

Summary of Responses to The External Review for the Government Buying Standards for Food and Catering Services

Background

The Government has committed to introducing Government Buying Standards (GBS) for Food and Catering Services for the first time. This will support the Government in its aim to be the Greenest Government ever and will help us to meet the EU Green Public Procurement (GPP) targets.

A partial impact assessment containing three options was circulated to a wide range of stakeholders, including: Government departments; the food service sector; the food manufacturing sector; health NGOs; and sustainability NGOs, on 8 December 2010. Interested parties were given until 24 January 2011 to respond with any comments, additional evidence and answers to some specific questions. Responses were received from over 60 parties including many organisations who replied on behalf of their members.

This summary of responses and our replies to them does not include a response to every individual comment made, but responds to the common points raised by multiple respondents. Comments are not attributed to individuals or organisations, but a full list of the organisations consulted can be found at **Annex A**.

Draft Criteria	Summary of the most common stakeholder comments	Defra/DH Response
100% of eggs (in shell) are sourced from systems which do not use conventional cages. If eggs are sourced from a cage system, they should be sourced from an enriched cage system.	<p>Nearly all catering companies felt this would be fully achievable. Only one organisation expressed concern over being able to identify which systems eggs had been sourced from which production systems.</p> <p>Several organisations felt the standard was not stringent enough and should include a requirement to source from free-range systems and for the criteria to cover liquid and powdered eggs as well as those in shell.</p> <p>All Government Departments that responded were content with this criterion.</p>	<p>The criterion reflects Government animal welfare policy.</p> <p>We will ensure that free-range and organic systems are identified in the guidance as ways of meeting this criterion.</p> <p>The best practice standard will include liquid and powdered eggs.</p>
At least 60% of all seafood products procured is from sustainable sources.	<p>Nearly all respondents and a large number of separate campaign correspondence urging for the criterion to be set at 100% of fish from sustainable sources.</p> <p>Several respondents commented on the need for a clear definition</p>	<p>The final criterion has been set at 100%.</p> <p>A clear definition of what is acceptable as a sustainable source has been included in-line with the definition developed for the 2012 Olympic</p>

Draft Criteria	Summary of the most common stakeholder comments	Defra/DH Response
	<p>of what would be accepted as a sustainable source.</p> <p>The level of costs identified in the impact assessment were supported by many respondents.</p>	<p>and Paralympic Games.</p>
<p>100% of meat and meat products are farm assured or equivalent as a welfare minimum.</p>	<p>The comments were split, with a large number of respondents, mainly from the food service sector, saying that this could be done but would be very costly and there maybe issues around sourcing some products. Another group of respondents felt that farm assurance standards were not stretching enough and higher measures of animal welfare should be included, for example Freedom Foods.</p> <p>The issue of what was meant by equivalence was also raised by several respondents.</p>	<p>This criterion is not being included in the final GBS. It is felt that the high cost associated with it is not balanced by the benefits.</p> <p>Public Procurement laws prevent from supporting a particular scheme such as Freedom Foods.</p> <p>The overarching commitment on sourcing to British standards of production or equivalent and the guidance that explains that will address the aims of this criterion.</p>
<p>100% of milk and dairy is farm assured or equivalent</p>	<p>There was broad support for this criteria for milk, as most milk is already farm assured. There was concern raised over additional costs for farmed assured cheeses, and difficulties identifying suitable schemes when sourcing foreign produce.</p>	<p>We have removed this criterion as most if not all milk already meets the standard and there may be difficulties sourcing other dairy produce meeting the criterion.</p>
<p>100% of vegetables are farm assured or equivalent</p>	<p>Some respondents were concerned that 100% would be challenging and that it could be difficult guaranteeing certification for vegetables sourced from abroad.</p>	<p>This criterion is not being included in the final GBS. It is felt that the high cost associated with it is not balanced by the benefits.</p> <p>The overarching commitment on sourcing to British standards of production or equivalent and the guidance that explains that will address the aims of this criterion.</p>
<p>At least 10% by value of primary commodity food procured is produced to certified or assured higher</p>	<p>There was a balance of comments under this criterion between those that felt the cost or availability would be prohibitive and those that felt 10% was too low.</p> <p>Some respondents commented that there is no evidence of</p>	<p>On balance we feel the 10% level is right at this time. The cost is significant so we would not want to push it further and these production methods only form part of the picture.</p>

