School Food Standards: updating the legislative framework

Introduction

This response is submitted by the Faculty of Public Health's Food Special Interest Group in consultation with the Commercial Determinants of Health Special Interest Group. It is informed by the Faculty's established positions on healthy and sustainable diets, on ultra-processed foods, and on the commercial determinants of health, and by the Faculty's report *Health of the Next Generation: Good Food for Children*. The Faculty strongly advocates for policy that supports a healthier and more sustainable dietary pattern across the population, and we welcome these proposed updates as an opportunity to improve children's diet, health, educational outcomes and health equity. Our recommendations reflect the Faculty's position that reducing ultra-processed foods in the diet generally is likely to be health-promoting, with priority placed on foods that are also high in fat, salt or sugar or low in nutritional value, while retaining the nutrient profiling model as the basis for regulation; that processed meat requires special consideration; and that school food environments should be protected from commercial influence.[1][2]

References

[1] Bash K. Summary of FPH Position on Ultra-processed Foods. London: Faculty of Public Health, June 2023. Available at: https://www.fph.org.uk/media/akmahrdc/upf-position-paper-final-16062023-pdf.pdf

[2] Bash K, Black M, McNee R, Oliver-Williams C, Oyebode O, Smith D, Wharton A, Williams J. Health of the Next Generation: Good Food for Children. Faculty of Public Health, Royal Society of Medicine, Royal Society for Public Health, Association of Directors of Public Health, Royal College of Paediatrics and Child Health, School and Public Health Nurses Association, and British Association for Child and Adolescent Public Health; January 2024. Available at: www.fph.org.uk/good-food-for-children

Consultation Response
Section B - Questions on the proposed updates to the School Food Standards

10. To what extent do you agree with the new rules about which foods and drinks can be offered at breakfast clubs before the school day begins?

Response: Strongly agree.
We strongly agree with the introduction of rules governing food and drink offered at breakfast clubs. Eating breakfast is associated with better health and educational attainment in children, and school breakfast programmes are of particular value for children from more deprived backgrounds, who are less likely to eat breakfast at home or to have a nutritious one when they do. However, the Faculty's *Good Food for Children* report notes that evidence on the nutritional impact of breakfast clubs is mixed, and raises concerns about the quality of food served, with some school staff highlighting products high in fat, saturates and sugars being offered.[1] Clear, enforceable nutritional standards for breakfast clubs are therefore welcome and necessary if these programmes are to deliver their potential health benefits.
We are concerned about the influence of health-harming product industries in UK schools and early years settings. A BMJ investigation found that food and drink companies have influenced UK schools and nurseries through breakfast clubs, nutrition guidance and healthy-eating campaigns; it reported that Kellogg's and Greggs have sponsored school breakfast clubs in the UK for more than two decades, reaching many thousands of primary school children, with Kellogg's donating £5.7 million to UK schools and the Greggs Foundation supporting 898 breakfast clubs reaching more than 62,000 children a day.[2]

While products provided may meet School Food Standards, brand awareness and loyalty built through exposure to a company's healthier products can lead to greater consumption of the same brand's less healthy products,[3] and several cereals marketed to children contain excessive levels of sugar.[4] To protect children from the influence of organisations that prioritise profit over health, the Standards should ensure that products from commercial organisations selling primarily HFSS foods are excluded from breakfast club menus and activities, and that those organisations are prohibited from engaging in corporate social responsibility activities within schools.

On the detail of the proposed standards, we welcome the emphasis on lower-sugar options, higher-fibre breads and the inclusion of fruit or vegetables, which aligns with UK dietary recommendations and supports satiety, concentration and overall diet quality. There are some areas where further clarity would support implementation. It

would help to provide schools with a clear list of foods considered ‘processed’, aligned with the NHS definition,[5] and a clarifying statement that ‘fried potato products are not permitted’ includes oven-baked hash browns. Clearer definitions and examples of ‘fruit spreads’ and ‘savoury spreads’, and clarity on whether items such as baked beans may be offered daily at breakfast, would reduce ambiguity for providers. We would also welcome clearer guidance on pancakes, which are commonly served and not clearly addressed.

The inclusion of unsweetened, fortified dairy and plant-based alternatives is a particular strength, ensuring nutritional adequacy (calcium, iodine, vitamin D, riboflavin, B12) while supporting dietary diversity and inclusion. This is in keeping with SACN and COT guidance that fortified, unsweetened plant-based drinks are an acceptable alternative to cow’s milk for children over five.[7] We recommend the permitted plant-based drinks be extended to include fortified, unsweetened pea drinks, which have a high protein content, providing greater variety for caterers and pupils. Preference should be given to soya drinks given their higher protein content and provision of all nine essential amino acids, with oat drinks remaining valuable alternatives for children with soya allergies; rice drinks are not suitable for children under five because of arsenic content.[7] The proposed drinks standards, prioritising water and removing fruit juice and fruit-juice-based combination drinks, are consistent with best practice. We oppose the phased approach for secondary drinks and recommend water, milk and unsweetened fortified plant-based alternatives only in secondary schools within the same timeframe as primary (see Q18 and Q19).

References

[1] Bash K, Black M, McNee R, et al. Health of the Next Generation: Good Food for Children. Faculty of Public Health et al.; January 2024.
[2] Wilkinson, E. (2024) ‘Food industry has infiltrated UK children’s education: stealth marketing exposed’, BMJ, 387, q2661. doi: 10.1136/bmj.q2661. Available at: https://www.bmj.com/content/387/bmj.q2661
[3] Boyland EJ, Kavanagh-Safran M, Halford JC. Exposure to ‘healthy’ fast food meal bundles in television advertisements promotes liking for fast food but not healthier choices in children. Br J Nutr 2015;113:1012-8.
[4] Action on Sugar. Breakfast Cereals and Yogurts survey.
[5] NHS. What are processed foods? Accessed 28 May 2026. https://www.nhs.uk/live-well/eat-well/how-to-eat-a-balanced-diet/what-are-processed-foods/
[6] Scientific Advisory Committee on Nutrition and Committee on Toxicity. SACN and COT assessment of the health benefits and risks of consuming plant-based drinks: summary. London: OHID, 9 July 2025.

https://www.gov.uk/government/publications/sacn-and-cot-assessment-of-the-health-benefits-and-risks-of-consuming-plant-based-drinks

11. Do you think processed meat should be permitted to be served at breakfast?

Response: No.
Processed meat should not be permitted to be served at breakfast in school settings, and we would go further in recommending that processed meat be excluded from school food provision entirely.

The evidence base is substantial and unambiguous. In 2015 the WHO's International Agency for Research on Cancer classified processed meat as a Group 1 carcinogen, concluding on the basis of over 400 studies that it causes colorectal cancer, with risk increasing in a dose-response pattern.[1] Cancer Research UK estimates that 13% of bowel cancer in the UK is attributable to processed meat consumption.[2] Beyond cancer, strong evidence links processed meat to cardiovascular disease,[3] ischaemic heart disease,[4] type 2 diabetes,[5] dementia[6] and all-cause mortality.[7] Children eat proportionally more processed meat than adults, with over a third (36%) of meat eaten by children coming from processed meat.[8] The Faculty's UPF position statement identifies processed meat as a category requiring special consideration, on the basis that all types of processed meat, and particularly processed red meat, should be limited in the diet.[9]

Breakfast provision is an important opportunity to establish healthy eating habits early in the day. Prioritising minimally processed, nutrient-dense protein sources such as eggs, beans and pulses, which are already included in the proposed standards, supports this aim while contributing fibre and other beneficial nutrients. Excluding processed meat also aligns with the wider direction of the standards and supports clear, consistent messaging. We recommend the Standards provide a clear operational list of foods considered 'processed meat' to avoid inconsistent interpretation across schools and caterers.

References

[1] International Agency for Research on Cancer. IARC Monographs evaluate consumption of red meat and processed meat. Lyon: IARC, 2015. https://www.iarc.who.int/wp-content/uploads/2018/07/pr240_E.pdf
[2] Cancer Research UK. Bowel cancer statistics: preventable cases.
[3] Yip CSC, Lam W, Fielding R. A summary of meat intakes and health burdens. Eur J Clin Nutr 2018;72(1):18-29.

