

Citizen Participation and Public Petitions Committee  
Wednesday 8 October 2025  
15th Meeting, 2025 (Session 6)

## PE2173: Ban ultra-processed foods in school meals

### Introduction

**Petitioner** Lauren Houstoun

**Petition summary** 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.

**Webpage** <https://petitions.parliament.scot/petitions/PE2173>

1. This is a new petition that was lodged on 7 July 2025.
2. A full summary of this petition and its aims can be found at **Annexe A**.
3. A SPICe briefing has been prepared to inform the Committee's consideration of the petition and can be found at **Annexe B**.
4. Every petition collects signatures while it remains under consideration. At the time of writing, 5,748 signatures have been received on this petition.
5. The Committee seeks views from the Scottish Government on all new petitions before they are formally considered.
6. The Committee has received a submission from the Scottish Government, which is set out in **Annexe C** of this paper.

### Action

7. The Committee is invited to consider what action it wishes to take.

**Clerks to the Committee**  
**October 2025**

## **Annexe A: Summary of petition**

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

#### **Petitioner**

Lauren Houstoun

#### **Date Lodged**

7 July 2025

#### **Petition summary**

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.

#### **Background information**

The Perth and Kinross Council school menu relies heavily on ultra-processed products, particularly meat substitutes, while claiming to meet government regulations. I therefore believe these regulations need to be reviewed.

My children don't eat processed meat substitutes, as we do not believe they are beneficial for the environment or for our children's health and well-being.

There are days when no suitable meal is available for them at all. Even when a vegetarian option is offered, it often relies on highly processed substitutes. There are many nutritious vegetarian dishes that don't require ultra-processed ingredients.

Unfortunately, many of the meat options on the menu are also heavily processed, raising further concerns about the overall nutritional value of these meals. For many children, a school lunch is the only hot meal they receive each day, and I believe the current menu is failing those children.

Furthermore, I believe ultra-processed foods have no place on a school menu and should be banned across Scotland.

## Annexe B: SPICe briefing on PE2173



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 healthy 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 [10<sup>th</sup> 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 31<sup>st</sup> January 2025 Douglas Lumsden MSP asked the Scottish Government](#) how Food Standards Scotland is addressing concerns about ultra-processed foods, which was answered on 28<sup>th</sup> February 2025.

[On 5<sup>th</sup> May 2023 Foyso 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 15<sup>th</sup> May 2023.

**Euan Ross**

**Senior Researcher, SPICe**

15/08/2025

The purpose of this briefing is to provide a brief overview of issues raised by the petition. SPICe research specialists are not able to discuss the content of petition briefings with petitioners or other members of the public. However, if you have any comments on any petition briefing you can email us at [spice@parliament.scot](mailto:spice@parliament.scot)

Every effort is made to ensure that the information contained in petition briefings is correct at the time of publication. Readers should be aware however that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.

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## **Annexe C: Written submission**

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

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

##### **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**