

Report of the Technical Working Group

Review of Nutrition Requirements for Food and Drink in Schools (Scotland) Regulations 2008

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Executive Summary

The remit of the technical working group (TWG) was to undertake a review of the existing School Food and Drink Regulations (Scotland) 2008, and to provide evidence based recommendations to progress school food further towards the Scottish Dietary Goals (SDGs). The primary focus of the TWG was the health and wellbeing of children and young people.

The TWG took account of differences in the types of provision between primary and secondary schools, to ensure that the standards apply specifically to each setting. The proposals presented maintain and update nutrient standards, as well as enhancing existing food and drink based standards.

Nutrient Standards

The nutrient standards, which apply to school lunches, have been amended to encompass Scientific Advisory Committee on Nutrition (SACN) recommendations published since 2008 on energy and carbohydrates. With respect to energy there is a small reduction in energy requirements for primary aged children, however the energy requirements for young people in secondary school have increased in line with the SACN reference values. In turn, those nutrient standards expressed as % energy, e.g. fats and sugars, have changed accordingly. The TWG recognise that the increase in energy requirements for young people in secondary school appears inconsistent with current overweight and obesity rates. However, it is in line with current SACN energy requirements and there is a duty of care to ensure that those entitled to free school meals have access to a school lunch that meets their energy and nutrient requirements.

To reduce the variation and extremes in energy content it is proposed that school lunches meet the energy standard within acceptable tolerances on a daily basis. It is proposed that the calculation of all other nutrients remain over the week to allow flexibility in menu design.

Evidence from school inspections show that young people in secondary schools use the school catering service in a different way to primary school children and tend to choose single items over a number of occasions, rather than a full meal at lunchtime. There are also a wider range of items, most of which can be purchased individually, that are on offer making nutritional analysis of the entire secondary lunch provision extremely challenging. It is therefore proposed that the nutrient standards in secondary school are applied to a minimum of a two choice, two course lunch only.

Substantial changes are required to reduce free sugar in school food. The proposed standard for free sugar has been set at 7.5% of energy, rather than the SACN recommendation of 5%. This represents a significant reduction in sugar from the existing standard, whilst recognising the severity of moving to a 5% nutrient standard for free sugar in one step. In addition to reducing sugar in the nutrient standards, new food based standards designed to reduce sugar across the day have also been proposed.

The nutrient standard for fibre has been brought into line with the new SDG.

Food and Drink Standards

The SACN report on iron and health highlighted the link between consumption of red and processed meat and increased risk of developing colorectal cancer in later life. Therefore standards are proposed for red and red processed meat to protect the health of children and young people.

It is proposed that the existing standard for fruit and vegetables is amended to increase fruit and vegetable provision and move further towards the SDGs. The proposed change moves the emphasis from variety to the provision of full portions of fruit and vegetables.

Changes are proposed to permitted drinks in schools, with a key focus on reducing free sugars. In order to support the reduction in free sugar provision across the day, it is proposed that fruit juice and fruit juice combination drinks are no longer permitted due to their high free sugar content. The proposed standards are designed to reduce sugar and provide choice, whilst still supporting public health and moving towards the SDGs.

All proposals for food and drinks provided across the school day have been designed to support progress towards the SDGs. The enhanced set of food and drink standards encompass nutrient and frequency specifications, to limit high fat, salt or sugar (HFSS) foods. New standards are proposed for sweetened and baked products, red and red processed meat, breakfast cereals, sweetened yoghurts and other milk based desserts, and pastry products.

Prior to finalising the recommendations, the TWG sought views from education and catering colleagues from across Scotland on some key aspects of the proposals.

Next Steps

The recommended changes to the regulations are based on the most up to date consensus scientific evidence on diet and health and are designed to support the health of children and young people in the school setting. It is proposed that any revised regulations are reviewed and updated within 3 years, with a view to further aligning school food provision with the SDGs.

1. Remit of the Technical Working Group

The remit of the technical working group (TWG) was:

- ❖ to undertake a review of the existing School Food and Drink Regulations (Scotland) 2008
- ❖ to provide evidence based recommendations with a view to more closely aligning school food regulations with the Scottish Dietary Goals (SDGs). The SDGs, agreed by Scottish Ministers, were most recently amended in March 2016 and are published on the Scottish Government website¹.

The primary focus of the TWG was the health and wellbeing of children and young people. The proposed nutritional standards are based on the consensus view of the current science and evidence base in relation to diet and health.

1.1 The Wider Context of School Food

Evidence gathered from inspections by Education Scotland's Health and Nutrition Inspectors provided a wider context for the TWG considerations.

In proposing change, the TWG took account of differences in the types of provision between primary and secondary school. In primary school the uptake of school lunch is the highest it has ever been due to the introduction of universal free school lunches for primary 1-3 in January 2015.

In secondary schools, fewer young people choose a main meal in the middle of the day and almost all have the choice to leave school at lunchtime, where there are fewer options for eating healthily compared with in school². Morning provision may also be used by young people to purchase food for consumption during lunchtime activities. However, it is of concern that current food provision outwith lunch in schools may lead to the establishment of poor dietary habits that could track into adulthood e.g. through daily purchase of rolls with red processed meat fillings and large portions of sweetened baked products. This type of provision undermines the strict standards set for lunches.

Currently, only a few standards apply to food provision outwith lunch. However, the 2008 guide to implementing the nutritional requirements for food and drink in school (Scotland) regulations 2008³ contains guidance to encourage healthier snack provision and minimise foods high in fat, salt and sugar. Regrettably, this is not seen consistently in practice across Scotland and therefore additional standards are now proposed in relation to food provision across the day.

¹ <http://www.gov.scot/Resource/0049/00497558.pdf>

² Crawford, F, Ellaway, A et al. 2012. *Is eating out of school a healthy option for secondary pupils?* Glasgow Centre for Population Health, Glasgow.

³ <http://www.gov.scot/Publications/2008/09/12090355/0>

The TWG is aware of the budgetary pressures on local authorities and the impact that the proposed changes may have on staff who plan menus and undertake nutritional analysis.

In proposing new standards, the TWG also considered regulations or guidance provided to schools in the other devolved nations and the Republic of Ireland.

The TWG is aware of the high level of interest in school food and prior to finalising the recommendations, the TWG sought views from education and catering colleagues from across Scotland on some key aspects of the proposals.

2. Membership of the Technical Working Group

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3. Changes to Dietary Recommendations Since 2008

3.1 Background

The proposed standards have been developed to reflect the recommendations published by the Scientific Advisory Committee on Nutrition (SACN) on Energy⁴, Carbohydrates and Health⁵ and Iron and Health⁶. These recommendations are also reflected in the SDGs.

While other UK devolved nations and the Republic of Ireland have moved to solely food based standards for school lunches, it is proposed that in Scotland we should maintain and enforce nutrient standards, in addition to food standards. This will help to ensure that children and young people, especially those receiving free school meals, have access to nutritionally balanced school lunches that meet 30% of their nutritional requirements for the day.

It is proposed that the standards for primary and secondary schools are differentiated further, as the provision of school food within these two settings is vastly different. This will allow for the standards to be tailored, and thus more specific to each setting.

3.2 Nutrient Standards

Technical Considerations in Relation to Nutrition Standards

Energy

In 2011, SACN published new recommendations on energy reference values. The new energy reference values increased energy requirements for most population groups. This change reflects the more accurate methods used to assess energy expenditure. The new energy values have been used to calculate the proposed standards for energy in both primary and secondary. The resultant impact is a slight decrease in energy for the primary school lunch, and an increase in energy for the secondary school lunch.

Free sugars and fibre

In 2015 SACN published new recommendations relating to dietary carbohydrates⁵. In 2016, the SDGs were amended to reflect the SACN recommendations, reducing the goal for free sugars to 5% of energy. The SDG for fibre was also changed in line with SACN recommendations.

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https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/339317/SACN_Dietary_Reference_Values_for_Energy.pdf

5

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445503/SACN_Carbohydrates_and_Health.pdf

6

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/339309/SACN_Iron_and_Health_Report.pdf

Instead of setting the school lunch nutrient standard at 5%, in line with the SDG, a proposed new standard for school lunch has been set at 7.5%. This recognises the severity of moving to a 5% nutritional standard for free sugar in one step. Furthermore, there are insufficient standards for food and drink provided outwith lunch, and therefore high sugar options are currently available. It is for this reason that new standards for provision outwith lunch have been proposed. This will minimise disparities between lunch and outwith lunch and reduce sugar over the day.

Please refer to **annexe 1** for definitions of non milk extrinsic sugars, free sugars and total sugars.

Protein

The proposed nutrient standard for protein is based on 15% of energy requirement. This is a change from the existing standard which is based on minimum protein requirement, calculated using average body weights⁷. Total fat and total carbohydrate standards are set at 35% and 50% of energy respectively, which leaves 15% of energy from protein, making a total of 100% energy from macronutrients. Although this appears to be a large increase, it is in line with amount of protein currently provided in school lunches.

3.3 Food and Drink Based Standards

Technical Considerations in relation to setting food and drink based standards

Red and Processed meat

In 2010, SACN published robust evidence linking red and processed meat to an increased risk of colorectal cancer in later life, and in 2013 Scottish Ministers agreed a new SDG limiting red and processed meat. More recently, in 2017, the World Cancer Research Fund⁸ published updated evidence which strengthens the links between red and processed meat and risk of developing colorectal cancer, particularly with respect to processed meat.

To minimise the risk to the health of children and young people, new standards are proposed for red and red processed meat. Processed products made from poultry are not included within the proposed standards at this time as the strength of the evidence is weaker, however the exclusion of these products from the standard will be reviewed along with all other recommendations within 3 years to take account of any further scientific evidence published during this time.

Other Food Based Standards

A number of new proposed food based standards have been developed by the TWG to increase fibre, and limit the intake of fat, sugar and salt. New food based standards are therefore proposed for the following categories;

⁷ Department of Health. Dietary Reference Values for Food Energy and Nutrients for the United Kingdom. London: HMSO, 1991.

⁸ http://www.wcrf.org/sites/default/files/CUP%20Colorectal%20Report_2017_Digital.pdf

- Sweetened and baked products
- Breakfast cereals
- Sweetened yoghurts, fromage frais and other milk based desserts
- Pastry and pastry products

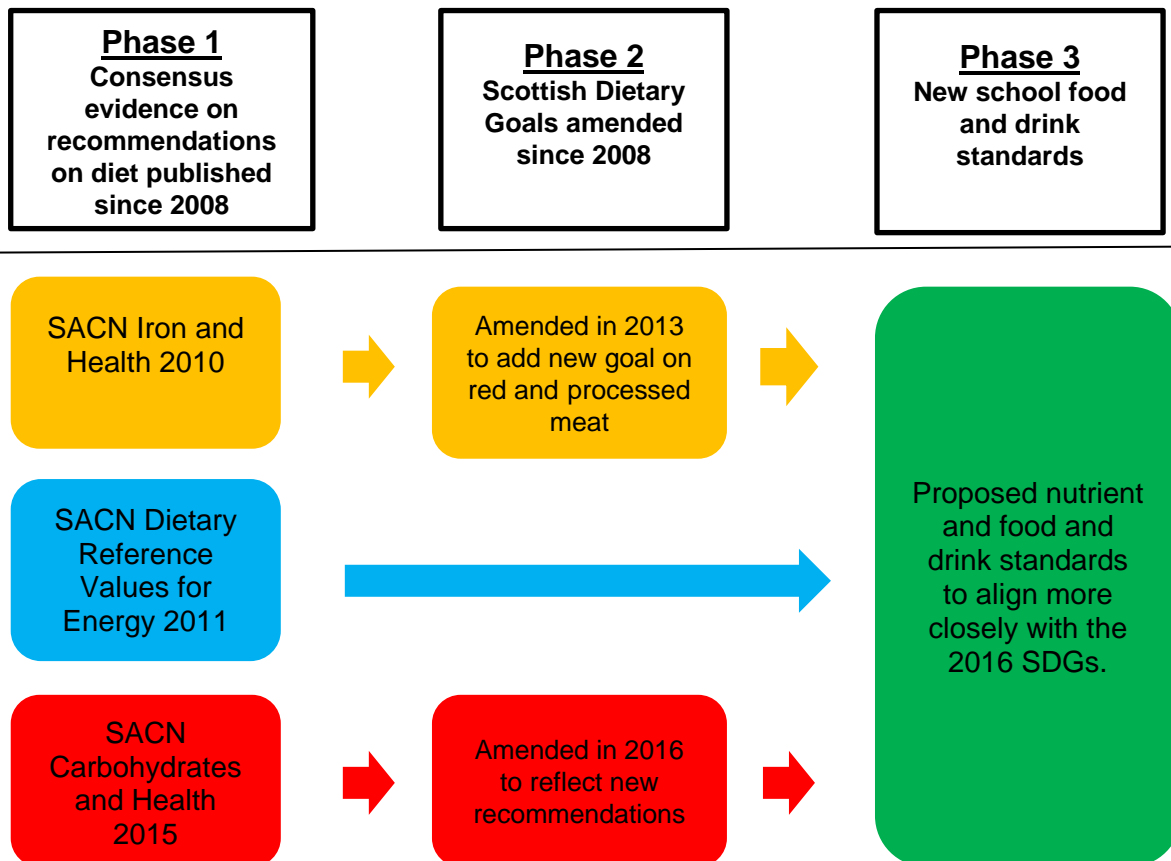
Furthermore the TWG propose amendments to the following standards;

- Fruits and vegetables
- Savoury snacks
- Bread
- Drinks

In addition a change in the definition of “confectionery” is proposed.