[4] Papier K, Knuppel A, Syam N, et al. Meat consumption and risk of ischaemic heart disease: a systematic review and meta-analysis. Crit Rev Food Sci Nutr 2023;63(3):426-37.
[5] Schwingshackl L, Hoffmann G, Lampousi AM, et al. Food groups and risk of type 2 diabetes mellitus: a systematic review and meta-analysis of prospective studies. Eur J Epidemiol 2017;32(5):363-75.
[6] Zhang H, Greenwood DC, Risch HA, et al. Meat consumption and risk of incident dementia: cohort study of 493,888 UK Biobank participants. Am J Clin Nutr 2021;114(1):175-84.
[7] Schwingshackl L, Schwedhelm C, Hoffmann G, et al. Food groups and risk of all-cause mortality: a systematic review and meta-analysis of prospective studies. Am J Clin Nutr 2017;105(6):1462-73.
[8] The Food Foundation. Meat Facts. 2025.
https://foodfoundation.org.uk/publication/meat-facts
[9] Bash K. Summary of FPH Position on Ultra-processed Foods. Faculty of Public Health, June 2023.

12. To what extent do you agree that honey should not be permitted?
Response: Strongly agree.

Honey is classified as a free sugar and, from a nutritional perspective, has similar impacts to other sugars such as syrups and table sugar.[1] High intakes of free sugars are associated with an increased risk of dental cavities and excess energy intake, particularly in children.[2][3] Excluding honey is therefore consistent with the overall aim of the proposed standards to reduce free-sugar consumption in school food environments.

Maintaining consistency in messaging is also important. Allowing honey while restricting other sources of free sugars could create confusion for both providers and children, and may undermine the intent of the standards. This will require clear communication to parents and pupils, as there are widespread misconceptions that honey is healthier than other forms of sugar. In practice, portion control of honey in breakfast club settings can be difficult to implement effectively; the Nourish programme observed that limiting portions is not consistently adhered to, which strengthens the case for a clear approach that excludes honey altogether.[4]

References

[1] Raatz SK, Johnson LK, Picklo MJ. Consumption of honey, sucrose, and high-fructose corn syrup produces similar metabolic effects in glucose-tolerant and -intolerant individuals. J Nutr 2015;145(10):2265-72.

[2] Mahboobi Z, Pakdaman A, Yazdani R, et al. Dietary free sugar and dental caries in children: a systematic review on longitudinal studies. Health Promot Perspect 2021;11(3):271-80.
[3] Gibson S, Ashwell M, Arthur J, et al. Associations between free sugars and nutrient intakes among children and adolescents in the UK. Br J Nutr 2016;116(7):1265-74.
[4] School Food Matters, Impact on Urban Health and ICF Consulting Services. Evaluation of the Nourish Programme. 2026.

13. To what extent do you agree with the proposed change to the structure of the standards with separate standards for the whole of the school day?

Response: Agree.
We agree that breakfast should have standalone standards because it makes implementation and compliance significantly clearer. Breakfast provision is often delivered by different providers and staff to food at lunchtime. Having clear, standalone standards that apply consistently helps simplify monitoring and compliance, as providers do not need to cross-reference with lunch standards. This clarity is likely to support more effective implementation in practice.

Standalone standards for breakfast are compatible with a whole-school-day approach to food. The Nourish programme found that schools can have consistent values and culture across the day while having operationally distinct standards for different settings.[1] A whole-school-day approach is strongly supported from a public-health and behavioural perspective: children's dietary patterns are shaped by their overall food environment, and consistent standards across the day reinforce healthy habits and avoid mixed messages. Where different sets of standards operate, it is important that values are consistent and aligned across all eating occasions. Evidence from Nourish found that where food standards and culture were approached consistently across the whole school day, improvements in one setting often generated positive ripple effects elsewhere.[1]

We would urge the government to close the exemption for food provided at parties or celebrations including fundraising events, as well as school trips and other events. This exemption is being used by food and drink companies (including doughnut and pizza brands) to market their products and brands to children, which is inconsistent with public health policy including restrictions on HFSS promotions and advertising. We also urge the government to include guidance that foods high in fat, salt or sugar should not be used to reward students in either primary or secondary schools. Nourish found that exemptions for rewards, celebrations and parties created genuine

practical barriers to a consistent whole-school food culture, and that schools could move away from these approaches successfully, for example replacing cake sales with alternatives such as homemade popcorn.[1]

References

[1] School Food Matters, Impact on Urban Health and ICF Consulting Services. Evaluation of the Nourish Programme. 2026.

14. To what extent do you agree with the proposed changes to the fibre requirements for starchy foods?

Response: Agree.
We support proposals that increase the amount of fibre in school meals. The percentage of children not meeting fibre recommendations is 86% for 4 to 10 year olds and 96% for 11 to 18 year olds.[3] A diet meeting fibre recommendations is associated with lower risk of cardiovascular disease, type 2 diabetes and bowel cancer.

The proposal that at least 50% of pasta and rice should be brown, wholegrain or white varieties with added fibre is ambiguous: it is unclear whether this means 50% of menu items, 50% of days, or both. We recommend clarity to guard against loopholes, and we encourage the government to be more ambitious with a target higher than 50% where possible. Brown rice contains substantially more fibre than white (around 3.2g per cup versus 0.6g),[1] and wholegrain pasta can contain two to three times the fibre of regular pasta.

We agree that all bread should be a source of fibre. However, the fibre minimum for bread should align with the 50/50 white/wholemeal threshold, meaning a fibre minimum of 4.2 to 4.7g per 100g rather than the 3g per 100g proposed. The 3g threshold is too low and would still allow some white breads: Tesco medium sliced white currently contains exactly 3g/100g[2] and ASDA Just Essentials white is 3.2g/100g, whereas Tesco wholemeal contains 6.3g/100g.[4] For a secondary student with a recommended intake of 25g per day, bread at 3g/100g would contribute less than 8% of intake in a two-slice portion.

We agree that starchy foods cooked using fat or oil may be served on no more than two meal occasions each week and only as part of a meal. The percentage of calories from saturated fat exceeds the recommended maximum of 10% among children of all income levels, with an average of 13.1%.[5] We recommend greater nuance on focaccia and ciabatta: focaccia is feasible to bake on site at scale and

would be healthier than bought processed bread, so should be permitted where cooked on site using 50% wholemeal flour; ciabatta should be permitted where not cooked with oil. Acceptability to pupils will be critical, so recipe development and menu consultation with pupils will be required.

References

[1] Khalua RK, Tewari S, Mondal R. Nutritional comparison between brown rice and white rice. 2019.
[2] Tesco Medium Sliced White Bread 800g. Product nutrition information, accessed 28 May 2026.
[3] Office for Health Improvement and Disparities, Food Standards Agency and partner organisations. National Diet and Nutrition Survey 2019 to 2023: report. June 2025. https://www.gov.uk/government/statistics/national-diet-and-nutrition-survey-2019-to-2023
[4] Tesco Wholemeal Medium Sliced Bread 800g; ASDA Just Essentials White Bread 800g. Product nutrition information, accessed 28 May 2026.
[5] The Food Foundation. The Broken Plate 2025. https://foodfoundation.org.uk/publication/broken-plate-2025

15. To what extent do you agree with the requirement to serve a portion of vegetables and/or salad with all grab-and-go main meals?

Response: Strongly agree.
We strongly support including a portion of vegetables and/or salad with all grab-and-go main meals as a practical step to improve nutritional quality. We recommend amending this requirement, for both main meals and grab-and-go options, to at least two portions of vegetables, as an accompaniment or as part of the main meal. The inclusion of two portions of vegetables and/or pulses in every meal is a key recommendation of the joint-policy briefing *Serving Up*, endorsed by 25 health and sustainability organisations.[1]

The current definition of ‘vegetables’ should explicitly include pulses and legumes, so these high-protein vegetables can be encouraged as part of the protein element of a meal. A review is needed of what an appropriate portion of vegetables should amount to, with practical advice for caterers, particularly for grab-and-go, to ensure uptake and minimise waste. A minimum of one portion in grab-and-go should be introduced from 2026, with the increase to two portions phased.

