

SAOS Conference – Questions/Comments Arising from Dennis Overton’s Presentation:

Are Scottish Government and local authorities doing anything to reduce group 4 ultra processed foods in schools, hospitals and other public run facilities?

Yes. Over half of Local Authorities in Scotland hold Food for Life Served Here accreditation (awarded by the Soil Association), and part of the criteria is the requirement for 75% of the food served has to be made from unprocessed ingredients, and not bought in, pre-prepared. Scottish Government provides funding for this programme and encourages public caterers to make use of this approach. In addition to this, there are nutrition-based food standards in place across schools and across hospitals and compliance with these is mandatory. These standards are based on existing nutritional advice, and as evidence evolves around the area of UPFs, standards may change in line with this in future years.

How do we educate those in public procurement about what ‘good food’ actually is and fund investment in good food on school dinner plates – it all starts there

In public kitchens ‘good food’ is defined by the current nutrition and food standards, such as the Healthy Eating in Schools Guidance 2020 and in hospitals, the Food in Hospitals 2025 Specification is awaiting final adoption.

With regards to the role that public food can play in supporting local food production and the supply chain, there are many examples of good practice but more to do across the Country. The National Farmers Union Scotland and the Public Sector Catering Alliance held a round table in December 2025 to foster collaboration and develop ways of improving this, and there is a commitment to drive reform in this area.

There is, of course, always work to do to improve engagement with and education for public caterers.

Is Scotland’s food culture challenges by modern materialism and the funds available to buy real food? How do you reverse this trend?

The impact of poverty is an area of focus for the Good Food Nation Act, and in Outcome One, it specifically mentions that everyone benefits from reliable and dignified access to nutritious, affordable, enjoyable, sustainable and age-appropriate food. The Scottish Government has identified measures within its outcomes to address this issue, and it is anticipated that local authorities and health boards will identify local actions to help to address this.

We have villainised fat for years – Dumfries Council will not give butter in school but instead tell my children ultra processed margarine is healthier

The Healthy Eating in Schools Guidance 2020 is the mandatory nutrition and food standards guidance which schools must follow. This means that individual local authorities are unable to serve butter in schools. The guidance is based on the current nutritional advice provided by the Scientific Advisory Committee on Nutrition (SACN), that only oils and spreads high in polyunsaturated and/or monounsaturated fats can be used in schools.

Will government put buying local before cost?

In the National Plan, Outcome Four is: Our food and drink sector is prosperous, diverse, innovative, and vital to national and local economic and social wellbeing. It is key to making Scotland food secure and food resilient and creates and sustains jobs and businesses underpinned by fair work standards throughout food supply chains and there are measures in place to monitor progress against this outcome.

Public caterers must carefully balance limited budgets with supporting local provision, and it will be for individual local authorities and health boards to determine how they will balance this when they develop their local plans.

The current Community Wealth Building Bill is a further opportunity to consider local provision, whereby the social return on investment can be more readily evidenced and understood.

How does food production policy and regulation compare across the healthier European countries?

The Scottish Food Commission has the remit to track effective food system transformation policies in other countries around the world, advising government about relevant innovative, impactful developments. Your question will help shape this work over the coming months as the Commission begins this task

Do you see catering (schools etc) as a first step to that culture change? Can the food commission play a part in easing those conversations?

Yes. Education is a key focus of the Good Food Nation Plan, recognising the need to ensure that education supports food systems change, not just in schools but also beyond school gates and in communities.

Children in receipt of 1140 hours of childcare (from 3 years' old) are entitled to a free meal and is an excellent opportunity to support the development and choices of our youngest children earlier than ever before. Caterers anecdotally report the positive impact this is having, though there is not yet robust evidence or evaluation to support this.

Healthy eating – isn't education the key, so ensure home economics teachers in every school and don't waste money on the rest?

In the National Plan. Outcome five notes: People and communities are empowered to participate in, and shape, their food system. Scotland has a thriving food culture with a population who are educated about good and sustainable food. This outcome recognises the importance of food education not only in schools but across communities.

Education is one of the key principles that underpins the Good Food Nation Act.

Where will the investment come from to deliver small to medium sized local processing?

