

Report on the consultation on 'arrangements for Scotland to continue participating in the EU school milk scheme'

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Scottish Government
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Consultation

In a consultation issued on 5th May, the Scottish Government asked consultees to note the main points of the common new framework (for the EU school milk scheme) and consider the delivery approach proposed for Scotland. The consultation was shared with a comprehensive range of stakeholders with an interest in milk provision in schools including industry and school caterers. The consultation period ended on 21st May with responses being received from 2 individuals and 6 organisations.

No significant objections were received on the proposed overall delivery approach were received. Respondents made a number of comments and suggestions about the plans for the poster, educational measures in general, the application form, Brexit arrangements, the product range, specifically cheese and flavoured milk, and the EU school Fruit and Vegetable scheme.

Scottish Government Comment

Brexit

In the event that Scotland is taken out of the European Union, local authorities will no longer be able to claim funding under the EU school milk scheme to subsidise their local school milk schemes. Future arrangements where appropriate will be considered as Brexit negotiations progress.

Claim process

The design of the new application form and the process for claiming will be developed by the Rural Payments Agency who currently (and will continue to) administer the EU school milk scheme. We do not expect them to make unnecessary or significant amendments to the existing scheme arrangements.

Product range

It is expected that local authorities will wish to maintain their current approach which focuses mainly on the provision of plain milk at the mid morning break. The scheme currently allows plain yoghurt to be provided if local authorities wish to do so.

Consideration has been given to including cheese as part of the scheme in Scotland. Following expert dietary advice, it is felt that this would add an unnecessary additional amount of fat and salt over and above the amount pupils currently receive as part of their school lunch. As such we do not plan to allow cheese to form part of this particular scheme in Scotland.

All food and drink served in schools must comply with the Nutritional Requirements for food and drink in schools Regulations (Scotland) 2008 which allow flavoured milk to be provided in schools (these regulations are currently under review). Flavoured milk is an eligible product under the EU school milk scheme, however under the new scheme arrangements due to come in on 1 August 2017, only the plain milk component will be eligible for subsidy from that date.

Procurement of food and drink for school catering services remains the responsibility of local authorities. Guidance such as 'Better Eating, Better Learning – a new context for school food' and 'Catering for Change – buying food sustainably in the public sector' is provided by Scottish Government and advocate local sourcing.

Fruit and Vegetable scheme

Although Scotland submitted a successful bid and strategy for £1.1m funding (Scotland's full share of the money available to the UK), which was accepted in April 2010, we were advised that the UK Treasury would immediately reclaim monies to offset the UK rebate.

Consequently if we had continued with our plans to offer the scheme in Scotland, almost three-quarters (72%) of the funding claimed by local authorities under the EU school fruit and veg scheme would require to be repaid to the UK Treasury while still leaving local authorities tied by rigorous EU auditing and administration rules. As a result of these UK Treasury rules, it was our view that no real benefit could be gained by Scotland's local authorities participation in the EU fruit scheme and the Scottish Government withdraw its bid in August 2010.

The Scottish Government provides local government in Scotland with an agreed package of funding and it is the responsibility of each local authority to allocate its financial resources on the basis of local needs, circumstances and priorities having first fulfilled its statutory obligations. Local authorities have flexibility to provide services such as free fruit, vegetable and milk schemes if they deem this appropriate to meet their local aims and needs.

As fruit juice is not an eligible product under the EU school milk scheme and it does not make financial sense to participate in the EU school fruit and vegetable scheme, local authorities will not be able to claim an EU subsidy on fruit juice products.

Educational Measures and Poster

The new framework requires that *'Member States shall accompany the distribution of products with educational measures in order to reconnect children to agriculture. Such measures may also concern related issues such as healthy eating habits, local food chains, organic farming, sustainable production, food waste'*. The framework also requires that educational measures material is *'badged with the EU flag'*.

The proposed poster will display the EU flag and key messages about dairy products and the dairy industry (which are already provided via Curriculum for Excellence). The poster will require to be displayed where the milk funded under the EU school milk scheme is distributed, to allow local authorities to show clearly that they are meeting the educational measures requirements of the EU scheme.

The poster is not intended or designed to replace the material already being used by schools to teach Curriculum for Excellence. The poster will provide high level factual messages in relation to dairy products and the dairy industry, and highlight the links with the food and health experiences and outcomes in Curriculum for Excellence.