On average, children aged 11 to 18 consume 2.8 portions of fruit and vegetables a day, and fewer than one in ten (9%) meet the 5 A Day recommendation, with

consumption lowest in the lowest income quintile.[2] Parents support including more vegetables in school meals, with 75% supporting the proposed increase in recent Survation polling for Sustain.[3] Grab-and-go has become very popular in secondary schools: a 2026 survey of 2,000 students found a third buy grab-and-go at morning break at least three to four times a week, and 60% purchase at lunch at least once a week. The dominance of grab-and-go disproportionately affects students receiving free school meals: 56% of FSM students buy grab-and-go at least three to four times weekly, compared with 36% of non-FSM students.[4]

Grab-and-go is not inherently problematic and can play a positive role in busy school days, but current provision often falls short of dietary recommendations, with students increasingly relying on quick, cheap options such as pizza, pastries and sugary drinks. [4] To be effective, vegetables should be incorporated in appealing, convenient formats. A two-day pilot at Launceston College overhauled the breaktime offer with freshly made vegetarian items priced at £1, including cauliflower wings and pea fritters, leading to record income.[5]

An increase in vegetable provision needs to sit alongside wider considerations, including adequate lunch times, improving the canteen environment, and practical support for caterers. The canteen environment often influences students towards grab-and-go: busy, noisy halls discourage selection of the main meal, and healthier items are often less prominent while high-calorie snacks are placed in high-traffic areas.[6] Students cite long queues, short lunch breaks, limited healthier choices and the desire to preserve free time as reasons to opt for quick, portable snacks.[6]

The government should encourage governors to work with caterers and students to promote healthy innovation in grab-and-go, ensure healthy options are never more expensive than less healthy alternatives, and review lunchtime design including sufficient time for all year groups and policies that do not disadvantage those who sit down for a main meal.

References

[1] Foodrise and Sustain. Serving Up: aligning public procurement of food for UK public institutions with healthy sustainable diets. 2025.
[2] Office for Health Improvement and Disparities, Food Standards Agency and partner organisations. National Diet and Nutrition Survey 2019 to 2023: report. June 2025.
[3] Sustain (2026) *Survation polling*, fieldwork 5–12 May 2026, n=1,020. Unpublished polling supplied by Sustain.

[4] Bite Back (2026) *Big Food in Schools: Research & Findings*. Available at: https://www.biteback2030.com/about/our-campaigns/big-food-in-schools/big-food-in-schools-research/
[5] Chefs in Schools. Launceston College breaktime initiative. 2024. *Available at: https://chefsinschools.org.uk/n-i/news/chefs-in-schools-snack-takeover/*
[6] Devine LD, et al. Factors that influence food choices in secondary school canteens. Front Public Health 2023;11; and related studies (Hart CS, Page A, 2020; Murphy M, et al., 2021).

16. To what extent do you agree to the changes so that primary schools should have at least one day a week where fruit is the only dessert option?

Response: Strongly agree.
This proposal is strongly supported as a practical and proportionate measure to reinforce healthier dietary norms and contribute to reducing free-sugar intake and increasing fibre consumption among primary-aged pupils. The majority of UK children currently fail to meet the 5 A Day recommendation, so boosting intake is vital.

To be effective, implementation guidance should emphasise variety and presentation. Offering a rotating selection of seasonal fruits, presented appealingly, will be essential to maintaining pupil engagement and avoiding waste. Schools should be encouraged to involve pupils in choosing which fruits are offered, supporting uptake and the broader goal of developing positive relationships with fruit and vegetables. Evidence from the Nourish programme shows fruit-only dessert initiatives are well received when introduced gradually and with pupil involvement: one school's weekly "Fruity Fridays" led to students increasingly choosing fruit on other days.[1] Recent Survation polling for Sustain found two thirds of parents supported replacing sugary desserts with healthier alternatives such as fresh fruit and yoghurt.[2]

We urge the government to incorporate into guidance that schools should specify in procurement tenders that 50% of fruit is sourced from local, sustainable British producers, in line with the ambition that 50% of all public-sector food be local or produced to high environmental standards.

References
[1] School Food Matters, Impact on Urban Health and ICF Consulting Services. Evaluation of the Nourish Programme. 2026.

[2] Sustain (2026) *Survation polling on school drinks policy*, fieldwork 5–12 May 2026, n=1,020. Unpublished polling supplied by Sustain.

17. To what extent do you agree to the proposed list of permitted drinks in primary schools?

Response: Strongly agree.
Restricting the permitted drinks list in primary schools is one of the most impactful proposals in the updated standards. Fruit juice accounts for a significant proportion of free-sugar intake in primary-aged children, and removing it from the school environment is a straightforward, evidence-based intervention. Establishing these habits during primary years is likely to generate lasting benefits.

Concerns that removing fruit juice will compromise micronutrient intake are not well-founded in the context of these proposals as a whole: increased fruit and vegetable provision will more than compensate, and whole fruit delivers those micronutrients without the accompanying free sugars. Concerns that children will become dehydrated if they dislike plain water are also not well supported: children's drink preferences are largely shaped by what they are routinely offered, and where sweetened drinks are consistently unavailable, the vast majority drink water. An evaluation of the Mayor of London's Water Only Schools initiative, which invited 2,212 London schools to participate and used surveys and interviews with schools, pupils and parents, found positive attitudes among staff, parents and students and evidence of a shift towards water-only school policies.[2] Recent Survation polling for Sustain found 60% of parents support only water and milk (or unsweetened plant-based alternatives) in schools.[3]

We agree with the requirement that plain soya or oat drinks must be unsweetened and fortified with calcium, iodine, vitamin D, riboflavin and B12, in keeping with SACN and COT guidance.[1] We recommend the permitted list be extended to include fortified, unsweetened pea drinks, and that preference be given to soya drinks for their higher protein content. Clear, proactive communication to parents will be essential, given the perception that fruit juice is a healthy choice; some fruit-juice-based combination drinks marketed to children contain more than half the maximum recommended daily free-sugar intake. Resources and template communications should be developed ahead of implementation.

References
[1] Scientific Advisory Committee on Nutrition and Committee on Toxicity. SACN and COT assessment of plant-based drinks: summary. London: OHID, 9 July 2025.

[2]Yusuf, H., Golkari, A., Gareja, A., Cox, C. et al. (2025) '"I drink tap water as it is convenient and quick" – a mixed methods evaluation of water only school policies in London', *Critical Public Health*, 35(1), 2507228. doi: 10.1080/09581596.2025.2507228. Available at: https://www.tandfonline.com/doi/full/10.1080/09581596.2025.2507228
[3] Sustain (2026) *Survation polling on school drinks policy*, fieldwork 5–12 May 2026, n=1,020. Unpublished polling supplied by Sustain.

18. To what extent do you agree to the proposed list of permitted drinks in secondary schools?

Response: Disagree.
We recommend that the secondary school drinks standards align with the proposals for primary schools, permitting only water, milk or plant-based milk alternatives that are unsweetened and fortified. Consistency across primary and secondary ensures that positive habits and preferences developed during primary school are maintained. Recent Survation polling for Sustain found this position supported by parents, with 73% saying the same food standards should apply to both primary and secondary schools.[5]

The proposal to allow low-sugar drinks that can contain sweeteners is concerning given the evidence of low compliance with current drinks standards,[4] and it sits awkwardly with the direction of the rest of the standards to reduce sweet-tasting drinks. The WHO's 2023 guidance advises against the use of non-sugar sweeteners as a means of achieving weight control or reducing the risk of non-communicable diseases.[1] SACN's assessment is more nuanced: it notes that, in the short term, replacing free sugars with non-sugar sweeteners can reduce energy intake and body weight, but that the longer-term implications are uncertain, and it supports a precautionary, long-term goal of limiting non-sugar sweetener consumption.[2] On that basis, permitting sweetener-containing drinks in secondary schools is best treated as a school-setting precaution to avoid normalising sweet-tasting drinks, rather than as a response to established harm. Aligning secondary with primary standards is the clearer and more consistent approach.

Government should ensure that restricting the drinks list is accompanied by funding for water fountain installation and maintenance, and that access to free, fresh drinking water is subject to regular external monitoring. Despite being a legal requirement, Food Foundation research found students unable to access free drinking water easily due to broken or poorly located fountains, and distrust of communal water jugs.[3] Dehydration is a risk if water is not genuinely accessible,

convenient and appealing. Reliance on bottled drinks also disproportionately affects students receiving free school meals, as spending on bottled drinks reduces what they can afford to eat. We understand from caterer roundtables that many have concerns about reduced drink sales in secondary schools, where drinks are a major source of revenue; on balance we consider the impact on child health and the environment overrides the commercial concern.

References

[1] World Health Organization. Use of non-sugar sweeteners: WHO guideline. Geneva: WHO, 2023.
[2] Scientific Advisory Committee on Nutrition. SACN statement on the WHO guideline on non-sugar sweeteners: summary. London: OHID, 2025. https://www.gov.uk/government/publications/sacn-statement-on-the-who-guideline-on-non-sugar-sweeteners
[3] The Food Foundation. A Better Deal for Free School Meals. 2023.
[4] Pallan M, et al. School food policy in secondary schools in England: the FUEL multiple-methods study. Public Health Res 2024;12(12).
[5] Sustain (2026) *Survation polling on school drinks policy*, fieldwork 5–12 May 2026, n=1,020. Unpublished polling supplied by Sustain.

