

School Food Standards consultation – Soil Association submission

The Soil Association is a charity advocating for healthy and sustainable food and farming.

Food for Life Served Here is a Soil Association scheme that provides caterers with a framework for healthy and sustainable food provision. Caterers working with Food for Life are serving freshly prepared and more environmentally sustainable menus which meet national nutrition standards, including the School Food Standards in England. Almost 2 million meals are served each day under the scheme, including in approximately 25% of English primary schools.

Soil Association is a member of the School Food Review – a coalition of forty organisations working across the food system to improve school food in England – and our response is drawn from, and supports, the wider School Food Review position.

Section B: questions on the proposed updates to the School Food Standards

Breakfast and whole school day 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?

SA response = Strongly agree

Follow-on question to all answers: please explain why you answered in this way:

The proposed standards are robust and evidence-based, and their introduction would improve the nutritional quality of breakfasts served in schools. The emphasis on lower sugar options, higher fibre breads, and the inclusion of fruit or vegetables aligns with UK dietary recommendations and will contribute to improved diet quality in children.

We support the proposed restriction of foods high in free sugars (such as chocolate spreads and syrups) and the removal of fried and highly processed items. We also support the proposed exclusion of processed meats from breakfasts, and we welcome the proposed drinks standards that prioritise water, removing fruit juice and fruit-juice-based combination drinks from the list of permitted drinks.

Overall, the standards are well aligned with current nutrition evidence and public health priorities. Attention must be given to successful implementation, ensuring that meals remain appealing, accessible and feasible for schools to deliver.

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

Processed meat should not be permitted to be served at breakfast in school settings.

Breakfast provision in schools presents an important opportunity to establish healthy eating habits. 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 meats also aligns with the wider direction of the standards, which emphasise reducing foods high in salt, saturated fat, and additives.

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

SA response = Agree

Follow-on question to all answers: please explain why you answered in this way:

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

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?

SA response = Agree

Follow-on question to all answers: please explain why you answered in this way

We agree that breakfast should have standalone standards as 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.

Increasing fibre | Starchy foods

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

SA response = Agree

Follow-on question to all answers: please explain why you answered in this way:

We support proposals that increase the amount of fibre in school meals. Children's diets are characteristically ultra-processed and depleted in fibre, with the percentage of age groups not meeting fibre recommendations for 4 to 10 year olds and 11 to 18 year olds being 86% and 96% respectively.

With regards to the detail, the proposal that at least 50% of pasta and rice should be brown, wholegrain, or white varieties with added fibre feels ambiguous – it is unclear if it is 50% of menu items, 50% of days or both served in the same meal. The proposal has the potential to increase fibre intake if loopholes are closed to ensure it leads to increased uptake of these foods. Brown rice contains substantially more fibre than white 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. This would mean mandating a fibre minimum of 4.2-4.7g/100g as opposed to the current 3g/100g suggested in the proposals. This standard should be accompanied by good practice guidance that states a preference for bread that is high in fibre (i.e. 6% or more, as defined by retained Regulation (EC) No 1924/2006) and, ideally, 100% wholemeal.

We agree that starchy foods that are cooked using fat or oil (including during manufacture) should be served on no more than two meal occasions each week and only when they form part of a meal.

We recommend that the restrictions proposed on focaccia and ciabatta are given more nuance. Focaccia is a feasible bread for schools to bake from scratch on site at scale and would be a healthier option than bought ultra-processed bread. We recommended that focaccia is permitted as a bread option where it is cooked on site by schools using 50% wholemeal flour. Ciabatta should also be permitted when not cooked with oil.

Acceptability among pupils will be critical to successfully increasing their fibre intake. For children less familiar with higher fibre starches, taste preferences will need to be developed. Therefore, recipe development and menu consultation with pupils will be required.

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?

SA response = Strongly agree

Follow-on question to all answers: please explain why you answered this way:

We strongly support the proposal to include a portion of vegetables and/or salad with all grab-and-go main meals as a practical step to improve their nutritional quality.