Draft Criteria	Summary of the most common stakeholder comments	Defra/DH Response
level environmental standards (organic, LEAF or equivalent).	nutritional benefits of organic food. Some commented that LEAF and organic are not equivalent standards to each other.	Organic is included for the biodiversity benefits it brings, as does LEAF and other higher environmental, and integrated production systems, this criterion is not included for any nutritional benefit. We are aware the systems are not the same, but they do bring similar benefits.
At least 50% of tea and coffee is certified to be fairly traded.	There were no comments that didn't support inclusion of this criterion. The majority of those who responded on this criterion felt it was not ambitious enough and should be either increased to 100% for tea and coffee or that other products such as bananas and cocoa should be included. The majority of respondents confirmed the price premium assumed in the impact assessment with two organisations questioning it being as too high.	We are keeping this criterion as it stands as there is significant cost. The 50% also allows some flexibility as EU public procurement laws make it impossible to specify fairly traded produce and other methods need to be used. Discrepancies in the premium may be down to the fact that we are not necessarily comparing like for like. A prison for example may currently source bottom of the range coffee and to move to a fairly traded line would have a significant cost. We have included a more ambitious best practice criterion of "100% tea, coffee, bananas and cocoa" to reflect a number of the comments.
Where fresh produce is used, menus are designed to reflect in-season produce and in-season produce is highlighted on menus.	Many respondents welcomed the definition of what we mean by seasonal food for its clarity, the fact it makes it clear it only applies to fresh produce and that the food can be sourced from anywhere in the world where it is in season. Others would like to see the definition changed so that only locally sourced food that is in season would be included. There was some concern raised that this criterion would lead to bias away from frozen foods.	The definition reflects Government policy. There is evidence to suggest that food miles are not a good proxy for the carbon footprint of a product. However food grown outdoors using natural sunlight etc will have a lower footprint than food grown in artificial conditions. Even if we did want to it would not be possible within EU public procurement laws to specify where produce comes from. We have previously agreed the wording of the

Draft Criteria	Summary of the most common stakeholder comments	Defra/DH Response
		<p>criterion with representatives from the frozen food industry and the guidance will make it clear that there is no bias towards fresh or frozen produce.</p>
<p>Pre-bottled water (mineral or spring) is not included in the hospitality menu</p>	<p>Almost all responses agreed with this criterion.</p> <p>An environmental NGO felt that it should also be removed from staff restaurants and other facilities, except in exceptional circumstances such as in certain hospital condition</p> <p>Two industry bodies and a major supplier felt that restricting this criterion to hospitality menus was the right approach, but that advice would need to be provided to staff or caterers on how to provide water hygienically. In addition, the costs of handling tap water to/from client meeting rooms, and of washing re-usable water bottles or jugs should be taken into account</p> <p>The Ministry of Defence pointed out that bottled water is essential in operations, particularly overseas.</p>	<p>This has been adopted as a minimum mandatory criterion, as the further costs indicated were not judged to be significant. However guidance underpinning it will include a reference to hygiene.</p> <p>The Greening Government Commitments include provision for special case exemption that also apply to GBS – in this case the difficulties of providing clean tap water in military operations.</p>
<p>There are facilities available to staff and customers for recycling cans, bottles, cardboard and plastics.</p>	<p>Almost all responses agreed with this criterion.</p> <p>Several responses pointed out that waste management is usually the public sector client's responsibility.</p> <p>A small number of responses from suppliers asked if this would apply to their own off-site operations, and those further down the supply chain.</p> <p>A small number of responses noted that waste separation was ineffective unless provisions were put in place to ensure the waste was collected separately and sent for recycling.</p> <p>An environmental NGO welcomed action on packaging waste</p>	<p>This has been adopted as a minimum mandatory criterion for on-site facilities only. It is recognised in guidance that this criterion may be delivered through catering services contracts or waste management contracts. But the key will be that both services operate in an integrated manner to achieve the best outcomes.</p> <p>Greening Government Commitments include a target to reduce the amount of waste generated by Government by 25% by 2015 from a 2009/10 baseline. As part of efforts to achieve this, Government clients are extremely likely to have to ensure that separated waste is suitably collected.</p>