Ultimately the market will support such developments. In the early stages there may be a place for e.g. loan guarantees from Scotland's economic development agencies: HIE, SOSE, SE. There may be a place for strategic developments, e.g. critical abattoirs, to be supported by the Scottish National Investment Bank. The Good Food Nation Act provides the context for a co-ordinated response to be taken by these agencies. Outcome 4 requires a prosperous, diverse farming and processing sector.

Is it not about time we went back to eating what we grow and produce?

The Good Food Nation Act gives everyone in Scotland the opportunity to create systems change, including refocussing on eating and enjoying the produce grown across Scotland. This is recognised in the National Plan, and from a local perspective, the local authorities and health boards will have the opportunity to identify local actions to improve this.

Will the consumer really buy local if it is more expensive?

This is a difficult question to answer at this early stage: there is work to do to evidence and explain the benefits of eating locally in terms of the social return on investment that can be returned to communities, via Community Wealth Building and there is also much work to do to ensure that good quality, local and sustainable food is available and affordable for all across Scotland. There is also work to do on the wider food environment that will influence choice and availability.

How will the Commission scrutinise local plans to ensure they are not just 'ticking a box', but connecting with local farmers and supporting local production?

It will be for each local authority and health board to ensure that they consult widely when developing their plans and their targets and measures. The role of the Scottish Food Commission will include ensuring that the local plans meet the principles and statutory requirements outlined in the Good Food Nation Act, recognising that this will be a long-term commitment to systems change.

The Commission will also be consulting with and listening to people across Scotland in the course of its work, including farmers and producers who are a critical part of the food system.

How does Dennis propose to change Scottish consumer spend per capita of income in relation to other European countries, where less processed foods are valued?

This is a complex issue and will require a wide range of actions to influence consumer behaviour. The importance of food and its impact on health has been recognised in Scotland's Population Health Framework which was published in 2025, and we have much to learn from our counterparts across the world who have made progress in this area.

Isn't there a danger that we can't make much difference given the power of global giants who flog UPFs? We could spend lots only to make next to no difference

There is no doubt that there are a range of actors who are very successful at lobbying to maintain the food system as it is, or to move it further in their favour. The purpose of the Good Food Nation Act and the plans associated with it are to disrupt the current power dynamics and make inroads to systemic change. This will be a long-term and challenging process, but prioritising the need for change is an important step.

Food leaving the farm today is much the same as in the 50s. Unprocessed raw material. Trust in farmers is eroded by ultra processors in the supply chain above us.

There is power in the hands of farmers around market dynamics, and who they provide raw ingredients to. That said, we understand the business drivers that mean some of this is outside the control of farmers – but they are an important part of the food system.

UPFs and vaccines account for almost all chronic health conditions. How as an industry do we fight back?

It will take collaborative efforts from all to create the systems change to improve our food: one step would be to engage with your local authority and your health board as they begin to draft their plans, ensure you participate in their consultation, and continue to highlight the importance of your role in the food system.

We keep talking about procurement into schools, hospitals, etc but hands are tied until we sort the current procurement system. Are there any plans to look at it?

The National Farmers Union Scotland and the Public Sector Catering Alliance held a round table in December 2025 to foster collaboration and develop ways of improving this, and there is a commitment to drive reform in this area. However, we have many examples across Scotland of where local provision is used within the existing system.

There is a role for SAOS and its members to support this collaboration and ensure that their voices are heard as part of the improvement.

It's also important to ensure that you raise this during local consultation with your health board and local authority as they develop their plans,

Health eating: if the culture is the difference between us and continental countries. Isn't school education the key, rather than all the top-down tinkering?

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That said, education is only one part of the system where change is needed.

Should collaboration be part of a government mandate – but how do we control this to ensure they are meaningful and viable outcomes?

The systems approach that is laid out in the Good Food Nation Act is designed to foster collaborative working and break down previous silos that have been barriers for change. The Scottish Food Commission will be exploring how we can support better collaboration and ensuring that meaningful and viable outcomes reflect the whole system: please ensure that you connect with your local authority and health board as they develop their plans.

Is it time for Scottish Gov to be much more strategic with its capital funding? Stop buying 1,000 bakers a new oven and back a major processing infrastructure gap?

There is a clear need to ensure that investment in processing best meets the needs of market demand: this needs to be evidenced so that clear business cases are developed and systems change supported.