There are no plans to supplement the poster for this scheme. Under Curriculum for Excellence, teachers have the flexibility to select educational material from a number of sources as they see fit to deliver the food and health experiences and outcomes set out under the Health and Wellbeing section of Curriculum for Excellence.

The poster will be provided free to schools and local authorities in an electronic form, allowing them to share it more widely as they see fit, for example with parents and carers.

Scottish Government Conclusion

No significant objections were received to the proposed way in which the EU school milk scheme will be implemented in Scotland therefore the proposed approach will proceed. A number of suggestions were received from respondents on the design and content of the educational measures poster and these will be incorporated.

Consultation responses (7 online, 1 by email)

ANON-JQJV-FK9X-W

Why are we not taking this opportunity to also take part in the fruit and veg part of this scheme as this could help to improve the diet of Scottish Children?

ANON-JQJV-FK9J-F

I think we should stop any subsidised milk and give fruit and vegetables to school children instead, as it is much healthier and nutritious. I don't know why this isn't already happening.

ANON-JQJV-FK96-U

The framework outlines the requirements upon the Scottish Government for claiming this subsidy however it does not give a clear understanding of what the educational 'poster' would contain in terms of information to satisfy the requirements of the funding.

ANON-JQJV-FK9C-8

Given the short time to implementation, it is vital that any amendments to the application form be kept to a minimum, and for changes to be straightforward where they are unavoidable.

We also support the creation of a poster for educational purposes. We would like to suggest the following as options for content:

- A picture of a cow: This will draw the attention of children, and help to emphasise both the natural origin of milk and its link to the wider food chain.
- Text highlighting the nutritional value of milk: The nutritional benefits of milk to children's health and development is scientifically well established. Milk contains the vitamins and minerals vital for good dental health and bone development, and it also plays a key role in a healthy diet, helping efforts against childhood obesity. However, there are many misconceptions about milk and dairy held by the wider public. Educating children about its benefits can both encourage consumption and help dispel popular myths.
- Text highlighting that milk is ideal for consuming at mid-morning break: Milk has high satiety value, which means it is ideal for suppressing hunger. This makes consumption at mid-morning break ideal, as it can both boost the concentration of a child who would otherwise be distracted by hunger, and act as an alternative to the type of sugary snack a child might consume at break to alleviate their appetite.
- Comment from a respected medical figure: Dr Hilary Jones is the spokesperson for the SNMA, and we would be very happy to offer a quote from him endorsing school milk consumption to feature on the poster.
- The signature of the First Minister: The approval of a high profile political figure would help to emphasise the importance the Scottish Government places on school milk consumption.

However, we do have some concerns that a poster alone will struggle to convey all of the information that would be useful, and may be too passive for children to fully engage with. We believe that a supporting DVD or downloadable video that provides a 'story of milk' from the farm to the classroom, as well as further outlining the health benefits of milk, could be desirable.

Additionally, we would like to take this opportunity to highlight that there will likely only be an 18-month gap between the new school milk system being implemented and the UK's departure from the EU. It is therefore vital that consideration begin now as to the shape of both a replacement scheme, and any transitional arrangements between the end of the UK's involvement in the EU School Milk Scheme and the establishment of a national programme.

ANON-JQJV-FK99-X

The procedure for making the claim appears to be the same, however, I am unsure if the change to the claim on the flavoured milk will affect the subsidy we receive.

ANON-JQJV-FKHQ-5

Milk is a rich source of protein, calcium, Vitamin B12 and iodine, and should continue to be a key part of our children's daily diet for a healthier future. Policy should therefore focus on encouraging children to drink milk, and avoid anything that puts this at risk. 26% of teachers think that offering more choice of different types of milk would help improve milk time, and milk uptake.

By not including flavoured milk in its entirety as eligible under the EU Milk Scheme, the EU risks discouraging children from drinking milk. During qualitative research undertaken with 200 children, which fed in to the Making More of Milk report, 40% of 7-9 year olds said that they liked drinking flavoured milk, demonstrating that it is a significant route to encouraging children to drink milk.

In addition, the feedback from many of the children was that they did not like the taste of whole milk offered at school, as per nutrition guidelines, because it tasted different from the milk that their parents provided at home. Again, in this instance flavoured milk provides a good alternative that ensures that these children still benefit from milk.

If a school chooses not to provide flavoured milk because it will not receive as much subsidy, there is a risk that a child will end up not drinking milk at all.

