Briefing for the Citizen Participation and Public Petitions Committee on PE2173 Ban ultra-processed foods in school meals briefing

The petitioner is calling on the Scottish Parliament to urge the Scottish Government to ban the use of ultra-processed food in school meals across Scotland, in order to give our children healthier options.

Existing legislation

Food and drink provision in schools in Scotland has undergone significant transformation since the introduction of the Hungry for Success initiative in 2003 and the introduction of statutory school food and drink standards in primary schools in 2008 and secondary schools in 2009 under the Nutritional Requirements for Food and Drink in Schools (Scotland) Regulations 2008.

All education authorities and managers of grant-aided schools are required to comply with the Nutritional Requirements for Food and Drink in Schools (Scotland) Regulations 2020. They are also under a duty within the Standards in Scotland's Schools etc. Act 2000 to ensure that schools are health promoting. There is currently a framework which dictates nutrition, food and drink in Scottish schools.

The 2020 health eating in schools guidance is intended to help those who are involved in providing food and drink in schools to implement the regulations. It explains the nutritional requirements in the regulations and provides guidance on how to comply with them. The guidance also makes recommendations on other practical aspects not covered by those regulations and helps to support the achievement of the health promotion duty.

Education authorities and managers of grant-aided schools are ultimately responsible for ensuring that all food and drink provided in their schools comply fully with the regulations. However, everyone involved with providing food and drink on school premises can play a part in supporting compliance by making themselves aware of the requirements.

The regulations are broken down into food and drink standards, and nutrient standards. The food and drink standards apply to all food and drink provided to children and young people at any time of the day and define the types of food and drinks that must, can or cannot be offered including but not limited to:

- lunchtime
- the secondary school hostel evening meal
- breakfast clubs
- tuckshops
- vending machines
- mid-morning services
- community cafés serving children and young people during the school day
- before/after school clubs and nurture clubs.

The nutrient standards apply only to primary school lunch, secondary school analysed lunch and secondary school hostel evening meal. They set out the amount of nutrients that children and young people should receive from these meals.

Scotland's May 2025 Programme for Government pledged further progress on food policy but did not mention ultra-processed foods. The proposed Good Food Nation Plan (June 2025) also does not mention ultra-processed foods.

Ultra-processed foods

There is no single, universally agreed definition for ultra-processed foods (UPFs). The NOVA classification (which is the most commonly used) talks about food which contains "formulations of ingredients, mostly of exclusive industrial use, typically created by a series of industrial techniques and processes."

Some people have also defined ultra-processed foods as foods which contain ingredients that you might not find in your kitchen cupboard (for example, types of additives or emulsifiers or stabilisers).

Examples of ultra-processed foods might include sweetened breakfast cereals, carbonated soft drinks or confectionery. They might also include low fat spreads or some flavoured yogurts.

Health concerns around ultra-processed foods

A meta-analyses of observational evidence published by the University of Edinburgh found that high UPF consumption is associated with an increased risk of a variety of chronic diseases. No study that they reviewed reported an association between UPF intake and a beneficial health outcome. These findings suggest that dietary patterns with low consumption of UPFs may render broad public health benefits.

The School of public health at Imperial College London conducted a study which found that British children have the highest levels of ultra-processed food (UPF) consumption in Europe. The analysis, which looked at the content of school lunches of more than 3,000 children between 2008-2017, found that 64% of the calories in meals provided by the school come from ultra-processed foods, contributing to the

consumption of high levels of processed foods and increasing the risk of childhood obesity. Ultra-processed bread, snacks, puddings and sugary drinks were among the biggest contributors, and on the whole packed lunches contained more calories from highly processed foods, compared to school meals.

A survey conducted in 2024 by Dietary Intake in Scotland's Children (DISH) found that foods such as sweets, crisps and sugary drinks make up more than 20% of Scottish children's total calorie intake. Researchers found that older children (11 to 15 years) have less healthy diets than younger children, consuming diets significantly higher in free sugars, sugars added to food and drinks, and lower in fibre.

Ambiguity over definition and scientific consensus

In 2023, the Scientific Advisory Committee on Nutrition (SACN) published a position statement on processed foods and health. Overall, SACN concluded that the association between higher consumption of (ultra) processed foods and adverse health outcomes is concerning. However, limitations in the available evidence meant that it was unclear whether these foods are inherently unhealthy due to processing or because a large majority of them are high in energy (calories), saturated fat, salt and/or free sugars.

The Nordic Nutrition Recommendations 2023 recommend "minimal intake of … processed foods containing high amounts of added fats, salt and sugar". However, it notes that "the categorisation of foods as UPF does not add to the already existing food classifications and recommendations". The report notes that the approach taken is in line with guidelines from the USA, Canada and most European countries.

The Scientific Report of the 2025 US Dietary Guidelines Advisory Committee concluded that while there were associations between dietary patterns high in UPF and adverse health outcomes, the certainty of the evidence was "limited". The report notes that the "body of evidence was difficult to assess, largely because of the lack of clear definition of ultra-processed foods".