What is primary producer's role in tackling the Group 4 UPF problem? Don't we lose control of the product beyond the farm gate?

There is power in the hands of farmers around market dynamics, and who they provide raw ingredients to. That said, we understand the business drivers that mean some of this is outside the control of farmers – but they are an important part of the food system.

How much of the health decline is due to a collapse in physical activity, rather than just food types? Are we barking up the wrong tree?

Exercise and physical activity are key parts of diet and healthy weight strategy, and a great deal of focus has been placed on this area to improve health. For the first time, we are seeing a food systems approach within Scotland's Population Health Framework that recognises the role of food, along with other factors like exercise, smoking cessation, etc as key areas where improvement is needed to improve health outcomes.

Why is it that other countries have maintained a lower ratio of group 4 foodstuffs?

The Scottish Food Commission is looking across the globe to better understand how other countries have improved outcomes through food systems change.

We proclaim the value of food production, but nationally we do not value food and purchase decisions are price based. How do we change this deep-rooted culture?

This is one of the systemic challenges that, for the first time, the Good Food Nation Act sets Scotland up to address. That said, it won't be easy, or quick: the process of shifting our food system will require the local plans to help move us closer to achieving this.

Other countries have protein strategies, offering public payments to growers of (e.g.) peas & beans as well as grants for processing. Do we need the same?

This would be interesting to consider further, and worth discussing. There are lessons to be learned from other countries about how this has been achieved, and what difference this could make in Scotland should it be adopted.

With the highest tax burden and energy costs in Europe our ability to spend more on higher quality food is diminished. Cause and effect.

The impact of poverty and having little money to spend on food is a critical challenge that is identified in the National Plan.

Welsh schools have a much higher percentage of their school lunch food produced in Wales. How did they manage it, and can we do the same?

The Welsh Veg in Schools project is very successful, and it is rightly an exemplar of good practice. Over half of Local Authorities in Scotland hold Food for Life Served Here accreditation (awarded by the Soil Association) for their school meals, and part of the criteria is the requirement for local, sustainable food to be provided; this is promoted, for example each Local Authority has a food map detailing their local suppliers.

There is work to do to improve local food provision in the Scottish Public Sector, learning from other countries, including Wales.

There is a tax on sugar products should there be a tax on Group 4 products?

It would be interesting to see if this were to be considered by Government.

The Scottish Gov stood up to the climate commission on reducing meat and dairy in the Scottish diet because it was already so bad. It needs to do the same with Grp 4.

The scientific evidence supporting ultra processed food is developing, and any regulatory changes that may be required will emerge in the coming months and years.

Dennis – we have to be careful when discussing biodiversity loss. The evidence shows that Scotland's biodiversity is improving in relation to the rest of the UK.

The Good Food Nation Act recognises that biodiversity loss is one key principle that should be addressed.

Is there any hard proof that international food supply chains are fragile? Continued successfully through covid, Brexit, tariffs, etc.

Yes: Nature security assessment on global biodiversity loss, ecosystem collapse and national security - GOV.UK

The report - Food Security

Can we influence what we export as well as what we import to reduce similar produce passing each other?

This is an important part of food systems change that could be reviewed.

What about group 4 producers, does pressure need to be applied to them to improve their offer?

As the scientific evidence becomes clearer, there is likely to be a drive for reformulation and so on. The latest nutrient profiling model was recently published by the UK Government.

Why aren't we allowed to trade food in every market square in Scotland every day – that are all car parks - and our Councils don't allow change?

The local food plan consultations offer an excellent opportunity to raise this with your Local Authority.

How has the efficiency of food production in Scotland impacted the nutrient density of whole food produced here?

Not enough is known about the vitality of food crops and how that is impacted by production methods. As Scotland's farmers are steered by government policy towards more regenerative systems of production, it will be important to track the nutritional quality of food crops. Scotland's SEFARI research programme is well positioned to do this

Agriculture not being a priority sector means that people, especially the next generation, have no awareness of where our food comes from or what good food is.

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Can be easy to focus on the negatives, but important to recognise the changes happening in home economics departments. Now almost always the fav subject for pupils.

Yes, and where there are examples of this being done well, they should be celebrated and shared so that others can learn from them.