	<p>reduction but would expect clear targets to move towards zero waste systems.</p> <p>The Ministry of Defence said that waste would be disposed of as efficiently as practical, but as above, in a military operational environment, recycling facilities may not always be available or practical.</p>	<p>The Greening Government Commitments include provision for special case exemption that also apply to GBS – in this case the difficulties of guaranteeing suitable recycling facilities.</p>
<p>Tertiary packaging used at the delivery and distribution stages should either (i) consist of at least 75% recycled cardboard, or (ii) where other materials are used the crates or pallets must be reusable, or</p> <p>(iii) where materials are not reusable they must contain some recycled content.</p>	<p>While some responses agreed with this, several others noted some difficulties in making it a minimum mandatory criterion.</p> <p>Two major suppliers pointed out that – while the majority of cardboard packaging contained 75% recycled material, in some cases additional strength was needed. A typical figure cited was 65%-70% recycled cardboard. However this percentage could apply to both secondary and tertiary packaging,</p> <p>Moreover, while current foodservice practice restricted use of re-useable crates to fresh and chilled foods (not frozen or ambient), other materials such as shrink wrap did in the main contain some level of recycled content.</p> <p>An industry body felt that this criterion could be difficult to enforce as information was provided by third parties, and independent verification would be very difficult.</p> <p>Two industry bodies felt it could increase costs if adopted as a minimum mandatory criterion.</p>	<p>The wording has been changed and adopted as a voluntary best practice criterion, as follows:</p> <p><i>Packaging waste in delivering food for the catering service is minimised so that (i) tertiary and secondary packaging should consist of at least 70% recycled cardboard; (ii) where other materials are used, the tertiary packaging must either be reusable or all materials contain some recycled content, and recyclable.</i></p> <p>Issues around verification are addressed in guidance.</p>
<p>Any contractor has a food waste minimisation plan in place (including identified actions/estimated quantifiable waste reductions).</p>	<p>All responses agreed with the aim of minimising food waste.</p> <p>One major supplier noted that a feasible and practical way of measuring food waste would need to be agreed with the client in order to have quantifiable reduction targets which are feasible (and to a great extent accurate).</p> <p>Two environmental NGOs called for clear targets for reducing waste in the public sector.</p>	<p>On balance it was concluded that the minimum mandatory criteria should include action to reduce food waste, but that there was as yet insufficient data about the specific costs and benefits of a tried and tested food waste minimisation plan.</p> <p>Therefore, an alternative criterion was adopted at minimum mandatory level, as follows:</p> <p><i>Any contractor must take steps to minimise food waste in its on-site operation (using the indicative checklist supplied in guidance, as a guideline).</i></p>

		<p><i>Contractors should set out what they will do, and feed back to clients on progress and results.</i></p> <p>In addition, the following, more demanding, criterion would be adopted at voluntary best practice level:</p> <p><i>Any contractor has a food waste minimisation plan in place, including actions and estimated quantifiable waste reductions</i></p> <p>Subject to further work on food waste minimisation plans led by Defra, it is expected that this will become a minimum mandatory criterion in the future.</p>
<p>Where possible, an appropriately-licensed separate food waste collection service should be procured as part of overall site waste management (with the food waste collected going <u>either</u> for treatment at an in-vessel composting <u>or</u> anaerobic digestion facility or other suitable facility (as opposed to landfill).</p> <p>Separate food waste collection points should be provided for staff and customers of canteens/staff restaurants, and in staff kitchenettes, along with appropriate guidance on their use.</p>	<p>Many responses agreed that food waste represented a major environmental impact from catering services.</p> <p>Several large suppliers pointed out that this was usually provided not as part of a catering contract, but by waste management services. Some also asked for further information about the availability of Anaerobic Digestion and other facilities, and the likely cost implications of meeting this criterion. The costs would vary depending on the facilities provided by the local authority.</p> <p>An environmental NGO said that no food waste should be going to landfill or incineration. The government should ensure 100% of food waste is diverted to anaerobic digestion, bio gas processing or used for swill.</p>	<p>It was concluded that the balance of costs and benefits in meeting this criterion would vary greatly depending on geographical location and the availability of suitable facilities.</p> <p>Therefore, the minimum mandatory criterion requires clients to go through a process as follows:</p> <p><i>The department must check whether a separate food waste collection service can be provided (see guidance on how to do so). If it can be provided, while achieving value for money, then it should seek to meet the best practice standard.</i></p> <p>The details on how to check this are provided in guidance. If the voluntary best practice standard can be met, then the criterion has been reworded as follows:</p> <p><i>An appropriately licensed separate food waste collection service should be included (either as part of overall site waste management or as part of on-site catering services). The food waste collected should be sent for treatment either at an anaerobic digestion (AD) or in-vessel composting (IVC) facility, or other suitable treatment method other than landfill.</i></p> <p>As with food waste minimisation, it is expected</p>

