



Action on Salt & Sugar Response: School Food Standards - updating the legislative framework

About Action on Salt and Sugar

Action on Salt & Sugar is a registered charity dedicated to improving population diets in the UK and worldwide. Our work focuses on the prevention of diet-related diseases, including hypertension, cardiovascular disease, obesity, and type 2 diabetes, by addressing the structural drivers of poor diet, namely excess salt and sugar.

We are a leading, independent public health group, based within the Research Action on Salt and Obesity Unit at the Wolfson Institute of Population Health, Queen Mary University of London. Supported by a network of 33 expert scientific advisors, we generate and translate high-quality evidence to inform policy, guide reformulation and support effective, population-level interventions.

For more information on our submission, please contact Sonia Pombo, Head of Research and Impact s.pombo@qmul.ac.uk

Section A: About you

1. Do you consent to the data and information you provide being held in accordance with UK GDPR as covered in the Department for Education's personal information charter? (Required)

Yes

2. Would you like us to keep your responses confidential? (Required)

No

3. In processing your data and meeting legal duties, the government may be expected to share information about your consultation response. In line with the privacy notice, would you like your response to be kept confidential? (Required)

No

4. As the government analyses the consultation findings, we may identify direct quotes to include in the published government response, in an anonymised way – may we use your feedback in this way? (Required)

Yes

5. What area in England are you based in? (Required)

National

6. Are you responding as an individual or on behalf of an organisation? (Required)

Organisation

8. What type of organisation are you responding on behalf of?

Public Health/Nutritional organisation

9. What is your organisation's name?

Action on Salt & Sugar

Section B: Questions on the proposed new standards/permitted foods and drinks

Breakfast 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?

Strongly agree

We strongly agree with introducing clear breakfast standards. The expansion of breakfast provision makes it particularly important that breakfast clubs offer genuinely nutritious defaults rather than becoming an additional source of free sugars, salt or saturated fat. The proposed emphasis on lower sugar options of cereals, plain porridge or no-added-sugar muesli, higher fibre lower-salt bread, and the inclusion of fruit or vegetables is consistent with UK dietary recommendations, and supports improved satiety, concentration and overall diet quality in children.

It is particularly important that breakfast cereals lower in salt are provided. Breakfast cereals are among the top 10 food groups contributing to children's salt intake, accounting for approximately 3% total salt intake in children aged 4-18 [1]. The salt content of breakfast cereals, particularly those marketed to children, varies widely from 0.0g/100g to as much as 1.2g/100g [2], and excess salt intake raises blood pressure from an early age, and increases the risk of heart attack, stroke and kidney disease later in life. Appropriate lower-salt alternatives should therefore be procured at scale.

The restriction of foods high in free sugars (e.g. chocolate spreads, syrups) and the removal of fried and highly processed items is appropriate, given the well-established links between excess sugar, saturated fat and salt intake and poor health outcomes, including high blood pressure, dental decay and obesity. The exclusion of processed meat, which is typically high in salt and saturated fat, reflects current public health guidance: children eat proportionally more processed meat than adults, with over a third (36%) of their meat intake coming from processed sources, including sausages, bacon, ham, which collectively rank among the top 10 contributors to salt intake in children aged 4-18 [1]. We would suggest providing schools with a clear list of foods that are considered 'processed' to avoid confusion and suggest it aligns with the NHS definition of processed meats [3].

We would welcome clearer guidance on a few specific areas. The standards should clarify whether foods such as baked beans can be offered daily at breakfast and, if so, specify that lower-salt and lower-sugar varieties should be procured. Clearer definitions of what constitutes 'fruit spreads' and 'savory spreads' would also support consistency across settings. The standards should make clear that pancakes, a common school breakfast item, are addressed within the guidance.

The proposed drinks standards, especially prioritising water, removing fruit juice and including plain milk and suitable unsweetened fortified plant-based drinks, are consistent with best practice [4]. However, we disagree with the phased approach for secondary schools' drink standards and recommend full alignment with primary school standards within the same timeframe.

There should also be a strong recommendation that caterers develop flavour through herbs, spices, garlic, citrus and other seasonings rather than relying on salt during food preparation. Children do not need salt added to their food, as many ingredients already contain it, and references to adding salt within recipe guidance and catering resources should be removed where possible to avoid enforcing children's preference for salty foods.

Finally, guidance for caterers should explicitly require alignment with the Government Buying Standards for Food and Catering Services (GBSF), which recognises salt reduction as an important public health objective and aligns with the UK's 2024 salt reduction targets [5]. Schools are the largest public food setting for children, yet the proposed School Food Standards contain no requirement to comply with GBSF. At a minimum, foods procured for schools should meet the latest government salt reduction targets for 2024, particularly for foods that contribute most to children's salt intakes: bread, cereals, cheese, processed meat, pizza and sauces. This would provide a practical and proportionate mechanism for reducing salt intake and support the government's wider salt reduction programme, while ensuring consistency across public sector settings.

References:

1. Office for Health Improvement and Disparities. National Diet and Nutrition Survey 2019 to 2023: report, 2025. <https://www.gov.uk/government/statistics/national-diet-and-nutrition-survey-2019-to-2023/national-diet-and-nutrition-survey-2019-to-2023-report>
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3. NHS, accessed 28 May 2026, Meat in Your Diet, <https://www.nhs.uk/live-well/eat-well/food-types/meat-nutrition/>
4. Department for Environment, Food and Rural Affairs. School milk subsidy scheme. <https://www.gov.uk/guidance/school-milk-subsidy-scheme>
5. Department for Environment, Food and Rural Affairs. Government Buying Standard for Food and Catering Services. <https://www.gov.uk/government/publications/sustainable-procurement-the-gbs-for-food-and-catering-services/government-buying-standard-for-food-and-catering-services>

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

Processed meat should not be permitted at breakfast in school settings. Processed meat products are typically high in salt and saturated fat and would be inconsistent with the purpose of breakfast standards as a healthy start to the school day. Breakfast presents an important opportunity to establish healthy eating habits early in the day. They should provide protein and improve satiety through more appropriate options such as eggs, baked beans, pulses, plain yoghurt, milk, fortified unsweetened plant-based drinks, higher-fibre lower salt breads and low sugar cereals.

This position is consistent with the wider direction of the proposed standards, which restrict processed meat and foods high in fat, salt and sugar across the school day. Public health guidance recommends limiting processed meat consumption due to its association with adverse health outcomes [1-4]. The World Cancer Research Fund recommends eating 'very little, if any' processed meat given its strong association with bowel cancer, with no safe level of consumption established [5]. The World Health

Organisations' International Agency for Research on Cancer (IARC) classifies processed meat as carcinogenic, and Cancer Research UK estimates it causes 13% of new bowel cancer cases in the UK annually.

