

General comments on proposed Target Nutrient Specifications (TNS) for Manufactured Products used in School Meals

Subject	Respondent	Comment
Overall	Compass Group: Scolarest	Manufacturers are willing to support the reduction of fat, salt and sugar, although there will be technical difficulties and cost implications.
	LACORS	Welcomes the proposals to improve the nutritional quality of school meals.
	Brakes	Welcome the setting of the same targets throughout the UK with these targets replacing those for HFS and the simplification of some of the groups.
	Foodaware	Specifying the nutrient content of manufactured products for use in school meals is a useful step towards reintroducing full nutritional standards for school meals.
	Foodaware	Working with industry good way to ensure that the recommendations are practical and are more likely to result in substantial changes in practice.
	Which?	Support the establishment of these TNS and consider that they will play an important role in helping schools and their caterers implement the new nutritional standards for school lunches.
	Nestle	Fully support the Agency's drive to improve the nutritional standards of school meals.
	Sustain	Welcome the commitment to set targets for total fat, saturated fat, total sugar and salt for manufactured products used in school meals although the use of manufactured products should be kept to a minimum.
	RCGP	Welcome and encourage the general thrust of this activity, as it is widely recognised that eating habits and the health consequences of such habits are laid down in early life.
	City of Edinburgh Council	Support the need for improved healthy school meal options with particular regard to the key nutrients outlined in the consultation.
	North Lanarkshire Council	Agree with the proposal to set salt and fat intake targets below those prescribed in HFS as any reductions in fat, saturated fat, total sugar and salt must in the medium and long term benefit children's health. Also accept the argument for lesser nutritional targets due to potential allergy issues arising from nut and/or soya protein substitution.
	North Lanarkshire Council	Agree with the targets set out in the HFS report.
	TNS As Set	The Scottish Executive Health Department
The Scottish Executive Health Department		The results of the FSA's commissioned research on the impact of HFS on the food industry will inform the decision on whether the industry is able to, and likely to readily respond to, the proposed specifications.
Glasgow City Council		This consultation indicates that the implementation of Hungry for Success (HFS) targets has been successful. However, Glasgow City Council have found that there are a significant number of issues still causing concern.
Leicester City Council		Useful to have a percent meat/fish target for products containing these.
Compass Group: Scolarest		There needs to be a further breakdown of products within each food group.
British Heart Foundation		Would like to see minimum levels of fibre.
Staffordshire County Council		The specifications made for sodium are considered to be too high.
CASH		Children should not be exposed to unnecessarily high levels of salt.
Foodaware	Method of deriving TNS seems to produce anomalies and the possibility that foods with poorer nutrient profiles may be considered satisfactory because they meet the particular target set.	
Seafish	Needs to be made clear to manufacturers what the definition of a manufactured product is for the purposes of these targets.	

	Nestle	New category should be established for bouillons.
	LACA	There appears to be two standards; for those whose products already meet HFS criteria a higher standard is expected, whilst other products will be accepted on a lower standard.
	Stoke on Trent City Council City Council	As these are voluntary targets and many companies still have not met the Scottish standards it seems unwise to create more stringent targets at this stage.
	RCGP	Total sugar limits should be set for all foods, so that manufacturers do not 'compensate' for lower salt or fat levels by adding sugar.
	McCain	It is unnecessary to set TNS as the SMRP's recommendations set both nutrient standards for the content of lunch over a five day period plus a set of food-based standards to support these. It should be up to the school caterer how they meet these standards.
	Seafish	If foods not meeting the specifications cannot be supplied to schools there may be a reduction in the number of foods available and thus the variety of foods offered by schools.
Trans fat target	British Heart Foundation	Pleased to see the inclusion of a limit on saturated fats, but would also like to see limits on trans fats included in the targets.
	Which?	Given the evidence of the health effect of trans fats consider that it is important to limit the levels that children consume regularly along with total fat and saturates.
Vegetarian/protein TNS	Royal College of Physicans of Edinburgh	Protein deficiency in the UK is neither found in school children nor vegetarians so a minimum protein content for vegetarian meals is not necessary or justified. Soya should not be avoided as a protein source as it has been shown that regular intake of dietary soya are associated with lower levels of both blood pressure and serum cholesterol.
	Brighton and Hove PCT	Inappropriate to set minimum protein contents for vegetarian products at levels lower than in 'Hungry for Success' because of potential allergy problems to nuts or soya as there are a number of alternative vegetarian sources of protein.
	Staffordshire County Council	Lower protein specifications are avoidable if greater use is made of pulses and quorn as meat alternatives in recipes. Although meat regulations specify a minimum meat content for some but not all meat products, there is a chance that some meat products may be a relatively poor source of protein.
	The Nutrition Society	Welcome the addition of minimum target for protein in certain vegetarian products, although minimum protein targets should be set for meat products as well.
	Foodaware	The suggestion that vegetarian products are moving away from both nuts and soya needs further consideration as restricting vegetarian food choice by restricting the use of protein rich products may be counterproductive.
	Foodaware	Minimum protein targets set for vegetarian products do not need to be as high as the protein content of meat products.
	Seafish	Support the setting of targets for vegetarian products. Whilst there is generally no shortage of protein in the diet, the levels set for protein in vegetarian products is significantly lower than the meat products they replace.
	Sustain	Unaware of any research that has recorded protein deficiency in vegetarian children so question the necessity to set a minimum protein content for vegetarian products.
	Stoke on Trent City Council City Council	Concerned that levels for protein in vegetarian products have been set a lower level that those in Scotland.
	MLC	Question singling out vegetarian products for minimum protein values as catering contracts for schools meals specify protein content for both meat containing and vegetarian meals.

	MLC	The target minimum of 5g protein for vegetarian products is exceptionally low. The source and combination of protein is as important as the absolute amount of protein to ensure there is no limitation in the amino acids being provided.
	Trafford NHS	Useful to have minimum protein contents for sandwich fillings, meat based soups, baked beans, poultry products, sausage, burgers, fish products, stew etc and pasta dishes.
NMES	FDF	"Total Sugar" should read "Total Sugars" to distinguish it from NMES on the specifications spreadsheet.
	FDF	Pleased that the Agency have moved away from using NMES as this was not possible to analyse and is not recognised outside the UK.
	Rhonnda Cynon Taff County Borough Council	There should be consistency with regard to what sugars manufacturers are expected to quote on products as the promotion of children model uses NMES and the TNS looks at total sugars.
	Sustain	Proposed TNS lack consistency with the standards proposed by the SMRP. The Panel's report makes recommendations based on NMES whereas the TNS refer to the total sugar content of manufactured products.
	FDF	The Government's own advisors and WHO expert groups have not found a link between sugars consumption and any health problem other than dental caries. Since dental carries is not influenced by the quantity of sugars but by the frequency, the current targets seem inappropriate.
Milk and milk products	Leicester City Council	Useful to look at the sugar content of flavoured milks and yogurts.
	Staffordshire County Council	Should be a sugar specifications for milk and milk products.
	British Cheese Board	Cheese is not a manufactured product in the same way as other foods/products covered in this consultation. No nutrient specifications have been set for milk and milk products.
	Stoke on Trent City Council	Concerned about the omission of standards for the Milk and Dairy group, which can be a major source of fat and salt in savoury items and fat and sugar in sweet items.
	Stoke on Trent City Council	Milk and Dairy products are mentioned specifically in the Turning the Tables consultation with a stipulation for the sugar content of yoghurts and milkshakes so it would seem prudent to include this in these targets too.
	Brakes	Unreasonable to set targets for cheese dishes as there are no standard recipes for dishes made in schools. The dishes will have to fit into the menu as a whole and prepared dishes of known nutritional value should be able to do this.
Legislate/Statutory	Milk for schools	Targets should be a legal obligation which are monitored externally and for which there are penalties for non-compliance.
	LBHF	The specifications should be statutory for all companies who wish to provide manufactured foods for school meals.
	West Sussex County Council	Specifications should statutory, enforced and monitored.
	Leicester City Council	Standards should be compulsory otherwise there will continue to be variation in the nutritional specification of manufactured goods.
	Sustain	Recommend a mandatory approach.
	Brighton and Hove PCT	TNS should be mandatory and not voluntary.
	Stoke on Trent City Council	Specifications should be mandatory.
	NFWI	Recommend that a mandatory approach be taken to nutrient specifications for manufactured products used in school meals and that guidelines be put in place until such legislation is officially adopted.
	North Lanarkshire Council	Mandatory minimum nutritional values should be introduced for school meals.
	Staffordshire County Council	Nutritional school meal standards set by the Government will automatically pressurise school meal providers to comply; which will either force them to select 'healthier' manufactured products or to change their catering systems to avoid as many manufactured products as they can.
	The Nutrition Society	Legislation should be targeted towards the manufacturers. Monitoring of whether targets are being met should also occur at the manufacturing level.