Please refer to **annexe 2** for definition of confectionery.

3.4 Translation of Scientific Recommendations



4. Primary School

In primary schools, almost all children stay in school at lunchtime, for school lunches or a packed lunch. All children in P1-3 are entitled to a free school lunch, and uptake of this, along with P4-7 uptake, means that 65% of primary school children are having school lunch regularly. Therefore school lunches can have a significant impact on establishing good eating habits and improving children's diets.

The provision of breakfast clubs and tuck shops in primary schools varies across Scotland, with tuck shop services being less common than prior to the introduction of School Food Regulations in 2008. All breakfast clubs and afterschool clubs run on school premises offering food and drinks, including those provided by private operators, are required to meet the nutritional regulations.

The provision of school food in primary schools can be grouped into 4 sets of standards;

1. Nutrient Standards for primary school lunches
2. Food Standards for primary school lunches
3. Food Standards outwith primary school lunches
4. Food and Drink Standards across the school day (at lunch and outwith lunch)

Please note that the above standards are also applicable to food and drink served in school hostels.

4.1 Nutrient Standards for Primary School Lunches

Proposed changes to the nutrient standards for primary schools have been highlighted in bold in **table 1** below.

As with the existing nutrient standards, the proposed nutrient standards have been based on 30% of the daily requirement.

There is a small drop in energy requirement from 557 kcals to 518 kcals. As a result, the values for total fat, saturated fat and total carbohydrate have decreased slightly as these values are based on % food energy.

With respect to the existing nutrient standard for sugar, expressed as non milk extrinsic sugar (NMES), the value was set at 11% food energy in line with the evidence base at the time. In 2015 SACN replaced NMES with the term free sugars and reduced the recommendation to 5%.

The TWG propose that the nutrient standard for sugars in school meals is reduced from 11% NMES to 7.5% free sugars as a percentage of food energy. A reduction to 5% in a single step was considered unachievable in the school setting at this point in time. It was also set in the context that current dietary monitoring data indicates that average intake of NMES sugars in primary school children is around 14.8% of food energy⁹.

*Please refer to **annexe 1** for definitions of non milk extrinsic sugars, free sugars and total sugars.*

The fibre value has increased slightly to reflect the updated SDG. The proposed fibre standard is reflected in AOAC methodology, which is the standard methodology used in product analysis and food labelling.

As the new values are an average across a wide age range, 5-11 years, the guidance to support the new regulations will need to ensure that caterers understand and are able to use their professional judgement to adjust portion sizes served depending on age and stage of development of the child.

For completeness, values for both AOAC and NSP fibre are included in the updated **table 1** below.

⁹ http://www.foodstandards.gov.scot/downloads/NDNS_Y1-4_Scotland_report_FULL_TEXT_MASTER_DOC_FINAL_FOR_REPUBLICATIION__JUNE_2017.pdf

Table 1 – Proposed updates to statutory nutrient standards for school lunches for pupils in primary schools.

	An average day's primary school lunch – Existing Standards	An average day's primary school lunch – Proposed Standards
Energy (calories/kilojoules)	557 kcals 2328 kJ	518 kcals 2165 kJ
Total fat	Not more than 21.7 g	Not more than 20.1 g
Saturated fat	Not more than 6.8 g	Not more than 6.3 g
Total Carbohydrate	Not less than 74.3 g	Not less than 69.1 g
Non Milk Extrinsic Sugars	Not more than 16.3 g	N/A
Free Sugars*	N/A	Not more than 10.4 g
Fibre (AOAC)	N/A	Not less than 6.0 g
Fibre (NSP)	Not less than 4.5 g	Not less than 4.6 g
Protein	Not less than 8.5 g	Not less than 19.4 g
Iron	Not less than 3 mg	Not less than 3 mg
Calcium	Not less than 165 mg	Not less than 165 mg
Vitamin A	Not less than 150 µg	Not less than 150 µg
Vitamin C	Not less than 9 mg	Not less than 9 mg
Folate	Not less than 45 µg	Not less than 45 µg
Sodium	Not more than 745 mg (not more than 686 mg by 2010)	Not more than 686 mg
Zinc	Not less than 2.1 mg	Not less than 2.1 mg

* Calculated as NMES minus sugars from dried, stewed or canned fruit.

4.2 Nutritional Analysis of School Lunches

The current nutritional analysis software packages used to analyse school lunch menus do so across the full school week. Whilst it was always the intention for variation in menu design to allow higher energy and nutrient values on some days and lower on others that balance across the week, evidence from inspection of school food suggests that there are incidences where there are lunches offered which are out with acceptable tolerances of energy and other nutrients. The current software is not sophisticated enough to demonstrate these variances to allow menu planners to take this into account.

The variation and extremes in energy provision need to be reduced. Therefore the new proposal for nutritional analysis aims to ensure that all school lunches meet the energy standard within acceptable tolerances on a **daily basis**.

4.3 Nutritional Analysis of Primary School Lunches

It is proposed that for primary schools the existing standard is amended to include a **daily** energy calculation, in addition to a **weekly** energy calculation. All other nutrients should be calculated on a **weekly** basis.

The TWG acknowledged that the calculation of daily energy will potentially be challenging in terms of menu planning and therefore recommend a tolerance of 15% be applied to the daily energy calculation, in addition to the existing 10% weekly energy calculation. It was also acknowledged that some nutritional analysis software packages do not support a function to display values calculated on a daily basis, and therefore some will have to be updated to reflect this change.

Table 2 – Nutritional Analysis of Primary School Lunches

Existing standard	Proposed new standard for primary schools
<p>The average school meal for a school must be calculated in accordance with the following formula;</p> <p>$(A/B)/C$</p> <p>Where 'A' is the total amount of energy and nutrient content provided in all school meals served in the course of a <u>school week</u>.</p> <p>Where 'B' is the estimated number of school meals served to pupils during that school week.</p> <p>Where 'C' is the number of days in the school week.</p>	<p>The energy contained within the average school lunch must be calculated in accordance with the following formula;</p> <p>A/B</p> <p>Where 'A' is the total energy provided in all school lunches served at the school lunch <u>in a day</u>.</p> <p>Where 'B' is the estimated number of school lunches served to pupils during that school day.</p>
	<p>The energy and nutrient content of the average school lunch should be calculated using the following formula;</p> <p>$(C/D)/E$</p> <p>Where 'C' is the total energy and nutrient provided in all schools lunches served at the school lunch <u>in a school week</u>.</p> <p>Where 'D' is the estimated number of school lunches served to pupils during that school week.</p> <p>Where 'E' is the number of number of days in the school week.</p>

Table 3 – Energy and Nutrient Tolerances for Nutritional Analysis of Primary School Lunches

Existing standard	Proposed new standard
<p>The average school meal must provide-</p> <ul style="list-style-type: none"> a) an amount of energy which shall be either the figure shown in Table A or within 10% of that figure. b) no more than the amounts of fat, saturated fat, non milk extrinsic sugars and sodium in table A. c) as a minimum the amounts of all other nutrients shown in table A 	<p>The average school lunch must provide-</p> <ul style="list-style-type: none"> a) energy which shall be either the figure shown in Table 1 or within 15% of that figure on a daily basis and 10% on a weekly basis. b) no more than the fat, saturated fat, free sugars and sodium in Table 1. c) a minimum of all other nutrients shown in Table 1.

4.4 Summary of Food and Drink Based Standards in Primary Schools

Table 4 - Summary of food and drink standards across the school day

▲ denotes proposed amended standards. ■ denotes proposed new standards.

	At the School Lunch	Out with the School Lunch
▲ Fruits and Vegetables (excluding juice)	<p>Not less than two portions of vegetables shall form part of the school lunch.</p> <p>Not less than one portion of fruit shall form part of the school lunch.</p> <p>A portion must be at least 40g. A portion of dried fruit should be limited to 15g.</p>	<p>A variety of fruit and/or vegetable portions must be made available in any place within the premises where food is provided.</p> <p>A portion must be at least 40g. A portion of dried fruit should be limited to 15g.</p>
Oily Fish	Oily fish must be provided at least once every 3 weeks.	No standard.
■ Red and Red Processed Meat	No more than 175g of red and red processed meat is permitted over the course of the school week, of which no more than 100g should be red processed meat.	Red and red processed meat is not permitted.
■ Sweetened and Baked Products	Sweetened and baked products cannot be served more than three times per week.	<p>Only products meeting the following criteria can be provided:</p> <ul style="list-style-type: none"> • No more than 7g of total sugar per

	When served they should contain no more than 15g of total sugar per portion.	<p>portion.</p> <ul style="list-style-type: none"> • No more than 13g of fat per portion. • No more than 4g of saturated fat per portion.
■ Breakfast Cereals	<p>Only breakfast cereals meeting the following criteria can be provided:</p> <ul style="list-style-type: none"> • No more than 15g of total sugar per 100g. • No more than 440mg of sodium per 100g. • No more than 1.1g of salt per 100g. • At least 3g of fibre per 100g. 	
▲ Deep Fried and Fried Foods	<p>Food that has been deep fried in the cooking or manufacturing process shall not be permitted more than 3 times in a week.</p> <p>Chips if served must be served as part of a lunch.</p>	<p>No fried foods can be available outwith the school lunch, with the exception of savoury snacks that meet the criteria outlined below.</p>
▲ Savoury Snacks	<p>The following savoury snacks can be provided:</p> <ul style="list-style-type: none"> • plain savoury crackers • plain oatcakes • plain breadsticks 	

		<p>In addition, only pre-packaged savoury snacks meeting the following criteria can be provided:</p> <ul style="list-style-type: none"> • Pack size of no more than 25g. • No more than 22g of fat per 100g. • No more than 2g of saturated fat per 100g. • No more than 600mg of sodium per 100g. • No more than 1.5g of salt per 100g. • No more than 3g of total sugar per 100g.
▲ Bread	All Bread and bread rolls must contain a minimum of 3g of AOAC fibre per 100g.	
■ Sweetened Yoghurts, Fromage Frais and other milk based desserts	<p>Only sweetened yoghurt, fromage frais and other milk based desserts meeting the following criteria can be provided:</p> <ul style="list-style-type: none"> • Maximum portion size of 125g. • No more than 10g of total sugar per 100g. • No more than 3g of fat per 100g. 	
■ Pastry and Pastry Products	Pastry and pastry products should not be provided more than twice a week across the school day.	
Oils and Spreads	<p>Oils must contain a total saturated fat content which does not exceed 16 grams per 100 grams and –</p> <p>(a) a total monounsaturated fat content of at least 55 grams per 100 grams; or</p> <p>(b) a total polyunsaturated fat content of at least 30 grams per 100 grams.</p> <p>Fat spread must contain –</p> <p>(a) a total saturated fat content which does not exceed 20 grams per 100 grams; and</p> <p>(b) a combined total monounsaturated and polyunsaturated fat content of at least 30 grams per 100 grams.</p>	

Salt and Condiments	No salt shall be available to add to food after the cooking process is complete. Other condiments may be available to pupils only in individual portions of no more than 10 millilitres.
▲ Confectionery	No confectionery shall be made available in any place within school premises Sweetened and baked products must not contain any confectionery.
▲ Drinks	The only drinks that can be provided are: <ul style="list-style-type: none"> • Water (still or sparkling). • Plain lower fat milk and calcium enriched milk alternatives. • No added sugar, lower fat milk drinks (e.g. flavoured milk and hot chocolate) and drinking yoghurts.

Please refer to **annexe 2** for definitions.

