

School Food Standards for England: Real Bread Campaign response

As part of the 2026 review of School Food Standards for England, the Department for Education and Department for Health and Social Care conducted a [public consultation survey](#) on the government's proposed new standards.

This is a copy of the Real Bread Campaign's response, to be read in conjunction with Sustain's overall response, submitted by the Children's Food Campaign.

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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?

- [Neither agree nor disagree](#)

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

The Real Bread Campaign broadly agrees with the proposed requirements and restrictions for bread and baked / morning goods but with caveats: please see answers to later questions for details. Please also see the response from our Sustain sibling project, the Children's Food Campaign.

The proposed standards would include crumpets in permitted breakfast foods. Crumpets are typically made from highly-refined white flour, which is relatively low in fibre. The Real Bread Campaign recommends that, in line with the government's ambition to raise children's fibre intake, the same minimum fibre content should apply to crumpets as to other breads and baked goods. The standards should also require that their salt content does not exceed the government's current / most recent target maximum.

If, for some reason, the government chooses to make crumpets an exception to the minimum fibre content, then there should be a limit to the number of times they can be served a week.

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

This is outside the scope of the Real Bread Campaign's mission and work. Please see the Children's Food Campaign's response.

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

- [Neither agree nor disagree](#)

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

This is outside the scope of the Real Bread Campaign's mission and work. Please see the Children's Food Campaign's response.

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?

- [Agree](#)

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

Behaviour change and healthier eating habits will be best supported by consistency of food standards across the school day and wraparound care. Due to the circumstances and foods served in breakfast clubs often differing from other meal times, however, we agree the basic standards should be supplemented by specific guidance to implementation and good practice for breakfast.

Increasing fibre

Starchy foods

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

- Neither agree or disagree

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

We're glad that the government agrees with the Real Bread Campaign that the standards need to include a minimum fibre content for bread and other baked goods. The proposed 3% fibre, however, is too low. This would be a missed opportunity to make a significant contribution to children's recommended daily intake of dietary fibre.

According to the National Diet and Nutrition Survey 2019 to 2023, 86% of children aged 4 to 10 years and 96% of 11 to 18 year-olds did not meet the fibre recommendation for their age group.¹ It would be, therefore, beneficial to most children if the School Food Standards were more ambitious than the proposed low bar of simply being a 'source of fibre' (as per retained Regulation (EC) No 1924/2006 on nutrition claims) at a mere 3%.

With just 3% fibre, a typical 40g slice from an 800g factory loaf would only provide a child with 1.2g of fibre. This is only 8% of the daily recommended intake for toddlers and less than 5% of the target for children aged 11 to 18. Three percent fibre is around as low as (and, in some cases, lower than) than some Chorleywood Process, sliced white loaves, manufactured from highly-refined flours. For example: Hovis 'signature' white = 3.5%, ASDA 'Just Essentials' white = 3.2%, Morrisons white = 3.2%, Waitrose 'Essential' white = 2.9%, Sainsbury's 'Stamford Street' white = 2.8%.

In line with the government's intention, the Campaign recommends that the minimum fibre content of bread and baked goods² should be 5%. This is achievable by the use of higher extraction rate flours, or by mixing white / lower extraction flour with wholemeal. For example, retail versions of the 50/50 (aka half and half) products mentioned in the consultation document typically range from around 4.2% to 5.6% fibre. We recommend that the standards be more ambitious than just accepting the lower end of what is currently available, though. If cooks and caterers feeding around 8.5 million children at over 22,000 schools across England create a market for Real Bread with at least 5% fibre, bakeries will step up to meet that demand.

The standard should be accompanied by good practice guidance that states a preference for serving bread that is high in fibre (i.e. 6% or more, as defined by retained Regulation (EC) No 1924/2006) and, ideally, 100% wholemeal.

Particularly when taken with the government's commitment to expanding school meal eligibility to all families on Universal Credit, serving higher fibre, additive-free bread as part of healthier school meals will help to reduce health disparities, in line with the Child Poverty Strategy. Serving higher fibre bread would also offer tangible benefits to schools, not least through helping to stem and reverse the increasing incidences of constipation and other bowel-related problems amongst pupils.^{3,4} This would contribute towards fewer absences and healthier pupils, who are ready and able to learn, as well as reducing pressures on staff members having to deal with these issues.

¹ National Diet and Nutrition Survey (NDNS) results on the diet, nutrient intake and nutritional status of adults and children in the UK for 2019 to 2023, Office for Health Improvement and Disparities, 11 June 2025.

www.gov.uk/government/statistics/national-diet-and-nutrition-survey-2019-to-2023

² Of every type, style and culinary / baking heritage and tradition. Including, but not limited to: loaves; slices, subs, panini and other forms used for sandwiches; rolls / buns / baps; focaccia, pitta, lavash, chapati, roti, tortillas and other flatbreads / wraps; pizza; bagels; baguettes / batons.