As noted above, children eat proportionately more processed meat than adults, with over a third (36%) of meat consumption deriving from processed meat [6]. Because processed meats are also high in salt, and contribute significantly to children's salt intakes, their removal from school breakfast provisions would have meaningful public health benefits. Children aged 4-6 should consume no more than 3g salt per day, and 7-10-year-olds should eat no more than 5g/day [7]; research in South London found that 66% of 5-6-year-olds and 73% of 8-17-year-olds had a salt intake above their age-specific maximum [8]. Excess salt intake raises blood pressure, even in children [9], with well-established links to increased risk of heart attacks and stroke later in life. Establishing good eating habits early, including lower salt intake, is therefore important, as taste preferences for salt are formed and reinforced from an early age [10].

Overall, not permitting processed meat is a proportionate and evidence-based approach that supports both short and long-term health outcomes

References

1. Salter, A. M. (2018). 'The effects of meat consumption on global health', *Revue Scientifique et Technique*, 37(1), pp. 47-55. Available at: <https://pubmed.ncbi.nlm.nih.gov/30209430/>
2. World Cancer Research Fund. (2024). Meat and cancer. Available at: <https://www.wcrf.org/preventing-cancer/topics/meat-and-cancer/#processed-meat-and-cancer>
3. NHS. (2023) Processed Food. Available at: <https://www.nhs.uk/live-well/eat-well/how-to-eat-a-balanced-diet/what-are-processed-foods/>
4. Cancer Research UK (2025). Does processed and red meat cause cancer? Available at: <https://www.cancerresearchuk.org/about-cancer/causes-of-cancer/diet-and-cancer/does-processed-and-red-meat-cause-cancer>
5. World Cancer Research Fund. (2024). Meat and cancer. Available at: <https://www.wcrf.org/preventing-cancer/topics/meat-and-cancer/#processed-meat-and-cancer>
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12. To what extent do you agree that honey should not be permitted?

Strongly agree

We strongly agree. Honey is a source of free sugars and has similar impacts on health to other added sugars such as syrups and table sugar. The aim of breakfast standards should be to reduce children's exposure to sweetened foods and drinks, not simply to replace refined sugar with other free-sugar ingredients.

Children's average free sugars intake remains around double the recommended maximum [1], and high intakes are associated with an increased risk of dental caries and excess energy intake, particularly in children [2,3]. Allowing honey while limiting other sources of free sugars would create inconsistency, potentially causing confusion for providers and undermining the intent of the standards. Where sweetness is needed, fruit is the appropriate alternative

References

1. Office for Health Improvement and Disparities. National Diet and Nutrition Survey 2019 to 2023: report, 2025. <https://www.gov.uk/government/statistics/national-diet-and-nutrition-survey-2019-to-2023/national-diet-and-nutrition-survey-2019-to-2023-report>
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3. Gibson, S., Francis, L., Newens, K. and Livingstone, B., 2016. Associations between free sugars and nutrient intakes among children and adolescents in the UK. *British Journal of Nutrition*, 116(7), pp.1265-1274.

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

Strongly agree

We strongly agree with separate standards for breakfast, provided they sit within a coherent whole-school-day framework. Breakfast may be provided by different staff or caterers from lunch, so separate standards will make expectations clearer and easier to implement and will support monitoring and compliance without the need to cross-reference with lunch standards. However, the structure must not create gaps between breakfast, breaktime, lunch, grab-and-go, meal deals, vending or after-school provision.

Children's dietary patterns are shaped by their overall school food environment. Consistent standards across the entire school day reinforce healthy eating habits and avoid mixed messages. A whole-school-day approach also reflects how children eat in practice: food and drinks consumed across the day contribute cumulatively to energy and nutrient intake. The standards should make clear that children should encounter the same nutritional direction across the whole school day: more fibre, fruit, vegetables and pulses; fewer sweetened foods and drinks; lower salt; and fewer foods high in fat, sugar

and salt. In secondary schools, this means compliance should apply consistently across all outlets and service models, not only the main lunch counter.

We urge the government to close the exemption to food provided at parties, celebrations, fundraising events and school trips, as 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 the government's 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 as rewards or incentives for students in either primary or secondary schools.

Evidence from the School Food Matters Nourish Programme found that exemptions for rewards, celebrations and parties created genuine practical barriers to developing a consistent whole-school food culture [1]. Sweets and cakes were routinely used as classroom rewards and for birthdays, directly undermining wider food transformation work. Nourish supported schools to move away from these approaches (for example by replacing cake sales with alternatives such as homemade popcorn bags), demonstrating that healthier approaches are both achievable and positively received.

References

1. School Food Matters (2026) Evaluation of the Nourish Programme. London: School Food Matters. Available at: <https://www.schoolfoodmatters.org/sites/default/files/2026-01/N-report-DIGITAL.pdf>

Increasing fibre: starchy foods, fruit and vegetables

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

Strongly agree

We strongly agree with the proposed changes to the fibre requirements for starchy foods. Data from the latest National Diet and Nutrition Survey (NDNS 2019-2023) [1] shows that fibre intake remains too low: mean fibre intake was 14.5g/day for children aged 4-10 and 15.4g/day for those aged 11-18, against recommendations of 20g/day and 25g/day respectively. Only 14% of children aged 4-10 and 4% of those aged 11-18 met the recommendation for their age group.

The requirements for bread to be a source of fibre and for at least 50% of pasta and rice to be brown, wholewheat or higher-fibre options are welcome. However, the wording is ambiguous - it is unclear whether 50% refers to 50% of menu items, 50% of days served, or a 50/50 mix within the same meal. This should be clarified.

We also agree that all bread should be a source of fibre but recommend that the fibre minimum for bread align with thresholds found in 50/50 varieties, suggesting a minimum of 4.2-4.7g/100 rather than the 3g/100g proposed. At 3g/100g, some white breads would still qualify for example, Tesco's medium sliced white bread contains exactly 3g/100g of fibre [2], and ASDA Just Essentials white is 3.2g/100g [3]. A higher threshold would close this loophole and ensure a meaningful shift.

Importantly, bread quality should also not be defined by fibre content alone. Bread, wraps, baguettes, sandwiches, pizza bases and other cereal products are high-volume school foods, including in grab-and-go provision. Procurement specifications should also require these products meet relevant government salt reduction targets [4] or be specified as lower-salt options. We agree that starchy foods cooked using fat or oil (including during manufacture) should be limited to no more than two meal occasions each week and only when they form part of a meal. Saturated fat intake among children of all income levels exceeds the recommended daily maximum of 10% of energy, with an average intake of 13.1%[5], and high saturated fat intake is linked to increased risk of heart disease, stroke and certain cancers later in life[6].