However, we recommend additional incentives or requirements for both main meals and grab-and-go options to include at least two servings of vegetables, either as an accompaniment or as part of the main meal. Practical advice for caterers will be needed, particularly in grab-and-go options, to ensure uptake and minimise waste.

An increase in vegetable provision also needs to 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 the school canteen environment often influences students to purchase grab-and-go: busy, noisy dining halls discourage students from selecting the main meal, whilst grab-and-go options allow students to maximise their social time outdoors with friends. Canteen layouts mean healthier items are often less prominent, whilst visually appealing, high-calorie snacks are placed in high-traffic areas, for example at the till.

Students cite long lunch queues, short lunchtimes, and the desire to participate in activities such as clubs and sport, as reasons to opt for quick, portable snacks. The restrictive length of lunch breaks is a concern shared by caterers. The preference would be to provide a sit down meal, as shorter lunch breaks are associated with less healthy options, and we would urge that steps are taken to make it easier for pupils to take up the sit down meal, including guidance on managing lunch breaks and sharing good practice of schools implementing communal dining options. Guidance on longer lunch breaks would support the recommendation of increasing vegetable portions, by allowing students more time to eat it, even when they opt for grab-and-go.

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, as part of a whole school approach to good food provision. 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).

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?

SA response = Strongly agree

Follow-on question to all answers: please explain why you answered this way:

This proposal is strongly supported as a practical and proportionate measure to reinforce healthier dietary norms and contribute meaningfully to reducing free sugars intake and increasing fibre consumption among primary-aged pupils.

To be effective in practice, implementation guidance should emphasise the importance of variety and presentation. Offering a rotating selection of seasonal fruits and presenting them appealingly (for example as fresh fruit salads or attractively displayed whole fruit) will be essential to maintaining pupil engagement and ensuring the proposal achieves its intended nutritional benefit rather than resulting in uneaten food. 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.

We urge the government to incorporate into guidance for schools that they should specify that 50% of fruit should be sourced from sustainable British producers in their procurement tenders. This is in line with the government's ambitions that 50% of all public sector food be local or produced to high environmental standards, and would build on the precedent set by Food for Life Served Here in driving greater local and British food sourcing in schools.

Reducing sugar | Healthier drinks

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

SA response = Strongly agree

Follow-on question to all answers: please explain why you answered this way:

Restricting the permitted drinks list in primary schools is one of the most potentially impactful proposals in the updated standards. Fruit juice accounts for a significant proportion of free sugars intake in primary-aged children and removing these drinks from the school environment is a straightforward, evidence-based intervention.

Concerns that removing fruit juice will compromise children's micronutrient intake are not well-founded in the context of the proposals as a whole. The proposals to increase fruit and vegetable provision across meals and snacks will more than compensate for any micronutrients previously obtained from juice. Whole foods such as fruit and vegetables deliver those micronutrients without the accompanying free sugars and, therefore, consuming whole fruit is nutritionally preferable to juice. The proposals are likely to have wider benefits, including benefits to the environment by reducing the plastic waste generated by bottled drinks.

Clear and proactive communication to parents will be essential. Fruit juice is widely perceived as a healthy choice, as 150ml of fruit juice does count towards your 5 a day under NHS guidance. However, fruit juice contains high quantities of free sugars, with some fruit juice drinks currently sold in schools containing more than half the maximum recommended daily free sugar intake. Government and schools will need to provide

accessible, evidence-based messaging to explain the reasoning behind this change and manage the pushback that is likely to follow. Resources and template communications to support schools in having these conversations with families should be developed and made available ahead of implementation.