For consistency, flavoured milk should be subsidised in full, as long as it adheres to current nutritional standards as outlined by the Nutritional Requirements for Food and Drink in Schools (Scotland) Regulations 2008.

Post Brexit, if the Scottish Government is tasked with implementing a replacement scheme for school milk subsidy, we encourage flavoured milk to be subsidised in its entirety, particularly as it provides an excellent alternative to harmful fizzy drinks. Likewise, we also encourage the Scottish Government to promote 150ml of fruit juice as an alternative to less healthy drinks. While we do not recommend overconsumption of fruit juice, fruit juices and smoothies provide an easy way for children to receive one of their '5 a day'. As noted by the Scottish Health Survey in 2014, just 14% of 2-15 year olds eat five portions of fruit and vegetables a day, so this is convenient way to helping kids close this gap.

This is of value when you consider that research shows that people with balanced diets including the consumption of 100% fruit juice have better health indicators; are more likely to have their recommended fruit and vegetable intakes, they are leaner, more insulin sensitive, and have lower odds of obesity and metabolic syndrome.

Educational Measures Linked to School Milk

We believe that the poster that has been commissioned by the Scottish Government should focus on healthy eating and diets. It should provide information of the nutritional benefits of

milk in a way that engages pupils. Our research found that while 73% of parents of 3-5 year olds say that their child drinks milk at school, only 35% of parents of 9-11 year olds say the same. The poster should therefore include information that helps these older children make better nutritional choices, and select milk more often.

And while we welcome the new poster, we encourage the Scottish Government to go even further. As noted in our Making More of Milk report, 24% of parents and 38% of teachers want milk time to be linked to educational content. It's therefore important that additional educational resources are developed to support this demand.

The Curriculum for Excellence already establishes the aim of developing confident individuals able to pursue a healthy and active lifestyle. This aim can be supported by better education around milk and healthy drink choices, linked to school milk time. Tetra Pak is currently developing a school lesson plan about healthy eating, which will be used to run several workshops in schools in June. These will focus particularly on choices around school lunchboxes. We would be happy to share with the Scottish Government the insight we gain from these workshops. This work can be linked to related issues such as the Scottish dairy industry, agriculture and nature, to provide a holistic approach to children's education on healthy food.

This educational process should also extend to parents. Our research shows that nearly a third of parents whose children do not drink milk at school say that the main reason is that they are unaware that their children are eligible for a subsidy. Tetra Pak recommends that schools and nurseries should communicate to parents, kids and teachers about the recommended types of milk, daily portion sizes and benefits of milk, as well as wider messages about healthy eating. Information should be provided for parents to improve awareness about their right to ask for free or subsidised milk and how they might easily be able to secure this for their children. This could be via SMS, the school website or newsletter.

ANON-JQJV-FKHU-9

1. NFU Scotland's members strongly believe that Scottish school children should benefit from the School Milk Scheme, which should include cheese and yoghurt as well milk, supported by educational measures to explain the many benefits of dairy to school children and teachers, and that the products should be fresh, high quality and local.
2. NFUS welcomes the opportunity to respond to the Scottish Government consultation on the EU School Milk Scheme. The EU Scheme allows local authorities in Scotland to claim funding to subsidise their school milk schemes.
3. NFU Scotland strongly supports the Commissions ambition to ensure the scheme plays an effective role in reversing the ongoing decline in the consumption of dairy products and in reducing obesity among children.
4. NFU Scotland strongly supports the Commissions ambitions;
 - strengthening links between schoolchildren and farming, farmers and the various types of food they produce;
 - focusing these schemes on boosting the consumption of selected produce in the long term and instilling healthy eating habits through education;
 - making the scheme more efficient, through better targeting for maximum impact and more cost-effective distribution
5. NFU Scotland urges the Scottish government to encourage all Local Authorities to use the scheme, by reducing, where ever possible, unnecessary administration.
6. We are very supportive of extended the offering beyond drinking milk to include Cheese and Yoghurt. The products should be high quality and well presented to ensure children have a good experience, eating nutritious dairy products.

7. NFU Scotland members believe very much that in complying with the schemes requirements in providing education material to strengthen the impact of the scheme goes beyond the suggested poster, which is welcome, but not enough to take full advantage of the opportunity to add value to scheme.

8. Given the lack of understanding/misconceptions about dairy produce, and science supporting the nutritional benefits of dairy products then there is huge potential to add education value to the delicious products.

