



## **Response to on consultation on amendments to the ‘Nutritional Requirements for Food and Drink in Schools (Scotland) Regulations 2008’**

### **Action on Salt**

Action on Salt (formerly Consensus Action on Salt & Health, CASH) is an organisation supported by 24 expert members and working to reduce the salt intake of the UK population to prevent deaths, and suffering, from heart disease, stroke, kidney disease, osteoporosis, stomach cancer and obesity.

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### **What are your views on our intention to amend the current school food and drink Regulations to ensure children and young people are able to access more fruit and vegetables as part of their school day?**

Action on Salt are supportive of increasing access to fruit and vegetables as part of the school day. There are many health benefits associated with consuming at least five portions of fruit and vegetables a day, including reduced risk of cardiovascular disease.<sup>1</sup> However, more than three-quarters of adults and secondary school children in the UK do not eat five portions of fruit and vegetables a day.<sup>2</sup>

Highly processed packaged foods contribute two thirds of calories consumed by families. These foods are likely to be high in salt, sugar and saturated fat and low in fibre, fruit and vegetables. Typically, 47% of primary school children’s calories come from HFSS foods, 85% of secondary school children are not eating enough fruit and vegetables, more than 90% are not eating enough fibre and all are eating too much salt and sugar.<sup>3, 4</sup>

1. Aune D, Giovannucci E, Boffetta P, Fadnes LT, Keum N, Norat T, Greenwood DC, Riboli E, Vatten LJ, Tonstad S. Fruit and vegetable intake and the risk of cardiovascular disease, total cancer and all-cause mortality—a systematic review and dose-response meta-analysis of prospective studies. *International Journal of Epidemiology* 2017; 46:1029-1056.
2. NDNS: results from years 7 and 8 (combined). 2018. <https://bit.ly/2lxtAZ5>
3. The Global Burden of Disease Study. <http://ihmeuw.org/4dks>
4. The Food Foundation. Forced-fed. 2016. [https://foodfoundation.org.uk/wpcontent/uploads/2016/07/execSum\\_v2.pdf](https://foodfoundation.org.uk/wpcontent/uploads/2016/07/execSum_v2.pdf)

### **What are your views on our intention to amend the current school food and drink regulations to ensure the amount of sugar children and young people can access over the course of the school day is reduced?**

Action on Salt are supportive of the intention to aid reduced consumption of free sugars. We welcome the revision of the school food standards to include the updated free sugars recommendation and are calling for the rest of the UK to follow Scotland’s example.

Data from the National Diet and Nutrition Study shows that children consume at least twice as much sugar than is recommended by government guidelines and sugary drinks are the main source of sugar.<sup>1</sup> Therefore, we support the intention to provide sugar free drinks and to exclude those high in caffeine from the permitted drinks list. We appreciate the challenges faced to ensure that young people remain on school premises during lunch and see that the permitted list of drinks will hopefully avoid young people buying sugar sweetened and highly caffeinated beverages away from

school premises. Energy drinks consumption in the UK is a growing problem, particularly among children and teenagers. Energy drinks contain high levels of sugar and caffeine, which are associated with chronic sleep loss, addiction/dependence, withdrawal and intoxication.<sup>2</sup>

1. NDNS: results from years 7 and 8 (combined). 2018. <https://bit.ly/2lxtAZ5>
2. Breda JJ , Whiting SH , Encarnação R , et al . 2014. Energy drink consumption in europe: a review of the risks, adverse health effects, and policy options to respond. *Front Public Health*;2.doi:10.3389/fpubh.2014.00134

**What are your views on our intention to amend the school food and drink Regulations to set a maximum for red and red processed meat in primary school lunches and for overall provision in secondary schools?**

Action on Salt support this intention.

**What are your views on our intention to amend the school food and drink Regulations to enable caterers to provide a service which better supports secondary age pupils to make balanced and nutritious food and drink choices as part of their school day?**

Action on Salt support the intention to enable caterers to provide alternatives for secondary age pupils to encourage balanced and nutritious food choices.

Although outside the scope of this consultation, we would encourage a review of these changes such as a dietary survey to assess whether this has an impact on the nutritional quality of student's meals and snacks.

**Do you have anything else you wish to comment on in relation to the nutritional content of food and drink provided in local authority, and grant maintained, schools in Scotland via the School food and drink Regulations?**

Action on Salt note that 'salt will not be available to add to food after the cooking process is complete'. We would question however the levels of salt that are added during the cooking process and would suggest catering guidelines to minimise the addition of salt during cooking. The Scientific Advisory Committee on Nutrition (SACN) recommend that children aged 4-6 years eat no more than 3g of salt per day, and children aged 7-10 years eat no more than 5g of salt per day. Despite this, children regularly eat more salt than recommended, raising blood pressure, which then tracks through to adulthood and increases the risk of heart disease and stroke.