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

SA response = Disagree

Follow-on question to all answers: please explain why you answered this way:

We recommend that the secondary school drinks standards should 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 schools will ensure 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 given the evidence of low compliance with current drinks standards. It also contradicts the positive position across the rest of the standards to remove non-sugar sweeteners in all food and drink in primary school and from food in secondary school (and a prohibition on sweeteners is already a requirement under Food for Life Served Here). The WHO's 2023 guidance advises against sweeteners as a tool for improving health outcomes in children, noting potential undesirable effects from long-term use. SACN also recommends a long-term goal should be to limit non-sugar sweeteners consumption. This is recognised in the proposals regarding food and therefore, permitting drinks containing non-sugar sweeteners in secondary schools is inconsistent and unhelpful.

Government should also ensure that restrictions on permitted drinks should be backed by funding for water fountain installation and maintenance, and that access to free drinking water is subject to external monitoring by an appropriate inspection body.

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

SA response = Disagree

Follow-on question to all answers: please explain why you answered this way:

We strongly oppose phasing of the healthier drinks standards in secondary schools and recommended that the standards introduced for drinks in secondary schools fully align with the primary school standards.

Allowing hot chocolate and flavoured milks in secondary schools during a phasing-in period undermines other standards that do not permit use of chocolate or confectionery, removal of honey elsewhere, and alignment in reducing sugar overall. We would therefore 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 ultimately align with primary standards. 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.

Dairy and plant-based options

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

SFR response = Agree

Follow-on question to all answers: please explain why you answered in this way:

We broadly agree with the proposed changes.

Maintaining a requirement for daily milk provision ensures that pupils continue to have access to a reliable source of essential nutrients, while allowing flexibility through plant-based drinks provides schools with greater inclusivity, supporting pupils with different dietary needs and preferences, including those who are lactose intolerant, vegan, or from cultural backgrounds where dairy consumption is lower. (Though we note that plant-based drinks will not provide the same nutritional 'package' as dairy milk, so the two should not be seen as directly equivalent.)

Reducing foods higher in fat, sugar and salt

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?

SA response = Agree

Follow-on question to all answers: please explain why you answered in this way:

The proposed restrictions are well-evidenced and long overdue. Current dietary data shows children are consuming far more saturated fat and sugar than recommended. Limiting deep-fried foods, processed meats, batter-coated items and pastry-based products aligns directly with SACN guidance and will meaningfully reduce exposure to these nutrients during a critical period of dietary habit formation.

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. Because these types of items are often sold both at breaktime and lunchtime on the same day, the standards should specify that when, for example, a batter coated or breadcrumb item is sold at breaktime and 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. Evidence shows secondary schools struggle to implement and monitor compliance with the current school food standards, with the greatest challenges relating to restrictions on food and drink high in fat, salt and sugar. We would also 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 broadly support increasing plant-based options on school menus (see response to question 31 below), but standards need to ensure that these prioritise whole, minimally processed plant foods. The nutritional profile of plant-based meat alternatives varies widely. We urge OHID and DfE to consider how to categorise the HFSS plant-based products included in this restriction, taking into account both their nutritional composition and product category, and what is practical and implementable for caterers.

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

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

SA response = Agree

Follow-on question to all answers: please explain why you answered in this way:

Limiting cheese as a main ingredient to no more than two days per week is a proportionate and practical measure. It still allows cheese to feature as a topping or accompaniment, preserving flexibility for caterers, while also encouraging protein diversification.

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?

SA response = Agree

Follow-on question to all answers: please explain why you answered in this way:

The phased approach for secondary schools (three portions per week from September 2027, reducing to two from September 2028) gives caterers adequate time to develop appealing alternatives without disrupting service, while still delivering the nutritional benefit of change within a clear timeframe.

Reducing desserts

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

SA response = Strongly agree

Follow-on question to all answers: please explain why you answered in this way:

Limiting sweetened baked goods and desserts to once per week in primary schools is strongly supported by the evidence on free sugars intake in children. Primary-aged children are at a crucial 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.

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 and fruit and yogurt only policies, where supported by children, parents and staff, should be encouraged.

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

SA response = Strongly agree

Limiting sweetened baked goods and desserts to once per week in secondary schools is strongly supported by the evidence on free sugars intake in children.