Please refer to **annexe 3** for detail on proposed changes to the Scottish Statutory Instrument.

Please refer to **annexe 4** for primary school product specifications.

Please refer to **annexe 5** for detail on the use of artificial sweeteners.

4.5 Food Standards for Primary School Lunches

Fruit and Vegetables

Data from the Scottish Health Survey (SHeS)¹⁰ shows that children and young people in Scotland consume too few fruit and vegetables. Furthermore the National Diet and Nutrition Survey (NDNS)¹¹ highlights the particularly low consumption of vegetables. To increase fruit and vegetable intake the existing standard has been amended to ensure that three **full** portions are available at lunch (2 vegetable and 1 fruit). This is in contrast to the existing standard where the emphasis was on provision of **choice** of fruit and vegetables.

Oily Fish

The existing standard to provide oily fish at least once every 3 weeks in school lunches is based on the premise that school lunches provide 30% of dietary requirements. No change is proposed to this existing standard.

Deep Fried food products

Evidence from school inspections demonstrates that fat and saturated fat standards can be achieved in line with the existing standard to limit the provision of products that have been deep fried in the cooking or manufacturing process to no more than 3 times per week. In practice this allows, for example, one portion of fish and chips and one other product to be served over the course of the week. Therefore no change is proposed to this standard.

Savoury Snacks

The decision was made to retain the existing standard to allow only savoury crackers, oatcakes and breadsticks at lunch, these products have also been permitted outwith the lunch. However the standard has been slightly amended to add the word 'plain' to avoid inclusion of high fat, sugar and salt versions of these products.

Red and Red Processed Meat

In 2010 SACN published evidence linking the consumption of red and processed meat with an increased risk of developing colorectal cancer in later life, and recommended that intakes are limited to around 70g daily.¹² The evidence linking the consumption of red and processed meat with the risk of developing colorectal cancer has strengthened in recent years¹³, with increased risk associated with consuming processed meat. Decreasing intake of processed meat would prevent twice as many

¹⁰ <http://www.gov.scot/Resource/0052/00525472.pdf>

¹¹ <http://www.foodstandards.gov.scot/publications-and-research/national-diet-and-nutrition-survey-rolling-programme-results-from-years-1-4>

¹² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/339309/SACN_Iron_and_Health_Report.pdf

¹³ http://www.wcrf.org/sites/default/files/CUP%20Colorectal%20Report_2017_Digital.pdf

cases of colorectal cancer than reducing red meat alone.¹⁴ Therefore the TWG recommend that a standard for red and red processed meat is introduced, in order to protect the health of children and young people.

Within the primary school setting red and red processed meat tends only to be provided during the school lunch and therefore it is proposed that no more than 175g of red and red processed meat is permitted at lunchtimes over the course of the school week, of which no more than 100g should be red processed meat. Red and red processed meat is not permitted outwith the lunch.

The additional restriction on the red processed meat to no more than 100g reflects the strength of evidence in relation to these products and the risk of developing colorectal cancer in later life. In addition, it will help limit fat and salt which can be high in these types of products.

The maximum values proposed are applicable to the **cooked weight** of red and red processed meat.

*Please refer to **annexe 2** for definitions of red and red processed meat.*

*Please refer to **annexe 6** for calculation of red and red processed meat limits.*

Sweetened and Baked Products

Sweetened and baked products are common within current lunch provision, but these products can often be very high in sugar.

The proposed standard is that sweetened and baked products cannot be served more than three times per week, and when served they should contain no more than 15g of total sugar per portion. The rationale for restricting the frequency of these items to a maximum of three times per week is to encourage more children and young people to choose to have fruit and lower sugar alternatives with their lunch.

*Please refer to **annexe 2** for definition of baked and sweetened products.*

¹⁴ http://www.wcrf.org/sites/default/files/Policy_Report.pdf

4.6 Food Standards Outwith Primary School Lunches

Fruit and Vegetables

It is imperative that children have access to fruit and vegetables outwith the school lunch when food is provided. There has been a slight amendment to the existing standard to read ‘fruit and/or vegetables’ as opposed to ‘fruit and vegetables’, in addition to ensuring that **full portions** are provided.

Savoury Snacks and Deep Fried Foods

The TWG looked at whether the existing savoury snack criteria should be revised and did not feel that this was necessary. However the existing standard has been amended to allow plain savoury crackers, oatcakes and breadsticks outwith the school lunch, which they are not currently, to provide flexibility and choice.

Sweetened and Baked Products

Outwith the school lunch products high in fat and sugar, such as traybakes, cakes, muffins and biscuits are not currently restricted and may be available to buy either from school or catering run tuck shops. This is despite existing guidance that these foods should be limited. Therefore it is proposed to restrict these products in order to significantly reduce fat and sugar intakes in children and young people, in line with progress towards the SDGs.

Cereal bars have been removed from the definition of confectionery and added into this category. This is in recognition of the range of product innovation in this area. Any cereal bars permitted would need to meet the criteria, and contain no confectionery.

The criteria for inclusion of these products outwith the school lunch was set based on 20% of the average child’s overall daily energy requirement for fat (35%) and saturated fat (11%). The free sugar requirement was altered from 5% of energy recommended by SACN up to 7.5% of energy in recognition of the need to take a stepwise approach to sugar reduction in school food.

Therefore the proposed standard is that only sweetened and baked products meeting the following criteria can be provided:

- *No more than 7g of total sugar per portion.*
- *No more than 13g of fat per portion.*
- *No more than 4g of saturated fat per portion.*

*Please refer to **annexe 2** for definition of confectionery and sweetened and baked products.*

Red and Red Processed Meat

It is proposed that the provision of red and red processed meat is not permitted outwith the lunch in primary schools.

4.7 Food and Drink Standards Across the Full School Day in Primary Schools

Oils and Spreads

No change is proposed to the existing oils and spreads standard.

Salt and Condiments

No change is proposed to the existing salt and condiments standard. The guidance document will include further detail to use lower fat varieties of mayonnaise and low salt and sugar condiments such as ketchup.

Confectionery

It is proposed that the definition of confectionery is changed to remove cereal bars. Furthermore sugared or yoghurt coated products are required to be added to the definition of confectionery.

*Please refer to **annexe 2** for definition of confectionery.*

No change is proposed to the existing confectionery standard, other than an amendment to the wording from cakes, biscuits and puddings to sweetened and baked products, in line with the wording of the proposed new standard for this category.

Bread

The existing standard for bread was specifically for lunch provision and was introduced to ensure that children and young people had free access to a filling starchy carbohydrate food if they were still hungry after having lunch. In reality, this standard has not been effective in practice, with wide variations in what and how this is offered, and may detract from children eating the main components of their lunch.

The proposed standard, to be applied across the school day, is that all bread and bread rolls provided contain a source of fibre as set out in EU legislation (minimum of 3g/100g)¹⁵. This is to increase the fibre content of these products which are popular with children and young people. It should be noted that as part of a review of the regulations in the future, increasing this to a minimum of 6g of AOAC fibre should be considered to support acceptance of wholemeal bread products by children and young people. Guidance will heavily endorse the use of wholemeal products.

Breakfast Cereals

As breakfast cereals are provided in schools, for example as part of breakfast club provision or to supplement provision across the day, a standard has been developed

¹⁵ https://ec.europa.eu/food/safety/labelling_nutrition/claims/nutrition_claims_en

to ensure that breakfast cereal provision supports new Government recommendations for sugar and fibre.

It is proposed that breakfast cereals should only be available if they meet specific criteria.

The proposed standard is that only breakfast cereals meeting the following criteria can be provided:

- *No more than 15g of total sugar per 100g.*
- *No more than 440mg of sodium per 100g.*
- *No more than 1.1g of salt per 100g.*
- *At least 3g of fibre per 100g.*

Sweetened Yoghurts, Fromage Frais and Other Milk Based Desserts

Milk based desserts are a good source of calcium which is important for good bone development. However, they can be high in fat and sugar, therefore a standard for this category is proposed.

It is proposed that sweetened yoghurts, fromage frais and other milk based desserts should be available across the school day if they meet specific criteria.

The proposed standard is that only sweetened yoghurt, fromage frais and other milk based desserts meeting the following criteria can be provided:

- *Maximum portion size of 125g.*
- *No more than 10g of total sugar per 100g.*
- *No more than 3g of fat per 100g.*

*Please refer to **annexe 2** for definition of other milk based desserts.*

Pastry and Pastry products

Pastry and pastry products are high in fat and should be restricted in provision, therefore a new standard for pastry and pastry products is proposed.

The proposed standard is that pastry and pastry products should not be provided more than twice a week across the school day.

*Please refer to **annexe 2** for definition of pastry and pastry products.*

Drinks

Permitted Drinks

- Water (still or sparkling)
- Plain lower fat milk and calcium enriched milk alternatives
- No added sugar, lower fat milk drinks (e.g. flavoured milk and hot chocolate) and drinking yoghurts

Following consultation with caterers and education, the TWG made the decision to permit the provision of no added sugar milk drinks and drinking yoghurts due to the nutritional benefits of milk, and to allow choice and variety.

The drinks standard is a **permitted** list, meaning that the choice of drinks provided from the list is at the discretion of schools, Local Authorities and other providers. However it should be noted that in accordance with 'The Schools (Health Promotion and Nutrition (Scotland)) Act 2007'¹⁶ children and young people should have access to free drinking water across the school day.

Fruit juice, vegetable juice, smoothies and fruit juice combination drinks have been removed from the permitted drinks list due to their high free sugar content. A 150ml portion of fruit juice exceeds the maximum free sugar limit of 10.4g in the primary school lunch, and would contribute to excess sugar consumption throughout the day.

¹⁶ https://www.legislation.gov.uk/asp/2007/15/pdfs/asp_20070015_en.pdf

5. Secondary School

The provision of school food in secondary schools can be grouped into 3 sets of standards;

1. Nutrient Standards for the analysed secondary school lunch
2. Food Standards for the analysed secondary school lunch
3. Food and Drink Standards across the school day in secondary schools

Please note that the above standards are also applicable to food and drink served in school hostels.

5.1 Nutrient Standards for Analysed Secondary School Lunches

Proposed changes to the nutrient standards for secondary schools have been highlighted in bold in **table 5** below.

As with the existing nutrient standards, the proposed nutrient standards have been based on 30% of the daily requirement.

There is an increase in energy requirement from 664 kcals to 745 kcals. As a result, the values for total fat, saturated fat and total carbohydrate have increased as these values are based on % food energy.

It was noted that the proposed new energy requirement represents an increase from the existing value. This could encounter criticism given the backdrop of overweight and obesity in Scotland. However the TWG recognise the importance of ensuring that all pupils that are entitled to a free school lunch can access sufficient calories and nutrients from the school lunch.

With respect to the existing nutrient standard for sugar, expressed as non milk extrinsic sugar (NMES), the value was set at 11% food energy in line with the evidence base at the time. In 2015 SACN replaced NMES with the term free sugars and reduced the recommendation to 5%.

The TWG propose that the nutrient standard for sugars in school meals is reduced from 11% NMES to 7.5% free sugars as a percentage of food energy. A reduction to 5% in a single step was considered unachievable in the school setting at this point in time. It was also set in the context that current dietary monitoring data indicates that average intake of NMES sugars from young people aged 11-18 years is around 15.4% of food energy¹⁷.

*Please refer to **annexe 1** for definitions of non milk extrinsic sugars, free sugars and total sugars.*

The fibre value has also increased slightly to reflect new advice. The new fibre recommendation is reflected in AOAC methodology, which is the standard methodology used in product analysis and food labelling. For completeness values for both AOAC and NSP fibre are included in the updated table.

The TWG recognised that young people in secondary school use the school catering service in a different way to primary school children. Most have the choice to leave the school building and eat out with the school environment. Some young people will choose to purchase what they are eating for lunch during morning break (for example, if attending a lunch time club). Items are most often priced individually so young people can pick and choose what they have, meaning that they might only choose a sandwich or a drink which falls short of the greater energy requirement. Other young people will buy items to add to their home packed lunch or split what money they have been given between morning break and lunch.

¹⁷ http://www.foodstandards.gov.scot/downloads/NDNS_Y1-4_Scotland_report_FULL_TEXT_MASTER_DOC_FINAL_FOR_REPUBLICATIION__JUNE_2017.pdf

The wider range of items that are on offer for young people in a secondary school make nutritionally analysing the entire provision very difficult and time consuming, and meeting the nutrient standards extremely challenging. However, as noted above, the TWG felt that it was important to ensure that young people entitled to a free school lunch could be assured of being able to select a minimum of a two course lunch that meets the nutrient standards for their entitlement. Therefore, the TWG propose that the nutrient standards in secondary school are applied to a **minimum of a two choice, two course lunch only**. These choices should include a range of lunch options which are popular with young people across the week and should be clearly marketed on the menu. This is referred to below as *the analysed school lunch*. There will be strong guidance provided around the marketing of food and drinks in school settings.