	LACA	There should be a pilot phase before legislating in order to discover further issues that may not come to light until the standards are introduced.
	RCGP	It is unclear whether or not food manufacturers would adopt the proposed recommendations if there is no incentive or compulsion to do so.
Compliance/ monitoring	Foodaware	Situation needs to be monitored, if the targets are not being widely adopted, consideration should be given to a legislative route.
	Glasgow City Council	With no enforcement in place it is possible that manufacturers will not comply with the guidance.
Voluntary	Scottish Food and Drink Federation	Placing the nutrient specifications on a statutory footing is neither desirable nor necessary.
	Scottish Food and Drink Federation	Statutory specifications would not allow the scope or flexibility required to be able to make phased reductions in fat, salt and sugar levels. They are likely to reduce the number and choice between suppliers of food to schools and therefore the range of choices available to children.
Safety/ Technological issues	Compass Group: Scolarest	Potential reductions in shelf life for products where salt and fat are used as a preservative.
	FDF	Reductions of salt, fat and sugar in foods can only be carried out if it is both safe and technologically possible to reduce a given nutrient and that it can be shown that the reformulated product is acceptable to consumers.
	FDF	The risk analysis on which it has been concluded that reductions in the salt, fat and sugar content of products are safe should be made available.
	Nestle	Salt levels for some products are already at the boundary of product safety, technical feasibility and/or consumer acceptability. Phased approach required to overcome some of these issues.
	Nestle	May not be possible to reduce salt, fat and sugar within food categories simultaneously.
	Nestle	Pressure from consumers to use fewer additives, adds a further barrier to the reduction of salt, fat or sugar.
	Sustain	There are no safety or technical reasons why the original salt reduction targets cannot be met and some manufacturers are already able to meet these.
	Scottish Food and Drink Federation	Reductions in fat salt and sugar can only be achieved if it is both safe and technologically possible to do so.
Consumer Acceptability	Joanne Wilson - Manager of Nutrition and Dietetic Services	Targets should not be altered unless it can be proved that the resultant product would be unacceptable.
	McCain	A phased and sensitive approach to meeting target nutrient specifications is appropriate.
	FDF	A phased approach to meeting target nutrient specifications is appropriate.
	Nestle	A balance needs to be struck between having nutrient specifications which are dietetically sound, ensuring that schools can afford the products on offer and ensuring children will consume the meals produced.
	LACA	A phased approach to meeting target nutrient specifications is appropriate.
	MLC	A phased approach to meeting target nutrient specifications is appropriate.
	Scottish Food and Drink Federation	Reductions should be phased to allow time for palates to adjust to changing composition.
Commercial Issues	FDF	May be unreasonable for manufacturers who reduced the level of fat and salt in their products to meet HFS targets to now try to achieve even lower targets.
	Scottish Food and Drink Federation	There are logistical and bureaucratic barriers that manufacturers are faced with in Scotland which need to be addressed to encourage new entrants into the market and ensure a wide range of products are supplied.
Procurement	Glasgow City Council	May be difficult to source products at the current specification within suitable cost margins.
	Joanne Wilson - Manager of Nutrition and Dietetic Services	There should be national guidance as to what should be provided in all catering school meals contracts.
	Joanne Wilson - Manager of Nutrition and Dietetic Services	There should be resources freely available which give recipes for bulk catering and the nutritional breakdown to help with purchasing and production of appropriate menus.

	Foodaware	Use of specifications in procurement contracts would be a useful way forward to encourage widespread adoption.
	Rhonnda Cynon Taff County Borough Council	School meal budgets should be increased to allow for preparation of meals using local produce and the purchase of local produce. Local suppliers would be able to work closely with LA's procurement/catering teams to produce a healthier product.
	Rhonnda Cynon Taff County Borough Council	Should give procurement units guidelines as to nutritional levels etc, but have a statutory obligation that the procurement's specifications must include nutritional values for fat, sugar and salt etc, using DoH/FSA guidelines.
	Rhonnda Cynon Taff County Borough Council	Procurement of local foods would make it easier for Trading Standards Departments to control/monitor supplies.
Allergens/ additives / contaminants special diets	Tepnel BioSystems	Consideration should be given to food allergens as part of this review.
	Brighton and Hove PCT	Specifications should consider the presence of food additives, contaminants and agrochemical residues, as well as food production processes, such as genetic modification.
	National Union of Teachers	Concerned that the TNS for manufactured foods do not take in to account the presence of contaminants or additives as well as the use of food production techniques, such as genetic modification.
	Coeliac UK	Urgent action needs to be taken to highlight the deficiencies and variability in the provision of gluten-free school dinners to children with coeliac disease.
	Seafish	Exemptions should be included for products designed for use by children requiring special diets so as not to reduce the choice of foods available to these children.
Costs	McCain	By seeking incremental change to targets set in 'Hungry for Success' costs to businesses are ignored. In some cases it may not be possible to produce foods that both meet the specifications and remain acceptable to the end user.
	Seafish	Meeting these specifications may increase costs to industry in reformulating some products. In addition, it will not be possible to reformulate some products. Replacing these products will place greater financial burden on manufacturers than reformulating.
	Stoke on Trent City Council	Increased costs to industry of reformulation will affect both large and small manufacturers.
	LACA	Increased costs of reformulation will impact on LEA's as the extra costs will be passed down the chain to the purchaser.
	Scottish Food and Drink Federation	Costs associated with product redevelopment can be considerable and can act as a barrier to entry into this market or lead to manufacturers questioning the feasibility of supplying products for school meals.
	Nestle	Reformulated products with less fat, salt and sugar cost more to produce and therefore more to purchase.
	LACA	Manufacturers will want guarantees that increased funding will be available to their purchasers to make reformulation of products economically viable.
Guidance/ Labelling	Staffordshire County Council	Nutritional standards set need to be accompanied by specific guidance to manufacturers to provide all of the relevant information on the label or in the accompanying product literature.
	Stoke on Trent City Council	Nutrient breakdown should be given per portion as well as per 100g.
	Stoke on Trent City Council	Product labels should have information on the nutrients likely to feature in the new nutrient based standards.
	Brakes	Concerned that schools customers will treat these targets as mandatory maxima and minima. Guidance about tolerance around the targets while development work is underway would be useful.
	Seafish	Information needed on where nutrient declarations to be made i.e. trade documents or product label. Without legal status and enforcement some producers may be put at a disadvantage from those declaring inaccurate information, as well as the monitoring costs of maintaining a due diligence defence.