The British Nutrition Foundation's position on ultra-processed foods argues that 'due to the lack of agreed definition, the need for better understanding of mechanisms involved and concern about its usefulness as a tool to identify healthier products, the concept of UPF does not warrant inclusion within policy (e.g. national dietary guidelines).'

In a position statement, The Association of UK Dietitians stated that "It is also important to recognise that processed foods and ultra-processed foods as described by NOVA category 4 are not necessarily high in fat, salt and sugar or other less healthy additives. Processed or ultra-processed foods are not necessarily unhealthy to consume, and in some cases may be beneficial, especially to certain population groups, who may have more restricted diets. Some processed and ultra-processed foods have their place to support populations to meet nutritional requirements. It is important that people do not avoid all foods that include more than five ingredients,

as many of these products are integral to achieving a balanced diet for good health." Professor Robin May, the Chief Scientific Advisor to the UK's Food Standards Agency, has said that we are 'in danger of throwing the baby out with the bathwater' when it comes to healthy processed foods like sweeteners, whole grain bread, and fortified cereals.' The UK's Food Standards Agency have also illustrated this point stating:

"While there is a correlation between poorer health outcomes and diets that are high in ultra-processed food, we still don't know whether it is because these foods are unhealthy because of how they are made, or if it's because a large majority of processed foods are high in calories, saturated fat, salt and sugar.

However you define ultra-processed foods, the term covers a huge variety of foods, some of which are unhealthy, and some of which may have a lot of nutritional value. For instance, a chocolate bar, or a ready meal that is very high in fat, salt or sugar might be classed as ultra-processed foods, but so would a loaf of shop-bought, wholegrain bread, or a low-fat yogurt."

In a review of independent academic and scientific papers that critique ultra-processed foods FoodDrinkEurope concluded that the level of processing our food and drink undergoes does not determine the nutritional content of the final product. Furthermore, classifying and legislating food on the basis of the level of processing is not a scientifically-sound approach to food policy and would lead to negative outcomes for food systems.

Alexandra Johnstone's (Rowett Institute of Nutrition and Health, University of Aberdeen) study found that until the link between ultra-processed foods (UPFs) and poor health is better understood, the focus of official public advice should remain on avoiding known threats: high fat, sugar and salt content.

The study finds that issuing formal warnings about UPFs in the UK – which some other countries have done – could be counter-productive, leading some people to switch to alternatives that are not classified as ultra-processed but are less nutritious than what they were consuming before.

Food safety and standards

Food Standards Scotland have outlined that processing is a vital part of ensuring food safety and standards. The use of such processing is covered by strict legislation that require thorough safety assessments before they can be authorised to be used as an ingredient in a food product.

They list several reasons for why additives or other substances are added, detailed below:

- Preservatives which help to keep food safer for longer by slowing the growth of microorganisms.
- Emulsifiers which help to mix or thicken the product.
- Sweeteners which are used to replace sugar in calorie-reduced foods.

- Food colourings which add or restore colour to a food which was lost during processing.
- Antioxidants which stop fats within the product becoming rancid or changing colour.
- Flavours which add or restore flavours to a food which was lost during processing.

The UK Food Standards Agency have also stated: "Some processing – including some processing used in ultra-processed foods – can play an important role in food safety or nutrition, or in making food cheaper. For example:

- pasteurisation, which kills harmful bacteria
- cooking, which is used to ensure food is edible and safe to consume
- adding vitamins and minerals (for example, adding iron and Vitamin B1 to flour, or calcium to plant-based milks)
- improving the nutritional content of food (reducing saturated fat or sugar or salt content, for example).

Implementation Challenges

The UK Food Standards Agency points out that this can make food more accessible or affordable or help to reduce food waste. This speaks to the budgetary or logistical challenges that may be faced by schools in eliminating ultra-processed food entirely.

The schedules in the Nutritional Requirements for Food and Drink in Schools (Scotland) Regulations 2020 already sets out comprehensive regulations in regards to school meals. As one example, primary school breakfast cereals provided must contain:

(a) total sugars content which does not exceed 15 grams per 100 grams,

(b) total sodium content which does not exceed 440 milligrams per 100 grams,

(c) total salt content which does not exceed 1.1 grams per 100 grams,

(d) total fibre content of at least 3 grams per 100 grams.

Previous parliamentary engagement

On 10th June 2025 the Health, Social Care and Sport Committee took evidence from Food Standards Scotland and the topic of ultra-processed foods was covered extensively.

On the 31st January 2025 Douglas Lumsden MSP asked the Scottish Government how Food Standards Scotland is addressing concerns about ultra-processed foods, which was answered on 28th February 2025.

On 5th May 2023 Foysol Choudhury MSP asked the Scottish Government whether it will use any forthcoming national good food plan to highlight the reported negative

impact of the over-consumption of ultra processed foods on public health and the environment. It was answered on 15th May 2023.

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