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

SA response = Neither agree nor disagree

Follow-on question to all answers: please explain why you answered in this way:

The phased implementation (two portions per week from September 2027, reducing to one from September 2028) is a reasonable concession to the operational realities of secondary school catering. It avoids a cliff-edge change while maintaining a clear trajectory toward the healthier standard. From a behaviour change perspective, gradual reformulation also tends to be better tolerated by pupils, reducing the risk of disengagement from school meal provision. However, from a public health perspective making this change faster would be advisable.

Meal deals

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

SA response = Strongly agree

Follow-on question to all answers: please explain why you answered this way:

Requiring meal deals to include at least one portion of vegetables or salad and one portion of fruit, while excluding drinks, is an improvement on current practice. This proposal ensures that the convenience and affordability of a meal deal works in favour of nutritional quality rather than against it.

The exclusion of drinks from the meal deals also means that children will not have to waste money on drinks, but it is critical that free water is available and accessible to children. This is not always the case in schools currently, despite being a legal requirement. This issue will need to be addressed particularly to ensure that children on Free School Meals, who are often reliant on meal deals, are not disadvantaged.

Evidence shows that in order to be able to afford a main course, sweet item and a drink, many students on Free School Meals have to get a meal deal. Although individual salads or pots of fruit were sometimes available in the schools researched, they were not included as part of the meal deal, and with the Free School Meals allowance, it wasn't possible to buy them in addition to the meal deal. This is a way in which the Free School Meals allowance may be restricting access to healthy options for students under the current Standards.

Successful implementation will depend on ensuring that meal deals are appealing, with meaningful involvement from pupils.

Protein changes | 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?

SA response = Strongly agree

Follow-on question to all answers: please explain why you answered this way:

Requiring pulses to be included within or alongside all main menu options at least once a week is an excellent proposal with strong nutritional and environmental 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 to them at home, supporting longer-term healthy and sustainable eating habits.

Beans and pulses can be successfully introduced onto school menus in a variety of ways, including in popular dishes by blending into sauces, supported by engagement with the staff and students to ensure acceptability and confidence.

In addition to the nutritional benefits, normalising pulse consumption can contribute to a wider dietary shift away from industrial meat, supporting children to enjoy a diet that includes 'less and better' meat and 'more and better' plants. We strongly suggest that procurement policy should be levered in tandem to ensure that the any meat served is British and higher welfare, with an overall target for organic procurement introduced alongside the School Food Standards.

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

SA response = Agree

The phased implementation for secondary schools (requiring pulse inclusion every two weeks from September 2027, increasing to weekly from September 2028) is a sensible approach.

Secondary school menus, particularly grab-and-go offerings, present greater recipe development challenges than primary school provision, concerns which have been raised by caterers. A transitional period therefore allows catering teams adequate time for training and support to implement these changes, and to formulate, trial and embed dishes that incorporate pulses in ways that are nutritionally effective and acceptable to older pupils.

This reduces the risk of both food waste and disengagement from school meal provision during the changeover. The integrity of the ultimate requirement of weekly pulse inclusion across all menu options is not compromised by this approach, provided the phasing is treated as a firm transitional measure.

Protein

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

SA response = Strongly agree

Follow-on question to all answers: please explain why you answered this way:

The proposed updates to protein requirements represent a well-evidenced and timely modernisation of the standards. Expanding the qualifying protein sources to include pulses alongside meat and poultry has the potential to enhance nutritional quality as well as menu flexibility. Pulses are high in fibre and essential nutrients, making them a nutritionally superior complement to sustainable meat-based proteins in the context of children's overall dietary patterns.

The requirement for vegetarian menu options to feature pulses as the primary protein source on at least three days per week is particularly positive, though caterers may need support with menu development and innovation. Current vegetarian school meal options frequently rely heavily on cheese. This proposal directly addresses that imbalance and strengthens the nutritional integrity of the vegetarian offer.