19. To what extent do you agree with the approach to introduce healthier drinks in secondary schools in stages?

Response: Disagree.
We oppose phasing of the healthier drinks standards in secondary schools, and recommend that the standards introduced for drinks in secondary schools fully align with the primary school standards within the same timeframe.

Allowing hot chocolate and flavoured milks in secondary schools during a phasing-in period undermines other standards that do not permit chocolate or confectionery, the removal of honey elsewhere, and the overall direction on reducing sugar. Phased introduction also undermines the progress on healthier drink choices for primary pupils who will benefit from the new primary standards in 2026 but would then move to looser, phased standards in secondary schools where such drinks remain available. The final permitted drinks list for secondary schools should be made consistent with primary standards. We recognise that some secondary schools and caterers may need practical support to shift procurement, vending and meal-deal arrangements; this should be provided through implementation support rather than delayed ambition. Unless aligned, phasing simply delays an inadequate outcome

rather than delivering a genuinely healthier one, and there is a risk it becomes a permanent compromise rather than a stepping stone.

20. Do you have any views on whether drinks standards for secondary schools should be the same as, or different from, those for primary schools?

Secondary school drinks standards should ultimately align with primary standards, with a clear timeline for alignment. The nutritional rationale for restricting sugary and sweetener-containing drinks does not weaken with age, and maintaining a more permissive secondary list creates an unjustifiable distinction that is hard to defend on public-health grounds. Given that primary pupils will have had no exposure to sweetener-containing drinks throughout their primary education under these standards, allowing them at secondary level risks undermining habits built during those years. Aligning the standards is also likely to have wider benefits for the environment by reducing the plastic waste generated by bottled drinks.

21. To what extent do you agree with the proposed changes to the dairy and plant-based requirements?

Response: Agree.
We agree with the proposed changes as they support improved nutritional standards and greater inclusivity through the recognition of plant-based alternatives. Maintaining a requirement for daily milk provision ensures pupils continue to have access to a reliable source of essential nutrients, while allowing flexibility through plant-based drinks provides greater inclusivity.

The inclusion of plant-based alternatives alongside dairy supports pupils with different dietary needs and preferences, including those who are lactose intolerant (affecting around 8% of the UK population[2]), vegan, vegetarian (an estimated 7% of the population) or flexitarian (an estimated 13%[3]), or from cultural backgrounds where dairy consumption is lower.

We recommend that plant-based alternatives to milk (such as plain soya or oat drinks) should be “made available on every school day at a time during school hours”, as is currently required for animal milk, subject to the requirements on sugar and fortification. We suggest adding fortified, unsweetened pea drinks to the permitted list. Requiring these products to be fortified with calcium, iodine, vitamin D, riboflavin and B12 is particularly important to ensure nutritional equivalence with dairy.[1] Plant-based drinks and dairy alternatives vary considerably in composition, and the standards should distinguish between whole-food plant sources and

processed substitutes, assessing the latter against nutritional criteria rather than treating them as equivalent as a category.[1]

The proposed reduction in sugar thresholds for yoghurt products is also welcome. Setting clear limits for both dairy and plant-based options will help reduce children's intake of free sugars.

References
[1] Scientific Advisory Committee on Nutrition and Committee on Toxicity. SACN and COT assessment of plant-based drinks: summary. London: OHID, 9 July 2025.
[2] Storhaug CL, Fosse SK, Fadnes LT. Country, regional, and global estimates for lactose malabsorption in adults: a systematic review and meta-analysis. Lancet Gastroenterol Hepatol 2017;2(10):738-46.
[3] YouGov. Dietary Choices of Brits. 2024.

22. To what extent do you agree with the new rules restricting foods high in fat, sugar, and salt?

Response: Agree.

Support for the HFSS restrictions: The Faculty strongly supports tighter restrictions on foods high in fat, salt and sugar across the school day. These restrictions are necessary because children's diets remain too high in free sugars and saturated fat and too low in fibre, fruit and vegetables: fewer than one in ten children (9%) meet the recommendation that no more than 5% of energy comes from free sugars, and only 16% meet the saturated-fat recommendation.[1] The UK is also facing a childhood overweight and obesity epidemic, with 37% of children living with overweight or obesity by Year 6,[2]. Obesity among Year 6 children is substantially socially patterned, with children in the most deprived areas more than twice as likely to be living with obesity as those in the least deprived areas.[3]

Because HFSS items are often sold both at breaktime and lunchtime on the same day, the standards should specify that an item sold at breaktime and resold at lunchtime on the same day counts as being sold twice in one week, and should apply consistently across breakfast clubs, lunch, snacks, vending and meal deals. We would also like guidance to ensure healthy options are never more expensive than less healthy alternatives, as testimony from students suggests healthier options, particularly fruit, are often more expensive than cakes, cookies or sugary drinks.[4] We strongly support the proposed limits on deep-fried foods, batter-coated and

breadcrumb-coated items, and pastry-based products, which align with SACN guidance.

Processed meat: As set out in our response to Q11, processed meat warrants particular attention: IARC classifies it as a Group 1 carcinogen, and the Faculty's UPF position statement identifies processed meat as a category requiring special consideration.[5][6] The inclusion of processed meat is incongruous when other unhealthy foods such as deep-fried items are fully restricted, and processed meat is not part of the Eatwell Guide.

We recommend a tighter restriction of no more than 50g of processed meat per week, equivalent to a half portion, which would actively encourage and normalise healthier blended meat-and-plant products already served in some NHS hospitals.[7] The standards should set a clear trajectory towards healthier protein provision based on beans, pulses, eggs, fish, dairy and fortified plant-based options.

Ultra-processed foods**:** The Faculty supports a precautionary but proportionate approach to diets high in ultra-processed foods, consistent with its current position statement. The School Food Standards should continue to be grounded in established nutrient-based requirements, including the nutrient profiling model and restrictions on foods high in fat, salt and sugar. However, the standards and accompanying guidance should also recognise that a high reliance on ultra-processed products can undermine dietary quality by displacing foods recommended in the Eatwell Guide, including vegetables, fruit, wholegrains, pulses and other minimally processed foods. We therefore recommend that the Department uses UPF as an additional monitoring, procurement and menu-improvement lens, prioritising action on products that are both ultra-processed and HFSS, low in nutritional value, or routinely replacing freshly prepared, balanced meals. This approach would support improving the everyday school-food offer through more freshly prepared meals, more vegetables and pulses, better grab-and-go options, and stronger accountability for what is served across the school day. It would also avoid the practical risks of treating all UPF categories as equivalent, recognising that some products classified as UPF may differ substantially in nutritional quality and public-health relevance. [6][8][9][10]

Commercial influence: Many food companies, and particularly those whose profits strongly rely on sales of HFSS or unhealthy UPF foods, shape population health through their business practices. These commercial determinants of health include direct activities, such as marketing and sale of unhealthy products, and indirect activities, such as lobbying against regulation, funding research and generating

doubt about product harms, mirroring the playbook of the tobacco, alcohol and gambling industries.[16][17] Foods and drinks high in fat, salt or sugar should not be promoted through branding, sponsorship, fundraising, rewards, educational materials or corporate social responsibility activities in schools; we would further suggest that no advertising belongs in a school setting where children are a captive and naïve audience. While suppliers have a legitimate implementation role, the development, interpretation and enforcement of the School Food Standards should be protected from conflicts of interest and undue commercial influence, with children's health and equity treated as the overriding public-interest tests.

Implementation and phasing**:** We further recommend that the list of foods restricted to one serving per week (or no more than two combined across the week) also include highly processed plant-based alternatives that are high in fat, salt or sugar; the nutritional profile of plant-based meat alternatives varies widely, so the category should consider both nutritional composition and product type while remaining practical for caterers.[18] Finally, we disagree with the phased proposals for secondary schools. Evidence from the UK Sugar Reduction Programme shows that extended voluntary timelines can have limited impact.[19] A one-year implementation period would better reflect the government's ambition to create the healthiest generation of children ever.

References

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23. To what extent do you agree with the new rules restricting the serving of cheese?