References

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4. Public Health England. Salt reduction targets for 2024, 2020. <https://www.gov.uk/government/publications/salt-reduction-targets-for-2024>
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6. NHS (2026) How to get more fibre into your diet. Available at: <https://www.nhs.uk/live-well/eat-well/digestive-health/how-to-get-more-fibre-into-your-diet/>

Fruit and vegetables

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?

Strongly agree

We strongly support this requirement. Grab-and-go provision is particularly important in secondary schools, where limited lunch breaks and space can drive food choices. Requiring vegetables or salad with all grab-and-go main meals will help ensure that these meals are not nutritionally weaker than plated meals.

We recommend amending the requirement to a minimum of two servings of vegetables as an accompaniment or as part of the main meal, for both main meals and grab-and-go options. An increase to one portion in grab-and-go should be introduced from 2026 to avoid any delays, with a phased

increase to two portions thereafter. NDNS data shows that on average, children in the UK aged 11-18 years consume on average 2.8 portions of fruit and vegetables a day, and fewer than 1 in 10 (9%) meet the '5 A Day' recommendation. Parents support including more vegetables in school meals, with 75% saying they support the proposed increase in a recent poll conducted by Survation on behalf of Sustain[1].

Implementation should avoid tokenistic portions. Guidance should make clear that vegetables or salad should be visible, meaningful and built into default meal-deal and grab-and-go options, not used as a small garnish. Schools and caterers should be supported with attractive, culturally varied and practical options such as salad boxes, vegetable sticks with dips, roasted vegetables, bean salads, slaws, vegetable fillings, soups, hummus and pulse-based sides, and for vegetables to be a key component of the dish itself, for example in a pasta sauce, soup, dahl, stew or curry. This should align with existing early primary provision such as the School Fruit and Vegetable Scheme [2], so that fruit and vegetables are normalised across the school day rather than treated as an add-on.

Increase vegetable provision should sit alongside wider considerations, including adequate lunch times, improving the canteen environment, and practical support for caterers around menu development and pupil engagement. Evidence suggests that busy, noisy dining halls can discourage students from choosing a main meal, whilst grab-and-go options allow students to maximise their social time outdoors with friends [3]. Healthier items are often less prominent in canteen layouts, while visually appealing, high-calorie snacks are placed in high-traffic areas, for example at the till [4].

The government should encourage school food governors to work collaboratively with school caterers and students to promote healthy innovation within the grab-and-go offer. We would like to see guidance for schools to ensure that healthy options are never more expensive than less healthy alternatives. The government should also encourage schools to review lunchtime design, including ensuring sufficient time for all year groups, staggered lunch periods where possible, and policies that do not disadvantage students who choose to sit down for a main meal (such as restrictions on taking hot food outside).

References

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2. UK Parliament. School Fruit and Vegetable Scheme: Pre-school Education, HL13854, answered 5 February 2026. <https://questions-statements.parliament.uk/written-questions/detail/2026-01-22/hl13854>
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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?

Strongly agree

We strongly agree. This is a practical and proportionate measure to normalise whole fruit and less sweet desserts, reinforce healthier dietary norms and contribute meaningfully to reducing free sugars consumption and increasing fibre in primary school children. It should be made explicitly clear that this is a minimum requirement, not a cap, and the wording should encourage schools to offer fruit-only dessert days more frequently than once a week .

Effective implementation will depend on variety and presentation. Offering a rotating selection of seasonal fruits, presented appealingly (for example as fresh fruit salads or attractively displayed whole fruit) will be essential for maintaining pupil engagement and ensuring the proposal achieves its intended nutritional benefit rather than resulting in food waste. Schools should be encouraged to involve pupils in choosing which fruits are offered, supporting both uptake and the broader goal of developing positive relationships with fruit and vegetables from an early age.

The consultation should also consider whether an equivalent requirement could be extended to secondary schools. A fruit-only dessert day is practical in secondary settings, particularly given grab-and-go provision and greater pupil choice. Secondary schools should be expected to demonstrate strong sugar reduction and a prominent fruit component across desserts, snacks, drinks, meal deals and other food served throughout the school day.

Reducing sugar: healthier drinks

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

Strongly agree

We strongly agree. Drinks served in primary schools should be simple and consistent: free, fresh drinking water; plain semi-skimmed or skimmed milk; lactose-free milk; and suitable plain, unsweetened fortified plant-based drinks. Removing fruit juice, fruit-juice-based combination drinks, sugary drinks and sweetener-containing drinks is well justified.

NDNS data shows that fruit juice and smoothies contribute substantially to children's free sugars intake [1]; a small 150ml serving of fruit juice can provide three-quarters of the daily free sugars maximum for primary-aged children. The proposed approach also aligns with Early Years Foundation Stage (EYFS) guidance, which recommends water and milk and avoids sugar-sweetened drinks, fruit juices, squash and smoothies for young children [2]. Any reduction in micronutrient intake from restricting fruit juice will be offset by the increased provision of fruit and vegetables, which is nutritionally preferable to juice.

Children's drink preferences are largely shaped by what they are routinely offered and if sweetened drinks are consistently unavailable at school, most children will drink water. This is borne out by experience in schools that have already moved to water-only policies. Work by the Greater London

Authority on restricting sugary drinks in primary schools has already demonstrated that this approach is both practical and effective, and that children adapt readily when healthier options are consistently available. An evaluation of the Mayor of London's Water Only Schools initiative, which surveyed over 2,000 schools, found positive attitudes toward water-only policies amongst staff, parents, and students, with schools reporting a tangible shift in children's behaviours and attitudes toward water [3].

Implementation should explicitly align with existing primary and early years provision, including the School Fruit and Vegetable Scheme and school and nursery milk schemes. Clear, proactive communication to parents will be essential, and the government should develop accessible, evidence based messaging resources for schools to use ahead of implementation.

References

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

Disagree

We recommend that the secondary school drinks standards align fully 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 schools ensures that the positive habits and preferences developed during primary school are maintained.

The proposal to allow low-sugar drinks that can contain sweeteners is concerning. It risks maintaining a high preference for sweet-tasting drinks even while reducing sugar content and contradicts the positive position across the rest of the standards to remove non-sugar sweeteners in all food and drink in primary school and food in secondary school. The WHO's 2023 guidance advises against non-sugar sweeteners as a tool for improving health outcomes in children, noting potential undesirable effects from long-term use [1]. The Scientific Advisory Committee on Nutrition (SACN) also recommends limiting non-sugar sweeteners consumption as a long-term goal [2]. Permitting such drinks in secondary schools while restricting them in food is therefore inconsistent.

Government should also 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 by an appropriate inspection body. Despite being a legal requirement, Food Foundation research found that students were unable to access free drinking water easily in their schools due to water fountains being broken or the location of the water fountain not being easily accessible [3].