9. The old and new science clearly proves dairy produce is good for children, and this scheme is an ideal opportunity to educate not only the school children, but also in many cases their teachers. The many misconceptions and untruths pedaled have damaged the image of dairy, to the detriment of adults and children health and wellbeing.

10. We urge the Scottish Government to support a proactive educational initiative involving e.g. the highly effective RHET, the Dairy Council, to add value to the aims of the scheme. The challenge of obesity, and unhealthy eating habits is huge, and dairy can play an important role, therefore education is key.

11. In addition to measures taken to ensure the products presented are high quality, with education to explain the values of dairy, the scheme in Scotland should as a prerequisite require the products to be as local as possible, with education to ensure school children know where the products come from.

12. In conclusion NFU Scotland urges the Scottish Government to view this as an opportunity to make progress on key ambitions,

- Encourage healthy eating habits by Scottish children, through offering healthy, nutrient dense dairy products, including milk, yoghurt and cheese, thus helping reduce obesity through displacement of poor quality, unhealthy alternatives.
- Encourage the wide benefits of fresh, local food, to the consumer, the local economy and wider economy, and the sustainability of rural businesses.
- Through an imaginative effective education programme, linked to existing educational initiatives, increase the understanding of where our food comes from.

BY EMAIL - Children in Scotland is the collective voice for children, young people and families in Scotland as well as the organisations and businesses that have a significant impact on children's lives throughout the country. It is a membership organisation comprising individuals and organisations from the voluntary, public and private sectors.

We aim to identify and promote the interests of children and their families, influencing the development of policy and services in order to ensure that they are of the best possible quality, capable of meeting the needs of children and young people living in Scotland.

We are glad to be able to respond to the Consultation on arrangements for Scotland to continue participating in the EU School Milk scheme. Evidence shows that tackling issues of diet and nutrition are vital to ensuring better outcomes in health and wellbeing for children and young people, and are also associated with improving attainment and limiting the impact of socio-economic factors on the life chances of children and young people across Scotland¹².

Food and Poverty

There is a clear link between access to food and poverty. In 2014/15 around one in eight children in Scotland was considered to be living in a household that was materially deprived, one of the key indicators of which is food insecurity/food poverty³. Information published by

¹ <https://www.cambridge.org/core/journals/public-health-nutrition/article/association-between-breakfast-consumption-and-educational-outcomes-in-911-year-old-children/8174B87D235C67D22C0913F66E1ED6B4>

² https://orca-mwe.cf.ac.uk/3147/1/MOORE_Orca3147.pdf

³ <http://www.gov.scot/Publications/2016/06/5456/1>

the Trussell Trust indicates that they provided 47, 995 three-day food parcels for households with children over a 12-month period⁴.

These figures show that in Scotland we have a great many children living in poverty who are not receiving the nourishment they need due to economic factors that are outwith their control.

The health consequences of food poverty and poor diet are considerable⁵. Evidence from the Scottish Government and the RCPCH *State of child health* report shows that children and young people from poorer backgrounds are more likely to be diagnosed with type 2 diabetes, obesity and to have a healthy life expectancy of 23 years less than their most affluent counterparts⁶⁷. Obesity In Scotland's statistics suggest that around 15% of Scottish children are at risk of obesity with a further 13% on top of this being at risk of being overweight⁸.

Evidence also shows poor diet and nutrition can have a negative impact on children and young people's ability to learn and achieve in the school setting⁹. We feel that the Scottish Government has a key role to play in tackling both the economic factors that cause poverty and the issues that stem from this, and see the EU milk scheme as one mechanism for doing so.

With this in mind Children in Scotland is glad to see that the Scottish Government will continue to participate in the EU milk scheme. We believe this can provide a valuable contribution to the dietary and nutritional needs of Scotland's children and young people and ultimately support their learning and attainment.

However we are disappointed that Scotland will not extend its participation to include the fruit and vegetable scheme, which provides children and young people the opportunity for a more balanced and nutritious diet. We believe that this scheme could play an important role in preventing some of the dietary issues that our children and young people face in relation to poverty as it could increase their fruit and vegetable consumption and reduce the likelihood of health issues like obesity¹⁰.

Previous projects of this nature have been prone to particular issues where it has impacted on fruit and vegetable consumption outside school and, as such, the scheme would have to be coupled with work to embed an understanding of healthy eating and promote this outside the school setting¹¹. Initial feedback from our Food, Families, Futures project has shown that parents have taken away healthy recipes and continued to make these at home. This shows that with effective support children, young people and their families can benefit from greater access to a healthy diet if shown how. This could be linked in to the educational aspects of the scheme.