As the new values are an average across a wide age range, 11-18 years, the guidance to support the new regulations will need to ensure that caterers understand and are able to use their professional judgement to adjust portion sizes served depending on age and stage of development of the young person.

All food and drinks provided across the school day will need to meet an enhanced set of proposed food and drink standards set out in **section 5.5** to support progression towards the SDGs.

Please refer to **annexe 7** for definition of an analysed school lunch.

Table 5 – Proposed updates to statutory nutrient standards for analysed school lunches for pupils in secondary schools

	An average day's secondary school lunch – Existing Standards	An average day's secondary school lunch – Proposed Standards
Energy (calories/kilojoules)	664 kcals 2776 kJ	745 kcals 3114 kJ
Total fat	Not more than 25.8 g	Not more than 29.0g
Saturated fat	Not more than 8.1 g	Not more than 9.1g
Total Carbohydrate	Not less than 88.5 g	Not less than 99.3g
Non Milk Extrinsic Sugars	Not more than 19.5 g	N/A
Free Sugars*	N/A	Not more than 14.9 g
Fibre (AOAC)	N/A	Not less than 9.0g
Fibre (NSP)	Not less than 5.3 g	Not less than 6.9g
Protein	Not less than 13.6 g	Not less than 27.9g
Iron	Not less than 4.4 mg	Not less than 4.4mg
Calcium	Not less than 300 mg	Not less than 300mg
Vitamin A	Not less than 187 µg	Not less than 187µg
Vitamin C	Not less than 11 mg	Not less than 11mg
Folate	Not less than 60 µg	Not less than 60µg
Sodium	Not more than 894 mg (not more than 824 mg by 2010)	Not more than 824mg
Zinc	Not less than 2.8 mg	Not less than 2.8mg

* Calculated as NMES minus sugars from dried, stewed or canned fruit.

5.2 Nutritional Analysis of Analysed Secondary School Lunches

The analysed two course lunch should include all meal components. Inclusion of a drink with this lunch is at the discretion of the school catering provider (free drinking water should always be available), but this should be considered as part of meeting the nutritional and energy requirements, and must be included in the nutritional analysis.

It is proposed that for secondary schools the existing standard is amended to include a **daily** energy calculation, in addition to a **weekly** energy calculation. All other nutrients should be calculated on a **weekly** basis.

The TWG acknowledged that the calculation of daily energy will potentially be challenging in terms of menu planning and therefore recommend a tolerance of 15% be applied to the daily energy calculation, in addition to the existing 10% weekly energy calculation. It was also acknowledged that some nutrition analysis packages are not currently calculated on a daily basis and therefore some software packages will have to be updated to reflect this change.

In the guidance to support these changes it is important to ensure that caterers are more aware of the energy contribution of different lunches and the choices that young people can access across the week.

Table 6 - Nutritional Analysis of Secondary School Lunches

Existing standard	Proposed new standard for secondary schools
<p>The average school meal for a school must be calculated in accordance with the following formula;</p> <p>$(A/B)/C$</p> <p>Where 'A' is the total amount of energy and nutrient content provided in all school meals served in the course of a <u>school week</u>.</p> <p>Where 'B' is the estimated number of school meals served to pupils during that school week.</p> <p>Where 'C' is the number of days in the school week.</p>	<p>The energy contained within the average school lunch must be calculated in accordance with the following formula;</p> <p>A/B</p> <p>Where 'A' is the total energy provided in all analysed school lunches¹⁸ served at the school lunch <u>in a day</u>.</p> <p>Where 'B' is the estimated number of analysed school lunches served to pupils during that school day.</p>
	<p>The energy and nutrient content of the average school lunch should be calculated using the following formula;</p> <p>$(C/D)/E$</p> <p>Where 'C' is the total energy and nutrient provided in all analysed schools lunches served at the school lunch <u>in a school week</u>.</p> <p>Where 'D' is the estimated number of analysed school lunches served to pupils during that school week.</p> <p>Where 'E' is the number of days in the school week.</p>

¹⁸ Please refer to annexe 7 for the definition of an 'analysed school lunch.'

Table 7 – Energy and Nutrient Tolerances for Nutritional Analysis of Secondary School Lunches

Existing standard	Proposed new standard
<p>The average school meal must provide-</p> <ul style="list-style-type: none"> d) an amount of energy which shall be either the figure shown in Table A or within 10% of that figure. e) no more than the amounts of fat, saturated fat, non milk extrinsic sugars and sodium in table A. f) as a minimum the amounts of all other nutrients shown in table A 	<p>The average school lunch must provide-</p> <ul style="list-style-type: none"> d) energy which shall be either the figure shown in Table 5 for secondary or within 15% of that figure. e) no more than the fat, saturated fat, free sugars and sodium in Table 5 for secondary school. f) a minimum of all other nutrients shown in Table 5.

5.3 Summary of Food and Drink Based Standards in Secondary Schools

Table 8 - Summary of food and drink standards across the school day

▲ denotes proposed amended standards. ■ denotes proposed new standards.

	At the Analysed School Lunch	Out with the Analysed School Lunch (including non-analysed school lunch options and all other items served across the whole school day)
▲ Fruits and Vegetables (excluding juice)	<p>Not less than two portions of vegetables shall form part of the analysed school lunch.</p> <p>Not less than one portion of fruit shall form part of the analysed school lunch.</p> <p>A portion is at least 80g. A portion of dried fruit should be limited to 30g.</p>	<p>A variety of fruit and/or vegetables portions must be made available in any place within the premises where food is provided.</p> <p>Salad or vegetables must be provided and included in the cost of any main lunch item.</p> <p>A portion is at least 80g. A portion of dried fruit should be limited to 30g.</p>
▲ Oily Fish	Oily fish must be provided at least once every 3 weeks.	
■ Red and Red Processed Meat	No more than 230g of red and red processed meat is permitted over the course of the school week, of which no more than 130g should be red processed meat.	
■ Sweetened and Baked Products	<p>Only products meeting the following criteria can be provided:</p> <ul style="list-style-type: none"> • No more than 10g of total sugar per portion. • No more than 19g of fat per portion. 	

	<ul style="list-style-type: none"> No more than 6g of saturated fat per portion.
<p>■ Breakfast Cereals</p>	<p>Only breakfast cereals meeting the following criteria can be provided:</p> <ul style="list-style-type: none"> No more than 15g of total sugar per 100g. No more than 440mg of sodium per 100g. No more than 1.1g of salt per 100g. At least 3g of fibre per 100g.
<p>▲ Deep Fried and Fried Foods</p>	<p>Food that has been deep fried in the cooking or manufacturing process shall not be permitted more than 3 times per week (with the exception of savoury snacks that meet the criteria detailed below).</p> <p>Chips if served must be served as part of a lunch.</p>
<p>▲ Savoury Snacks</p>	<p>The following savoury snacks can be provided:</p> <ul style="list-style-type: none"> plain savoury crackers plain oatcakes plain breadsticks <p>In addition, only pre-packaged savoury snacks meeting the following criteria can be provided:</p> <ul style="list-style-type: none"> Pack size of no more than 25g. No more than 22g of fat per 100g. No more than 2g of saturates per 100g. No more than 600mg of sodium per 100g. No more than 1.5g of salt per 100g. No more than 3g of total sugar per 100g.
<p>▲ Bread</p>	<p>All Bread and bread rolls must contain a minimum of 3g of AOAC fibre per 100g.</p>
<p>■ Yoghurts, Fromage Frais and Other Milk Based Desserts</p>	<p>Only sweetened yoghurt, fromage frais and other milk based desserts meeting the following criteria can be provided:</p> <ul style="list-style-type: none"> Maximum portion size of 175g. No more than 10g of total sugar per 100g. No more than 3g of fat per 100g.

<p>■ Pastry and Pastry Products</p>	<p>Pastry and pastry products should not be provided more than twice a week across the school day.</p>
<p>Salt and Condiments</p>	<p>No salt shall be available to add to food after the cooking process is complete. Other condiments may be available to pupils only in individual portions of no more than 10 millilitres.</p>
<p>Oils and Spreads</p>	<p>Oils must contain a total saturated fat content which does not exceed 16 grams per 100 grams and –</p> <p>(a) a total monounsaturated fat content of at least 55 grams per 100 grams; or</p> <p>(b) a total polyunsaturated fat content of at least 30 grams per 100 grams.</p> <p>Fat spread must contain –</p> <p>(a) a total saturated fat content which does not exceed 20 grams per 100 grams; and</p> <p>(b) a combined total monounsaturated and polyunsaturated fat content of at least 30 grams per 100 grams.</p>
<p>▲ Confectionery</p>	<p>No confectionery shall be made available in any place within school premises.</p> <p>Sweetened and baked products must not contain any confectionery.</p>
<p>▲ Drinks</p>	<p>The only drinks that can be provided are:</p> <ul style="list-style-type: none"> • Water (still or sparkling). • Plain lower fat milk and calcium enriched milk alternatives. • Tea and coffee. • No added sugar, lower fat milk drinks (e.g. flavoured and hot chocolate) and drinking yoghurts. • Sugar free drinks (excluding high caffeine – 150 mg per litre).

Please refer to **annexe 2** for definitions.

Please refer to **annexe 5** for detail on the use of artificial sweeteners.

*Please refer to **annexe 8** for detail on proposed changes to the Scottish Statutory Instrument.*

*Please refer to **annexe 9** for secondary school product specifications.*

5.4 Food Standards for Analysed Secondary School Lunches

Fruit and Vegetables

Data from the Scottish Health Survey (SHeS)¹⁹ shows that children and young people in Scotland consume too few fruit and vegetables. Furthermore the National Diet and Nutrition Survey (NDNS)²⁰ highlights the particularly low consumption of vegetables. To increase fruit and vegetable intake the existing standard has been amended to ensure that three **full** portions are available at lunch (2 vegetable and 1 fruit). This is in contrast to the existing standard where the emphasis was on provision of **choice** of fruit and vegetables.

¹⁹ <http://www.gov.scot/Resource/0052/00525472.pdf>

²⁰ <http://www.foodstandards.gov.scot/publications-and-research/national-diet-and-nutrition-survey-rolling-programme-results-from-years-1-4>

5.5 Food and Drink Standards Across the Full School Day in Secondary Schools

This section applies to the analysed lunch options, non-analysed lunch options and all other items served across the whole school day.

Oils and Spreads

No change is proposed to the existing oils and spreads standard.

Salt and Condiments

No change is proposed to the existing salt and condiments standard. The guidance document will include further detail to use lower fat varieties of mayonnaise and low salt and sugar condiments such as ketchup.

Fruit and Vegetables

A variety of fruit and/or vegetables portions must be made available in any place within the premises where food is provided.

To further encourage the consumption of vegetables, which are lower in Scotland than in the rest of the UK, in secondary schools all main lunch items must incorporate a portion of salad or vegetables as part of the cost of that item. The guidance document will provide further details around this including that this should be clearly marked on the menu and heavily promoted.

*Please refer to **annexe 7** for definition of a main lunch item.*

Oily Fish

The existing standard to provide oily fish at least once every 3 weeks in school lunches is based on the premise that school lunches provide 30% of dietary requirements. No change is proposed to this existing standard.

Deep Fried food products

Evidence from school inspections demonstrates that fat and saturated fat standards can be achieved in line with the existing standard to limit the provision of products that have been deep fried in the cooking or manufacturing process to no more than 3 times per week. In practice this allows, for example, one portion of fish and chips and one other product to be served over the course of the week. Therefore no change is proposed to this standard

Savoury Snacks

The existing standard has been amended to add the word 'plain' to savoury crackers, oatcakes and breadsticks to avoid inclusion of high fat, sugar and salt

versions of these products. In addition the TWG looked at whether the existing savoury snack criteria should be revised and did not feel that this was necessary.

Bread

The existing standard for bread was specifically for lunch provision and was introduced to ensure that children and young people had free access to a filling starchy carbohydrate food if they were still hungry after having lunch. In reality, this standard has not been effective in practice, with wide variations in what and how this is offered, and may detract from children eating the main components of their lunch.