References

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3. The Food Foundation (2023) A Better Deal for Free School Meals. London: The Food Foundation. Available at: https://foodfoundation.org.uk/sites/default/files/2023-11/TFF_FSM%20Allowance_Report_FINAL.pdf

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

Disagree

We oppose a phased approach for secondary schools drinks standards and recommend full alignment with primary school standards from the outset.

Allowing hot chocolate and flavoured milks in secondary schools during a transitional period undermines other standards that do not permit the use of chocolate or confectionery, removal of honey elsewhere, and alignment in reducing sugar overall. We would therefore strongly advise against this.

Moreover, phased introduction undermines the progress on healthier drink choices and habits for primary school students who will benefit from the new drinks standards in primary schools in 2026, but would then move to the looser, phased standards in secondary schools where such drinks were still allowed in 2027.

The final permitted drinks list for secondary schools should be made consistent with primary school standards, which means removing sweetener-containing drinks. Unless these standards are aligned, phasing simply delays an inadequate outcome rather than delivering a genuinely healthier one. There is a risk that a phased approach becomes a permanent compromise rather than a stepping stone to best practice.

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 align with primary school standards. The nutritional rationale for restricting sugary and sweetener-containing drinks does not weaken with age, and maintaining a more permissive list for older children creates an unjustifiable distinction that is hard to defend on public health grounds. Given that primary school pupils will have had no exposure to sweetener-containing drinks throughout their primary education under these new standards, allowing them at secondary level risks undermining habits built during those primary years.

Aligning the standards with primary schools is likely to have wider benefits on the environment by reducing plastic waste generated by bottled drinks.

Dairy and plant-based options

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

Agree

We agree with updating the standards to recognise plant-based options and to set sugar limits for yoghurts and plant-based yoghurts. The requirement that plant-based drinks should be plain, unsweetened or no sugar and fortified with calcium, iodine, vitamin D, riboflavin and vitamin B12 is important because plant-based drinks are not automatically nutritionally equivalent to cows' milk.

The proposal should be checked against SACN-COT advice on plant-based drinks, which recommends fortification with vitamin A as well as riboflavin, vitamin B12, calcium, iodine and vitamin D [1]. The omission of vitamin A should be reviewed and manufacturers encouraged to routinely fortify with vitamin A. Soya and oat are understandable choices for primary schools: soya generally offers a stronger protein profile, while oat provides a widely available non-soya option. Rice drinks should remain excluded from primary schools because of arsenic concerns for younger children, and rice drinks in secondary schools should not be presented as nutritionally equivalent to cows' milk [2].

The inclusion of plant-based alternatives alongside dairy is a positive step, as it supports pupils with different dietary needs and preferences, including those who are lactose intolerant, vegan, or from cultural backgrounds where dairy consumption is lower. Pea-based drinks also deserve consideration where they are plain, unsweetened, appropriately fortified and suitable for school allergen and medical-diet systems. A criteria-based approach for plant-based drinks, with standard nutritional profiles, would be more future-proof than a fixed list, allowing nutritionally suitable products while excluding poorly fortified, sweetened or nutritionally weak products.

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

References

1. Scientific Advisory Committee on Nutrition and Committee on Toxicity. Assessment of the health benefits and risks of consuming plant-based drinks: summary, 2025.
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<https://www.food.gov.uk/business-guidance/allergen-guidance-for-food-businesses>

Restricting foods higher in fat, sugar and salt

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

Strongly agree

We strongly agree with restricting foods high in fat, sugar and salt (HFSS). The proposed removal of deep-fried foods, tighter limits on processed meat, coated items, savoury snacks, confectionery, sweetened baked products, condiments and spreads is consistent with the need to improve children's diets. Current dietary data shows children are exceeding their saturated fat, salt and sugars recommendations, significantly increasing their lifetime risk of cardiovascular disease, type 2 diabetes and obesity.

Less than 1 in 10 children (9%) meet the recommendation that no more than 5% of energy comes from free sugars, with average intake at 10.5% of energy for children. Only 16% of children meet the saturated fat recommendation of no more than 10% daily energy [1]. Salt intakes similarly exceed age-specific limits in many children, with knock-on effects on their blood pressure [2].

The restrictions must apply across the whole school food environment, not only to the main meal or hot lunch counter. This is particularly important in secondary schools, where pupils may choose from grab-and-go counters, meal deals, vending, tuck shops and breaktime provision, as well as from the main lunch service. If healthier options are available only in one part of the school, while less healthy items remain more visible, convenient or affordable elsewhere, the intended impact of the standards may be weakened. Evidence from schools across England indicates that foods high in fat, sugar, and salt are regularly available in canteens. Observations have identified the sale of packaged crisps and confectionery products from well-known brands while menu analysis and testimony from young people indicates that fried products, processed meats and cheese-based products are served frequently [3-5]. Because these types of items are often sold both at breaktime and lunchtime on the same day, the standards should additionally specify that when, for example, a batter coated or breadcrumb coated item is sold at breaktime and resold at lunchtime on the same day, this should count as being sold twice in one week.

Strengthening these restrictions is important, but the impact will heavily depend on consistent monitoring and enforcement. We would like to see guidance for schools to ensure that healthy options are never more expensive than less healthy alternatives: testimony from secondary school students suggests that healthier options, particularly fruit, are often more expensive than cakes, cookies or sugary drinks.

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 and sugar. We support increasing plant-based options on school menus, but standards need to ensure that these prioritise whole, minimally processed plant-based options. The nutritional profile of plant-based meat alternatives varies widely, as demonstrated in our earlier research [6]. Food-based standards should be supported by clear procurement specifications and reformulation targets for manufactured and branded products, so that compliance reflects genuine nutritional quality rather than simply meeting a food-category threshold [7,8]. For example, bread should be higher-fibre and lower-salt, yoghurts should meet sugar limits, vegetarian alternatives should not be high in salt or saturated fat, and grab-and-go meal deals should be assessed as a whole offer rather than as separate permitted components. All procured foods should comply with the government's reformulation programmes for salt, sugar and calorie reduction.

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 [9]. We believe a

one-year implementation period would better reflect the government's ambition to create the healthiest generation of children ever.