		that, subject to further work by Defra, this will become a minimum mandatory criterion in future. It is assumed that in order to meet this criterion, separate food waste collection facilities would need to be provided in any case. It is also recognised in guidance that this may be delivered through waste management services or catering services depending on arrangements in each Government facility.
Tap water freely available	All supportive. Only issue raised was where buildings do not have potable tap water.	This will be added to the guidance - where tap water is non-potable, free vend drinking water must be made available.
Vegetables and boiled starchy foods such as rice, pasta and potatoes, are cooked without salt	This was received positively though concern was expressed about the taste acceptability.	A gradual change in cooking practices through the lead in time, such as adding salt to boiled starchy foods should reduce consumer rejection. Salt added at the time of cooking reduces consumers ability to choose or adapt to a lower salt diet. The guidance will reference best practices.

Salt is not available on tables	This was received positively though concern was expressed about restricting consumer choice and 'policing'.	Salt can be available at a designated spot, there is no removal of consumer choice on use of salt. As with all criteria, Departments decide how to ensure and record compliance.
50% of the volume of desserts available is based on fruit – which can be fresh, canned in fruit juice, dried or frozen.	This was considered achievable. There were questions raised about definitions and how the criterion apply to certain desserts, e.g. yoghurts.	Definitions of a 'fruit based dessert' will be clearly provided in the guidance. Yoghurts and similar dairy desserts are covered by this criteria.
A piece of fruit is cheaper than a portion of hot or cold dessert.	There was support for this criteria with question about settings where food is not paid for at selection. Civil Society organisations requested that fruit should also be cheaper than confectionery.	Guidance addresses the issue around where food is not paid for at point of selection. Confectionery is covered through portion size, to request that fruit is always cheaper than any single serve portion is impractical.
If caterers serve lunch and an evening meal, fish is provided twice a week, one of which is oily. If caterers only serve lunch or and evening meal, an oily fish is available at least once every 3 weeks	This was supported and considered achievable.	N/A
A percentage of meat and meat products, breads, breakfast cereals, soups and cooking sauces, ready meals and pre-packed sandwiches (procured by volume) meet FSA salt targets. Stock preparations are lower salt varieties (i.e. below 0.6g/100mls)	Industry have been working towards nationally agreed targets for some time. There was a mixed response regarding how achievable these targets are, some industry consider this criterion achievable, others consider it very challenging. There was confusion about which targets were referred to within the criterion: 2010, 2012 or salt reduction targets as part of the Responsibility Deal. Civil societies would like higher proportion of products to meet the targets.	There are some manufacturers who are currently working towards the Government's voluntary salt reduction targets for 2012 and some products already reach these levels. The 2012 salt targets were set by the Food Standards Agency and will be the benchmark for GBS until superseded by Responsibility Deal salt targets. The guidance will explain this.

	<p>With regard to stock preparations, there was support provided that there was demand for such a low taste profile. Some comments requested that compliance be lowered to 50%</p>	<p>The aim of the GBS and the salt targets is to reduce consumers taste for salt. We recognise the challenge that this criteria sets but believe that over time lower salt stocks will become the norm as we have seen in other food stuffs.</p>
<p>Meat and meat products, biscuits, cakes and pastries (procured by volume) are lower in saturated fat where available. A percentage of hard yellow cheese has a maximum total fat content of 25g/100g; a percentage of ready meals contain less than 6g saturated fat per portion; a percentage of milk is reduced fat; and a percentage of oils and spreads are based on unsaturated fats</p>	<p>Some comments that criterion should be split for clarity.</p>	<p>Guidance will present information clearly and separate guidance where applicable to ensure clarity.</p>
	<p>Some very positive industry responses due to the level of reformulation work that has happened to this point. There were requests for clarity on how to define 'lower' in saturated fat and 'where available', clear benchmark values were requested.</p>	<p>There are no targets for saturated fat as there are for salt. Using nutrition information from suppliers and front of pack values for low, medium and high amounts of fat and saturated fat as a guide when choosing products and selecting within the range available those that have lower values. Information on choosing lower saturated fat versions will be provided within the guidance.</p>

