

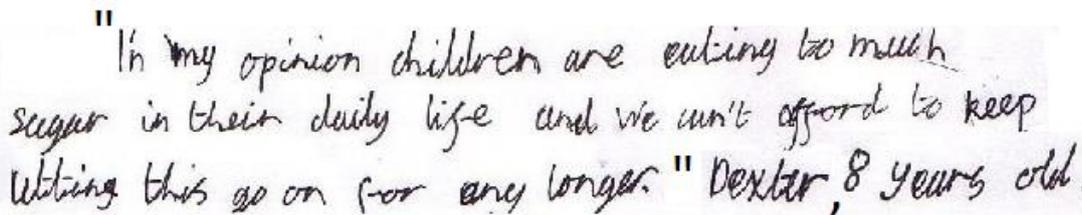
About the RCPCH

The Royal College of Paediatrics and Child Health (RCPCH) is responsible for training and examining paediatricians. The College has over 18,000 members in the UK and internationally and sets standards for professional and postgraduate education. We work to transform child health through knowledge, research and expertise, to improve the health and wellbeing of infants, children and young people across the world.

Consultation on Amendments to the Nutritional Requirements for food and drink in schools (Scotland) regulations 2008

RCPCH is very happy to support any intervention which provides a healthy, balanced diet to all children. Child poverty is a threat to a child receiving a healthy diet and affects 25% of children in Scotland today, and food at schools can be the main source of nutrition for many thousands of children. The type of food offered by schools (and nurseries) is likely to influence a “norm” in what comprises a healthy lifestyle and contribute to a trajectory to a healthier life beyond school.”

Despite continued focus, rates of obesity in Scotland are not improving and are rising most quickly in our poorest communities. More than 28% of children in Scotland are overweight or obese and research demonstrates that there is a clear link between the food and drink children see, their food choices and how much they eat. The problem is nicely summarised by an eight-year-old who participated in a recent [RCPCH &Us](#) event:



"In my opinion children are eating too much sugar in their daily life and we can't afford to keep letting this go on for any longer." Dexter, 8 years old.

Theme One – Increase access to fruit and vegetables

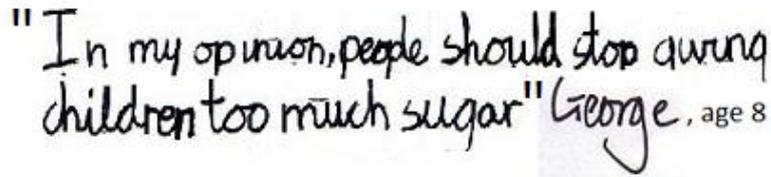
Question One:

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.

RCPCH are supportive of this intention. Paradoxically, the number of local authorities providing free fruit decreased with the introduction of free school meals, according to surveys of all Scotland's local authorities carried out by the BMA, and we urge the government to be vigilant to unintended consequences of intervening in school food and drink. Specifically, RCPCH strongly suggests that any

change to the regulations on food and drink are fully funded and not reliant on schools already stretched budgets.

Theme Two – reduce the sugar content of school food and drink provided in Schools



"In my opinion, people should stop giving children too much sugar" George, age 8

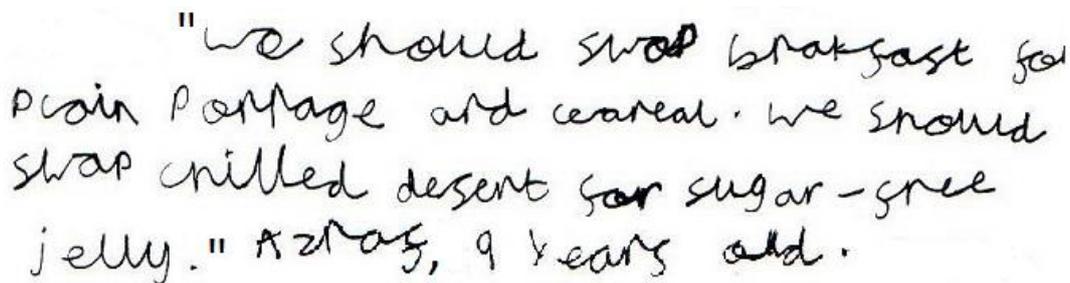
Question Two:

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.