References

1. Office for Health Improvement and Disparities. National Diet and Nutrition Survey 2019 to 2023: report, 2025. <https://www.gov.uk/government/statistics/national-diet-and-nutrition-survey-2019-to-2023/national-diet-and-nutrition-survey-2019-to-2023-report>
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3. Bite Back (2025). Fuel Us, Don't Fool Us: An investigation into Big Food in schools.
4. Bite Back (2021) Spill the Beans
https://biteback.contentfiles.net/media/documents/Spill_the_Beans_School.pdf
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6. Alessandrini R, Brown MK, Pombo-Rodrigues S, Bhageerutty S, He FJ, MacGregor GA. Nutritional Quality of Plant-Based Meat Products Available in the UK: A Cross-Sectional Survey. *Nutrients*. 2021 Nov 25;13(12):4225. doi: 10.3390/nu13124225. PMID: 34959777; PMCID: PMC8709452.
7. Public Health England. Salt reduction targets for 2024, 2020.
<https://www.gov.uk/government/publications/salt-reduction-targets-for-2024>
8. Department of Health and Social Care. Nutrient profiling model 2018: technical guidance, 2026.
<https://www.gov.uk/government/publications/nutrient-profiling-model-2018/nutrient-profiling-model-2018-technical-guidance>
9. Office for Health Improvement & Disparities (2022), Sugar reduction programme: industry progress 2015 to 2020 <https://www.gov.uk/government/publications/sugar-reduction-programmeindustry-progress-2015-to-2020>

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

Strongly Agree

We agree with restricting the serving of cheese as a main ingredient. Cheese can contribute valuable nutrients, including calcium and protein, but it is also a significant source of saturated fat and salt, and there is a significant variation in the salt content of different types of cheese [1,2]. A limit on cheese-based main dishes is therefore appropriate, particularly where school menus might otherwise rely heavily on pizza, panini, macaroni cheese, cheese-topped dishes or cheese-heavy grab-and-go options. Schools should still offer appropriate dairy or fortified plant-based options, lower-sugar yoghurts, and balanced meals containing vegetables, pulses and higher-fibre starchy foods.

References

1. Office for Health Improvement and Disparities. National Diet and Nutrition Survey 2019 to 2023: report, 2025. <https://www.gov.uk/government/statistics/national-diet-and-nutrition-survey-2019-to-2023/national-diet-and-nutrition-survey-2019-to-2023-report>
2. Action on Salt & Sugar. 2024. The salt content of cheddar and other hard-pressed cheese.
<https://www.actiononsalt.org.uk/salt-surveys/2024/cheese/>

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?

Agree

We agree with a staged restriction in secondary schools, as menus and grab-and-go provision may need more time to adapt. The additional time should be used to develop appealing alternatives, including pulse-based dishes, egg dishes, fish, lean meat/poultry where appropriate, vegetarian options and vegetable-rich fillings all lower in salt. Phasing should not become a reason to delay change indefinitely. The endpoint should be clear and supported by recipe development and procurement guidance for lower-salt and lower-saturated-fat options.

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

Strongly agree

We strongly agree. Primary-school desserts should support healthier eating habits, not provide frequent exposure to sweetened baked products which contribute significantly to children's free sugar intake. Sweet biscuits, cakes and puddings make up 19% of free sugars intake in primary school aged children [1]. The proposals align with the need to reduce free sugars and to normalise fruit as an everyday option. They also fit with EYFS nutrition guidance [2], which advises avoiding foods high in saturated fat, salt and/or sugars and avoiding artificial sweeteners for young children.

References

1. Office for Health Improvement and Disparities. National Diet and Nutrition Survey 2019 to 2023: report, 2025. <https://www.gov.uk/government/statistics/national-diet-and-nutrition-survey-2019-to-2023/national-diet-and-nutrition-survey-2019-to-2023-report>
2. Department for Education. Early Years Foundation Stage nutrition guidance, May 2025. <https://www.gov.uk/government/publications/early-years-foundation-stage-nutrition>

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

Suggested rating/response: Strongly agree

We strongly agree with reducing sweetened baked products and desserts in secondary schools to once per week. Data from the NDNS shows that older children also have high intakes of free sugars with only 5% of secondary school aged children meeting the guidelines [1]. Sweet biscuits, cakes and puddings make up 16% of free sugars intake in secondary school aged children, therefore a greater autonomy of secondary-school food choices makes it especially important that desserts, snacks and grab-and-go options do not undermine the wider standards.

The restriction should apply across the whole secondary-school food environment, including lunch counters, grab-and-go provision, meal deals, vending/tuck shops and after-school provision. Otherwise,

a compliant dessert policy at the main counter could be offset by exposure to sweetened products elsewhere.

References

1. Office for Health Improvement and Disparities. National Diet and Nutrition Survey 2019 to 2023: report, 2025. <https://www.gov.uk/government/statistics/national-diet-and-nutrition-survey-2019-to-2023/national-diet-and-nutrition-survey-2019-to-2023-report>

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

Agree

We agree with staged implementation where this supports recipe development, procurement and pupil engagement. However, the additional year should be treated as an active implementation period, not a delay. Schools should demonstrate progress during the transition by reducing frequency, improving fruit content, removing confectionery and chocolate, and replacing sweetened products with appealing lower-sugar alternatives. The final standard of no more than one sweetened baked product or dessert per week should not be weakened. Government should provide practical recipe support and examples of appealing fruit-based or lower-sugar desserts suitable for secondary-school service models.

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

Strongly agree

We strongly agree. Meal deals are a key part of the secondary-school food environment and can strongly shape pupil choices. Where meal deals include sweetened drinks, desserts, savoury snacks or products high in fat, sugar or salt, they can undermine the wider School Food Standards even where a compliant hot meal is available elsewhere.

Meal deals should make healthier choices the default: water or plain milk/suitable unsweetened fortified plant-based drinks, a main meal or balanced grab-and-go item, and fruit, vegetables or lower-sugar yoghurt rather than confectionery, crisps, sweetened baked products or sweetened drinks. Salt reduction targets for 2024, as included in the GBSF should be used as a backstop for manufactured or branded components, and schools should monitor what pupils are buying through meal deals, not only what is theoretically available [1-3].

References

1. Department of Health and Social Care. Nutrient profiling model 2018: technical guidance, 2026. <https://www.gov.uk/government/publications/nutrient-profiling-model-2018/nutrient-profiling-model-2018-technical-guidance>
2. Public Health England. Salt reduction targets for 2024, 2020. <https://www.gov.uk/government/publications/salt-reduction-targets-for-2024>

3. Department for Environment, Food and Rural Affairs. Government Buying Standard for Food and Catering Services. <https://www.gov.uk/government/publications/sustainable-procurement-the-gbs-for-food-and-catering-services/government-buying-standard-for-food-and-catering-services>

Protein and pulses

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?

Strongly agree

We support requiring pulses within or alongside menu options but consider the proposed minimum of once per week unambitious. Pulses are affordable, familiar in British and global food traditions, flexible across cuisines, nutrient-dense, low in saturated fat, high in fibre and a useful source of plant protein. They can meaningfully improve fibre intake and diversify menus while reducing reliance on processed meat or heavily processed vegetarian alternatives.