The proposed standard is that all bread and bread rolls provided contain a source of fibre as set out in EU legislation (minimum of 3g/100g)²¹. This is to increase the fibre content of these products which are popular with children and young people. It should be noted that as part of a review of the regulations in the future, increasing this to a minimum of 6g of AOAC fibre should be considered to support acceptance of wholemeal bread products by children and young people. Guidance will heavily endorse the use of wholemeal products.

Red and Red Processed Meat

In 2010 SACN published evidence linking the consumption of red and processed meat with an increased risk of developing colorectal cancer in later life and recommended that intakes are limited to around 70g daily.²² The evidence linking the consumption of red and processed meat with the risk of developing colorectal cancer has strengthened in recent years²³, with an increased risk associated with consuming processed meat. Decreasing intake of processed meat would prevent twice as many cases of colorectal cancer than reducing red meat alone.²⁴ Therefore the TWG recommend that a standard for red and red processed meat is introduced, in order to protect the health of children and young people.

In the secondary school setting red and red processed meats are frequently served outwith the lunch service, particularly during mid-morning, where the provision of rolls filled with bacon or sausages are often available on a daily basis. In addition to this, red and red processed meat is also available during the lunch service. It is proposed that no more than 230g of red and red processed meat is permitted over the course of the school week, of which no more than 130g should be red processed meat.

The additional restriction on the red processed meat no more than 130g reflects the strength of evidence in relation to these products and the risk of developing colorectal cancer in later life. In addition, it will help limit fat and salt which can be high in these types of products.

²¹ https://ec.europa.eu/food/safety/labelling_nutrition/claims/nutrition_claims_en

²² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/339309/SACN_Iron_and_Health_Report.pdf

²³ http://www.wcrf.org/sites/default/files/CUP%20Colorectal%20Report_2017_Digital.pdf

²⁴ http://www.wcrf.org/sites/default/files/Policy_Report.pdf

The maximum values proposed are applicable to the **cooked weights** of red and red processed meat.

It is acknowledged that the introduction of a standard for red and red processed meat will represent a substantial change to current provision, however this is warranted on the basis of reducing risk of colorectal cancer.

*Please refer to **annexe 2** for the definition of red and red processed meat.*

*Please refer to **annexe 6** for calculation of red and red processed meat limits.*

Pastry and Pastry products

Pastry and pastry products are high in fat and should be restricted in provision, therefore a new standard for pastry and pastry products is proposed.

The proposed standard is that pastry and pastry products should not be provided more than twice a week across the school day.

*Please refer to **annexe 2** for the definition of pastry and pastry products.*

Sweetened Yoghurts, Fromage Frais and other milk based desserts

Milk based desserts are a good source of calcium which is important for good bone development. However, they can be high in fat and sugar, therefore a standard for this category is proposed.

It is proposed that sweetened yoghurts, fromage frais and other milk based desserts should be available across the school day if they meet specific criteria.

The proposed standard is that only sweetened yoghurt, fromage frais and other milk based desserts meeting the following criteria can be provided:

- *Maximum portion size of 175g.*
- *No more than 10g of total sugar per 100g.*
- *No more than 3g of fat per 100g.*

*Please refer to **annexe 2** for definition of other milk based desserts.*

Sweetened and Baked Products

Products high in fat and sugar, such as traybakes, cakes, muffins and biscuits are not currently restricted outwith the lunch and can be available to buy either from school or catering run tuck shops on a daily basis. Inspection evidence from Education Scotland shows that whilst the quantities and portion sizes of these products do vary, their provision remains of significant concern.

Therefore it is proposed a standard is set to restrict these products across the day, in order to significantly reduce fat and sugar intakes in young people, in line with progress towards the SDGs. Consideration was given to provision of different criteria at lunchtime but this was considered impractical for caterers. On balance it

was agreed that products from this category could be provided across the day but within strict limits.

The criteria for inclusion of these products across the school day was set based on 20% of the average young persons overall daily energy requirement for fat (35%) and saturated fat (11%). The free sugar requirement was altered from 5% of energy recommended by SACN up to 7.5% of energy in recognition of the need to take a stepwise approach to sugar reduction in school food.

The guidance to accompany the regulations will discourage the provision of sweetened and baked products daily and instead include emphasis on the provision of starchy carbohydrates.

The proposed standard is that only sweetened and baked products meeting the following criteria can be provided:

- *No more than 10g of total sugar per portion.*
- *No more than 19g of fat per portion.*
- *No more than 6g of saturates per portion can be provided.*

Breakfast Cereals

As breakfast cereals are provided in schools, for example as part of breakfast club provision or to supplement provision across the day, a standard has been developed to ensure that breakfast cereal provision supports new Government recommendations for sugar and fibre.

It is proposed that breakfast cereals should be available across the school day if they meet specific criteria.

The proposed standard is that only breakfast cereals meeting the following criteria can be provided:

- *No more than 15g of total sugar per 100g.*
- *No more than 440mg of sodium per 100g.*
- *No more than 1.1g of salt per 100g.*
- *At least 3g of fibre per 100g.*

Confectionery

It is proposed that the definition of confectionery is changed to remove cereal bars. Furthermore sugared or yoghurt coated products are required to be added to the definition of confectionery.

*Please refer to **annexe 2** for definition of confectionery.*

No change is proposed to the existing confectionery standard, other than an amendment to the wording from cakes, biscuits and puddings to sweetened and baked products, in line with the wording of the proposed new standard for this category.

Drinks Standards

Permitted Drinks

- Water (still or sparkling)
- Plain lower fat milk and calcium enriched milk alternatives
- Tea and Coffee
- No added sugar, lower fat milk drinks (e.g. flavoured and hot chocolate) and drinking yoghurts
- Sugar free drinks (excluding high caffeine - 150mg per litre)

The key focus when reviewing the range of permitted drinks in secondary schools was to reduce the provision of drinks high in free sugar.

The TWG consulted with catering and education colleagues who felt that the range of drinks currently provided in schools were not attractive to young people and that this was a contributory factor to young people leaving school at lunchtime to purchase their lunch out of school. This evidence, along with the need to reduce sugar intake considerably, led to the TWG recommending that sugar free drinks be included within the permitted list in schools. The drinks standard is a **permitted** list, meaning that the choice of drinks provided from the list is at the discretion of schools, Local Authorities and other providers. However it should be noted that in accordance with 'The Schools (Health Promotion and Nutrition (Scotland)) Act 2007'²⁵ children and young people should have access to free drinking water across the school day.

The TWG also recognise that there will need to be careful consideration given to educating young people, parents and educators about the reasons for this change in approach to drinks.

Fruit juice, vegetable juice, smoothies and fruit juice combination drinks have been removed from the permitted drinks list due to their high free sugar content. A 150ml portion of fruit juice typically contributes 100% of the free sugar allowance at the school lunch and would contribute to excess sugar consumption throughout the day.

²⁵ https://www.legislation.gov.uk/asp/2007/15/pdfs/asp_20070015_en.pdf

6. Recommendations Related to School Food Standards

In relation to the proposed standards, the TWG have made the following recommendations to ensure the successful implementation of the new standards.

6.1 Nutritional Analysis Software

Software packages will be required to be updated to meet new specifications required by new standards.

6.2 Support for Implementation

Support will be required to ensure that all staff involved in the delivery of school food fully understand the new standards and their implementation.

6.3 Guidance

Comprehensive guidance will need to be developed to support the effective implementation of new standards and to strengthen advice on the whole school approach to food and drink.

6.4 Cost Implications

There may be cost implications associated with the new standards, and the TWG advise that this is fully modelled. However it is also recognised that this should be set against the overall cost of poor diet and obesity in Scotland.

6.5 Evaluation of Impact on School Food Provision

Measures to evaluate the impact of the proposed standards should be put in place from the outset.

6.6 Timescales

A period of transition before the new regulations are fully implemented will be required.

Once implemented any new standards adopted should be reviewed within 3 years.

6.7 Communications and Engagement Strategy

If the proposed standards are accepted, a well-developed communication and engagement strategy will be required.

7. Annexes

7.1 Annexe 1: Sugar

NMES, Free Sugars and Total Sugars

Non-Milk Extrinsic Sugars (NMES)	NMES include all sugars naturally present in fruit juices, honey, and syrups as well as the sugars added to foods and drinks. Half of the sugars found in dried, stewed or canned fruit are also included. The sugars in milk or integrally present in the cells of food such as fruit and vegetables are not included. ²⁶
Free Sugar	All monosaccharides and disaccharides added to foods by the manufacturer, cook or consumer, plus sugars naturally present in honey, syrups and unsweetened fruit and vegetable juices. The sugars in milk or integrally present in the cells of food such as fruit and vegetables are not included. ^{27,28}

**The only difference between the definition of free sugars and NMES is that NMES also includes 50% of the sugars found in dried, stewed or canned fruit and vegetables, whereas none of the sugars found in dried, stewed or canned fruit and vegetables are included within the definition of free sugars.*

Total Sugar	Total sugar includes all sugars; <ul style="list-style-type: none">• the sugars in milk (lactose) or integrally present in the cells of food such as fruit and vegetables• all sugar found in dried, stewed or canned fruit• all monosaccharides and disaccharides added to foods by the manufacturer, cook or consumers, plus sugars naturally present in honey, syrups and unsweetened fruit and vegetable juices.
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The TWG are of that view that the most pragmatic way to calculate free sugars in practice is to maintain the existing NMES calculation but deduct any sugars from dried, stewed or canned fruit and vegetables. However please note that the sugar content of fruit juice or syrup present in canned fruit should be counted as NMES/ free sugars.

This recommendation will be reviewed along with all other recommendations within 3 years to take account of any further scientific evidence published during this time

²⁶ <http://www.foodstandards.gov.scot/publications-and-research/the-scottish-diet-it-needs-to-change>

²⁷ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445503/SACN_Carbohydrates_and_Health.pdf

²⁸ <https://www.cambridge.org/core/journals/public-health-nutrition/article/definition-of-free-sugars-for-the-uk/2A2B3A70999052A15FD157C105B3D745>

and to also take account of further developments with analysis programmes to provide calculations of free sugars.

7.2 Annexe 2: Glossary of Definitions

Term	Definition
Sweetened and baked products	<p>Baking, home baked and commercially produced e.g. cookies, muffins, traybakes, cakes, scones, pancakes, waffles, brownies.</p> <p>Desserts e.g. sponge puddings, cheesecakes, crumbles.</p> <p>Frozen desserts e.g. ice cream and frozen yoghurt.</p> <p>Biscuits including pre-packed e.g. bourbons, digestives.</p> <p>Cereal bars including breakfast bakes and bars.</p>
Confectionery	Chewing gum, processed fruit bars, any sugared or yoghurt-coated products, non-chocolate confectionery (whether or not containing sugar), chocolate in any form, any product containing or wholly or partially coated with chocolate and any chocolate flavoured substance, but excludes cocoa powder used in sweetened and baked products and drinks.
Red and Red Processed Meat	<p>Red meat includes beef, lamb, pork, veal, venison, goat and offal.²⁹</p> <p>The term 'processed meat' refers to red meat that has been preserved by smoking, curing, salting or adding preservative; this includes sausages, bacon, ham, salami and pates.³⁰ The addition of ingredients such as egg, breadcrumbs, flour, seasoning (including small amounts of salt for the purpose of seasoning) and spices to red meat does not constitute processing and therefore would not be referred to as a processed meat product, provided it has not undergone any of the processes listed above or the addition of preservatives.</p>
Milk based desserts	Desserts containing milk e.g custard, rice pudding and semolina.
Pastry and Pastry Products	Savoury and sweet products e.g. pies, croissants, choux pastry, butteries and Danish pastries.

²⁹

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/339309/SACN_Iron_and_Health_Report.pdf

³⁰

World Cancer Research Fund/American Institute for Cancer Research. *Food, Nutrition, Physical Activity and the Prevention of Cancer: a Global Perspective*. Washington DC: AICR, 2007.