	<p>The definition of hard yellow cheese was questioned and the effect the criterion will have on the cheese industry. It was stated that cheese is not a major contributor of saturated fat in the British diet. The cheese industry expressed concern that this criterion would reduce the amount and variety of cheese purchased, affecting certain sectors of the cheese industry.</p>	<p>The criterion will not restrict the use of cheese. Cheddar is single most significant contributor to saturated fat intakes. This criterion aims to encourage buyers to consider the saturated fat content of the standard cheese used within the kitchen. The figure is based on the catering use of these cheeses and the market availability of lower fat (not 'reduced fat') hard yellow cheese. Definitions will be clear in the guidance document.</p>
	<p>General support for increasing the proportion of reduced fat milks to 100%, both from industry and civil society organisations.</p>	<p>If GBS is taken up in hospitals and some other wider public sector settings then there is a need for full fat milk to be procured e.g. settings where there are young children. Therefore, scope for allowing procurement of full fat milk needs to be kept within the criterion and also for reasons of maintaining choice. The criterion does state 'at least' so organisations could choose a higher level of compliance.</p>
	<p>With regard to oils and fats based on unsaturated fats, comments were generally around definitions. It appears from the criterion that cooking fats such as ghee, dripping and lard are not included.</p>	<p>Definitions will be clarified in the guidance.</p>
<p>A percentage of breakfast cereals (procured by volume) are higher in fibre (i.e. more than 6g/100g) and do not exceed 12.5g/100g added sugars.</p>	<p>A mixture of responses were received, some saying that meeting this criterion would restrict choice but other suppliers quite content that this is achievable with the products available. Some civil society organisations feel that the criterion should go further.</p>	<p>The criterion is achievable without restricting choice, to increase the percentage of cereals to meet the figures would restrict choice.</p>

<p>Non-baked savoury snacks are only available in packet sizes of 35 g or less</p>	<p>This criterion is contentious. Respondents disagree with the 35g packet size cut off. They argue that this restricts choice, consumers will purchase bigger packs elsewhere, favours a small number of suppliers, allows high fat baked goods to be sold in larger pack sizes, is confusing for procurers as it is not easy to determine if a product is baked. They cited that there was no evidence that smaller pack sizes would result in lower fat and calorie intakes. Concerns were also raised about potential costs incurred to vending as a result of changes to packet size. There were some catering suppliers that felt that this was reasonable and that products were available in a range of sizes to meet the criterion.</p>	<p>The aim of this criterion is to move consumers to smaller pack sizes so helping to reduce discretionary calories (those calories from foods that do not provide significant contributions of any other nutrients when compared to the energy they provide).</p> <p>The words 'non-baked' have been removed from the criterion in response to comments made.</p> <p>We considered the responses carefully and explored possible changes to the criterion to address concerns raised, particularly those relating to restriction of choice, whilst maintaining the health benefits of the criterion .</p> <p>A pragmatic decision has been taken based on the responses. This criterion will be 'voluntary best practice' to minimise the burden, including any financial impact, on caterers of meeting GBS whilst encouraging this as best practice.</p> <p>Calorie reduction will be considered within the Responsibility Deal and any agreements will be reflected within GBS.</p>
<p>Confectionery and packet sweet snacks are in the smallest standard single serve portion size available within the market.</p>	<p>Caterers would not be able to stock some leading brands, choice would be limited, consumers would buy more packets to compensate for the small size, purchase their confectionery elsewhere, large costs for vending operators to adapt to smaller packets and no evidence to prove that serving smaller portions will result in lower energy and fat intakes. Some suppliers stated that there was a range of compliant products on the market and this criterion was achievable. Civil society organisations would strengthen this criterion to reduce availability of confectionery further.</p>	<p>There is consensus that decreasing discretionary calories (see above) is important. It is not appropriate to encourage businesses to market larger/supersize single portions which may encourage overconsumption.</p> <p>We considered the responses carefully and explored possible changes to the criterion to address concerns raised, particularly relating restriction of choice, whilst maintaining the health benefits of the criterion .</p>