Government should consider a stronger expectation, such as pulses on at least two days per week, or one plant-rich main meal day per week. A “Meat Free Monday” model could be one practical route, while schools retain flexibility to reflect cultural preferences, pupil acceptability and menu cycles. Implementation should focus on appealing recipes and gradual familiarisation, such as lentil bolognese, bean chilli, chickpea curry, hummus with vegetable sticks, dhal, mixed bean salads, soups and pulse-enriched sauces.

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

Agree

No open box for additional text on form

We agree with staged implementation for secondary schools where this supports recipe development and pupil acceptability, but the additional time should be used as an active implementation period rather than a delay. Pulses can work very well in secondary provision, including soups, curries, chilli, burritos, salads, pasta sauces and grab-and-go formats, but schools may need recipe development, supplier options and communication with pupils.

Government should ensure provision of recipe templates, case studies, procurement examples and support for culturally diverse pulse-based dishes. Given the fibre gap in children’s diets, the long-term ambition should be higher than once per week, with a clear expectation that pulses become a regular, familiar part of school food rather than an occasional compliance item

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

Agree

We agree with broadening the protein requirement so that meat, poultry or pulses can meet the requirement on three or more days each week. This gives schools flexibility and supports higher-fibre, lower-saturated-fat and potentially more sustainable options. The requirement for vegetarian menu options to feature pulses as the primary protein source on at least three days per week is particularly positive, as current vegetarian school meal options frequently rely heavily on cheese, which is high in salt and saturated fat.

The reclassification of fresh tuna as a non-oily fish brings the standards into alignment with current UK dietary guidelines and is an important correction that improves the accuracy and credibility of the standards.

The standards should also maintain protein quality and micronutrient adequacy, including iron and omega-3 considerations. The restriction on meat alternative products to no more than two portions per week should be accompanied by clear guidance on what this category includes. We welcome guidance that encourages the use of minimally processed plant-based proteins such as pulses, tofu and mycoprotein in preference to highly processed manufactured alternatives, which can be high in salt and saturated fat [1]. Whole-food proteins such as beans, lentils, chickpeas, eggs, fish, lean meat/poultry where served, tofu and other suitable options should be encouraged.

We also recommend that a limit is set on how much red meat can be served per week to no more than twice per week. This limit is due to the links between red meat and several negative health outcomes including cancer and cardiovascular disease [2], as well as the environmental impact of red (and other) meat production, including driving greenhouse gas emissions and biodiversity loss [3]. The independent National Food Strategy recommended a 30% reduction in UK meat consumption by 2032 in order to meet both climate and health goals, and the Climate Change Committee has recommended the UK reduce meat consumption by 25% by 2040 and 35% by 2050 to remain on track to meet climate targets [4].

References

1. Alessandrini R, Brown MK, Pombo-Rodrigues S, Bhageerutti S, He FJ, MacGregor GA. Nutritional Quality of Plant-Based Meat Products Available in the UK: A Cross-Sectional Survey. *Nutrients*. 2021 Nov 25;13(12):4225. doi: 10.3390/nu13124225. PMID: 34959777; PMCID: PMC8709452.
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4. Climate Change Committee (2025) The Seventh Carbon Budget: The UK's path to Net Zero 2038–2042.London: Climate Change Committee. Available at: [https:// www.theccc.org.uk/wp-content/uploads/2025/02/The-Seventh-Carbon-Budget.pdf](https://www.theccc.org.uk/wp-content/uploads/2025/02/The-Seventh-Carbon-Budget.pdf)

Maintained nursery schools and nursery units within primary schools

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?

Agree

No open box for additional text on form

We agree that early years provision should be guided by the EYFS nutrition guidance because it is age-appropriate and covers the specific needs of children aged 0-5, including portion sizes, responsive feeding, safe food preparation, allergens, special diets, communication with parents and menu planning [1]. The guidance is particularly strong on avoiding added salt and sugar for babies and young children, offering water and milk, avoiding sugary drinks and artificial sweeteners, and limiting foods high in saturated fat, salt and/or sugars.

However, if maintained nursery schools and nursery units move to EYFS nutrition guidance only, government should make the legal and compliance position very clear. The EYFS guidance says providers must have regard to it, which may be perceived as weaker than direct school food standards unless accountability expectations are explicit. The change should not reduce the enforceability of healthy, balanced and nutritious provision. Schools, caterers and inspectors should have clear guidance on what evidence of compliance looks like, including menus, recipes, portion sizes, allergen management, communication with parents/carers and use of existing nursery milk provision where relevant.

References

1. Department for Education. Early Years Foundation Stage nutrition guidance, May 2025.
<https://www.gov.uk/government/publications/early-years-foundation-stage-nutrition>

The School Food Standards overall

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

To a great extent

No open box for additional text on form

The proposed changes should improve the nutritional quality of school meals to a great extent, especially by increasing fibre, fruit, vegetables and pulses, reducing free sugars, removing fruit juice, restricting sweetened desserts and snacks, and limiting foods high in fat, salt and sugar.

However, the revised standards represent a missed opportunity to align school food policy with the Government's wider salt reduction programme and public sector procurement standards. While excess intake of free sugars and low fibre consumption are rightly identified as public health concerns, the consultation does not similarly recognise that children consume too much salt, the majority of which

comes from processed, packaged and out-of-home foods. Salt is addressed primarily through broad restrictions on foods high in fat, salt and sugar and limitations on table salt, condiments and spreads, rather than through more comprehensive measures such as procurement standards [1], recipe standards or alignment with the Government's salt reduction programme [2]. This is particularly important given that taste preferences are established early in life and reducing salt intake in childhood can help lower blood pressure and improve long-term cardiovascular health.

The extent of improvement will depend on implementation. The standards will be strongest if supported by procurement specifications aligned with GBSF [1], supplier reformulation, recipe development, training, menu monitoring and practical compliance support. Salt reduction should be treated as a procurement and recipe issue, not only a table salt or condiment issue. The revised standards should also support freshly prepared meals, batch cooking and ingredient-based procurement where feasible, so that schools are not dependent on manufactured products that remain high in salt, saturated fat or free sugars.

References

1. Department for Environment, Food and Rural Affairs. Government Buying Standard for Food and Catering Services. <https://www.gov.uk/government/publications/sustainable-procurement-the-gbs-for-food-and-catering-services/government-buying-standard-for-food-and-catering-services>

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

Likely practical challenges include procurement and supply-chain constraints, costs of compliant products, kitchen capacity, staff training, recipe development, menu redesign, managing pupil acceptability, reducing waste during transition, and adapting secondary-school grab-and-go provision within short lunch breaks and limited dining space. These challenges may be greatest for schools with limited kitchens, outsourced catering contracts or tight food budgets.