Increasing beans and pulses on menus can also be cost-effective. Analysis undertaken in 2024 by the Food Foundation found that beans cost on average 2.6 times less per

100g than meat and 4.5 times less per 100g than other plant-based alternatives. Standards should ensure that plant-based meals are as affordable as the meat option. Procurement policy should encourage caterers to use cost savings to 'trade up' to higher welfare and organic meat.

The reclassification of fresh tuna as a non-oily fish brings the standards into alignment with current UK dietary guidelines, reflecting the fact that fresh tuna does not contain levels of long-chain omega-3 fatty acids comparable with oily fish such as salmon and mackerel. This is an important correction that improves the accuracy and credibility of the standards.

The restriction on meat alternative products (marketed as such) 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 less highly processed plant-based proteins such as pulses, tofu and mycoprotein in preference to ultra-processed manufactured products. However, we suggest that the list of exemptions should also include tempeh and seitan.

We recommend that the standards on protein go further and require that a plant-based protein be served every day, provided that these are minimally processed and not-HFSS (and therefore falling into the restrictions for HFSS foods, see response to question 22). This plant-based option could include pulses (already mandated three times a week as a vegetarian option). As well as supporting environmental goals, a daily plant-based option supports cultural and religious inclusivity. Ensuring the nutritional quality of plant-based options would be critical. Priority should be given to whole foods such as pulses and beans.

Clarification is needed on the restriction to a maximum two servings a week of plant-based alternatives marketed as meat alternatives that are 'homemade'. Where whole food ingredients (e.g. beans, pulses, vegetables, grains) are used and these are cooked from scratch on site by caterers e.g. homemade vegetarian burgers or sausages, these should be permitted without restrictions.

Schedule 5 - nurseries

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?

SA response = Agree

Overall question

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

SA 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.

Standards alone are insufficient to drive lasting change. Updated standards must be accompanied by practical tools (including menu audits, simple templates and clear guidance) and compliance must be externally monitored rather than left to self-assessment alone. Government should encourage take-up of third party schemes that can support with implementation and can help verify compliance, such as Food for Life Served Here, which is already widely established.

Section C: practical considerations

Implementing new standards

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

Lunchtime logistics present a significant structural barrier. Many schools, particularly secondary schools, have insufficient time allocated to lunch and inadequate capacity to manage queuing efficiently. If pupils cannot access a meal within the time available, the nutritional quality of what is on offer becomes irrelevant. The length of lunch breaks is a concern shared by caterers and parents. Implementation of the standards must be accompanied by broader consideration of how lunchtime is organised, including queue management, service point design and the length of the lunch break itself.

Practical guidance will be critical. Schools and caterers will need detailed, accessible support on how to meet the new requirements in practice including recipe ideas, menu planning tools, procurement advice and guidance on interpreting the standards in ambiguous situations. Without this, there is a significant risk of inconsistent implementation across settings.

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, taking into account common misconceptions, particularly around fruit juice and sweeteners.

Pupil involvement in menu design is essential to maintaining and growing school meal uptake. Young people are more likely to accept and enjoy new menu items if they have had a meaningful role in shaping them. Schools should be actively encouraged and supported to co-design menus with pupils, particularly when introducing less familiar ingredients such as pulses and wholegrains. Activities such as hosting tasting sessions when introducing new menu items should be deployed.

Special dietary requirements will need careful handling. Clear guidance is needed on how schools should apply the standards for pupils with allergies, intolerances, medical conditions, SEND needs, and those from cultural or religious backgrounds with specific dietary requirements. The standards must be implemented in a way that is genuinely inclusive and does not inadvertently disadvantage or exclude any group of pupils.

Maintaining meal uptake must be treated as a priority throughout implementation, as a drop in uptake is a concern shared across the school food sector, including by caterers. The nutritional benefits of the new standards will only be realised if pupils are actually eating school meals. Poorly managed transitions risk alienating pupils and driving them toward less regulated food options outside school. Implementation support should therefore include guidance on how to introduce changes gradually and palatably, and how to monitor and respond to changes in uptake.