Response: Strongly agree.
We strongly agree with proposals that cheese (including plant-based versions) can only be used as a main ingredient on up to two days per week. Cheese is a significant source of saturated fat in children’s diets: most cheeses contain between 20g and 40g of fat per 100g, qualifying them as high-fat foods, and many are also high in salt.[1] Limiting cheese as a main ingredient is a proportionate and practical measure that still allows it to feature as a topping or accompaniment, preserving flexibility for caterers while reducing saturated-fat load across the week.

Cheese also carries a high environmental impact: an average of 11kg CO_2eq of greenhouse gas emissions per 100g protein, higher than both pork and chicken, over five times higher than tofu and thirteen times higher than pulses.[2] The Planetary Health Diet recommends no more than around 25 to 30g of hard cheese per day for those who choose to eat dairy,[3] and the government's proposals are consistent with this.

References
[1] NHS. Dairy and alternatives in your diet.
[2] Poore J, Nemecek T. Reducing food's environmental impacts through producers and consumers. Science 2018;360(6392):987-92.
[3] British Dietetic Association. The EAT-Lancet Commission 2.0 on healthy, sustainable and just food systems. 2025.

24. To what extent do you agree with the plan to restrict the serving of cheese as a main protein option in secondary schools, in stages?

Response: Agree.
The phased approach for secondary schools (three portions per week from September 2027, reducing to two from September 2028) gives caterers time to develop appealing alternatives without disrupting service, while still delivering the nutritional benefit of the full restriction within a clear timeframe. We would, however, encourage the shortest practicable transition, given that the public-health rationale for the restriction does not differ between primary and secondary settings.

25. To what extent do you agree with the plan to reduce desserts in primary schools?

Response: Strongly agree.
Limiting sweetened baked goods and desserts to once per week in primary schools is strongly supported by the evidence on free-sugar intake in children. Primary-aged children are at a key stage for establishing taste preferences and eating patterns. Replacing sugary desserts with fruit and lower-sugar dairy options on other days provides a genuine opportunity to shift norms around sweetness and improve overall diet quality.

The latest National Diet and Nutrition Survey shows only 8% of primary pupils meet the free-sugars guidelines, and sweet biscuits, cakes and puddings make up 19% of free-sugar intake in primary-aged children.[1] It should be made clear to schools and caterers that the once-a-week limit on desserts is a maximum rather than a

requirement; moving towards fruit, or fruit-and-yoghurt-only policies where supported by children, parents and staff, should be encouraged, and sweetened products should not simply be displaced to snacks, breakfast clubs or after-school activities.

References

[1] Office for Health Improvement and Disparities, Food Standards Agency and partner organisations. National Diet and Nutrition Survey 2019 to 2023: report. June 2025.

26. To what extent do you agree with the plan to reduce desserts in secondary schools?

Response: Strongly agree.
Limiting sweetened baked goods and desserts to once per week in secondary schools is strongly supported by the evidence on free-sugar intake. The latest National Diet and Nutrition Survey shows only 5% of secondary pupils meet the free-sugars guidelines, and sweet biscuits, cakes and puddings make up 16% of free-sugar intake in secondary-aged children.[1] Older pupils should not be subject to a weaker nutritional environment, particularly where secondary schools may have more commercial-style catering, meal deals, vending and snack provision.

Secondary schools present distinct challenges in implementing dessert reductions. Research by School Food Matters and the University of Birmingham found that pupils at this age have greater autonomy over food choices and are more strongly influenced by the food environment outside school, making them more likely to disengage if changes feel imposed. Pupils are significantly more likely to accept and sustain new food norms when they have had a genuine role in shaping them, with one student reflecting that changes were something “we helped create.”[2] Schools should be actively supported to co-design menu changes with students as dessert reductions are introduced.

References

[1] Office for Health Improvement and Disparities, Food Standards Agency and partner organisations. National Diet and Nutrition Survey 2019 to 2023: report. June 2025.
[2] School Food Matters and University of Birmingham. Delivering Nourish in secondary schools: whole-school approach evidence-informed recommendations. April 2026. *[Reference to confirm: exact title and URL.]*

27. To what extent do you agree with the plan to reduce desserts in secondary schools in stages?

Response: Disagree.
We disagree with a prolonged staged approach (two portions per week from September 2027, reducing to one from September 2028). The same public-health rationale applies across age groups: adolescents remain at risk from excess free-sugar intake, poor dental health and unhealthy food environments. Secondary schools should be supported to reduce dessert frequency promptly and consistently. If a short transition period is considered unavoidable, it should have a clear end date and be accompanied by practical support for caterers, not by weaker long-term expectations for older pupils. Delaying stronger standards in secondary schools risks widening inconsistency and reducing the credibility of the whole-school approach.

28. To what extent do you agree with the plan to set what can and can't be included in a school meal deal?

Response: Strongly agree.
We welcome the requirement that a meal deal must include at least one portion of vegetables and/or salad and at least one portion of fruit, while excluding drinks. This is an important step to ensure children eat their 5 A Day, and ensures the convenience and affordability of a meal deal works in favour of nutritional quality rather than against it.

The exclusion of drinks means children will not have to spend money on drinks, but it is critical that free water is available and accessible, which is not always the case despite being a legal requirement. This must be addressed particularly to ensure children on free school meals, who are often reliant on meal deals, are not disadvantaged or left at risk of dehydration. Evidence shows that to afford a main course, sweet item and a drink, many students on free school meals have to buy a meal deal; where individual salads or fruit pots were available, they were not part of the meal deal and could not be bought in addition within the FSM allowance.[1] Meal-deal rules should also prevent price promotions from making less healthy options more attractive than healthier ones, and should ensure HFSS foods, sweetened drinks and branded snack products are not bundled into meal deals. Successful implementation will depend on ensuring meal deals are appealing, with meaningful involvement from pupils.

References
[1] The Food Foundation. A Better Deal for Free School Meals. 2023.

29. To what extent do you agree with the changes being suggested for pulses being included alongside main menu items at least once every week?

Response: Strongly agree.
Requiring pulses to be included within or alongside all main menu options at least once a week is an excellent proposal with strong nutritional justification. Pulses are nutrient-dense, high in fibre, low in saturated fat, and a good source of plant-based protein and iron. This requirement also gently normalises pulse consumption among children who may have limited exposure at home. However, the government can and should be more ambitious: we recommend pulses be included in meals at least three times per week, ideally as the main ingredient or alongside main menu items, including as a blended ingredient, side dish, dip or sandwich filling.[1]

Secondary-aged children eat the smallest amount of beans across all age groups, the equivalent of just two-thirds of a portion a week, while primary-aged children eat the most at 1.2 portions a week.[2] Half of children's bean intake comes from baked beans, demonstrating potential for greater diversity. The percentage of children not meeting fibre recommendations is 86% for 4 to 10 year olds and 96% for 11 to 18 year olds.[3] Children eating less than one portion of beans per week are 47% more likely to be below the LRNI for potassium, 58% more likely for magnesium, 30% more likely for zinc and 20% more likely for iron, so eating more beans could help close this nutrient gap.[2] Pulses are associated with reduced obesity and cancer risk, which is why many European dietary guidelines recommend higher legume consumption, such as Spain (at least four servings a week) and Greece (at least three).[4] Beans and pulses can be successfully introduced in popular dishes by blending into sauces, supported by engagement with staff and students to ensure acceptability.[5]

References
[1] ProVeg UK. School Plates recipes. 2025.
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https://foodfoundation.org.uk/publication/bean-facts
[3] Office for Health Improvement and Disparities, Food Standards Agency and partner organisations. National Diet and Nutrition Survey 2019 to 2023: report. June 2025.
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[5] The Food Foundation. How the quality of school food can be improved to increase uptake. 2025. https://foodfoundation.org.uk/publication/how-quality-school-food-can-be-improved-increase-uptake

30. To what extent do you agree with the plan to increase pulses in secondary schools in stages?

Response: Agree.
The phased implementation for secondary schools (pulse inclusion every two weeks from September 2027, increasing to weekly from September 2028) is a sensible approach, provided the phasing does not dilute ambition. Secondary menus, particularly grab-and-go offerings, present greater recipe-development challenges than primary provision, concerns raised by caterers. A transitional period allows catering teams adequate time for training and support to formulate, trial and embed dishes that incorporate pulses in ways that are nutritionally effective and acceptable to older pupils, reducing the risk of food waste and disengagement.

This is consistent with evidence from secondary school food transformation work, which found that strong catering team involvement and adequate time for recipe development are essential conditions for embedding new ingredients successfully, particularly within grab-and-go formats.[1] The integrity of the ultimate requirement of weekly pulse inclusion should not be compromised, and the phasing should be treated as a firm transitional measure rather than an open-ended one.