Specific challenges may include sourcing lower-salt products; finding compliant yoghurts and plant-based options; increasing pulses beyond token provision; managing allergen and special-diet requirements; ensuring culturally and religiously appropriate menus; communicating changes to pupils and parents; and maintaining take-up while reducing sugar and salt. For early years, settings will also need clarity on how EYFS nutrition guidance interacts with school food requirements and existing nursery/school milk provision.

Communication with parents and pupils will require careful management. Government should provide schools with clear, evidence-based communication resources to explain the rationale for the changes in accessible language, considering common misconceptions, particularly around fruit juice and sweeteners.

Government support should include model menus, recipe templates, procurement specifications, supplier guidance, staff training, menu-cycle nutrient analysis tools, funding or transitional resource where needed, and practical case studies from schools that have successfully improved healthier grab-

and-go options. Without training and implementation support, the schools with least capacity may struggle most, widening rather than reducing inequalities.

Funding for school food needs to be kept under review, particularly for small schools and caterers who do not benefit from economies of scale in the same way that larger schools and caterers do. Funding must be sufficient to support head teachers, business managers and their catering partners.

Compliance with the School Food Standards

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?

Strongly agree

No open box for additional text on form

We strongly agree, provided the role is clearly defined and supported. A named governor or trustee with responsibility for school food could strengthen accountability, keep school food on the governance agenda, and support leadership teams to monitor menus, contracts, pupil experience and compliance.

The role should not be tokenistic. The lead governor should receive basic training or guidance and should review the school food policy, published menus, contract specifications, allergen and medical-diet arrangements, pupil feedback, take-up and waste data, and progress against the updated standards. This should include all food outlets across the school day, not only the main lunch service.

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?

Strongly agree

No open box for additional text on form

We strongly agree. Publishing the school food policy and menus would improve transparency for pupils, parents, governors, trustees and caterers, and would make it easier to identify whether provision is consistent with the standards.

The published policy should cover food provision across the whole school day, including breakfast, lunch, packed lunches, breaktime, vending, tuck shops, grab-and-go, meal deals and after-school provision. It should also include the approach to food education, allergen and special-diet management, cultural and religious inclusion, free water access, use of existing fruit/vegetable and milk schemes where relevant, and how the school monitors compliance. Menus alone are not enough: schools should also hold evidence from recipes, product specifications and purchasing records.

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

Schools could appoint a named senior lead and lead governor for school food; maintain a whole-school food policy; map all food provision across the school day against the standards; review menus termly and report annually on school food activities; build standards into catering contracts and supplier specifications; use cycle menus and standardised recipes; monitor salt, free sugars, saturated fat and fibre; and review take-up, waste and pupil feedback. These structures create formal ownership and establish clear lines of accountability at school level. Schools should also appoint a student School Food Ambassador, responsible for ensuring that pupil feedback on school quality is fed back to school leaders, governors and caterers

Schools should also monitor what is purchased, prepared and served, not only what appears on published menus or approved supplier lists. Evidence should include product specifications, purchase records, recipes, frequency checks for restricted items, and checks across breakfast, breaktime, lunch, grab-and-go counters, meal deals, vending/tuck shops and after-school provision. This is particularly important in secondary schools, where a compliant hot meal could be available in one area while less healthy options dominate elsewhere.

Schools should provide training for cooks, catering managers and lunchtime staff; involve pupils in tasting panels and menu development; communicate changes to parents/carers; ensure allergen and medical-diet procedures are robust; align food education with menu changes; and make water, vegetables, pulses, wholegrains and lower-sugar options visible, attractive and affordable.

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

Government could support compliance by providing clear practical implementation guidance in collaboration with caterers, nutritionists and school food professionals, rather than producing top-down documentation that does not reflect operational realities. They should model whole-school food policies, model procurement specifications, recipe templates, exemplar menus, training materials, supplier guidance and an accessible menu-review or nutrient-analysis tool. Support should be practical and category-specific, particularly for breakfast provision, secondary grab-and-go menus, lower-salt procurement, lower-sugar desserts, plant-based drinks, special diets and early years provision.

Government should also strengthen procurement expectations. School-procured products covered by the 2024 salt reduction programme should meet the relevant maximum target [1]; for the limited categories without a maximum target, the published average target should be used as the procurement maximum. Government should consider aligning the GBSF standards within the School Food Standards and consider moving beyond the current 75% compliance threshold towards full compliance over time, with a phased implementation period if necessary [2].

Template communications for parents and pupils should be provided to support schools in explaining the changes accessibly and consistently, with guidance for schools on how to communicate changes e.g.

including photos of new meals and listing ingredients clearly. Dedicated guidance on managing special dietary requirements, allergies, cultural and religious needs, and SEND-related exceptions is essential to ensure inclusive implementation. All materials should be available in plain English and accessible formats for non-specialist staff.

Compliance should include supportive monitoring rather than relying only on self-assessment. Government could publish checklists, training for governors/trustees, template reporting forms, and guidance on how schools should evidence what is bought, prepared and served. This should include menus, recipes, product specifications, purchasing records and checks across all service points. Government should also consider drawing on good practice from countries where school meals are treated as part of health, education and public food infrastructure, while tailoring implementation to the English school system.

Finally, Government should review lunchtime length and organisation in schools, recognising that the nutritional quality of school food cannot be realised if pupils do not have sufficient time to access and eat a meal. The expansion of free school meals to children from households in receipt of Universal Credit is strongly welcomed but must be accompanied by a clear commitment to quality as well as quantity, ensuring that the increase in uptake does not place unsustainable pressure on catering teams or dilute the standards being introduced.

References

1. Public Health England. Salt reduction targets for 2024, 2020.
<https://www.gov.uk/government/publications/salt-reduction-targets-for-2024>
2. Department for Environment, Food and Rural Affairs. Government Buying Standard for Food and Catering Services. <https://www.gov.uk/government/publications/sustainable-procurement-the-gbs-for-food-and-catering-services/government-buying-standard-for-food-and-catering-services>

Culture, equality and diversity

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

Positive

Overall, the proposals should have a positive impact because they strengthen access to healthier food across the school day, including for children who may rely most heavily on school food. However, implementation must be inclusive and should actively consider disability, special educational needs, allergies, coeliac disease, religious and cultural food requirements, and pupils who need medically modified diets.

Menus should include culturally familiar healthy options, vegetarian and plant-based choices, suitable allergen-safe alternatives, and clear communication with parents/carers. Care is needed to ensure that restrictions on meat alternatives, dairy options, plant-based drinks, nuts, processed products or menu formats do not unintentionally reduce choice for pupils with religious, ethical, allergy-related, medical or

sensory needs. The EYFS guidance [1] is helpful here because it explicitly addresses allergies, intolerances, coeliac disease, food for religious faiths and beliefs, additional support needs and special diets.