Product approval system	Merisant UK	A product approval system/kite mark should be implemented to help those manufacturers that have been flexible enough to meet with the Government guidelines, and help those who procure such products for school meals.
	LACA	There needs to be a system similar to a kite mark award that will identify which products meet the criteria laid down.
Nutrient profiling model	CASH	The Agency should maintain a consistent approach to standards for children's food basing its recommendations on its scientifically developed nutrient profiling model, which already categorises healthier and less healthy foods.
	Sustain	Recommend consistent approach based on the profiling model.
	NFWI	Concerned that the FSA has not used the nutrient profiling model setting the standards for manufactured foods in school meals. Recommend consistent approach based on the profiling model.
	Rhonnda Cynon Taff County Borough Council	The nutrient profiling model uses the term sodium which causes confusion with some consumers as they do not relate the sodium content in food to the daily RDI for salt of 6g/day. It would be less confusing for manufacturers to quote the salt content in their products.
	MLC	The nutrient profiling model is not sufficiently sensitive to recognise products reformulated with reduced fat and or salt content and a number of anomalies still exist. Therefore if applied as is currently proposed it would prevent advertising of reformulated foods to children and reduce the incentive for manufacturers to make compositional improvements.
Health Education/ Promotion	Staffordshire County Council	Changes in provision need to be underpinned by promotional and health educational activities for parents as well as children in schools.
	SNACMA	Attempts to improve children's' diets should be set within the wider context of messages about, for example, the need for regular exercise.
	SNACMA	Healthy eating policies will only lead to results if they work within current behaviours and beliefs and utilise current habits.
	SNACMA	The Agency should concentrate its efforts to improve the diet of children by educating them about the benefits of a balanced diet and healthy lifestyle. The Agency should also support industry in its attempts to improve the nutritional profile of its products and encourage the free promotion and communication of these product improvements to its consumers.
	VEGA	The Agency should apply its powers to educating all parties involved in school meals, and overseeing the effect of changes.
	RCGP	Children should be educated from an earlier age with regards to which foods they should eat less of and which food will be most beneficial to their health.
Wider school meal standards in place/being developed	SNACMA	There is no scientific rationale for restricting the consumption of any foodstuffs.
	Scottish Food and Drink Federation	Nutrient specifications should be assessed for effectiveness in the context of their contribution towards promoting a balanced and healthy lifestyle.
	Scottish Food and Drink Federation	There is a need for a widespread and widely supported public education campaign to promote healthier lifestyles that combine balanced diets and physical activity.
	Eliana Tomkins - Independent person	Schools should only use fresh foods, no pre-prepared foods, no ready made sauces and products should not be fried.
	Rachel Paine - Independent person	As well as lowering salt, fat and sugar content the sources for animal products should approach the standards set by organic and free range farming practices. Children should be educated as to how foods are grown, raised, and prepared. There should be extreme limitations on colourings and additives. Fruit and yoghurt should replace all cakes, biscuits, chocolates etc for dessert and water should be made available on every table with an enticement to drink it.

West Sussex County Council	Protein elements should in the majority come from the animal that it is supposed to represent and not from added ingredients.
West Sussex County Council	All snack items should be eliminated from the menu and a small selection of basic nutritious balanced meals served which only have a small element of choice.
Bath and North East Somerset Environmental & Consumer Services	Should be moving away from using processed shaped products in school meals towards freshly prepared products from raw ingredients.
Bath and North East Somerset Environmental & Consumer Services	An opportunity has been missed to promote healthier options, such as white bread being replaced by half wholemeal, half white bread, to make recommendations on acceptable levels of frequency of provision of processed food in the school meals service.
Bath and North East Somerset Environmental & Consumer Services	Recommend limiting the number of times schools are permitted to serve certain types of food such as chips and ask for guidance on the appropriate use of this type of product.
Brighton and Hove PCT	In setting target nutrient specifications the nutrient profile of manufactured foods used in school meals should not be separated from frequency or should other aspects of quality.
Bernard Matthews	Increasing numbers of schools are demanding whole muscle products, these are usually with the addition of a brine or marinade. These types of product will increase in popularity over chopped and shaped products because of media speculation and confusion surrounding processed products in terms of definition and inaccurate reporting.
National Union of Teachers	Greater emphasis should be placed on the use of fresh ingredients in school meals rather than the serving of processed food. Guidance needs to be provided for school caterers setting out the nutrient content of food as served and frequency of service.
Royal College of Physicians of Edinburgh	Need to re-emphasise in the TNS package that this is one of a number of policies that needs to be included in a whole school approach to improve children's diets. There need to be nutrient targets for meals as eaten averaged over a week.
Royal College of Physicians of Edinburgh	Levels of fat and saturated fat need to be reduced further as the modeling exercise showed that intakes of fat and especially saturated fat were still above recommended levels.
Dairy UK	Proposed specifications should take into account portion size or frequency of serving.
Staffordshire County Council	If recommendations such as those proposed by the Caroline Walker Trust and the School Meals Review Panel are accepted, nutrient specifications for micronutrients will exist in addition to the nutrients covered in this consultation, which would suggest that the current proposals do not go far enough.
British Cheese Board	Proposed specifications should take into account portion size or frequency of serving.
RHM Foodservice	A single meal or product criteria is extremely specific. A balanced approach to the menu cycle across the week and term should be taken in order to ensure a fully rounded perspective of the food consumed.
Westler	Recent reports indicate that the consumption of school meals continues to decline due to the move to 'health foods', suggesting that there is an increase in the consumption of uncontrolled meals.
Foodaware	If products can not be reformulated to produce a reasonable nutritional profile then their use in schools should be questioned.
Foodaware	There is a danger with specifications that foods meeting the targets are considered 'healthy' when this is not necessarily the case.
Foodaware	Consideration should be given to how often foods with poor nutritional profiles are acceptable in the midday meal.
Which?	Important that the relationship between these specifications and the mandatory standards is made clear as there is the potential for confusion.