References
[1] School Food Matters and University of Birmingham. Delivering Nourish in secondary schools: whole-school approach evidence-informed recommendations. April 2026.

31. To what extent do you agree with the changes being suggested for protein in school menus?

Response: Strongly agree.
The proposed updates to protein requirements represent a well-evidenced and timely modernisation. Expanding the qualifying protein sources to include pulses alongside meat and poultry enhances nutritional quality and menu flexibility. Pulses are high in fibre and low in saturated fat, nutrients where children's intakes are not currently meeting recommendations, making them a nutritionally superior complement or partial substitute for meat-based proteins. The requirement for vegetarian menu options to feature pulses as the primary protein source on at least

three days per week is particularly positive, directly addressing the current over-reliance on cheese in vegetarian options.

We recommend the standards go further and require that a portion of plant-based protein be provided every day, with plant-based proteins given their own food category. This would ensure a nutritious option is always available for those who want to choose a plant-based protein or have a dietary preference to do so, supporting cultural and religious inclusivity as well as environmental goals. Priority should be given to whole and minimally processed plant proteins such as beans, lentils, peas, chickpeas, tofu and tempeh, since these provide the highest health benefits, and the criteria for this category should consider composition and preparation rather than only product type. Standards should ensure plant-based meals are at least as affordable as the meat option, filling and nutritionally balanced; analysis found beans cost on average 2.6 times less per 100g than meat and 4.5 times less than other plant-based alternatives.[1]

We recommend a limit on how much red meat can be served per week, of no more than one portion (equivalent to about 100g in secondary schools, or 50 to 80g in primary), of which no more than 50g can be red processed meat, in line with the Planetary Health Diet.[6] Red meat has particularly high emissions and land-use impacts and is linked to several negative health outcomes including cancer and cardiovascular disease.[4][5] The National Food Strategy recommended a 30% reduction in UK meat consumption by 2032, and the Climate Change Committee has recommended reductions of around 25% by 2040 and 35% by 2050.[6][7] NDNS data shows that while adults are slightly reducing red and processed meat, children are not, with 22% of boys aged 11 to 18 eating above recommended levels.[8] Scotland's 2020 regulations already cap red and red processed meat at 175g per school week, and Denmark's public canteen guidance limits beef or lamb to no more than one day per week, providing workable templates.[9]

On plant-based meat alternatives, we welcome the exclusion of plain mycoprotein, tofu and soya mince from the proposed restriction of no more than two portions a week, and we recommend the exemption be extended to tempeh and seitan, and to whole-food alternatives such as homemade vegetarian burgers or sausages cooked from scratch on site. The Faculty's UPF position statement is clear that not all foods within the ultra-processed category carry the same nutritional or health implications, and processed plant-based alternatives should not be assumed to be harmful simply because they are processed; some evidence indicates they are not associated with the increased cancer, cardiovascular and diabetes risk seen for processed meat.[10][11] At the same time, they should not be assumed to be healthy simply

because they are plant-based: to guard against products high in salt or saturated fat, plant-based meat alternatives should meet limits of no more than 1.5g salt and no more than 5g saturated fat per 100g, with preference given to products fortified with iron, calcium and vitamins B12, B2 and D.[10][12][13]

The reclassification of fresh tuna as a non-oily fish brings the standards into line with UK dietary guidelines and is a sensible correction. We also recommend that the category ‘pulses’ be permitted to include baked beans, provided only low-salt and low-sugar varieties are used and baked beans are limited to a main ingredient in vegetarian meals no more than once per week, since baked beans are highly nutritious and familiar to children, which may improve uptake of pulses overall. More broadly, we recommend placing greater emphasis on the variety of plant-based foods within the daily protein requirement.

References

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[4] International Agency for Research on Cancer. IARC Monographs evaluate consumption of red meat and processed meat. Lyon: IARC, 2015.
[5] WWF. Living Planet Report 2024.
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32. To what extent do you agree with maintained nursery schools and nursery units within primary schools having to comply with the EYFS nutrition guidance only?

Response: Agree.
We agree, on the basis that the EYFS nutrition guidance introduced in September 2025 was developed with nutrition experts and sector representatives and provides a single, coherent framework for these settings. Reducing duplication is sensible, provided the EYFS guidance is treated as a robust minimum and is consistently applied. There should be coherence between the EYFS guidance and the wider School Food Standards, so that children do not experience inconsistent messages as they move from nursery into reception and primary school. We would encourage the government to keep the EYFS guidance up to date, to ensure staff have practical training, and to monitor the impact of this change to ensure nutritional standards in these settings are maintained or improved, and not weakened by the removal of Schedule 5.

33. To what extent do you think the proposed changes will improve the nutritional quality of school meals?

Response: To a great extent.
The proposed changes have strong potential to meaningfully improve the nutritional quality of school meals. However, the extent to which improvement is realised will depend significantly on what accompanies the standards. Evidence from School Food Matters' five-year Nourish programme evaluation shows that standards alone are insufficient to drive lasting change: prior to intervention, staff frequently lacked awareness of how existing standards applied in practice, and the gap between what was required and what was served was significant.[1]

The evaluation recommends that updated standards be accompanied by practical tools, including menu audits, simple templates and clear guidance, and that compliance be externally monitored rather than left to self-assessment alone. We would add that the full nutritional and health benefit will only be realised if the standards are strengthened where we have recommended (extending the precautionary lens to UPF, aligning secondary drinks with primary, setting red-meat limits and a daily plant-based protein option) and if the process is protected from industry influence, as set out in our responses to Q34 and Q38.

References

[1] School Food Matters, Impact on Urban Health and ICF Consulting Services. Evaluation of the Nourish Programme. 2026.

Section C – Practical considerations

34. What practical challenges, if any, do you think schools might encounter when implementing the new School Food Standards?

For any set of healthy food standards to be effective, funding and resource are required to achieve two things: the capacity to acquire, prepare and serve meals that are appealing and likely to be consumed (including staff, storage and preparation space and equipment, and a budget to purchase food); and a systematic process and infrastructure to monitor and enforce the standards across all schools equally. The Food SIG is concerned about the potential for widening inequalities to emerge between schools based on resource and local support. The nutritious quality of school food should not be subject to a postcode lottery where affluent areas feed their children in a way that becomes vastly different to those living in areas of higher deprivation. The Faculty's *Good Food for Children* report highlights these concerns directly, noting that evidence on whether school meals improve nutrition is mixed, partly because standards are not consistently enforced in practice.[1] It warns that a poorly administered or underfunded programme risks being costly and ineffective, and calls for a mandatory accountability framework to ensure compliance is consistent across all schools. The report also identifies commercial pressures as a structural challenge, noting that the food industry shapes what is available and affordable for schools to procure, with cheaper, nutrient-poor options dominating particularly in secondary schools. Adequate long-term funding, robust monitoring, and protection from commercial influence are prerequisites for the new standards to be implemented effectively and equitably.

More broadly, the Faculty's CDoH and Food SIGs are concerned about the influence that unhealthy commodity industries have on school food. Two issues in particular may prevent schools from implementing the standards effectively: the influence of unhealthy commodity industries (including HFSS and UPF food companies) on school food procurement, and the dominance of grab-and-go products in secondary schools that are more difficult to monitor for compliance; and the influence of marketing, branding and corporate social responsibility activities on school food and on how diet and nutrition are discussed in the curriculum. A report involving interviews with school food stakeholders and student focus groups found that food in secondary schools is becoming an expanding and commercially attractive market,

with the grab-and-go offer dominated by nutrient-poor items that are cheaper than main meals and purchased disproportionately by those on free school meals.[2] A separate report by the youth-led organisation Bite Back identified tactics used to drive profit at the expense of children's health, including using schools as a venue for branding and sponsoring curriculum materials that normalise the consumption of harmful products.[3] Corporate actors develop and deliver educational materials and market their products in ways that promote their corporate image and serve profit-driven interests at the expense of public health.[4]

Alongside these structural concerns, schools will face a number of operational challenges. Lunchtime logistics present a significant barrier: many schools, particularly secondary schools, have insufficient time allocated to lunch and inadequate capacity to manage queuing, so implementation must be accompanied by consideration of how lunchtime is organised. Practical guidance will be critical, including recipe ideas, menu-planning tools, procurement advice and guidance on interpreting the standards in ambiguous situations. Communication with parents and pupils will require careful management, with clear, evidence-based resources addressing common misconceptions, particularly around fruit juice and sweeteners. Pupil involvement in menu design is essential to maintaining uptake, as is careful handling of special dietary requirements for pupils with allergies, intolerances, medical conditions, SEND needs and cultural or religious requirements.

