45,000 people, 25% of the Scottish manufacturing workforce
- Adds £3.8bn GVA to the Scottish economy, 29.7% of Scottish manufacturing value added
- Is Scotland's largest manufacturing sector, accounting for 30% of total manufacturing turnover
- 95% of our 1015 businesses are SMEs

The following Associations actively work with the Food and Drink Federation:

ABIM	Association of Bakery Ingredient Manufacturers
ACFM	Association of Cereal Food Manufacturers
BCA	British Coffee Association
BOBMA	British Oats and Barley Millers Association
BSIA	British Starch Industry Association
BSNA	British Specialist Nutrition Association
CIMA	Cereal Ingredient Manufacturers' Association
EMMA	European Malt Product Manufacturers' Association
FCPPA	Frozen and Chilled Potato Processors Association
FOB	Federation of Bakers
GFIA	Gluten Free Industry Association
PPA	Potato Processors Association
SA	Salt Association
SNACMA	Snack, Nut and Crisp Manufacturers' Association
SSA	Seasoning and Spice Association
UKAMBY	UK Association of Manufacturers of Bakers' Yeast
UKTIA	United Kingdom Tea & Infusions Association Ltd

FDF also delivers specialist sector groups for members:

Biscuit, Cake, Chocolate and Confectionery Group (BCCC)  
Frozen Food Group  
Ice Cream Committee  
Meat Group  
Organic Group  
Seafood Industry Alliance