Overall, 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. The extension of free school meals and the improvement of nutritional standards together represent a significant equity intervention. Increased fruit and vegetable provision and reduced sugar and saturated fat will benefit all pupils regardless of background but could particularly help address the inequalities in consumption of healthier foods

References

1. Department for Education. Early Years Foundation Stage nutrition guidance, May 2025.
<https://www.gov.uk/government/publications/early-years-foundation-stage-nutrition>

Environmental principles

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

The standards could have positive environmental effects if implemented through more pulses, vegetables, wholegrains, seasonal produce, freshly prepared meals and reduced reliance on processed meat and highly processed products. Pulses are particularly useful because they support fibre intake, provide protein and can diversify menus while reducing reliance on meat sources.

Procurement guidance should help schools use seasonal, sustainable and locally sourced ingredients where affordable and practical. This can support freshness, food education, shorter supply chains and local economies, but local procurement should still meet clear nutrition standards for salt, sugar, saturated fat and fibre. Local is not automatically healthy; it needs to be combined with strong product specifications.

There are also potential risks if implementation increases packaging, single-use portions, food waste, or dependence on imported manufactured products. For example, portion-controlled condiments may support nutrition goals but can increase packaging unless schools use sustainable dispensing systems that also control portion size. Lower-sugar, lower-salt and plant-based products should be procured with attention to nutritional quality, sustainability, affordability and supply resilience.

Realising these environmental benefits will require active intent. The current School Food Standards do not require compliance with GBSF [1], representing a significant missed opportunity. The government has committed to ensuring that at least 50% of public sector food is sourced locally or to high sustainability and environmental standards, and the school food system is critical to achieving this ambition. Enforcing GBSF within school food procurement would ensure that the environmental potential of the new standards is translated into practice, benefiting schools, society and the wider economy while

minimising environmental harm. Government should take this opportunity to make compliance with GBSF a requirement alongside the updated School Food Standards.

References

1. Department for Environment, Food and Rural Affairs. Government Buying Standard for Food and Catering Services. <https://www.gov.uk/government/publications/sustainable-procurement-the-gbs-for-food-and-catering-services/government-buying-standard-for-food-and-catering-services>

Closing question

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

We support the proposed reforms. They are well aligned with the need to improve children's diets by increasing fibre, fruit, vegetables and pulses while reducing free sugars, saturated fat and foods high in fat, salt and sugar. The strongest aspects of the proposals are the focus on whole-school-day provision, healthier breakfast standards, fruit and vegetables, higher-fibre starchy foods, pulses, removal of fruit juice, restrictions on sweetened desserts and snacks, and stronger accountability structures.

We would highlight four areas where the standards should be strengthened. First, sugar reduction should remain central across the whole school day, and the standards should avoid replacing sugar with non-sugar sweeteners as a default solution.

Second, while the consultation identifies low fibre and excess free sugars as concerns, it does not adequately acknowledge that children also consume too much salt, the majority of which comes from processed, packaged and out of home foods. Taste preferences are established early on in life, and high salt intake during childhood contributes to elevated blood pressure and increased cardiovascular risk later on [1, 2, 3]. Reducing population salt intake is one of the simplest and most cost-effective public health interventions available to government [4]. A number of countries have successfully incorporated salt reduction into school food policies [5]. Japan's Standards for the School Lunch Program sets mandatory salt limits for each meal [6], while the United States Department of Agriculture's National School Lunch Program sets average salt limits by age group, with further reductions planned for 2027 [7]. These examples demonstrate that clear, measurable salt standards can be implemented successfully at scale.

Salt reduction within the proposed School Food Standards should therefore be strengthened substantially. While restrictions on table salt, condiments and spreads are welcome, they do not adequately address the primary sources of salt in children's diets [8]. Guidance for caterers should explicitly require alignment with the GBSF, which recognises salt reduction as an important public health objective and aligns with the UK's 2024 salt reduction targets [9,10]. School food represents one of the largest publicly funded food procurement programmes in England and therefore presents a major opportunity to improve children's diets through procurement standards, yet there is no requirement to comply with GBSF. At a minimum, foods procured for schools should meet the latest government salt reduction targets for 2024, particularly for foods that contribute most to children's salt intakes. This

would provide a practical and proportionate mechanism for reducing salt intake and support the government's wider salt reduction programme, while ensuring consistency across public sector settings

Third, the use of salt during food preparation should be restricted. Schools and caterers should instead be supported to enhance flavour through herbs, spices, garlic, citrus, vinegars and other seasonings that do not add to total salt intake. References to adding salt within recipe cards, menu guidance and catering resources should be removed, as they risk reinforcing children's preference for salty foods. Where additional flavour enhancement is considered necessary, lower-sodium alternatives, for example reduced-salt stock, reduced-salt gravy, reduced salt baked beans and ketchups, lower salt breads and sauces, and lower-sodium salt substitutes could be considered as optional tools for caterers and suppliers, complementing rather than replacing a broader approach focused on building children's preferences for less salty foods.

Fourth, HFSS concerns should be addressed through the nutrient profiling model [11], transparent procurement specifications and reduced reliance on highly processed products that are high in salt, saturated fat and free sugars and low in fibre.

The strongest single policy improvement would be to align school-food procurement with current government salt and sugar reduction ambitions, moving beyond a 75% compliance threshold towards full compliance over time, supported by phased implementation where necessary. Pulses should also be more ambitious than once per week over time, because they are affordable, high in fibre, flexible and acceptable across many food traditions. The standards should be supported by a whole-school food culture and explicit food education, so pupils understand why school meals are shifting towards fruit, vegetables, pulses, wholegrains, less sweet drinks and less salty savoury foods.

The consultation's introductory aspirations are welcome, but not all are fully captured by individual food-category questions. The revised standards should therefore be supported by practical implementation measures: training for caterers, school business leaders, governors and procurement teams; model specifications; recipe development support; and guidance on scratch cooking and batch cooking where feasible. The standards should also align with existing schemes such as the School Fruit and Vegetable Scheme and school/nursery milk provision in the early primary years.

Compliance should be assessed across the whole school food environment, not only the main lunch counter. This includes breakfast, mid-morning break, grab-and-go, meal deals, vending/tuck shops and after-school provision. Packed lunches should not be exempted from criteria that ensure a nutritious meal is provided. This helps to maintain a sense of fairness for pupils and supports the healthy eating ambition. Similarly, schools should carefully consider their lunchtime off site policies to limit exposure to poor nutritious choices through food availability in the retail and out of home environment. Schools and caterers should be expected to evidence what is purchased, prepared and served through menus, recipes, product specifications and purchasing records. This would help ensure that healthier standards are delivered in practice rather than existing only as compliant menu options.

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