

# HSCS Committee Call for Views: National Good Food Nation Plan

Response submitted by the Royal College of Paediatrics and Child Health Scotland: 15 August 2025

## About us

The **Royal College of Paediatrics and Child Health (RCPCH)** is responsible for training and examining paediatricians. The College has over 24,000 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.

## Question 1:

**Thinking about those aspects of the Proposed National Good Food Nation Plan related to public health, health services and social care, what, if any, specific changes would you like to see reflected in the finalised national plan?**

RCPCH Scotland welcomes the National Good Food Nation Plan's recognition of the role food plays in public health and wellbeing. However, we believe the finalised Plan must go further to address the urgent and growing challenge of childhood obesity and poor nutrition.

Tackling childhood obesity must be a national priority. One in five children in Primary 1 are currently at risk of overweight or obesity, and children living in the most deprived areas are more than twice as likely to be affected compared to their peers in the least deprived communities<sup>1</sup>. RCPCH Scotland members have echoed these concerns, stating that healthy weight and nutrition must be a public health priority in Scotland.

If we are serious about improving child health, we must invest in early years nutrition, physical activity, and community-led interventions that address the root causes of unhealthy weight, such as poverty, food insecurity, and lack of access to safe, active spaces.

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<sup>1</sup> Public Health Scotland. *Primary 1 Body Mass Index (BMI) Statistics Scotland – School Year 2023 to 2024*. Available at: <https://publichealthscotland.scot/publications/primary-1-body-mass-index-bmi-statistics-scotland/primary-1-body-mass-index-bmi-statistics-scotland-school-year-2023-to-2024/>

We recommend the Plan include the following actions:

- Expand BMI data collection to include children at the end of primary school, enabling more accurate monitoring and targeted interventions.
- Fund local authorities to maintain and expand access to sports and leisure facilities for children and young people, including preserving green spaces, swimming pools, and community leisure facilities.
- Restrict the promotion of foods high in fat, salt and sugar, including measures such as banning unlimited refills on soft drinks.

### **Ultra-Processed Foods**

We recommend that the Plan explicitly address the growing body of evidence linking high consumption of Ultra-Processed Foods (UPFs) to adverse health outcomes, including obesity, cardiovascular disease, and mental health challenges in children and young people.

While we recognise that some UPFs serve important roles in specialist diets, such as gluten-free products for coeliac disease or fortified foods for nutritional support, many UPFs contain excessive levels of fat, salt, and sugar. These products are typically energy-dense and nutrient-poor, contributing to poor dietary quality and long-term health risks.

Specifically, we recommend:

- Including UPF consumption as a monitored dietary indicator.
- Developing public health messaging and education campaigns to raise awareness of UPFs and promote whole, minimally processed foods.
- Exploring regulatory measures to reduce the availability and promotion of UPFs, particularly to children.

### **Child Poverty**

Children living in poverty are more likely to experience low birth weight, obesity, chronic conditions, and mental health problems. These impacts persist across the life course. Tackling the root causes of poverty is essential to improving child health and wellbeing.

Recent evidence highlights persistent inequalities in child nutrition and physical activity. Children in the most deprived areas have poorer diets, with lower intakes of fibre, fruit, and vegetables, and higher consumption of energy-dense foods and free sugars. Physical activity levels also vary significantly, with adherence lowest among 13–15-year-olds<sup>2</sup>.

While the Plan includes affordability in Outcome 1 and monitors food price inflation and food insecurity, we recommend:

- Stronger commitments to universal free school meals, particularly for all primary school pupils. While the extension to P6 and P7 children receiving the Scottish Child Payment

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<sup>2</sup> Scottish Government. *Scottish Health Survey 2023*. Available at:

<https://www.gov.scot/publications/scottish-health-survey-2023-volume-1-main-report/>

is welcome, we must go further to ensure equitable access to nutritious food during the school day.

### **The importance of school meals**

Healthy school meals play a vital role in shaping children's dietary habits, helping to prevent obesity and tooth decay. Evidence from the World Health Organisation (WHO) also shows that improving the school food environment reduces the risk of noncommunicable diseases in children<sup>3</sup>.

The Nutritional Requirements for Food and Drink in Schools (Scotland) Regulations 2020, alongside the statutory [Healthy Eating in Schools](#) guidance, set out clear standards for nutritious provision, including daily fruit and vegetable portions, limits on processed meats, and age-appropriate portion sizes.

However, we would like to see a commitment to make school meals for Primary aged children:

- reduce processed meat and limit processed alternatives to fish and meat which can be high in salt and saturated fat
- limit pastry, sweetened baked goods and desserts, and fried foods based on the latest dietary advice
- include starchy carbohydrates (like wholegrains) to increase fibre intake
- tailor portion sizes based on age group which could reduce food waste
- rely less on ultra processed foods.

Current guidance stipulates that local authorities have a statutory duty to consider sustainable procurement when providing food and drink in schools, with an emphasis on reducing reliance on processed foods in favour of fresh, local, and sustainable options. Although local authorities are best placed to tailor menus to local needs and circumstances, enhanced funding and support would help ensure consistent delivery of healthy, sustainable meals across all schools.

### **Oral Health**

We support the inclusion of dental health indicators and urge the Scottish Government to prioritise reducing inequalities in child oral health, particularly in deprived communities. The Scottish Government must prioritise CYP dental health urgently, and address the link between deprivation and tooth decay, as children from lower socioeconomic groups have a greater prevalence and severity of tooth decay.

In addition to the proposed policies in the Plan, RCPCH Scotland would like to see the following commitments to improve child oral health:

- Ensure all children are seen by a dentist by age one to support good oral health development.

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<sup>3</sup> World Health Organisation (WHO) European Childhood Obesity Surveillance Initiative (2021)

<https://iris.who.int/bitstream/handle/10665/274792/WHO-NMH-PND-ECHO-18.1-eng.pdf?ua=1> and

<https://www.who.int/europe/news/item/03-03-2021-how-healthy-are-children-s-eating-habits-who-europe-surveillance-results>

- Implement supervised tooth brushing schemes in all nurseries and primary schools to build lifelong oral health habits.

### **Question 3:**

**Thinking about the aspects of the Plan on allotments and community growing, what, if any, specific changes would you like to see reflected in the finalised National Plan?**

Our members would welcome a commitment to support and expand school-based community gardens. These initiatives offer significant educational and social value by teaching children how to grow, cook, and enjoy fresh produce. In many cases, the food grown is used in school meals or shared with families, reinforcing healthy eating habits and community engagement.

### **Question 4:**

**Thinking about other aspects of the Proposed National Good Food Nation Plan (not covered above), what, if any, specific changes would you like to see reflected in the finalised National Plan?**

## **Engagement with Children and Young People**

Future iterations of the Plan should include structured consultation with children and young people, in line with UNCRC commitments. Their voices must be central to shaping food policy that affects their health, education, and wellbeing.

## **Public Health Campaign**

We recommend launching a national public health campaign focused on nutrition education for children, young people, and families. This should include awareness of UPFs.

### **For further information please contact:**

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