

# **PE2173/A: Ban ultra-processed foods in school meals**

## **Scottish Government written submission, 1 August 2025**

### **Does the Scottish Government consider the specific ask of the petition to be practical or achievable?**

Current scientific evidence does not support a change to dietary advice in relation to consumption of ultra processed foods noting that the evidence base remains of insufficient quality to propose changes at this time and highlighting that not all ultra processed foods are unhealthy with many playing an important part in ensuring food safety and standards. Current dietary advice advocates for a diet rich in a wide range of nutrients as depicted by the Eatwell Guide but recognises that there may also be a place for some ultra processed foods as part of a balanced and nutritious diet. As such a change to the existing position is not currently considered to be in the best interests of child nutrition which focuses on providing children and young people with an appropriate amount of energy and key nutrients as part of their school day to support healthy growth and development.

All food and drink served in education authority and grant aided schools in Scotland are under a statutory duty to comply with the Nutritional Requirements for Food and Drink in Schools (Scotland) Regulations 2020. The Regulations are based on scientific evidence and dietary advice designed to support the nutritional needs of school aged children and young people. Compliance with the Regulations is monitored by Education Scotland Health and Nutrition Inspectors as part of the school inspection programme.

Local authorities are under a statutory duty to consider sustainable procurement as they provide food, drink and catering services in schools with an emphasis on reducing reliance on processed foods in favour of fresh, local and sustainable food and drink. This approach is highlighted in the statutory 'Heathy Eating in Schools' guidance which accompanies the Regulations and reinforced by the 'Better Eating, Better Learning' guidance which also encourages local authorities to involve pupils, parents and carers when designing menus.

So long as local authorities are complying with their statutory duties in relation to school food and drink provision, it is up to them to decide what produce to use in school menus recognising they are best placed to take into account local needs and circumstances.

While the issue of processed and ultra processed foods is kept under review by the Scientific Advisory Committee on Nutrition (SACN), current advice set out by Food Standards Scotland (FSS) in light of the most recent advice from SACN notes that not all processed and ultra processed foods are unhealthy and that processing is a vital part of ensuring food safety and standards. Full detail is available [here](#). The next SACN review on processed and ultra processed foods is expected to take place in 2026.

In practice, using the definitions set out in the FSS advice, a ban on all ultra processed foods in a school setting would mean a ban on products including but not limited to:

- Food developed for children and young people with severe or complex allergies for example products for those with celiac disease
- Most breads
- Yoghurts
- Soya drinks or oat drinks commonly provided as an alternative for children and young people with dairy allergies
- Any product fortified with vitamins for example breakfast cereals

In addition, it is noted that although there is evidence to suggest that eating lots of processed and ultra-processed foods is linked with poor health outcomes, there are uncertainties around the quality of this evidence.

A key issue is that we can't yet determine whether the risk associated with processed food is due to the processing itself or because these foods are often energy-dense, high in saturated fat, salt or sugars and/or low in fruit, vegetables, and fibre. In comparison, the evidence of health harms as a result of consuming too much fat, sugar and salt is very strong and well established, including increased risk serious conditions such as heart disease, stroke and some types of cancer. Full detail is available [here](#).

With this in mind, the school food and drink Regulations have been designed to focus on the known health harms by limiting the amount of fat, saturated fat, sugar and salt that is available as part of the school day and ensure that an appropriate amount of nutrients are provided as part of a school meal.

**What, if any, action the Scottish Government is currently taking to address the issues raised by this petition, and is any further action being considered that will achieve the ask of this petition?**

While the Regulations do not prohibit the inclusion of ultra processed food, they also do not require them to be offered. This means that local authority catering teams already have the flexibility to reduce or remove them if deemed appropriate to local circumstances taking into account the impact this would have on choice and the ability to meet the dietary needs of children and young people including those with special dietary needs.

**Is there any further information the Scottish Government wish to bring to the Committee's attention, which would assist it in considering this petition?**

While an over reliance on processed and ultra processed products in school menus is discouraged in favour of fresh, sustainable produce, we recognise that there is a place for these products to be offered as part of a balanced diet.

An outright ban of ultra processed products would mean products like bread, yoghurts and breakfast cereals would no longer be provided in schools which in turn could have a significant impact on the nutritional content of school meals including

fibre, calcium and vitamins, some of which would be difficult to get in sufficient quantities from other food sources.

As such a ban on ultra processed products in schools is not currently considered to be in the best interests of child nutrition in light of current scientific evidence and dietary advice. Instead local authorities are encouraged to use the existing flexibility within the Regulations to design school menus that meet local needs, take account of feedback from children, young people, parents and carers, and a focus of fresh foods while still including ultra processed products where it is deemed appropriate.

**Improvement, Attainment and Wellbeing Division**