Maintaining school meal uptake must be treated as a priority throughout implementation, as the nutritional benefits will only be realised if pupils are eating school meals. Funding needs to be kept under review, particularly for small schools and caterers who do not benefit from economies of scale. Research commissioned by School Food Matters identified a gap of 63p per meal between the true cost of a nutritious, sustainable school lunch (£3.16) and the funding available at the time of study (£2.53),[5] and 62% of school staff identified budget pressures as the greatest risk to sustaining improvements once external support ended.[6] Quality does not always mean higher cost: switching some meat for pulses supports a shift to healthy sustainable diets while saving money that can be reinvested in higher-quality ingredients and in meeting requirements for local and sustainable sourcing.

References

[1] Bash K, Black M, McNee R, et al. Health of the Next Generation: Good Food for Children. Faculty of Public Health et al.; January 2024.
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[4] Schools for healthy lives, not for corporate interests. Lancet Child Adolesc Health. *[Reference to confirm: authors, year, volume and DOI.]*
[5] School Food Matters and Impact on Urban Health. Calculating the cost of a nutritious, sustainable school lunch. 2024.
[6] School Food Matters, Impact on Urban Health and ICF Consulting Services. Evaluation of the Nourish Programme. 2026.

35. To what extent do you agree that schools having a governor with responsibility for school food would help ensure schools follow the School Food Standards?

Response: Strongly agree.
A named governor or trustee with designated responsibility for school food helps embed school food within formal accountability structures and creates clear ownership at governance level, rather than treating it solely as an operational issue. School food is not only a catering issue; it affects health, educational participation, equality, safeguarding, sustainability and financial planning. Evidence from the Nourish programme found that governor involvement was a significant factor in sustaining improvements; in one school a lead governor helped secure capital investment in the dining environment that would not otherwise have been possible.[1]

However, a named governor is only meaningful if they are trained and supported. Also to support this aspect of the governor role by ensuring there are clear routes and mechanisms for them to influence school food. The evaluation found many governors were unaware of their existing statutory duties in relation to school food. The proposal should therefore be accompanied by clear guidance and practical training resources for governors, and the named governor should be able to review menus, catering contracts, pupil feedback, free-school-meal uptake and compliance checks, and should help ensure that conflicts of interest and commercial partnerships are managed appropriately. This should be reinforced through Ofsted's consideration of school food governance structures.[1]

References
[1] School Food Matters, Impact on Urban Health and ICF Consulting Services. Evaluation of the Nourish Programme. 2026.

36. To what extent do you agree that schools publishing their school food policy on their website would help ensure they meet the School Food Standards?

Response: Strongly agree.
Publishing a school food policy alongside menus on school websites provides pupils, parents, governors and trustees with a clear understanding of how the school offers healthy and nutritious food, and the process of developing such a policy allows schools to reflect on what is working well and where improvements could be made. A published policy should cover meals, breakfast clubs, snacks, vending, drinks, packed-lunch guidance, food used in rewards or fundraising, allergens, equality considerations, sustainability and commercial partnerships. Transparency supports accountability and gives parents a straightforward way to see whether provision meets the standards. To be effective, publication should be supported by a consistent template and by external verification, so it strengthens accountability in practice rather than becoming a paperwork exercise (see Q37).

37. What practical methods do you think schools could take to help ensure they meet the School Food Standards?

Effective compliance requires a coherent system of governance, accountability and support working together at school level. The following recommendations form an integrated framework.
Governance is a crucial foundation. We support every school appointing a lead governor or trustee with designated responsibility for school food, publishing a school food policy, and reporting annually on school food activities. Schools should also appoint a student School Food Ambassador, responsible for ensuring pupil feedback on food quality reaches school leaders, governors and caterers.

External verification is essential to ensure governance structures are taken seriously. Ofsted should be required to check that school food governance structures are in place as part of routine inspection, and annual reporting should be made a condition of school food grant funding. Evidence supports combining self-assessment with external support: when schools were expected to lead audits without additional support, progress was slower and staff felt overwhelmed, whereas the most effective approach combined practical tools with external support and shared ownership.[1]
Compliance checking addresses whether the standards are actually met in what children are served day to day. Schools should be required to use a standardised self-reporting compliance tool to verify menus against the standards, complemented by a national school food audit scheme delivered through Environmental Health Officers, providing independent verification across all settings. This should check foods and drinks actually served, not only planned menus. Accreditation and support are also essential: schools should use a recognised quality assurance scheme,

School Food Improvement Officers should be introduced in every local authority to provide hands-on support, and mandatory training should be introduced across the whole school food workforce, so that accountability is genuinely effective rather than punitive.

Schools can also meet the standards within budget by taking advantage of the cost savings from substituting some meat for pulses, and should be encouraged to co-design menus with communities and nutritionists to ensure buy-in, cultural appropriateness and inclusivity. Practical options include making plant-based meals a visible default, introducing plant-based days, reducing the amount of meat in a dish by replacing some with pulses, and pricing dishes so lower-emissions options are attractively priced. There is clear evidence that schools can improve healthy provision without harming uptake: one academy trust working with ProVeg UK saw meal uptake rise by around 20% while boosting plant-rich options and cutting emissions by around 26%.[2]

References
[1] School Food Matters, Impact on Urban Health and ICF Consulting Services. Evaluation of the Nourish Programme. 2026.
[2] ProVeg UK. School Plates: the guide and case studies. 2025.

38. What practical methods do you think government could take to help ensure schools meet the School Food Standards?

As outlined in our response to Q34, resources are an essential and practical necessity for all schools to meet the School Food Standards. A needs assessment should be undertaken for all schools to determine the gaps in capacity and resources necessary for them to fully meet and deliver the standards in a high-quality and sustainable way. It is also essential for government to introduce and fund a reliable, systematic and sustainable way to monitor and enforce these standards.
The CDoH and Food SIGs anticipate that the food industry will seek to influence the development and implementation of the standards, and that this poses a risk to their effective and timely delivery. The influence of unhealthy commodity industries, particularly those selling HFSS and UPF products, is well documented.

We recommend the following:

- Protect the development and implementation of the School Food Standards from conflicts of interest and undue commercial influence. While industry actors have a legitimate role as suppliers, the development, interpretation and enforcement of the standards should be protected from commercial influence,

with children's health and equity treated as the overriding public-interest tests, and we caution against weakening the proposals in response to industry concerns about commercial impact.
- Implement the standards without undue delay, to reduce the opportunity for lobbying that could weaken them and to avoid prolonging negative impacts on children's health. It is well documented that, when faced with regulation that may affect profits, unhealthy commodity industries seek to block, delay or weaken measures that would protect population health.[1][2]
- Develop and implement a straightforward system of mandatory reporting on school food provision that allows monitoring and evaluation, with funding provided.
- Increase funding to allow local authorities, food providers, caterers and schools to implement the changes quickly and without detrimental effect on school budgets.

It is well evidenced that health-harming industries use public-relations tactics, including corporate social responsibility initiatives, to downplay their impact on health.[3] The consultation and the subsequent implementation of the standards therefore need to be protected from industry influence, and the risk of regulatory capture, as seen in other policy processes, should be guarded against. Lobbying of government is a well-documented strategy of the food and drink industry. Nesta's *Nourishing Britain* report, drawing on interviews with former ministers, found that governments face conflicts of interest in their relationship with industry, with attempts to legislate often impeded by industry lobbying and concerns about the impact on business.[4] The policy to restrict the advertising of HFSS products online and on television has had its implementation deferred, and brand-only advertising exemptions introduced, adaptations that weaken the policy's effectiveness and that have been linked to extensive and sophisticated industry lobbying.[5][6][7]
There is no consistent assessment, monitoring or reporting of compliance with the standards, and this must change. School Food Standards are not always adhered to and the quality of food is variable, which risks exacerbating inequalities whereby some children receive nutritious school meals while others receive lower-quality food. The government should urgently implement a means of monitoring, assessing, reporting on and improving school food provision; one potential approach, proposed by the School Food Review coalition, is a School Food Accountability Framework.[8]
Building on these points, we recommend the following practical steps. On guidance and resources, government should develop clear, practical implementation guidance in collaboration with caterers, nutritionists and school food professionals, including recipe banks and menu-planning tools aligned to the new standards, template communications for parents and pupils, and dedicated guidance on special dietary,

allergy, cultural, religious and SEND-related needs, all in plain English and accessible formats. On funding, adequate and sustained funding is a prerequisite: the per-meal funding gap identified by School Food Matters should be addressed, per-meal funding should be linked to inflation, and targeted support should be made available for small schools and for kitchen upgrades and drinking-water infrastructure. On training and workforce, training should be available for catering staff and lead governors, including continuing professional development in wholegrain cookery, pulse-based dishes and lower-sugar menu design, with Denmark's free courses for public-sector kitchen professionals as a useful template.[9]

On monitoring and enforcement, in addition to the mandatory reporting recommended above, government should create a monitoring and enforcement regime, which could be delivered through the Food Standards Agency, including audits and inspections to complement a standardised self-reporting tool; a recent study of 36 secondary schools found very low compliance with current standards limiting confectionery, chocolate, cakes, biscuits, deep-fried and breadcrumbed foods.[10] On engagement, government should meaningfully involve young people in the national rollout and provide effective communication to parents; recent Survation polling for Sustain found 45% of parents were not aware of the School Food Standards at all and 50% were not aware of the consultation, indicating current communications are failing to reach parents.[11] On supply chains, the switch to more legumes and pulses is an opportunity to support UK horticulture, and farm innovation grants and agricultural funding could help farmers diversify into legume production and unlock domestic supply chains for schools.