Which?	Important specifications do not detract from the aim of schools providing a hot meal, cooked on site from fresh and seasonal ingredients.
Which?	Consideration should be given to including advice per serving as well as per 100g for items that are consumed as part of the main meal.
Nestle	Research has shown that some chefs add salt to products during preparation so further reductions could be counter productive as they will add even more.
Nestle	Supports the FDF's view that these targets, along with CWT guidelines, may adversely affect the energy levels of school children.
LACA	Quality specifications would seem advisable for many of the items in the group of products containing meat fish and alternatives as there is no scope for descriptors of e.g texture. However, the way forward is not with the ongoing inclusion of manufactured foods but by providing freshly cooked meals prepared from basic ingredients.
South Sefton PCT	Consumption of fruit and vegetables should be mentioned within the guidelines for manufactured products.
Sustain	Recommend guidance to discourage the use of manufactured products in school meals.
Brighton and Hove PCT	Schools should be encouraged to produce meals cooked on site using fresh produce when possible. Where this is no longer possible for schools Government should improve or provide necessary facilities to allow this to be achieved.
Brighton and Hove PCT	All food provided in schools throughout the day should work to the same standards to ensure consistency in food provision within the school as a whole.
Brighton and Hove PCT	Healthy eating should begin as young as possible, and food provision in nurseries should also work to the same standards.
Grampian Foodservice	Concerned that without strict guidance any reformulation work carried out to meet these voluntary specifications may prove non-beneficial. Caterers could overcome the issue of increased cost resulting from product redevelopment by using lower specification products not meeting TNS.
NFWI	Sustainable development factors be taken into account such as ensuring schools source food locally and to consider the environmental impacts of foods. The proposed TNS should take into account the presence of food additives and contaminants, agrichemical residues and food production processes such as genetic modification.
RCGP	The consultation should deal with the quality of food products used in school meals as well as the sugar fat and salt content.
RCGP	Presume that the announcement that 'junk food' will be banned from school meals supersedes much of the information contained in this consultation.
MLC	Improvements to the quality and variety of food provided with greater emphasis on the application of healthier catering practices in food preparation and menu compilations, can yield a better nutrient intake balance by children and young people from their meals at school. However, the central role of the parents and their influence on their children's eating patterns both at school and at home must also be considered as this could either support or undermine the success of any improvements made in light of the proposed TNS.
MLC	Many vegetarian dishes overly rely on cheese, making them high in both fat and salt. If the number of vegetarian dishes predominantly based on cheese is not limited there is a danger that the same children will repeatedly be exposed to a high fat and salt intake from their school meal.
MLC	It is important that manufactured meat products and dishes for use in schools take account of the meat content to prevent iron deficiency and ensure students intake adequate amounts of protein.
Rhonnda Cynon Taff County Borough Council	Specifications for school meals need to include nutritional values for fat, saturated fat, carbohydrates, NME sugar and sodium.

Rhonnda Cynon Taff County Borough Council	Nutritional values of specifications should be expressed per portion as well as per 100g.
Scottish Food and Drink Federation	Restrictions on choice combined with an altered taste profile will increase the likelihood of children going elsewhere for their lunchtime meal.
BDA	Main concern is that food should be of high quality, palatable and acceptable to children.
Scottish Food and Drink Federation	Nutrient specifications can only make a difference if children actually eat the meals on offer.
The Scottish Executive Health Department	Any health impact of nutritional standards introduced will only be anticipated in those children who eat school lunch 4-5 days a week during the school terms and in conjunction with everything else that the child eats and drinks. The specifications are useful in underpinning the delivery of the school meal standards and nothing more.
The Scottish Executive Health Department	Whole school approach is alluded to but not clearly expressed and no mention made of this either as a key principle of HFS or in the context of the development of health promoting schools in Scotland which is currently well underway.
The Scottish Executive Health Department	The evidence base presented for this UK consultation is predominantly English even where Scottish data exists.
Brakes	Useful if all targets for sodium within the TNS were in line with the Agency's salt targets.
FDF	Needs to be greater consistency between TNS targets for salt and the FSA's revised draft salt targets for retail foods. it is uneconomic to produce a food to meet the requirements of 2 different markets.
Nestle	Needs to be greater consistency between TNS salt targets and the current FSA salt consultation.
Staffordshire County Council	Resources need to be allocated to support businesses who wish to work with school meals providers to comply with these specifications.
Westler	Despite efforts to provide products that meet specifications, sales are being lost due to the misunderstanding of the term 'processed foods'.
West Sussex County Council County Council	Analysis of the nutrient content of foods should be carried out by an external body.
Glasgow City Council	Nutritional information from manufacturers needs to be accurate and effectively monitored.
NIFAC	School governors and the school inspectorate should be including the quality of food and nutrition provision as part of their accountability regime.
The Nutrition Society	This guidance should not be seen as a stand alone paper. The results of the DfES wider consultation on school meals and the Agency's consultation on salt in key food categories that contribute most to intakes may mean this guidance requires alteration or widening in scope.
Seafish	If caterers meet these specifications it is likely that they will only use foods meeting the criteria rather than balancing non-conforming foods to meet the targets set for the meals as a whole. This would mean these specifications would be mandatory.
Dairy UK	Concerned that the specifications could result in cheese, which is a good source of a variety of nutrients, being disallowed in a sandwich filling, a pizza topping, a potato top or in a sauce.
British Cheese Board	Concerned that the proposed guidelines will diminish the use of cheese in school meals and exacerbate the already poor nutrition of many children.
Scottish Food and Drink Federation	Endorse the FDF response to this consultation.
North Lanarkshire Council	To promote the uptake of healthy eating habits from an early age free, nutritious school meals should be provided to all pupils irrespective of parental income.
Miscellaneous	FDF Produced table comparing TNS, HFS, salt targets proposed by FSA and McCance and Widdowson's The Composition of Foods data.

The Scottish Executive Health Department	The nutrient specifications are over-emphasised as a major intervention to improve children's health. It was not clear what the nutrient specifications are in comparison to nutritional standards for school meals.
The Scottish Executive Health Department	Scottish Ministers were not consulted on the proposed option for UK Governments to legislate in advance of the consultation being placed in the public domain. Any further discussion of this option would require Scottish Ministers' involvement and agreement.
The Scottish Executive Health Department	Options themselves are not well placed for Scotland since there is no 'do nothing' option for Scotland as TNS are already in place.
The Scottish Executive Health Department	The voluntary option is not effectively analysed in terms of its impact at present or in the future. The analysis of this option fails to take account of the driving force of the market.
The Scottish Executive Health Department	Plans for the Agency to track nutrients in institutions would be untenable in Scotland.
The Scottish Executive Health Department	Given the Scottish Executive's leadership of HFS it would have been useful to involve the Executive at an early stage on this to ensure that the analysis and consultation documents could be accurately drafted and as useful in Scotland as they should be.

Comments on proposed Target Nutrient Specifications for Manufactured Products used in School Meals

Food Category	Target Nutrient Specifications				
	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
Bread			893 / 350		
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
Glasgow City Council			By lowering the sodium target these products may become unattainable schools due to increased costs. Target should be the same as wider "salt targets"		
CASH			Proposed sodium target is a good starting point but should be working towards lower target for children's foods.		Sodium: 0.2g/100g
RHM Foodservice			Should retain Scottish target for Sodium		
Brighton and Hove PCT	Where possible the preference should be for wholemeal breads, bagels and pitta breads.				Sodium: 0.3g/100g
Food Category	Target Nutrient Specifications				
	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
Garlic bread	15	5	893 / 350		
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
LACA			10g salted butter will add 60mg sodium approx so it would seem advisable to make with unsalted butter, and a small amount only		
Brighton and Hove PCT			No products meet proposed targets despite being set at FSA guidelines for moderate levels		
Food Category	Target Nutrient Specifications				
	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
Chips and roast potatoes	4	1	89 / 35		
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
McCain			The proposed fat target is unnecessary when the incremental benefit it delivers is considered against the detrimental effect on the 'eat quality', leading to customer rejection of the product.		Total fat: 5g/100g
LACA	Specify whether "jacket wedges" etc are included				
Brighton and Hove PCT	The new CWT nutrient based standards recommends that these sorts of products not be used in school meals more than once a week.		Concerned that cooking processes have not been taken into account when setting these targets.		