7.3 Annexe 3: Primary Schools - Changes to Scottish Statutory Instrument³¹

SSI – Primary

Schedule 1 - School Meal Requirements – Menu

Number	Existing Standard	Proposed Standard	Additional Notes
1	(1) Not less than 2 types of vegetable shall be provided every day (2) For the purposes of sub-paragraph (1), “vegetable does not include potatoes	(1) Not less than two portions of vegetables shall form part of the school lunch. (2) For the purposes of sub-paragraph (1), “vegetable does not include potatoes A portion must be at least 40g.	
2	Not less than 2 types of fruit shall be provided every day	Not less than one portion of fruit shall form part of the school lunch. A portion must be at least 40g. A portion of dried fruit should be limited to 15g.	
3	Bread shall be provided every day	All Bread and bread rolls must contain a minimum of 3g of AOAC fibre per 100g.	Please note that it is proposed that this standard extends across the school day.
4	Oily fish must be provided at least once every 3 weeks	No change	
5	No savoury snacks shall be provided except –	No savoury snacks shall be provided except –	

³¹ http://www.legislation.gov.uk/sdsi/2008/9780110816456/pdfs/sdsi_9780110816456_en.pdf

	(a) savoury crackers; (b) oatcakes; or (c) breadsticks.	(a) plain savoury crackers; (b) plain oatcakes; or (c) plain breadsticks.	
6	(1) No confectionery shall be provided (2) Cakes, biscuits and puddings must not contain any confectionery	(1) No confectionery shall be provided. (2) Sweetened and baked products must not contain any confectionery.	Please note that it is proposed that this standard extends across the school day.
7	(1) Food that has been deep fried in the cooking or manufacturing process shall not be provided more than 3 times in a week (2) Chips may only be served as an accompaniment to other food	(1) Food that has been deep fried in the cooking or manufacturing process shall not be permitted more than 3 times in a week (2) Chips if served must be served as part of a lunch.	
	N/A	No more than 175g of red and red processed meat is permitted over the course of the school week, of which no more than 100g should be red processed meat.	New standard.
	N/A	Sweetened and baked products cannot be served more than three times per week. When served they should contain no more than 15g of total sugar per portion.	New standard.
	N/A	Only breakfast cereals meeting the following criteria can be provided: <ul style="list-style-type: none"> • No more than 15g of total sugar per 100g. • No more than 440mg of sodium per 100g. • No more than 1.1g of salt per 100g. 	Please note that it is proposed that this standard extends across the school day.

		<ul style="list-style-type: none"> • At least 3g of fibre per 100g. 	
	N/A	<p>Only sweetened yoghurt, fromage frais or other milk based desserts meeting the following criteria can be provided:</p> <ul style="list-style-type: none"> • Maximum portion size of 125g. • No more than 10g of total sugar per 100g. • No more than 3g of fat per 100g. 	Please note that it is proposed that this standard extends across the school day.
	N/A	Pastry and pastry products should not be provided more than twice a week across the school day.	Please note that it is proposed that this standard extends across the school day.

Schedule 2 – Food and Drink Requirements in School Meals

Number	Existing Standard	Proposed Standard	Additional Notes
1	<p>(1) Oils must contain a total saturated fat content which does not exceed 16 grams per 100 grams and –</p> <p>(a) a total monounsaturated fat content of at least 55 grams per 100 grams; or</p> <p>(b) a total polyunsaturated fat content of at least 30 grams per 100 grams</p> <p>(2) Fat spread must contain –</p> <p>(a) a total saturated fat content which does not exceed 20 grams per 100 grams; and</p> <p>(b) a combined total monounsaturated and polyunsaturated fat content of at least 30 grams per 100 grams.</p>	No change	
2	<p>(1) No salt shall be available to add to food after the cooking process is complete.</p> <p>(2) Other condiments may be available to pupils only in individual portions of no more than 10 millilitres.</p>	No change	
3	Subject to paragraphs 4 to 6 only the following drinks may be	Only the following drinks may be provided:-	Please note that it is proposed that this standard extends across the

	<p>provided:-</p> <ul style="list-style-type: none"> (a) milk (b) milk drinks (c) drinking yoghurts (d) soya, oat and rice based drinks enriched with calcium (e) fruit juice (f) vegetable juice (g) drinks comprising combinations of fruit juice or vegetable juice with water; (h) drinks comprising blends of fruit, vegetables, fruit juice or vegetable juice in any combination; (i) tea and coffee; and (j) bottled water 	<ul style="list-style-type: none"> (a) Plain lower fat milk (b) Calcium enriched milk alternatives (c) Water (d) No added sugar, lower fat milk drinks (e) No added sugar lower fat drinking yoghurts 	school day.
4	<p>(1) Milk must contain a total fat content which does not exceed 1.8 grams per 100 millilitres.</p> <p>(2) Milk drinks and drinking yoghurts must contain-</p> <ul style="list-style-type: none"> (a) a total fat content which does not exceed 1.8 grams per 100 millilitres. (b) a total sugars content which does not exceed 10 grams per 100 millilitres provided that the total sugars content does not exceed 20 grams per portion. 	<p>(1) Milk must contain a total fat content which does not exceed 1.8 grams per 100 millilitres.</p> <p>(2) Milk drinks and drinking yoghurts must contain –</p> <ul style="list-style-type: none"> (a) a total fat content which does not exceed 1.8 grams per 100 millilitres; and (b) a total sugars content which does not exceed 5 grams per 100 millilitres. 	
5	Soya, oat and rice based drinks	Calcium enriched milk alternatives must	

	<p>enriched with calcium must contain-</p> <p>(a) a total fat content which does not exceed 1.8 grams per 100 millilitres.</p> <p>(b) a total sugars content which does not exceed 5 grams per 100 millilitres provided that the total sugars content does not exceed 10 grams per portion.</p>	<p>contain-</p> <p>(a) a total fat content which does not exceed 1.8 grams per 100 millilitres.</p> <p>(b) a total sugars content which does not exceed 0.5 grams per 100 millilitres</p>	
6	<p>(1) Fruit juice and vegetable juice must –</p> <p>(a) have no added salt;</p> <p>(b) have no added sugars except sugar which has been added for the purpose of regulating acidic taste in an amount (expressed as dry matter) not exceeding 15 grams per litre; and</p> <p>(c) be made available only in individual portions not exceeding 200 millilitres.</p> <p>(2) Drinks comprising combinations of fruit juice or vegetable juice with water must –</p> <p>(a) contain a minimum of 50% fruit juice or vegetable juice;</p> <p>(b) be made available only in individual portions not exceeding 400 millilitres;</p> <p>(c) have no added salt;</p> <p>(d) have no added sugar except</p>	Not permitted.	

	<p>sugar which has been added for the purpose of regulating acidic taste in an amount (expressed as dry matter) not exceeding 15 grams per litre; and</p> <p>(e) contain a total sugars content which does not exceed 20 grams per portion.</p> <p>(3) Drinks comprising blends of fruit, vegetables, fruit juice or vegetable juice in any combination must –</p> <p>(a) be made available only in individual portions not exceeding 200 millilitres;</p> <p>(b) have no added salt; and</p> <p>(c) have no added sugars except sugar which been added for the purpose of regulating acidic taste in an amount (expressed as dry matter) not exceeding 15 grams per litre.</p>		
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Schedule 4 – Food and Drink Requirements Otherwise than as Part of a School Meal

Number	Existing Standard	Proposed Standard	Additional Notes
1	Fruit and vegetables must be made available in any place within the premises where food is provided.	<p>A variety of fruit and/or vegetables portions must be made available in any place within the premises where food is provided.</p> <p>A portion must be at least 40g. A portion of dried fruit should be limited to 15g.</p>	
2	<p>(1) No salt shall be available to add to food after the cooking process is complete.</p> <p>(2) Other condiments may be available to pupils only in individual portions of no more than 10 millilitres</p>	No change	
3	<p>(1) With the exception of savoury snacks no food that has been fried in the cooking or manufacturing process shall be made available in any place within school premises where food is provided.</p> <p>(2) Savoury snacks – (a) may be made available only in individual portions which do not exceed 25 grams; and (b) must contain –</p>	<p>(1) The following savoury snacks can be provided:</p> <ul style="list-style-type: none"> • Plain savoury crackers • Plain oatcakes • Plain breadsticks <p>(2) All other savoury snacks– (a) may be made available only in individual portions which do not exceed 25 grams; and (b) must contain– (i) a total fat content which does not</p>	

	<p>(i) a total fat content which does not exceed 22 grams per 100 grams;</p> <p>(ii) a total saturated fat content which does not exceed 2 grams per 100 grams;</p> <p>(iii) a total sodium content which does not exceed 0.6 grams per 100 grams; and</p> <p>(iv) a total sugars content which does not exceed 3 grams per 100 grams.</p>	<p>exceed 22 grams per 100 grams;</p> <p>(ii) a total saturated fat content which does not exceed 2 grams per 100 grams;</p> <p>(iii) a total sodium content which does not exceed 0.6 grams per 100 grams;</p> <p>(iv) a total salt content which does not exceed 1.5 grams per 100 grams; and</p> <p>(v) a total sugars content which does not exceed 3 grams per 100 grams.</p>	
4	<p>(1) No confectionery shall be made available in any place within school premises where food is provided.</p> <p>(2) Cakes, biscuits or puddings must not contain any confectionery.</p>	<p>(1) No confectionery shall be provided.</p> <p>(2) Sweetened and baked products must not contain any confectionery.</p>	
	N/A	<p>Only sweetened and baked products meeting the following criteria can be provided:</p> <ul style="list-style-type: none"> • No more than 7g of total sugar per portion. • No more than 13g of fat per portion. • No more than 4g of saturated fat per portion. 	
	N/A	<p>Only breakfast cereals meeting the following criteria can be provided:</p> <ul style="list-style-type: none"> • No more than 15g of total sugar per 100g. • No more than 440mg of sodium per 100g. 	<p>Please note that it is proposed that this standard extends across the school day.</p>

		<ul style="list-style-type: none"> • No more than 1.1g of salt per 100g. • At least 3g of fibre per 100g. 	
	N/A	<p>Only sweetened yoghurt or milk based desserts meeting the following criteria can be provided:</p> <ul style="list-style-type: none"> • Maximum portion size of 125g. • No more than 10g of total sugar per 100g. • No more than 3g of fat per 100g. 	Please note that it is proposed that this standard extends across the school day.
	N/A	Pastry and pastry products should not be provided more than twice a week across the school day.	Please note that it is proposed that this standard extends across the school day.
	N/A	All Bread and bread rolls must contain a minimum of 3g of AOAC fibre per 100g.	Please note that it is proposed that this standard extends across the school day.
5	<p>Subject to paragraphs 6 to 8 only the following drinks may be provided:-</p> <ul style="list-style-type: none"> (a) milk (b) milk drinks (c) drinking yoghurts (d) soya, oat and rice based drinks enriched with calcium (e) fruit juice (f) vegetable juice (g) drinks comprising combinations of fruit juice or vegetable juice with water; (h) drinks comprising blends of fruit, vegetables, fruit juice or vegetable juice in any combination; (i) tea and coffee; and 	<p>Only the following drinks may be provided:-</p> <ul style="list-style-type: none"> (a) Plain lower fat milk (b) Calcium enriched milk alternatives (c) Water (d) No added sugar lower fat milk drinks (e) No added sugar lower fat drinking yoghurts 	Please note that it is proposed that this standard extends across the school day.

	(j) bottled water		
4	<p>(1) Milk must contain a total fat content which does not exceed 1.8 grams per 100 millilitres.</p> <p>(2) Milk drinks and drinking yoghurts must contain-</p> <p>(a) a total fat content which does not exceed 1.8 grams per 100 millilitres.</p> <p>(b) a total sugars content which does not exceed 10 grams per 100 millilitres provided that the total sugars content does not exceed 20 grams per portion.</p>	<p>(1) Milk must contain a total fat content which does not exceed 1.8 grams per 100 millilitres.</p> <p>(2) Milk drinks and drinking yoghurts must contain –</p> <p>(a) a total fat content which does not exceed 1.8 grams per 100 millilitres; and</p> <p>(b) a total sugars content which does not exceed 5 grams per 100 millilitres.</p>	
5	<p>Soya, oat and rice based drinks enriched with calcium must contain-</p> <p>(a) a total fat content which does not exceed 1.8 grams per 100 millilitres.</p> <p>(b) a total sugars content which does not exceed 5 grams per 100 millilitres provided that the total sugars content does not exceed 10 grams per portion.</p>	<p>Calcium enriched milk alternatives must contain-</p> <p>(a) a total fat content which does not exceed 1.8 grams per 100 millilitres.</p> <p>(b) a total sugars content which does not exceed 0.5 grams per 100 millilitres.</p>	
6	<p>(1) Fruit juice and vegetable juice must –</p> <p>(a) have no added salt;</p> <p>(b) have no added sugars except sugar which has been added for the purpose of regulating acidic taste in</p>	Not permitted.	