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39. What concerns, if any, do you have about the potential impact of these proposals on all individuals with protected characteristics?

Socio-economic background: Although socio-economic status is not a protected characteristic, it is central to the equity impact of these proposals, and we therefore address it first. The proposed changes are likely to have a positive impact on children from disadvantaged backgrounds, who are most reliant on school food as a primary source of daily nutrition and who have the highest rate of diet-related ill health. Increased fruit and vegetable provision and reduced sugar and saturated fat will benefit all pupils but could particularly help address inequalities in consumption of healthier foods. Consideration of inequalities should go beyond the protected characteristics: children in the most deprived areas have the worst diet-related outcomes, so school food policy should target these areas as a priority. Affordability and stigma are also equality issues: pupils eligible for free school meals should have access to the full range of healthy, appealing and compliant options, including grab-and-go and meal-deal choices where these are offered.

Cultural and religious inclusivity: Schools will need clear guidance on how to ensure compliant menus remain culturally inclusive. Providing a greater variety of plant-based options is important to accommodate the cultural, religious and dietary needs of diverse communities, including lactose intolerance (around 8% of the UK population[1]), religious dietary observances, and vegan, vegetarian and flexitarian diets.[2] The increased emphasis on pulse-based dishes may be welcomed by many communities where pulses are a dietary staple. All communication materials should be available in accessible formats and multiple languages.

Disability and SEND: Children with sensory processing difficulties, autism or highly restricted diets may find transitions to wholegrain foods, alternative proteins and reduced-sugar options particularly challenging. Evidence from the Adapt-Ed study found that access to preferred or “safe” foods can be crucial for children’s sense of security and mental health, and that poorly managed experiences with school food can negatively affect eating both at school and at home.[3] A blanket approach without appropriate flexibility risks excluding some of the most vulnerable children from school food altogether. The study also found low uptake of free school meals in special schools, despite children with SEND being significantly more likely to be FSM-eligible. Clear guidance on reasonable adjustments and exceptions is essential, and government should develop dedicated, evidence-based guidance on implementing the standards in SEND settings, recognising the need for flexibility around sensory needs, safe foods and eating environments. The Department for Education should also address the data gap on free school meal uptake to monitor the impact of these changes on sub-groups including those with SEND, as there are currently no published data showing how many children with SEND in mainstream schools receive their entitlement.[4]

Age: Secondary pupils have greater autonomy and stronger established food preferences than younger children, and are more likely to disengage from school meal provision if changes feel imposed or unappealing. Meaningful involvement of young people in menu design and in the communication of changes is essential to maintain uptake among this age group, particularly older pupils who may have easier access to food outside school.

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40. Do you think the new School Food Standards could have any positive and/or negative effects on the environment?

Response: Positive.

The proposed changes are likely to have a net positive environmental impact, though this will depend significantly on how implementation is managed. The shift toward greater consumption of pulses, wholegrains, fruit and vegetables, and the reduction in processed meat, represents a meaningful move toward more plant-forward menus. Plant-based foods generally have a substantially lower carbon footprint than meat and dairy: on average 1.8kg of greenhouse gas emissions are produced per kilogram of beans, compared with around 99kg per kilogram of beef from dedicated beef herds.[1] If high-income nations aligned their diets with the Planetary Health Diet, annual agricultural production emissions could fall substantially, with associated land sparing.[2] Food procurement accounts for around 16% of UK schools' total carbon footprint, and is the single largest contributor in primary schools.[3]

Realising these benefits will require active intent. The current School Food Standards do not require compliance with Government Buying Standards, which is a significant missed opportunity. The government has committed to ensuring at least 50% of public-sector food is sourced locally or to high sustainability standards, and we recommend that compliance with the Government Buying Standard for Food and Catering Services be made mandatory for all schools, with the DfE working closely with DEFRA to ensure these standards are sufficiently ambitious. Any move toward more local and sustainable sourcing should go hand in hand with developing UK horticultural production to reduce supply-chain barriers.

We recommend that the standards encourage reductions in emissions per meal through a common, proportionate reporting mechanism, with the method left to public institutions in consultation with their communities, rather than through highly prescriptive targets that would require a separate technical evidence base. There are positive examples in practice: four London councils signed up to the London Food Purchasing Commitment, which targets average emissions of no more than 1.04kg CO2eq per 1000kcal meal by 2030, and Sustain estimates that if all London free school meals met this target, over 11,000 tonnes of emissions could be avoided annually.[4] We also recommend caterers report against transparent environmental and social sustainability criteria.

The reduction in heavily processed foods may also reduce packaging waste. One potential short-term negative effect is an increase in food waste during the transition period as pupils adapt to less familiar ingredients, but this is likely to diminish as familiarity increases and as schools invest in pupil engagement and menu co-design; government transition guidance should explicitly address food-waste minimisation. Messaging and communication of the change implementation represents should be

framed to avoid emphasis on restriction or standards being imposed upon schools rather; instead that this an improvement in quality and desirable.

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41. Do you have any further comments you would like to share with us?

The exclusion of sixth form colleges and further education colleges is a missed opportunity that could drive inequalities, particularly given that young people from more disadvantaged backgrounds (those eligible for free school meals) are more likely to attend colleges than school sixth forms.[1] A Bite Back report found that some sixth form colleges have unhealthy drinks outlets within the college setting itself.[2] We recommend the standards be extended to sixth form and further education colleges, which are frequently targeted by unhealthy food and drink companies.

While updating the School Food Standards is an important and welcome step in improving children's access to nutritious meals, this alone is not sufficient to ensure the health and wellbeing of children or to address the obesity epidemic.

We would like to make the following additional points on the wider school system:

- Revised regulations should go beyond food provision and explicitly address the governance, content and delivery of school-based food and nutrition education. This should include safeguards to prevent commercial influence and ensure that all educational materials used in schools are independent, evidence-based, and aligned with public-health and child-rights goals. There should be no commercial-industry influence in the curriculum, including from unhealthy food industries.
- There should be a ban on advertising commercial products in school, including unhealthy food and drink and the brands that sell them, and no branded products should be provided free or for purchase in schools.
- Consideration of inequalities should extend beyond the protected characteristics. Children in the most deprived areas have the worst diet-

related outcomes, so school food policy should target these areas as a priority.

There is growing evidence, including analyses published in leading medical journals, that industries with vested interests, including producers of unhealthy food, drink and alcohol, are able to influence educational content and programmes aimed at children and young people, disseminating industry-favourable content and narratives that deflect from the role of marketing, product design and obesogenic environments in driving consumption of unhealthy products. To support children's ability to thrive, the revised regulations should address the governance, content and delivery of food and nutrition education, so that the food children consume and the knowledge they receive work together to promote lifelong health.

Finally, we highlight the strong public support for measures of this kind and the case for extending them across the wider public sector. YouGov polling of over 2,000 members of the UK public in December 2025 found that 69% supported a policy to make schools serve a higher proportion of plant-based food, with only 10% opposed, and support across every age group, economic background and 2024 voting group.[3] We urge that this approach be adopted more widely across the public sector, and encourage the DfE to work with other departments to develop a complementary set of food standards for the NHS, modelled on the School Food Standards, alongside standards for the care system and youth detention, so that children in hospital, care or detention are not served food that fails to meet the standards applied in schools.

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