Stoke on Trent City Council			Need to be clear if these are oven-bake products or intended to be fried.		
Food Category Potato croquettes, potato waffles, smiley faces, alphabites, potato spirals, other potato shaped products	Target Nutrient Specifications				
	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
	5	1	255 / 100		
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
Leicester City Council			Fat content for potato products should be the same as chips and roast potatoes.		
McCain			Feel that the sodium content is unrealistically low. There may be technical problems reducing to this level and possible issues with consumer acceptability.		
Nestle					Salt target for mashed potato should be 750mg (300mg sodium)
LACA	The macronutrient standards will not reflect that these are very processed products that will have lost much of their vitamin content and often have further fat added in the cooking process either by frying or brushing with oil before baking.				
Brighton and Hove PCT	The new CWT nutrient based standards recommends that these sorts of products not be used in school meals more than once a week.		Concerned that cooking processes have not been taken into account when setting these targets.		
Food Category Sandwich fillings, salads and accompaniments to baked potatoes such as coleslaw, potato salad and pasta salad	Target Nutrient Specifications				
	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
	10	1	510 / 200		
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
British Cheese Board	The proposed sodium target would mean that cheese could not be used as a sandwich filling				
CASH			Sodium target is acceptable		
LACA	Pasta & potato should be removed from this category and placed in Group 1. Further clarification is required as to what constitutes and sandwich filling				

BDA	Maybe a miscellaneous category is required as few of these products provide a serving of fruit or vegetables.				
Brighton and Hove PCT			A target for maximum total sugar should also be set since such products can sometimes contain relatively high amounts of sugar.		
Food Category Vegetable and meat based soup	Target Nutrient Specifications				
	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
	5	1	510 / 200		
Organisation	Comment on Category	Comment on proposed TNS		Alternatives	
RHM Foodservice		Reductions in sodium content of products needs to be carried out over a longer period of time to allow consumers' palates time to adjust.			
CASH		Sodium target is acceptable			
Nestle		Whilst technically possible to reduce salt further in these products, reductions would have to take place over several years to allow consumers to adjust.			
LACA	These would best feature in a "miscellaneous section" as it is misleading to feature with 'fruit & veg'.	Specifications need to be given "as served" and "as packaged".			
BDA		Specifications need to be given "as served" and "as packaged".			
Brighton and Hove PCT	The targets for maximum total fat, saturated fat and sodium are in accordance with FSA's 'this is a lot' and 'this is a little' recommendations 'as served'. However this relies on catering staff limiting salt which is difficult to monitor. Preparing soup on site from fresh ingredients would avoid any ambiguity. A target for maximum total sugar should be set since these types of products often include relatively high amounts of sugar.				
Food Category Products in tomato sauce such as baked beans and tinned spaghetti	Target Nutrient Specifications				
	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
			765 / 300		
Organisation	Comment on Category	Comment on proposed TNS		Alternatives	
Leicester City Council	Useful if reduced salt products available on the retail market were also available in catering sized packs through wholesale providers.				
CASH		Proposed sodium target is a good starting point but should be working towards lower target.		Sodium: 0.2g/100g	

Staffordshire County Council		There should be a specification set for sugar in these types of product.	
Nutrition Society		There should be a specification set for sugar in these types of product.	
LACA	Products such as pasta in tomato sauce should be listed under "bread" other cereals & potatoes" as they are primarily a source of carbohydrate and contain no vitamin C. Baked beans would sit better with the 'meat fish & alternatives' group as a pulse item.		
BDA	These products should not be classified as fruit and vegetables as this is not their main nutrient function.		
Brighton and Hove PCT		There should be a specification set for sugar in these types of product.	

Target Nutrient Specifications					
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
Poultry products (burger/pieces/ shapes in batter or breadcrumbs)	10	2	1020 / 400		
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
Bernard Matthews			Although specifications set are possible, higher fat and sodium values would be more achievable and acceptable to the consumer.		Total fat: 15g/100g, Sodium: 400mg/100g
Bernard Matthews	Category definition should state that this includes whole muscle chicken products as well as chopped and shaped.				
CASH			Consider the sodium target to be too high.		Sodium: 0.2g/100g
LACA	There needs to be qualitative standards to ensure that the meat content is of reasonable quality.		Advise adding a minimum protein content.		Protein: 18-19g/100g
BDA	Quality in main consideration in all products in this group				
Brighton and Hove PCT			Saturated fat target acceptable. The sodium target should be reduced and a minimum protein content should be set		Sodium: 0.3/100g, Protein: 30% RNI
MLC			Useful to set a target for minimum protein/meat content.		

Target Nutrient Specifications					
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
Sausage	10	4	1403 / 550		
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
Brakes			Higher meat content sausages may have higher fat contents		Total fat: 20g/100g
CASH			The proposed sodium target is too high.		Sodium: 0.2g/100g

LACA	It would seem preferable to specify meat content and protein content and then frequency of service rather than aim for an artificially low fat content which the consumer may reject.		
Brighton and Hove PCT		The targets for saturated fat and sodium should be reduced. In addition a minimum protein content should be added.	Saturated fat: 3g/100g, Sodium: 0.3g/100g, Protein: 30% RNI
RCGP		Consider the salt target for all foods to be too high	
MLC		The salt target might be too low to be realistic. The fat target may also be too low and does not take into account cooking losses. Reduced fat content in the raw product may lead to more fat being added on cooking/preparation	Sodium: 600-750mg/100g

Target Nutrient Specifications					
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
Burgers, grillsteaks and meatballs (no gravy)	10	4	1020 / 400		
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
Bernard Matthews			Fat and sodium levels achievable for poultry and beef based products. Fat targets for lamb or pork based products should be higher due to naturally higher fat levels occurring in the meat.		
Brakes			Higher meat content burgers may have higher fat contents. Consider setting a target for meat content of burgers to enable products to meet the iron target in the nutrient base standards.		Total Fat: 20g/100g, Meat content: 99.5% (1.4mg/100g iron)
CASH			Consider the sodium target to be too high.		Sodium: 0.2g/100g
LACA			Suggest that a minimum protein standard is set for these products		
Brighton and Hove PCT	The target value for saturated fat is too high and should be reduced to 3g/100g. The target for sodium should be reduced to 0.3g/100g. A minimum protein content should also be set at not less than 30% of RNI if the product is to serve as the main protein source of the school lunch		The targets for saturated fat and sodium should be reduced. In addition a minimum protein content should be added.		Saturated fat: 3g/100g, Sodium: 0.3g/100g, Protein: 30% RNI
MLC			The total fat and salt targets may be unachievable. Further loss of fat on cooking could lead to a very dry product.		
Target Nutrient Specifications					
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)

Bolognese sauce (including meat), chilli con carne, cobbler, curry, goulash, hotpot, meatballs (in gravy/sauce), mince in gravy, poultry in white sauce, ragout, stew, sweet and sour, tandoori and tikka	4	2	638 / 250	
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Organisation	Comment on Category	Comment on proposed TNS	Alternatives
CASH		Sodium target a good starting point	Sodium: 0.2g/100g
LACA		Suggest that a minimum protein standard is set for these products	
Brighton and Hove PCT		There should be a target maximum set for sugar and a minimum protein target set.	Protein: 30% of RNI
MLC	May need to consider frozen, chilled and canned separately.	Achieving the target for salt will largely depend on the success of Project Neptune. Suggest setting a target for minimum protein/meat content.	Sodium: 350-400mg/100g

Food Category	Target Nutrient Specifications				
	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
	Breaded or battered fish shapes, fish burgers, fish cakes, fish fingers, fish in batter, fish in crumb and fish pie with pastry	8	1	638 / 250	

Organisation	Comment on Category	Comment on proposed TNS	Alternatives
Bernard Matthews	There should be a separate criteria for chopped and shaped fish products and coated natural fish fillets.	Total fat target is unachievable, even prior to coating for oily fish such as raw salmon and mackerel	Total Fat: 12-14g
Brakes		There are technical issues with reducing the saturated fat content of these products any further. Any fish product made with oil rich fish would have higher fat content so there must be some dispensation for these types of products.	
CASH	Sodium target a good starting point but should be working toward 0.2g/100g	Sodium target a good starting point	Sodium: 0.2g/100g
LACA		Suggest that a minimum protein content is set for this group of products	Protein: 12-13g/100g
Brighton and Hove PCT		A minimum protein content should be set for these products	Protein: 30% of RNI

