

PE2173/B: Ban ultra-processed foods in school meals

Scottish Government written submission, 24 November 2025

Thank you for your letter of 14 October 2025 seeking further information in relation to the public petition calling for a ban on ultra processed foods in schools. I have responded below to each of the four points you raise:

1) Clarity on whether the Scottish Government's position is that there are no alternative options to ultra-processed bread, yoghurt and breakfast cereals

While there is no universally agreed definition of 'ultra-processed foods', they can broadly be defined as foods with many ingredients used in the industrial production process. The widely used NOVA classification categorises foods by the nature, extent and purpose of processing but does not consider the nutritional content of foods. A wide range of products may be categorised as ultra-processed if using the NOVA classification. While the term ultra-processed may include products commonly high in fat, salt and sugar, such as sweet and savoury pre-packaged snacks and soft drinks, it also includes products which are fortified with vitamins and minerals and have nutritionally beneficial components such as fibre, including bread and yoghurts. As such, a ban on all products considered to be ultra-processed, based on the NOVA classification, is challenging and for example would exclude the provision of products which are fortified with vitamins and minerals.

2) The percentage of school meals provided to children that are fresh

The Scottish Government does not use a single definition of 'fresh' as this will depend on the context, and nor do we collect data on 'fresh' provision. Instead the Nutritional Requirements for Food and Drink in Schools (Scotland) Regulations 2020 focus on the nutritional value of school food, drink and meals to support the healthy growth and development of children.

For example some local authorities cook the main component of a meal (e.g., lasagne) at a central location, freeze and transport for reheating at several local school locations and serve alongside fruit, vegetables and salad prepared at each site. As such, while the meal as a whole delivers the desired amount of energy and key nutrients, it would be difficult to determine whether that meal would be deemed as 'fresh'. For others while the whole meal might be cooked on site daily, it could include frozen vegetables which deliver high nutritional value but may or may not be considered as 'fresh' as vegetables that have been cooked hours before and kept warm until service, or include prepackaged bread products that contains as much energy and fibre, and as many nutrients, as bread cooked on site daily.

3) The Scottish Government's definition of sustainable produce

The Scottish Government does not use a single definition of 'sustainable produce', recognising that the context and intention of each policy or piece of legislation is relevant. For example the Good Food Nation Act notes that '*a sustainable food system is one that delivers food security and nutrition for all in such a way that the economic, social and environmental bases to generate food security and nutrition for future generations is not compromised. (The Food and Agriculture Organisation of the United Nations)*'.

The Scottish Government also recognises that responsibility for procurement of food and drink for use in school menus rests with local authorities, each of whom will have their own robust approaches in defining sustainability for procurement contracts which are based on local needs and circumstances including nutritional, environmental and local economy [considerations](#).

4) details of how the Scottish Government monitors and assesses local authority school meal provision, including any relevant data that is collected.

Compliance with the Nutritional Requirements for Food and Drink in Schools (Scotland) Regulations 2020 is monitored by His Majesty's Inspectorate of Education (HMIE) Health and Nutrition Inspectors as part of the annual school inspection programme. Feedback from those inspections is shared with the head teacher, the local authority catering manager, and the local authority director of education and central officers at the end of the inspection, in order to inform areas for development.

Statistics on [uptake of school meals](#) are published annually. The most recent statistics cover 2023-24 and were published in September 2025. Statistics for 2024-25 are scheduled for publication in 2026.

I hope this information is helpful to the Committee.

Learning Directorate