	<p>an amount (expressed as dry matter) not exceeding 15 grams per litre; and (c) be made available only in individual portions not exceeding 200 millilitres.</p> <p>(2) Drinks comprising combinations of fruit juice or vegetable juice with water must – (a) contain a minimum of 50% fruit juice or vegetable juice; (b) be made available only in individual portions not exceeding 400 millilitres; (c) have no added salt; (d) have no added sugar except sugar which has been added for the purpose of regulating acidic taste in an amount (expressed as dry matter) not exceeding 15 grams per litre; and (e) contain a total sugars content which does not exceed 20 grams per portion.</p> <p>(3) Drinks comprising blends of fruit, vegetables, fruit juice or vegetable juice in any combination must – (a) be made available only in individual portions not exceeding</p>		
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	<p>200 millilitres; (b) have no added salt; and (c) have no added sugars except sugar which been added for the purpose of regulating acidic taste in an amount (expressed as dry matter) not exceeding 15 grams per litre.</p>		
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7.4 Annexe 4: Primary School Product Specifications

Category	Specification
Sweetened and Baked Products (outwith the lunch)	<p>Only products meeting the following criteria can be provided:</p> <ul style="list-style-type: none"> • No more than 7g of total sugar per portion. • No more than 13g of fat per portion. • No more than 4g of saturated fat per portion.
Breakfast Cereals	<p>Only breakfast cereals meeting the following criteria can be provided:</p> <ul style="list-style-type: none"> • No more than 15g of total sugar per 100g. • No more than 440mg of sodium per 100g. • No more than 1.1g of salt per 100g. • At least 3g of fibre per 100g.
Savoury snacks (outwith the lunch)	<p>Only pre-packaged savoury snacks meeting the following criteria can be provided:</p> <ul style="list-style-type: none"> • Pack size of no more than 25g. • No more than 22g of fat per 100g. • No more than 2g of saturated fat per 100g. • No more than 600mg of sodium per 100g. • No more than 1.5g of salt per 100g. • No more than 3g of total sugar per 100g.
Bread	All Bread and bread rolls must contain a minimum of 3g of AOAC fibre per 100g.
Sweetened yoghurts, fromage frais and other milk based desserts	<p>Only sweetened yoghurt, fromage frais and other milk based desserts meeting the following criteria can be provided:</p> <ul style="list-style-type: none"> • Maximum portion size of 125g. • No more than 10g of total sugar per 100g. • No more than 3g of fat per 100g.
Oils and Spreads	<p>Oils must contain a total saturated fat content which does not exceed 16 grams per 100 grams and –</p> <p>(a) a total monounsaturated fat content of at least 55 grams per 100 grams; or</p> <p>(b) a total polyunsaturated fat content of at least 30 grams per 100 grams.</p> <p>Fat spread must contain –</p> <p>(a) a total saturated fat content which does not exceed 20 grams per 100 grams; and</p> <p>(b) a combined total monounsaturated and polyunsaturated fat content of at least 30 grams per 100 grams.</p>

Drink	Specification
Lower fat milk	Milk must contain a total fat content which does not exceed 1.8 grams per 100 millilitres.
Calcium enriched milk alternatives	Calcium enriched milk alternatives must contain- <ul style="list-style-type: none"> • a total fat content which does not exceed 1.8 grams per 100 millilitres. • a total sugars content which does not exceed 0.5 grams per 100 millilitres.
No added sugar lower fat milk drinks and drinking yoghurts	Milk drinks and drinking yoghurts must contain - <ul style="list-style-type: none"> • a total fat content which does not exceed 1.8 grams per 100 millilitres; and • a total sugars content which does not exceed 5 grams per 100 millilitres.

7.5 Annexe 5: Artificial Sweeteners

Use of intense and non-caloric sweeteners

All sweeteners that are used in the EU undergo a rigorous safety assessment by the European Food Safety Authority (EFSA). As part of the evaluation process, EFSA sets an acceptable daily intake limit (ADI), which is the maximum amount considered safe to consume each day over the course of a lifetime. For intense sweeteners, conditions of use have been established which ensure that consumers do not exceed the ADI.

In addition to EFSA's safety assessment, both Cancer Research UK and the US National Cancer Institute have concluded that based on scientific evidence, approved sweeteners are safe for humans to consume.

For more information see:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/604336/Sugar_reduction_achieving_the_20_.pdf

7.6 Annexe 6: Red and Red Processed Meat Calculations

Scottish Dietary Goal

Average intake of red and processed meat to be pegged at around 70g per person per day.

Average intake of the highest consumers of red and processed meat (90g per person per day) not to increase.³²

As the basis for calculating weekly maximum intakes of red and red processed meat in school food the average intake of 70g per day (cooked weight) has been applied.

Maximum red and red processed meat over the school week (Monday to Friday) is;

- **SDG (70g per day) x 5 = 350g**

Primary

It has been assumed that in primary school children the only opportunity to consume red and red processed meat within school will be the lunch.

However it is recognised that children in primary school may also consume red and red processed meat at meal times outwith school.

Therefore the limit for lunches over the school week is set at **50%** of the maximum amount of red and red processed meat over 5 days.

50% of 350g over the 5 day school week is 175g.

The additional restriction on red processed meat reflects the strength of evidence in relation to these products and the risk of developing colorectal cancer in later life.

No more than 100g should be red processed meat (57% of a maximum of 175g red and red processed meat).

Secondary

It has been assumed that young people attending secondary school have more opportunities to consume red and red processed meat within schools, for example breakfast service, morning service and lunch service.

However it is recognised that young people in secondary schools may also consume red and red processed meat at meal times outwith school.

Therefore the limit to be served over the school week is set at **two thirds** (66%) of the maximum amount of red and red processed meat over 5 days, leaving an allowance of one third for meals consumed outwith school.

³² <http://www.gov.scot/Resource/0049/00497558.pdf>

66% of 350g over the 5 day school week is 231g (rounded to 230g).

The additional restriction on the red processed meat reflects the strength of evidence in relation to these products and the risk of developing colorectal cancer in later life.

No more than 130g should be red processed meat (57% of a maximum of 230g red and red processed meat).

7.7 Annexe 7: Glossary of Terms

Term	Definition
Analysed School Lunch (<i>secondary only</i>)	A minimum of a two choice, two course lunch.
Main Lunch Item	Includes; <ul style="list-style-type: none">• traditional lunches e.g. roast dinner, lasagne vegetable curry.• sandwiches/baguettes/panini/salad boxes, for example tuna salad baguette• other lunch options e.g baked potato, pizza.

7.8 Annexe 8: Secondary Schools - Changes to Scottish Statutory Instrument³³

Schedule 1 - School Meal Requirements – Menu

Number	Existing Standard	Proposed Standard	Additional Notes
1	(1) Not less than 2 types of vegetable shall be provided every day (2) For the purposes of sub-paragraph (1), “vegetable does not include potatoes	(1) Not less than two portions of vegetables shall form part of the school lunch. (2) For the purposes of sub-paragraph (1), “vegetable does not include potatoes A portion is at least 80g.	
2	Not less than 2 types of fruit shall be provided every day	Not less than one portion of fruit shall form part of the school lunch. A portion is at least 80g. A portion of dried fruit should be limited to 30g.	
3	Bread shall be provided every day	All Bread and bread rolls must contain a minimum of 3g of AOAC fibre per 100g.	Please note that it is proposed that this standard extends across the school day.
4	Oily fish must be provided at least once every 3 weeks	No change	Please note that it is proposed that this standard extends across the school day.
5	No savoury snacks shall be provided except –	The following savoury snacks can be provided –	Please note that it is proposed that this standard extends across the

³³ http://www.legislation.gov.uk/sdsi/2008/9780110816456/pdfs/sdsi_9780110816456_en.pdf

	(a) savoury crackers; (b) oatcakes; or (c) breadsticks.	(a) plain savoury crackers; (b) plain oatcakes; or (c) plain breadsticks. All other savoury snacks— (a) may be made available only in individual portions which do not exceed 25 grams; and (b) must contain— (i) a total fat content which does not exceed 22 grams per 100 grams; (ii) a total saturated fat content which does not exceed 2 grams per 100 grams; (iii) a total sodium content which does not exceed 0.6 grams per 100 grams; (iv) a total salt content which does not exceed 1.5 grams per 100 grams; and (iv) a total sugars content which does not exceed 3 grams per 100 grams.	school day.
6	(1) No confectionery shall be provided (2) Cakes, biscuits and puddings must not contain any confectionery	(1) No confectionery shall be provided. (2) Sweetened and baked products must not contain any confectionery.	Please note that it is proposed that this standard extends across the school day.
7	(1) Food that has been deep fried in the cooking or manufacturing process shall not be provided more than 3 times in a week (2) Chips may only be served as an accompaniment to other food	(1) Food that has been deep fried in the cooking or manufacturing process shall not be permitted more than 3 times in a week. (2) Chips if served must be served as part of a lunch.	Please note that it is proposed that this standard extends across the school day.
	N/A	No more than 230g of red and red processed meat is permitted over the	New standard.

		course of the school week, of which no more than 130g should be red processed meat.	Please note that it is proposed that this standard extends across the school day.
	N/A	Sweetened and baked products Only products meeting the following criteria can be provided: <ul style="list-style-type: none"> • No more than 10g of total sugar per portion. • No more than 19g of fat per portion. • No more than 6g of saturated fat per portion can be provided. 	New standard Please note that it is proposed that this standard extends across the school day.
	N/A	Only breakfast cereals meeting the following criteria can be provided: <ul style="list-style-type: none"> • No more than 15g of total sugar per 100g. • No more than 440mg of sodium per 100g. • No more than 1.1g of salt per 100g. • At least 3g of fibre per 100g. 	New Standard Please note that it is proposed that this standard extends across the school day.
	N/A	Only sweetened yoghurt, fromage frais or other milk based desserts meeting the following criteria can be provided: <ul style="list-style-type: none"> • Maximum portion size of 175g. • No more than 10g of total sugar per 100g. • No more than 3g of fat per 100g. 	New Standard Please note that it is proposed that this standard extends across the school day.
	N/A	Pastry and pastry products should not be provided more than twice a week across the school day.	New Standard Please note that it is proposed that

			this standard extends across the school day.
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Schedule 2 – Food and Drink Requirements in School Meals

Number	Existing Standard	Proposed Standard	Additional Notes
1	<p>(1) Oils must contain a total saturated fat content which does not exceed 16 grams per 100 grams and –</p> <p>(a) a total monounsaturated fat content of at least 55 grams per 100 grams; or</p> <p>(b) a total polyunsaturated fat content of at least 30 grams per 100 grams</p> <p>(2) Fat spread must contain –</p> <p>(a) a total saturated fat content which does not exceed 20 grams per 100 grams; and</p> <p>(b) a combined total monounsaturated and polyunsaturated fat content of at least 30 grams per 100 grams.</p>	No change	
2	<p>(1) No salt shall be available to add to food after the cooking process is complete.</p> <p>(2) Other condiments may be available to pupils only in individual portions of no more than 10 millilitres</p>	No change	
3	Subject to paragraphs 4 to 6 only the following drinks may be	Only the following drinks may be provided:-	Please note that it is proposed that this standard extends across the

	<p>provided:-</p> <ul style="list-style-type: none"> (a) milk (b) milk drinks (c) drinking yoghurts (d) soya, oat and rice based drinks enriched with calcium (e) fruit juice (f) vegetable juice (g) drinks comprising combinations of fruit juice or vegetable juice with water; (h) drinks comprising blends of fruit, vegetables, fruit juice or vegetable juice in any combination; (i) tea and coffee; and (j) bottled water 	<ul style="list-style-type: none"> (a) Plain lower fat milk (b) Calcium enriched milk alternatives (c) Water (d) No added sugar lower fat milk drinks (e) No added sugar lower fat drinking yoghurts (f) Tea and coffee (g) Sugar free drinks (excluding high caffeine – 150 mg per litre) 	<p>school day.</p>
4	<p>(1) Milk must contain a total fat content which does not exceed 1.8 grams per 100 millilitres.</p> <p>(2) Milk drinks and drinking yoghurts must contain-</p> <ul style="list-style-type: none"> (a) a total fat content which does not exceed 1.8 grams per 100 millilitres. (b) a total sugars content which does not exceed 10 grams per 100 millilitres provided that the total sugars content does not exceed 20 grams per portion. 	<p>(1) Milk must contain a total fat content which does not exceed 1.8 grams per 100 millilitres.</p> <p>(2) Milk drinks and drinking yoghurts must contain –</p> <ul style="list-style-type: none"> (a) a total fat content which does not exceed 1.8 grams per 100 millilitres; and (b) a total sugars content which does not exceed 5 grams per 100 millilitres. 	<p>Please note that it is proposed that this standard extends across the school day.</p>
5	<p>Soya, oat and rice based drinks</p>	<p>Calcium enriched milk alternatives must</p>	<p>Please note that it is proposed that</p>