Food Category	Target Nutrient Specifications				
	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
	Fish pasta bake and potato topped fish pie	8	3	638 / 250	

Organisation	Comment on Category	Comment on proposed TNS	Alternatives
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CASH		Sodium target a good starting point	Sodium: 0.2g/100g	
LACA	We would ask for a minimum protein content for this group	Ask for a minimum protein content for this group		
Brighton and Hove PCT		A minimum protein content should be set for these products	Protein: 30% of RNI	
Food Category Cannelloni, lasagne, mousakka, ravioli, and meat-based pasta bake	Target Nutrient Specifications			
	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)
	5	2	765 / 300	
Organisation	Comment on Category	Comment on proposed TNS	Alternatives	
CASH		Sodium target a good starting point	Sodium: 0.2g/100g	
LACA		Ask for a minimum protein content for this group		
Brighton and Hove PCT		A minimum protein content should be set for these products	Protein: 30% of RNI	
MLC	Achieving the targets for both salt and fat will largely necessitate a reduction in cheese content.	Target for salt is not in line with FSA salt target consultation of 250mg for Italian ready meals. Suggest setting a minimum protein/meat target.		
Food Category Cheese and vegetable/potato shaped products, macaroni cheese, other composite dishes with cheese as main protein source, cauliflower cheese	Target Nutrient Specifications			
	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)
	6	3	765 / 300	5
Organisation	Comment on Category	Comment on proposed TNS	Alternatives	
British Cheese Board	To meet the target 12.4g and 27.6g of cheese would be required to make a side serving and main course respectively. Feel this is a contradiction when only 2.76g of cheese would be allowed in a cheese sandwich			
CASH		Sodium target a good starting point	Sodium: 0.2g/100g	
LACA		Suggest setting a higher minimum protein target.	Protein: 6g/100g	
BDA		Suggest setting a higher minimum protein content		
Brighton and Hove PCT		Feel that the minimum protein target is too low	Protein: 30% of RNI	
MLC	20g of cheddar cheese will yield 5g of protein, but give 7g of fat and 4g of saturated fat.			
Food Category Pizza (any variety)	Target Nutrient Specifications			
	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)
	10	4	1020 / 400	
Organisation	Comment on Category	Comment on proposed TNS	Alternatives	

Brakes	Since there are no standard recipes it may be unreasonable to set standards for these products.		
CASH		The sodium target is too high	Sodium: 0.2g/100g
LACA		Suggest setting a minimum protein target.	Protein: 12g/100g
BDA		There should be a protein target for these products	
Brighton and Hove PCT		The target value for saturated fat and sodium should be reduced. In addition a minimum protein content should be set.	Saturated fat: 3g/100g, Sodium: 0.3g/100g, Protein: 30% of RNI

Target Nutrient Specifications					
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
Vegetarian burger, hot dog, lentil loaf, 'meat' grill, and sausage	10	2	765 / 300		10
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
CASH			Sodium target a good starting point		Sodium: 0.2g/100g
LACA			Suggest a protein target set to reflect the likely maximum possible within a palatable product.		
Brighton and Hove PCT	Other vegetarian protein sources such as lentils and a variety of beans should be used if there is a move away from the use of soya or nuts.		The minimum protein content is acceptable for children up to the age of 10 years old but falls short for children aged 11 and over.		
MLC	To yield the target amount of minimum protein, portion sizes will have to be large. Focusing only on total protein content takes no account of the quality of the protein which is particularly important for non-dairy vegetarian dishes.				

Target Nutrient Specifications					
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
Vegetarian mince	10	2	1020 / 400		12
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
CASH			The sodium target is too high		Sodium: 0.2g/100g
Brighton and Hove PCT	Other vegetarian protein sources such as lentils and a variety of beans should be used if there is a move away from the use of soya or nuts.		The sodium target should be reduced. The minimum protein content is acceptable for children up to the age of 10 years old but falls short for children aged 11 and over if this product is to provide the main source of protein in the school lunch.		Sodium: 0.3g/100g
MLC	Portion size will be significant for these products.				

Target Nutrient Specifications					
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)

Vegetarian bean hotpot, casserole, chilli, curry, stew, sweet and sour and tikka	6	2	765 / 300		5
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
CASH			Sodium target a good starting point		Sodium: 0.2g/100g
LACA			Ask that protein targets are set to protect the intake of vegetarian children and thus to reflect the likely maximum possible within a palatable product		
BDA			Suggest setting a higher minimum protein content		
Brighton and Hove PCT	Other sources of vegetable protein such as haricot beans, butter beans, lentils, split peas etc should be used if there is a move away from the use of soya or nuts as protein sources.		Suggest setting maximum sugar target and feel the minimum protein content is currently too low		
MLC	Concerned that these vegetarian dishes have higher minimum targets for salt and total fat than their meat containing equivalents. The combination of protein sources needs to be considered to ensure protein quality.				
	Target Nutrient Specifications				
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
Vegetarian cannelloni, lasagne, mousakka, and risotto	5	2	765 / 300		5
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
CASH			Sodium target a good starting point		Sodium: 0.2g/100g
LACA			Ask that protein targets are set to protect the intake of vegetarian children and thus to reflect the likely maximum possible within a palatable product		
Brighton and Hove PCT	Other sources of vegetable protein such as haricot beans, butter beans, lentils, split peas etc should be used if there is a move away from the use of soya or nuts as protein sources.		Suggest setting maximum sugar target and feel the minimum protein content is currently too low		
MLC	The combination of protein sources needs to be considered to ensure protein quality.				
	Target Nutrient Specifications				
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
Vegetarian pakora, pancake roll, samosa and spring roll	8	2	1020 / 400		5
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
CASH			The sodium target is too high		Sodium: 0.2g/100g

LACA	These products are not a good source of protein. Since they are vegetable/cereal based they would be better placed in one of those groups.		
BDA	Question whether these products are suitable meal options.		
Brighton and Hove PCT		Suggest reducing the sodium target and increasing the minimum protein target.	Sodium: 0.3g/100g
Target Nutrient Specifications			
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)
Frankfurter and hot dog	12	4	1403 / 550
Organisation	Comment on Category	Comment on proposed TNS	Alternatives
Westler	Products were designed to meet HFS criteria so broadly meet the targets specified		
CASH		The sodium target is too high	Sodium: 0.2g/100g
Brighton and Hove PCT		The target for sodium should be reduced and a minimum protein content should be set.	Sodium: 0.3g/100g, Protein: 30% of RNI
MLC	Reformulated hot dogs with a reduced salt content aimed at the school market have not proved popular.		
Target Nutrient Specifications			
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)
Cottage pie, shepherds pie and stovies	5	3	1020 / 400
Organisation	Comment on Category	Comment on proposed TNS	Alternatives
CASH		The sodium target is too high	Sodium: 0.2g/100g
LACA		Suggest a minimum protein content for these groups	
Brighton and Hove PCT		Feel the sodium target is too high and a minimum protein content should be set	Sodium: 0.3g/100g, Protein: 30% of RNI
Target Nutrient Specifications			
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)
Battered sausage, bridie, cold pork pie (melton mowbray), meat/cornish	15	5	1020 / 400
Organisation	Comment on Category	Comment on proposed TNS	Alternatives
CASH		The sodium target is too high	Sodium: 0.2g/100g
LACA		Ask for a minimum protein content for this group	
Brighton and Hove PCT		Targets for total fat, saturated fat and sodium all exceed moderate amounts. A minimum protein content should be set.	Protein: 30% of RNI