While we accept that the Scottish Government is under budgetary pressure, we believe that investing in the health and wellbeing of children and young people across the country is a sensible and effective use of public resources. A 2010 Scottish Government SPice briefing

⁴ <https://www.trusselltrust.org/news-and-blog/latest-stats/end-year-stats/>

⁵ <http://adc.bmj.com/content/early/2016/02/08/archdischild-2014-306746>

⁶ 'Long-Term Monitoring of Health Inequalities' (Edinburgh: The Scottish Government, October 2015)

⁷ <http://www.rcpch.ac.uk/state-of-child-health/school-age-and-adolescence>

⁸ <http://www.gov.scot/Topics/Statistics/Browse/Health/TrendObesity>

⁹ http://www.nourishscotland.org/wp-content/uploads/2016/10/Living_more_important_than_surviving.pdf

¹⁰ www.biglotteryfund.org.uk/er_eval_schoolfruits_final_report_uk.pdf

¹¹ www.biglotteryfund.org.uk/er_eval_schoolfruits_final_report_uk.pdf

identified that the provision of fruit and vegetables in schools could be seen as a public health intervention with an element of preventative spend¹². We support this assessment.

Healthy Products

We recognise the subsidy is only eligible for the milk component of any flavoured milk drink and are pleased to see the commitment towards healthier options, with an aim that products are free from sweeteners and artificial flavour enhancers, and have no added sugar, salt or fat.

However we feel that the Scottish Government should commit to a firmer stance in this regard and move to phase out flavoured milk products from the scheme to ensure that children and young people are gaining access to products that are likely to have nutritional benefit.

While we appreciate that encouraging some children to drink unflavoured milk can have challenges and accept that some organisations may want to continue ordering some flavoured milk products, we are strongly of the view that the Scottish Government and schools across the country have a key role in informing the choices of our children and young people through what they offer and as such should endeavour to provide the healthiest options possible.

We also welcome the fact that products will be expected to meet the standards set out in the 'Nutritional requirements for food and drink in schools (Scotland) Regulations 2008'. However, we have queries about how the term 'expected' will be applied and recommend that a strict regulatory line is enforced to ensure that only products that are not going to have a negative impact on the health and wellbeing of children and young people are provided through the scheme.

We welcome the signposting to 'Catering for Change - buying food sustainably in the public sector' from the Scottish Food And Drink Industry division when considering how to purchase the milk for distribution under this scheme. We support an approach that aims to have a positive impact on children's lives now and in the future: "generating benefits not only to the organisation, but also to society and the economy, whilst minimising damage to the environment."

As we stated previously in this response, Children In Scotland is disappointed that Scotland does not participate in the fruit and vegetable scheme. We feel this would give many children and young people access to fruit and vegetables that they may otherwise not have, with the health benefits that we have outlined above.

The scheme also allows for member states to prioritise local produce and Children In Scotland feels that this could have been used to bring more pupils into contact with both the key environmental considerations that relate to food and also the produce that is available through local or regional purchasing.

This would give them a clearer understanding of the food they access and ultimately contribute to them making better choices about their own diet. We feel this could be of particular benefit as it would bolster Curriculum for Excellence in line with the Food and Health experiences and outcomes, especially related to the journey of food.

¹² <http://www.parliament.scot/Research%20briefings%20and%20fact%20sheets/SB10-57.pdf>

Educational Measures

It is interesting to note the introduction of the thematic educational measures. We recognise this is an area of strength within Curriculum For Excellence under Health and Wellbeing Food And Health, especially around the journey of food.

However, we cannot assume all children are experiencing the same educational input and believe the Scottish Government is right to develop an extra educational aspect. We urge that this is easily accessible for all children, including those with additional support needs. To support this the Scottish Government must conduct consultation work with children and young people to ensure that they achieve an outcome that is understandable and useable for its target audience.

If this is to be a poster, it would be good practice for children to experience a supportive and inclusive 'educational' input when the posters go on display in schools and other educational establishments. We do not wish to see teachers' workloads being added to; we believe the poster should be a piece of support material that could tie in with planned work around Food And Health. We suggest that when the Scottish Government distributes the posters to schools this is with a briefing and perhaps direction as to how this can support Food And Health experiences, outcomes and benchmarks.



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