	<p>enriched with calcium must contain-</p> <p>(a) a total fat content which does not exceed 1.8 grams per 100 millilitres.</p> <p>(b) a total sugars content which does not exceed 5 grams per 100 millilitres provided that the total sugars content does not exceed 10 grams per portion.</p>	<p>contain-</p> <p>(a) a total fat content which does not exceed 1.8 grams per 100 millilitres.</p> <p>(b) a total sugars content which does not exceed 0.5 grams per 100 millilitres.</p>	<p>this standard extends across the school day.</p>
6	<p>(1) Fruit juice and vegetable juice must –</p> <p>(a) have no added salt;</p> <p>(b) have no added sugars except sugar which has been added for the purpose of regulating acidic taste in an amount (expressed as dry matter) not exceeding 15 grams per litre; and</p> <p>(c) be made available only in individual portions not exceeding 200 millilitres.</p> <p>(2) Drinks comprising combinations of fruit juice or vegetable juice with water must –</p> <p>(a) contain a minimum of 50% fruit juice or vegetable juice;</p> <p>(b) be made available only in individual portions not exceeding 400 millilitres;</p> <p>(c) have no added salt;</p> <p>(d) have no added sugar except</p>	<p>Not permitted.</p>	

	<p>sugar which has been added for the purpose of regulating acidic taste in an amount (expressed as dry matter) not exceeding 15 grams per litre; and</p> <p>(e) contain a total sugars content which does not exceed 20 grams per portion.</p> <p>(3) Drinks comprising blends of fruit, vegetables, fruit juice or vegetable juice in any combination must –</p> <p>(a) be made available only in individual portions not exceeding 200 millilitres;</p> <p>(b) have no added salt; and</p> <p>(c) have no added sugars except sugar which been added for the purpose of regulating acidic taste in an amount (expressed as dry matter) not exceeding 15 grams per litre.</p>		
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Schedule 4 – Food and Drink Requirements Otherwise than as Part of a School Meal

Number	Existing Standard	Proposed Standard	Additional Notes
1	Fruit and vegetables must be made available in any place within the premises where food is provided.	<p>A variety of fruit and/or vegetables portions must be made available in any place within the premises where food is provided.</p> <p>Salad or vegetables must be provided and included in the cost of any main lunch item.</p> <p>A portion is at least 80g. A portion of dried fruit should be limited to 30g.</p>	Please note that it is proposed that this standard extends across the school day.
2	<p>(1) No salt shall be available to add to food after the cooking process is complete.</p> <p>(2) Other condiments may be available to pupils only in individual portions of no more than 10 millilitres</p>	No change	
3	(1) With the exception of savoury snacks no food that has been fried in the cooking or manufacturing process shall be made available in any place within school premises where food is provided.	<p>(1) The following savoury snacks can be provided –</p> <p>(a) plain savoury crackers;</p> <p>(b) plain oatcakes; or</p> <p>(c) plain breadsticks.</p> <p>(2) All other savoury snacks–</p>	Please note that it is proposed that this standard extends across the school day.

	<p>(2) Savoury snacks –</p> <p>(a) may be made available only in individual portions which do not exceed 25 grams; and</p> <p>(b) must contain –</p> <p>(i) a total fat content which does not exceed 22 grams per 100 grams;</p> <p>(ii) a total saturated fat content which does not exceed 2 grams per 100 grams;</p> <p>(iii) a total sodium content which does not exceed 0.6 grams per 100 grams; and</p> <p>(iv) a total sugars content which does not exceed 3 grams per 100 grams.</p>	<p>(a) may be made available only in individual portions which do not exceed 25 grams; and</p> <p>(b) must contain–</p> <p>(i) a total fat content which does not exceed 22 grams per 100 grams;</p> <p>(ii) a total saturated fat content which does not exceed 2 grams per 100 grams;</p> <p>(iii) a total sodium content which does not exceed 600mg per 100 grams;</p> <p>(iv) a total salt content which does not exceed 1.5 grams per 100 grams; and</p> <p>(v) a total sugars content which does not exceed 3 grams per 100 grams.</p>	
4	<p>(1) No confectionery shall be made available in any place within school premises where food is provided.</p> <p>(2) Cakes, biscuits or puddings must not contain any confectionery.</p>	<p>(1) No confectionery shall be provided.</p> <p>(2) Sweetened and baked products must not contain any confectionery.</p>	<p>Please note that it is proposed that this standard extends across the school day.</p>
	N/A	<p>No more than 230g of red and red processed meat is permitted over the course of the school week, of which no more than 130g should be red processed meat.</p>	<p>New Standard.</p> <p>Please note that it is proposed that this standard extends across the school day.</p>
	N/A	<p>Sweetened and baked products.</p> <p>Only products meeting the following criteria can be provided:</p>	<p>New Standard.</p> <p>Please note that it is proposed that this standard extends across the</p>

		<ul style="list-style-type: none"> • No more than 10g of total sugar per portion. • No more than 19g of fat per portion. • No more than 6g of saturated fat per portion can be provided. 	school day.
	N/A	<p>Only breakfast cereals meeting the following criteria can be provided:</p> <ul style="list-style-type: none"> • No more than 15g of total sugar per 100g. • No more than 440mg of sodium per 100g. • No more than 1.1g of salt per 100g. • At least 3g of fibre per 100g. 	<p>New Standard.</p> <p>Please note that it is proposed that this standard extends across the school day.</p>
	N/A	<p>Only sweetened yoghurt, fromage frais or other milk based desserts meeting the following criteria can be provided:</p> <ul style="list-style-type: none"> • Maximum portion size of 175g. • No more than 10g of total sugar per 100g. • No more than 3g of fat per 100g. 	<p>New Standard</p> <p>Please note that it is proposed that this standard extends across the school day.</p>
	N/A	Pastry and pastry products should not be provided more than twice a week across the school day.	<p>New Standard</p> <p>Please note that it is proposed that this standard extends across the school day.</p>
	N/A	All Bread and bread rolls must contain a minimum of 3g of AOAC fibre per 100g.	<p>New Standard</p> <p>Please note that it is proposed that this standard extends across the school day.</p>
5	Subject to paragraphs 6 to 8 only	Only the following drinks may be	Please note that it is proposed that

	<p>the following drinks may be provided:-</p> <ul style="list-style-type: none"> (a) milk (b) milk drinks (c) drinking yoghurts (d) soya, oat and rice based drinks enriched with calcium (e) fruit juice (f) vegetable juice (g) drinks comprising combinations of fruit juice or vegetable juice with water; (h) drinks comprising blends of fruit, vegetables, fruit juice or vegetable juice in any combination; (i) tea and coffee; and (j) bottled water 	<p>provided:-</p> <ul style="list-style-type: none"> (a) Plain lower fat milk (b) Calcium enriched milk alternatives (c) Water (d) No added sugar lower fat milk drinks (e) No added sugar lower fat drinking yoghurts (f) Tea and coffee (g) Sugar free drinks (excluding high caffeine – 150mg per litre) 	<p>this standard extends across the school day.</p>
4	<p>(1) Milk must contain a total fat content which does not exceed 1.8 grams per 100 millilitres.</p> <p>(2) Milk drinks and drinking yoghurts must contain-</p> <ul style="list-style-type: none"> (a) a total fat content which does not exceed 1.8 grams per 100 millilitres. (b) a total sugars content which does not exceed 10 grams per 100 millilitres provided that the total sugars content does not exceed 20 grams per portion. 	<p>(1) Milk must contain a total fat content which does not exceed 1.8 grams per 100 millilitres.</p> <p>(2) Milk drinks and drinking yoghurts must contain –</p> <ul style="list-style-type: none"> (a) a total fat content which does not exceed 1.8 grams per 100 millilitres; and (b) a total sugars content which does not exceed 5 grams per 100 millilitres. 	<p>Please note that it is proposed that this standard extends across the school day.</p>

5	<p>Soya, oat and rice based drinks enriched with calcium must contain-</p> <p>(a) a total fat content which does not exceed 1.8 grams per 100 millilitres.</p> <p>(b) a total sugars content which does not exceed 5 grams per 100 millilitres provided that the total sugars content does not exceed 10 grams per portion.</p>	<p>Calcium enriched milk alternatives must contain-</p> <p>(a) a total fat content which does not exceed 1.8 grams per 100 millilitres.</p> <p>(b) a total sugars content which does not exceed 0.5 grams per 100 millilitres.</p>	<p>Please note that it is proposed that this standard extends across the school day.</p>
6	<p>(1) Fruit juice and vegetable juice must –</p> <p>(a) have no added salt;</p> <p>(b) have no added sugars except sugar which has been added for the purpose of regulating acidic taste in an amount (expressed as dry matter) not exceeding 15 grams per litre; and</p> <p>(c) be made available only in individual portions not exceeding 200 millilitres.</p> <p>(2) Drinks comprising combinations of fruit juice or vegetable juice with water must –</p> <p>(a) contain a minimum of 50% fruit juice or vegetable juice;</p> <p>(b) be made available only in individual portions not exceeding 400 millilitres;</p> <p>(c) have no added salt;</p>	<p>Not permitted.</p>	

	<p>(d) have no added sugar except sugar which has been added for the purpose of regulating acidic taste in an amount (expressed as dry matter) not exceeding 15 grams per litre; and</p> <p>(e) contain a total sugars content which does not exceed 20 grams per portion.</p> <p>(3) Drinks comprising blends of fruit, vegetables, fruit juice or vegetable juice in any combination must –</p> <p>(a) be made available only in individual portions not exceeding 200 millilitres;</p> <p>(b) have no added salt; and</p> <p>(c) have no added sugars except sugar which been added for the purpose of regulating acidic taste in an amount (expressed as dry matter) not exceeding 15 grams per litre.</p>		
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7.9 Annexe 9: Secondary School Product Specifications

Category	Specification
Sweetened and Baked Products	<p>Only products meeting the following criteria can be provided:</p> <ul style="list-style-type: none"> • No more than 10g of total sugar per portion. • No more than 19g of fat per portion. • No more than 6g of saturated fat per portion.
Breakfast Cereals	<p>Only breakfast cereals meeting the following criteria can be provided:</p> <ul style="list-style-type: none"> • No more than 15g of total sugar per 100g. • No more than 440mg of sodium per 100g. • No more than 1.1g of salt per 100g. • At least 3g of fibre per 100g.
Savoury snacks	<p>Only pre-packaged savoury snacks meeting the following criteria can be provided:</p> <ul style="list-style-type: none"> • Pack size of no more than 25g. • No more than 22g of fat per 100g. • No more than 2g of saturated fat per 100g. • No more than 600mg of sodium per 100g. • No more than 1.5g of salt per 100g. • No more than 3g of total sugar per 100g.
Bread	<p>All Bread and bread rolls must contain a minimum of 3g of AOAC fibre per 100g.</p>
Sweetened yoghurts, fromage frais and other milk based desserts	<p>Only sweetened yoghurt, fromage frais and other milk based desserts meeting the following criteria can be provided:</p> <ul style="list-style-type: none"> • Maximum portion size of 175g. • No more than 10g of total sugar per 100g. • No more than 3g of fat per 100g.
Oils and Spreads	<p>Oils must contain a total saturated fat content which does not exceed 16 grams per 100 grams and –</p> <p>(a) a total monounsaturated fat content of at least 55 grams per 100 grams; or</p> <p>(b) a total polyunsaturated fat content of at least 30 grams per 100 grams.</p> <p>Fat spread must contain –</p> <p>(a) a total saturated fat content which does not exceed 20 grams per 100 grams; and</p> <p>(b) a combined total monounsaturated and polyunsaturated fat content of at least 30 grams per 100 grams.</p>

Drink	Specification
Lower fat milk	Milk must contain a total fat content which does not exceed 1.8 grams per 100 millilitres.
Calcium enriched milk alternatives	Calcium enriched milk alternatives must contain- <ul style="list-style-type: none"> • a total fat content which does not exceed 1.8 grams per 100 millilitres. • a total sugars content which does not exceed 0.5 grams per 100 millilitres.
No added sugar lower fat milk drinks and drinking yoghurts	Milk drinks and drinking yoghurts must contain - <ul style="list-style-type: none"> • a total fat content which does not exceed 1.8 grams per 100 millilitres; and • a total sugars content which does not exceed 5 grams per 100 millilitres.
Sugar free drinks (excluding high caffeine - 150mg per litre)	<ul style="list-style-type: none"> • Must contain less than 0.5g of sugar per 100ml.



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