MLC		Achieving this target for salt will be difficult and limited by the degree to which the pastry component of the product can be modified. Suggest setting a minimum protein/meat content targets for these products.	Sodium: 450-600mg
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Target Nutrient Specifications					
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
Quiche	13	5	638 / 250		
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
Brakes	Since there are no standard recipes it may be unreasonable to set standards for these products.				
CASH			Sodium target a good starting point		Sodium: 0.2g/100g
LACA			Ask for a minimum protein content for this group		
BDA			As Quiche is often a vegetarian option, suggest setting a minimum protein target.		
Brighton and Hove PCT			The sodium target is acceptable. Targets for total fat and saturated fat exceed moderate amounts. A minimum protein content should be set.		Protein: 30% of RNI

Target Nutrient Specifications					
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
Vegetarian pastie, flan, nut cutlets, loaf and roast	15	5	1020 / 400		7
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
Brakes	Since there are no standard recipes it may be unreasonable to set standards for these products.				
CASH			The sodium target is too high		Sodium: 0.2g/100g
LACA			Ask that protein targets are set to protect the intake of vegetarian children and thus to reflect the likely maximum possible within a palatable product		
Brighton and Hove PCT			Targets for total fat, saturated fat and sodium all exceed moderate amounts. The minimum protein content target falls short of the CWT recommendations for children from the age of 5 if these products are to serve as the main source of protein in the school lunch.		

Target Nutrient Specifications					
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)

Ready to use sauce for addition to meat/TVP and/or vegetables e.g. bolognaise or curry, or dried sauce when made up ready for use	3	1	765 / 300	
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Organisation	Comment on Category	Comment on proposed TNS	Alternatives
Brakes	Specifications should be set "as sold" as conditions of use vary.		
Compass Group - Scolarest	Targets would be better as sold than as served.		
RHM Foodservice	As sauces will have meat and vegetables added, the sodium content will be diluted. Therefore these products should not be considered with ready meals. Some sauces containing soy sauce will naturally be high in sodium and never meet the targets.	Suggest retaining Scottish HFS Targets.	
CASH		Sodium target a good starting point	Sodium: 0.2g/100g
Nestle		Salt target is too low for these products	Salt: 1250mg/100g (Sodium: 500mg/100g)
Brighton and Hove PCT	Wording should be amended to 'Ready to Use Sauce for addition to meat/TVP and vegetables - should not be a choice between a source of protein or vegetables.	There should be a target set for the sugar content of these products.	
MLC	Whether products can meet the targets will be determined by Project Neptune		

Food Category	Target Nutrient Specifications				
	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
	Ready to use sauce for addition to pasta/potatoes/ other vegetables e.g. cheese and/or cream and/or milk based sauces, or dried sauce when made up ready for use	15	6	765 / 300	

Organisation	Comment on Category	Comment on proposed TNS	Alternatives
Brakes	Specifications should be set "as sold" as conditions of use vary.		
Compass Group - Scolarest	Specifications should be set "as sold" as conditions of use vary.		
RHM Foodservice	As sauces will have meat and vegetables added, the sodium content will be diluted. Therefore these products should not be considered with ready meals. Some sauces containing soy sauce will naturally be high in sodium and never meet the targets.	Suggest retaining Scottish HFS Targets.	
CASH		Sodium target a good starting point	Sodium: 0.2g/100g

LACA	Specifications should be set for products "as sold" and "as served" in this category.		
Brighton and Hove PCT		Targets for maximum total fat and saturated fat exceed moderate levels. The target for sodium falls between the Agency's guidance for 'a lot' and 'a little'.	
MLC	Targets will be determined by the outcome of Project Neptune. Do not see the logic sauces for use in vegetarian recipes having higher maximum targets for fat and saturated fat.		

Target Nutrient Specifications					
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
Gravy	2	1	1020 / 400		
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
Compass Group - Scolarest	Specifications should be set "as sold" as conditions of use vary.				
Brakes	Specifications should be set "as sold" as conditions of use vary.				
RHM Foodservice			Some gravy products already meet the sodium targets and all meet the requirements on fat.		
CASH			The sodium target is too high		Sodium: 0.2g/100g
Nestle	Most chefs say they would add more salt so further reductions would be counter productive.		Sodium content of gravy already reduced to the limit of consumer acceptability.		Sodium: 500mg/100g
LACA	Sodium is the only nutrient of concern in this group and should be set to include products that will appeal to consumers but exclude those at the extreme end of the spectrum.				
Brighton and Hove PCT	The nature of the product relies on accurate water dilution therefore instructions must clearly state dilution directions to meet 'as served' target		Sodium specification should be reduced.		Sodium: 0.3g/100g

Target Nutrient Specifications					
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
Salad cream	10	1	1275 / 500		
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
CASH			The sodium target is too high		Sodium: 0.2g/100g
Brighton and Hove PCT			The sodium target is too high and there should be a target set for sugar.		Sodium: 0.3g/100g

Target Nutrient Specifications					
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
Mayonnaise	30	3	1020 / 400		

Organisation	Comment on Category		Comment on proposed TNS		Alternatives
Oasis Foods	Children should have real mayonnaise.				
CASH			The sodium target is too high		Sodium: 0.2g/100g
LACA	Guidance on frequency of use and portion size may have more impact on fat intake than opting for a 'lower' fat product which is still high.				
Brighton and Hove PCT			Sodium target should be reduced. In addition targets should be set for sugar		Sodium: 0.3g/100g
RCGP	Low-fat variety should only be used in schools.				
Target Nutrient Specifications					
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
Tomato ketchup and brown sauce			1530 / 600		
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
CASH			The sodium target is too high		Sodium: 0.2g/100g
LACA	Should target portion size and availability as they have a major impact on sodium intake from this group.				
Brighton and Hove PCT			The sodium target should be reduced and a target set for sugar		Sodium: 0.3g/100g
Target Nutrient Specifications					
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
Pickle and relish			1275 / 500		
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
CASH			The sodium target is too high		Sodium: 0.2g/100g
Brighton and Hove PCT			The sodium target should be reduced and a target set for sugar		Sodium: 0.3g/100g
Target Nutrient Specifications					
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
Fruit pies and fruit crumble	10	4	255 / 100	20	
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
CASH			Sodium target is acceptable		
LACA	Palatability and fruit content from fruit that is not overly processed is an important issue. If the topping is not excessive a more positive nutrient profile should be apparent				
Brighton and Hove PCT			The saturated fat and sugar targets should both be reduced		Saturated fat: 3g/100g, Sugar: 10g/100g
RCGP			The total sugars specification is too high.		Sugar: 15g/100g
Target Nutrient Specifications					
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)