RCPCH Scotland welcomes the proposed reduction in sugar content of food and drink. We would, however, suggest that legislation states a target (e.g. a 50% reduction in sugar consumed during the school day). Foods Standards Scotland recommends that general daily sugar intake should be reduced by 50%.

We also recommend that in addition to removing items, portion size control measures are included in these regulations, in particular for any discretionary items (for example cakes). A Cochrane review and meta-analysis¹ found people consistently consumed more food and drinks when offered larger-sized portions, packages or items of tableware (e.g. plates) than when offered smaller-sized versions.

RCPCH would also recommend that schools encourage food swaps, as suggested by this nine-year-old:



"we should swap breakfast for plain porridge and cereal. we should swap chilled desert for sugar-free jelly." Azaq, 9 years old.

Reducing portion size is an important mechanism for action that has been a part of the sugar reduction programme – for example many chocolate bars, and some single portion ice creams, now contain fewer than 250 kcals. Evidence suggests that changes to portion size should be included in any calorie reduction programme to support overall improvements in population dietary intakes.

As milk is required as part of a healthy and nutritious diet we do not object to the suggestion that low fat milk drinks are included as a permitted school drink. We do, however, have concerns that the specifications for "low fat milk drinks" are not specified. RCPCH would recommend that milk-based drinks with higher sugar content than is naturally present in cow's milk, as these are particularly consumed by children, be specifically removed from the permitted list. We therefore believe that only milk drinks with less than 5% added sugar should be available in schools.

¹ Hollands GJ, Shemilt I, Marteau TM, Jebb SA, Lewis HB, Wei Y, et al. Portion, package or tableware size for changing selection and consumption of food, alcohol and tobacco. Cochrane Database of Systematic Reviews. 2015(9).

Theme Three – provision of red and red processed meat

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 evidence base linking the consumption of red meat to cancer is very limited and there is currently no evidence to suggest a link between cancer and the early ingestion of red meat. Whilst we are not against setting a maximum for red meat, we see little reason to support it.

Theme Four - A change to the application of nutrient standards in secondary Schools

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 [RCPCH 2017 State of Child Health-Scotland](#) recommends that Scottish Government should reduce “the proximity of fast food outlets to schools, colleges, leisure centres and other places where children gather.” One year later on there had been no progress on this item (one of the few “red light” or no progress items on the [Scottish Government’s report card](#)). Secondary school children purchase food with in the vicinity of their school and this cannot be policed within the school. We suggest that Scottish Government and local authorities survey food outlets within a 0.5 mile radius of secondary schools and ensure that the businesses selling food to children have suitable food available to purchase.

Any other comments

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?

We know from our 2017 State of Child Health report that weight status at the commencement of primary school is an important predictor of health outcomes later in life, and the obesogenic environment at this critical early period in the life course needs a range of targeted interventions. In 2014/15, 22% of children were either overweight or obese when starting school.

While RCPCH Scotland welcomes the focus on strengthening the standards for food and drinks in schools, these standards should be broadened to include all childcare settings and all meals and snacks provided to ensure every child receives balanced nutrition when being cared for outside the home. This is even more important with the increase in free nursery provision.

RCPCH Scotland would also add that instead of having any wastage of food, excess food could also be reused to educate children and young people on the maximisation of food as part of the PSE or home economics curriculum.

"How about we swap Cola and juice drinks to water and lower fat milk? Who thinks we should swap sugary cereals to plain yoghurt and plain porridge? Shall we swap chocolate biscuits to crackers and cheese? Isn't it a good idea to swap toffee caramel cubes to sugar free jelly. Of course we should. It is appalling that people say 'no' to these changes." Cairo, Age 8

For further information about any aspect of this consultation response, please contact Professor Steve Turner, Officer for Scotland at: s.w.turner@abdn.ac.uk