		<p>A pragmatic decision has been taken based on the responses. This criterion will become 'voluntary best practice' to minimise the burden, including any financial impact, on caterers of meeting GBS whilst encouraging this as best practice. Organisations that meet this criterion will support consumers to reduce discretionary calories.</p> <p>Calorie reduction will be considered as part of the Responsibility Deal and any agreements pertinent to confectionery and packet sweet snacks will be reflected within GBS.</p>
<p>All sugar containing drinks are available in no more than a 330ml portion size (excluding hot drinks).</p>	<p>Industry are concerned by the exclusion of 500ml bottles as they state that customers wish to purchase drinks that they can reseal and drink over a longer period of time. Concerns about vending, limiting choice and having to change production lines. Civil society organisations would like the availability of sugary drinks even further.</p>	<p>Drinking sugar containing soft drinks across a long time period is detrimental for dental health. It is recommended that sugar containing drinks be consumed at mealtimes.</p> <p>We considered the responses carefully and explored possible changes to the criterion to address concerns raised, particularly relating to restriction of choice, whilst maintaining the health aims of this criterion.</p> <p>Organisations choosing to meet the criterion would not need to remove choice and drinks of 500mls that are sugar free would still be available.</p> <p>A pragmatic decision has been taken to make this criterion 'voluntary best practice' to minimise the burden, particularly any financial impact, on caterers of meeting GBS whilst encouraging this as best practice.</p> <p>Calorie reduction will be discussed within the Responsibility Deal and any agreements pertinent</p>

		to soft drinks will be reflected within GBS.
Meal deals include a starchy carbohydrate, vegetables and 1 portion of fruit.	Most comments relate to the definition of a meal deal.	The definition of a meal deal and examples of compliant meal deals will be given in the guidance.
Menu cycles are analysed to meet stated nutrient based standards relevant to the major population subgroup of the catering provision	Agree that this criterion should be set at a best practice level and concerned that it would be too costly for SME to attain. Some Civil Society organisation would like to see this mandatory.	This criterion is for best practice only.
Menus (for food and beverages) include calorie and allergen labelling.	Comments received support that this should be set at a best practice level and that it would very costly for SME. Some civil societies feel strongly that this should be mandatory and that EU legislation around allergen labelling in catering settings is being considered.	Out of home calorie labelling will be discussed within the Responsibility Deal and any agreements reached will be reflected in GBS. Similarly, if legislation changes for allergen labelling then this will be reflected within GBS.

In addition to the proposed criteria there were calls for additional criteria to be included in the GBS. These included: reducing meat and dairy consumption, sustainably sourced palm oil and soy, Halal and Kosher meat and food safety. Some of these areas are ones we will watch and may introduce standards in the future when the Government policy on the issues is defined – for example sustainable palm oil and soy are not currently at that stage. Others are outside the scope of the GBS, for example food safety and religious practices.

Overarching comments

- No responses were received that were against introducing a set of standards for Government procuring healthier and more sustainable Food and Catering Services.
- Several responses asked for the standards to be **mandated to the wider public sector**.
 - The Government does not believe it is the role of Government to regulate how every school, care home or leisure centre should procure its food and catering services. Reform to local public services should be driven by pressure from local communities for what they want in their services rather than political decisions made by Government. Central Government will use the GBS to lead by example and will provide the tools and encourage the wider public sector to follow suit. Communities will have the means to make their voices heard through the Localism Bill which includes provisions for communities to instigate referendums on any local issue and to challenge how things are done in their local public bodies to ensure local policies fit with local priorities and needs. Through our 'transparency' agenda Government and public services will be more accountable. The public will have access to the information they need in order to challenge their local public bodies.
- There was support for **integrating sustainability and nutrition** within the GBS.
- Comments were made that the GBS should be supported by **training** to embed it.
 - A training module on sustainable food procurement that refers to the GBS is being developed and piloted which is aimed primarily at local authority procurers.
- Comments were made that the GBS should not only cover England, but also the **devolved administrations**.
 - The fact that Wales, Scotland and Northern Ireland are devolved administrations means that we cannot widen the remit.
- There were some concerns raised over the **cost** of the standards. Some organisations where cost could not be passed onto the consumer, e.g. MoD Pay As You Dine services and prisons, were particularly concerned that quality in other areas would have to be compromised to meet the standards.
 - The purpose of the impact assessment process has been to balance the costs and benefits of the overall policy. Some of the more costly criteria have been removed from the final GBS in order to ensure we have got this balance right.