Sponge puddings including jam roly poly, spotted dick	10	4	638 / 250	25	
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
Leicester City Council			Should keep the sugar content the same as crumbles, pies and ice cream.		
Cool Delight Desserts			Lowering the sugar levels to those proposed would have a significant and detrimental effect to the quality of products.		
RHM Foodservice			Sodium in these products is generally derived from the use of raising agents which are essential to allow the cake to rise. Moving to the levels proposed would cause problems for the cook/caterer in producing a tolerant product under normal kitchen preparation conditions.		
RHM Foodservice	Some schools have seen children rejecting lower sugar products.		Balance in a good sponge cake comes from the balance of sugar, fat and baking soda. Further reducing sugar and sodium will give rise to a number of problems for the caterer and final consumer. Suggest using same targets as in Scotland.		
CASH			The sodium target is too high.		Sodium: 0.2g/100g
BDA	Products should be made from fruit which has not been processed too highly.				
Brighton and Hove PCT			Saturated fat and sugar targets should be reduced.		Saturated fat: 3g/100g, Sugar: 10g/100g
RCGP			Total sugar target is too high.		Sugar: 15g/100g
	Target Nutrient Specifications				
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Total Sugar (g/100g)	Minimum Protein (g/100g)
Ice cream	6	3		20	
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
Cool Delight Desserts			Keep total fat and saturated fat targets the same as Hungry for Success. Reducing the fat content would have a detrimental effect to the quality of the product.		Total Fat: 8g/100g, Saturated fat 5g/100g
Brighton and Hove PCT			Saturated fat and sugar targets should be reduced.		Saturated fat: 3g/100g, Sugar: 10g/100g
RCGP			Total sugar target is too high.		Sugar: 15g/100g
	Target Nutrient Specifications				
Food Category	Maximum Total Fat (g/100g)	Maximum Saturated Fat (g/100g)	Maximum Salt/Sodium (g/100g/mg/100g)	Maximum Pack Size (g)	
Savoury snacks and crisps made from potato, rice, wheat, oats or corn	22	2	1530 / 600	25	
Organisation	Comment on Category		Comment on proposed TNS		Alternatives
Leicester City Council	Useful to specify a maximum pack size.				
SNACMA			Total fat target is at the current limit of capability and achievable only by a small number of products		

SNACMA		Want saturated fat target increased. This would acknowledge moves made by manufacturers are making in reducing levels of saturates whilst recognising the practical problems faced and timescales of changes involved.	Saturated fat: 11% of energy intake
SNACMA	DN: removed comments on hypertension and taste being influenced. Should these be kept in?	Salt targets should be in line with those set in the FSA salt target work which recognises problems associated with different types of savoury snacks.	
SNACMA		Suggest increasing the portion size. By doing this a number of other products including better-for-you options to also meet the criteria.	Portion size: 28g
CASH	Aware that there are lower sodium crisps available on the market and is technologically possible to produce such products.	Sodium target is unacceptable	
LACA	Assume this section is primarily for vending machine products in which case portion size/calorie yield is also extremely important. In addition other products such as cereal bars and other cake/biscuit/savoury snacks should be included in this group together with guidance on appropriate energy content from snack items. Beverages of all descriptions should also be considered.		
BDA	Suggest expanding the definition to snacks to cover products such as cereal bars. Portion size is an important factor.		
Brighton and Hove PCT		Targets for total fat and sodium should be lowered in accordance with the Caroline Walker Trust Guidelines.	As a snack product they should not provide more than 10% of recommended daily fat and sodium intake.
RCGP		More stringent targets should be set	

Target Nutrient Specifications (TNS) for Manufactured Foods used in School Meals
Summary of consultation responses to the partial regulatory impact assessment (RIA)

Issue		Company/Organisation	General Summary of Comments
Options:	'Do nothing'	South Sefton PCT NHS	'Do nothing': did not agree with this option. The financial cost to the NHS of unhealthy eating and the future health costs for individuals would mean that the long term cost of 'doing nothing' was likely to be enormous.
		Royal College of General Practitioners	
		North Lanarkshire Council	
	'Voluntary approach'	Royal College of Physicians of Edinburgh	Concern that a 'voluntary approach' would not be universally adopted and would not provide enough incentive for the food industry to make changes. However, some acknowledged that a requirement to comply with these TNS could be included in procurement contracts for school meals. One favoured a voluntary approach as part of a number of supportive initiatives to improve the diet of children and young people.
		Joanne Wilson - Manger of Nutrition and Dietetic Services	
		South Sefton PCT NHS	
		North Lanarkshire Council	
		Meat and Livestock Commission	
	'Legislation'	National Union of Teachers	Acknowledged the problems associated with legislation of this initiative within the EU and food imports used in school meals generally. However, legislation would maximise the effectiveness of the proposed TNS, and would drive change across the whole industry who provide such products.
		Compass Group: Scolarest	
		Staffordshire County Council	
		Consensus Action on Salt and Health (CASH)	
		South Sefton PCT NHS	
North Lanarkshire Council			
Costs	Estimated cost of reformulation	The Snack Nut & Crisp Manufacturers Association (SNACMA)	Reformulation costs varied according to number of products requiring reformulation and complexity. For example, a relatively simple reformulation (eg salt reduction) for a single product may cost £35-50K when consumer testing, factory trials and management time are taken into account. Reformulations for main brands and more complex reformulations (ie of more than one constituent) are likely to be at least £100K per product and multiple changes are not always technically feasible.
		Food and Drink Federation (FDF)	
		Nestle	
	Estimated timescales for reformulation	Compass Group: Scolarest	Process can take from 12-18 months to change a product specification depending on type of product and size of manufacturer.
		Bernard Matthews	
	Estimated Local Authority (LA) costs for potential enforcement	Rhondda Cynon Taff County Borough Council	Difficult to quantify costs for enforcement without further, detailed information. However, the primary cost source for enforcement by Local Authorities (LAs) would be sampling and staffing. Enforcement costs would include full nutritional analysis currently estimated at between £112-£260 plus officer's training, time, sampling, advising and investigation. For an estimated 20 samples per year, sampling alone would cost in the region of £5200.
		City of Edinburgh Council	
		Local Authorities Coordinators of Regulatory Services (Lacors)	
	General cost-related comments	The Nutrition Society	Normal business reformulation cycles are not standardised and reformulation would therefore occur at different times. As long as sufficient time was given to enable manufacturers to undertake reformulations within normal product review cycles legislation would not give rise to additional costs.
		Meat and Livestock Commission	
		Sustain	
		Meat and Livestock Commission	Likely to be considerable costs to industry and these will be the same whether the scheme is voluntary or compulsory. This may restrict choice of food and reduce price competition.
		Food and Drink Federation (FDF)	
		Nestle	
		Consensus Action on Salt and Health (CASH)	One response suggested introducing a charge to manufacturers who fail to meet the specified nutrient specifications, another thought that costs should not stop targets being mandatory. Some evaluation of the take up of school meals meeting the specifications was considered vital, but not without significant costs. One respondent was supportive as long as the TNS remained consistent with other UK guidelines and did not change in medium term. This was considered to be essential for business planning, and also to manage costs.
		Joanne Wilson - Manger of Nutrition and Dietetic Services	
		Food and Drink Federation (FDF)	
Nestle			

Costs to small businesses	Disproportionate costs for small businesses to comply with TNS	Staffordshire County Council	Likely that larger businesses would be more able to adopt the specifications as the level of custom generated from such products may make changes relatively cost efficient. Small businesses may not be able to afford to comply and may lose business.
Competition assessment		Sustain	Legislation would provide a level playing field for manufacturers with no net effect on competition.
General comments on partial RIA		Food and Drink Federation (FDF)	Comments were received on various wider issues including extending the TNS to take account of other aspects of food and health, sustainable development, the use of TNS in the wider review of school meals and as part of a 'whole school approach', and also the need to keep nutrient databanks which support Government surveys updated to give a true assessment of the impact of reformulating when monitoring and evaluating change.
		Sustain	
		British Heart Foundation	
		Meat and Livestock Commission	