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. Research has identified a gap of 63p per meal between the true cost of delivering a nutritious, sustainable school lunch (£3.16) and the funding available at the time of the study (£2.53).

Research with secondary schools also highlights that successful implementation depends on gradual change, meaningful student engagement and strong catering team involvement. These are practical implementation challenges that require time, capacity and support, rather than a compliance-only approach.

Compliance

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?

SA response = Strongly agree

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?

SA response = Strongly agree

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 to achieve this.

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. 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.

External verification is essential to ensure governance structures are taken seriously rather than treated as a paperwork exercise. 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 the importance of combining self-assessment with external support. When schools were expected to lead their own audits without additional support, progress was slower and staff reported feeling overwhelmed. The most effective approach combined practical tools (including menu audits, templates and clear guidance) with external support and shared ownership across staff teams, helping schools sustain improvements over time rather than treating compliance as a one-off exercise.

Compliance checking addresses the separate, but important, question of whether the standards are actually being met in what children are served day to day. A national school food audit scheme should be introduced, delivered through Environmental Health Officers, providing independent verification across all settings.

Accreditation and support are also essential to ensure that when gaps are identified, schools have the resources and knowledge to address them. Schools should be encouraged or required to use a recognised quality assurance scheme, such as Food for Life Served Here. School Food Improvement Officers should also be introduced in every local authority to provide hands-on support, and mandatory training should be introduced across the whole school food workforce. Without these support mechanisms, accountability and compliance risk becoming punitive rather than genuinely effective.

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

Guidance and resources: Government should develop 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. This should include recipe banks and menu planning tools specifically aligned to the new standards, making it as straightforward as possible for catering teams to build compliant menus without requiring specialist nutritional expertise. 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.

Funding: Adequate and sustained funding is a prerequisite for successful implementation. It is important to note that better food does not always mean higher costs: improvements in procurement, skills and menu design can deliver quality within existing budgets, and many caterers are already demonstrating this. However, funding must be sufficient to make implementation realistic.

Government should consider funding for kitchen upgrades and equipment including maintenance of drinking water infrastructure. Particularly, targeted support should be made available for small schools, which disproportionately lack the economies of scale and in-house capacity available to larger settings and multi-academy trusts. Regardless of the update to the Standards, the current school meals funding model should be streamlined to ensure the money in the system is most effectively distributed, and per-meal funding must be linked to inflation to ensure it remains realistic over time.

Training and workforce: Training should be made available for both catering staff and lead governors for school food. Governors in particular will need practical support to understand the standards and fulfil their accountability role meaningfully. Chefs and caterers should have access to continuing professional development that builds skills around the new requirements, including wholegrain cookery, pulse-based dishes and lower-sugar menu design.

Engagement: Young people should be meaningfully involved in the national rollout of the new standards, including in the development of guidance materials and communications. Schools that are already delivering high quality, nutritious food should be identified and supported to share their approaches, with government facilitating

networks and platforms for peer learning and best practice exchange. Government also need to ensure effective communication with parents, and provide guidance to schools on how to communicate the new proposals and their benefits to parents. Recent polling conducted on behalf of Sustain found that 45% of parents were not aware of the School Food Standards at all and until the polling 50% did were not aware of the consultation on the new proposals [2]. This suggests that currently communications around School Food Standards are failing to reach parents and need to be improved.

Structural: 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.

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?

Socio-economic background: 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.

Cultural inclusivity: Schools will need clear guidance on how to ensure compliant menus remain culturally inclusive. The increased emphasis on pulse-based dishes may be welcomed by many communities where pulses are a dietary staple. All communication materials relating to the changes should be made available in accessible formats and multiple languages to ensure families from all backgrounds can engage with them.

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. The texture, appearance and taste of

wholegrain alternatives, and attempts to 'hide' food in dishes, can be significant barriers for this group.

Clear guidance on reasonable adjustments and exceptions is essential and must ensure children's entitlements to food that meets their needs are met, and schools should be supported to work with children, families and nutritionists to ensure no child is left without an acceptable meal. Recent guidance on reasonable adjustments in accessing free school meals needs further clarification on which pupils these apply to, ensuring that schools are able to meet dietary needs and restrictions, whilst providing them with the support they need to enable all students able to take up a school meal to do so. The 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, and publish this as part of DfE's implementation resources. The Department for Education should also address a critical data gap on uptake of free school meals to monitor the impacts of these changes on sub-groups including those with SEND. There are currently no published data showing how many children with SEND in mainstream schools are receiving their entitlement: uptake in these settings could be even lower than in special schools, and the standards could have uneven impacts.

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 among older pupils who may have easier access to food outside school.

Environmental principles

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

SA response = Positive

Follow-on question to all answers: please explain why you answered this way

The proposed changes to the School Food Standards are likely to have a net positive environmental impact, though this will depend significantly on how implementation is managed in practice.

The shift toward greater consumption of pulses, wholegrains, fruit and vegetables, and the reduction in processed meat, represents a meaningful move toward more plant-rich menus. Plant foods generally have a substantially lower carbon footprint than industrial meat and dairy products.

The proposed flexibility for schools to substitute pulses for some meat and poultry provision may also create opportunities to source higher-welfare, seasonal and locally produced ingredients, supporting shorter supply chains and reducing food miles. This aligns well with the broader food strategy being developed by DEFRA and could contribute to government environmental commitments if procurement guidance actively encourages sustainable sourcing.

However, realising these environmental benefits will require active intent. The current School Food Standards do not require compliance with Government Buying Standards, 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 such as organic, and the school food system is critical to achieving this ambition. Enforcing Government Buying Standards 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 Government Buying Standards a requirement alongside the updated School Food Standards.

Closing question

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

Language encouraging the provision of minimally processed and whole foods should be built into the School Food Standards.

The World Health Organization (WHO) recommends the consumption of whole foods and cautions against highly processed products. Healthy and sustainable diets, the WHO says, “*are based on a great variety of unprocessed or minimally processed foods, balanced across food groups, while restricting highly processed food and drink products.*”

A growing number of countries – among them France, Belgium, New Zealand, Canada, Brazil, Ecuador, Peru, Uruguay, Chile, Mexico, Cataluña, Israel, Malaysia, Zambia, Sri Lanka, and Qatar – have begun to promote non-ultra-processed diets in their official food policies, including by recommending consumption of whole and minimally processed foods. Brazil’s guidelines say: “*Make... minimally processed foods the basis of your diet*”, while New Zealand recommends “*eating a diet with more whole, low or minimally processed foods*”. Australian public health authorities similarly recommend “*fresh and minimally processed foods*” and policies that “*increase the production and consumption of whole foods*”.

No such guidance has been voiced by the UK Government, despite the scientific rationale for doing so. Consumption of whole foods is implicitly encouraged in the Eatwell Guide – through the recommendation to consume at least five portions of fruit and vegetables per day, for example – but is not explicitly stated. Foods high in fat, salt and sugar sit are noted to be surplus

to a balanced diet, but the Eatwell Guide includes no explicit caution against excessive consumption of ultra-processed products.

The School Food Standards should be updated to address these shortcomings, shifting the emphasis from 'nutrients of concern' to whole foods and minimally processed ingredients. While excessive consumption of ultra-processed and unhealthy foods is driven by their ubiquity and the marketing power of major food companies, among other factors, the inadequacy of government policy is a contributing factor.

As a priority, the School Food Standards should reiterate the World Health Organization's statement that healthy and sustainable diets "*are based on a great variety of unprocessed or minimally processed foods, balanced across food groups, while restricting highly processed food and drink products.*" They should explicitly recommend the consumption of whole foods, with an emphasis on those of plant origin sourced from nature-friendly farming systems, while cautioning against the excessive consumption of ultra-processed products.