³ Hospital admissions for children with a 'primary diagnosis' or 'any diagnosis' of constipation, 2014-15 to 2023-24, NHS England, 11 February 2025. <https://digital.nhs.uk/supplementary-information/2025/hospital-admissions-for-constipation>

⁴ Constipation in children: How common is it? NICE, last revised August 2025. <https://cks.nice.org.uk/topics/constipation-in-children/background-information/prevalence/>

The authors of a 2025 UK study into serving more higher-fibre bread in schools reported: ‘child preferences were not a major barrier. When provided with higher fibre foods, children ate and enjoyed them.’ They cited a national breakfast club service provider having success in replacing all white with half-and-half products.⁵ A change to 50% wholegrain in the USA (where, unlike the UK, the term is defined) began in 2012.⁶

While larger bakeries have the capacity to calculate and test for fibre levels, school cooks and small bakeries do not. The good practice guidance should, therefore, include recipes, tables of ratios of wholemeal to white flour and other information to help them ensure products meet the 5% minimum fibre requirement, as well as delicious wholemeal options. We would be happy to help connect DfE / DHSC with expert bakers who could assist with creating this.

Please note that, until the government adopts the Real Bread Campaign’s Honest Crust Act proposal of introducing a legal definition of ‘wholegrain’⁷ the term is technically meaningless and wide open to interpretation. When referring in the standards and guidance to flour, bread and other baked products, it will be more appropriate and useful to use the word wholemeal, as this term is defined, and its use regulated, by The Bread and Flour Regulations.

The Campaign recommends that the standards require all bread and baked goods to meet our Real Bread definition, which basically is: made without chemical raising agents, ‘processing aids’ or other additives.⁸ For more, please see our response to question 41. The guidance should also encourage schools to serve *genuine* sourdough (rather than sourfaux) breads.⁹ While the Campaign continues to call for more research, there is a growing body of evidence that indicates there might be a range of health and nutritional benefits to making bread (which can be any type or style in the world) by the sourdough process. These might include reducing glycaemic index, improving dietary fibre composition, helping to create conditions favourable to increased mineral bioavailability, and increasing protein (gluten) digestibility.¹⁰

While in principle we very much support the idea of offering bread to children every day, having consulted with school cooks, we believe this can have counterproductive unintended consequences. Being required to serve ‘bread’ every day can lead to caterers serving the lowest common denominator, simply to tick a box. Reducing the required frequency is more likely to encourage higher quality, Real Bread being bought or made in-house. Delicious, nutritious Real Bread served a few times a week is likely to result in less food waste than serving low-quality, apparently cheap¹¹ products every day.

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?

- Neither agree or disagree

⁵ Nicholas Wilkinson, Eloise Tann, Neil Boyle, Samantha Caton, Victoria McColl, Fiona Croden, Gurbinder Singh Lalli, Louise Dye; The children may not be the problem: evidence of acceptance and enjoyment of higher fibre breads from choice architecture studies in school breakfast clubs. *Philos Trans R Soc Lond B Biol Sci* 18 September 2025; 380 (1935): 20240151. <https://doi.org/10.1098/rstb.2024.0151>

⁶ Joanne Guthrie, Biing-Hwan Lin and Travis A. Smith. Children Were Only Age Group Improving Whole-Grain Intakes—School Foods Are a Key Factor, USDA Economic Research Service. 14 September 2023. www.ers.usda.gov/amber-waves/2023/september/children-were-only-age-group-improving-whole-grain-intakes-school-foods-are-a-key-factor

⁷ Honest Crust Act, the Real Bread Campaign, last updated 31 March 2026. www.sustainweb.org/realbread/bread_labelling

⁸ What is Real Bread? The Real Bread Campaign. www.sustainweb.org/realbread/what_is_real_bread

⁹ Sourdough, the Real Bread Campaign www.sustainweb.org/realbread/sourdough

¹⁰ Literature reviews include: Alkay, Zühal & Falah, Fereshteh & Cankurt, Hasan & Dertli, Enes. (2024). Exploring the Nutritional Impact of Sourdough Fermentation: Its Mechanisms and Functional Potential. *Foods*. 13. 1732. www.mdpi.com/2304-8158/13/11/1732

¹¹ Low price at point of purchase, without factoring in any displaced or hidden true costs to health, the environment on local economies and communities.

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

[This is outside the scope of the Real Bread Campaign's mission and work. Please see the Children's Food Campaign's response.](#)

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?

- [Neither agree or disagree](#)

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

[Please see the Children's Food Campaign's response.](#)

Reducing sugar

Healthier drinks

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

- [Neither agree or disagree](#)

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

[This is outside the scope of the Real Bread Campaign's mission and work. Please see the Children's Food Campaign's response.](#)

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

- [Neither agree or disagree](#)

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

[This is outside the scope of the Real Bread Campaign's mission and work. Please see the Children's Food Campaign's response.](#)

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

- [Neither agree or disagree](#)

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

[This is outside the scope of the Real Bread Campaign's mission and work. Please see the Children's Food Campaign's response.](#)

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?

- [Neither agree or disagree](#)

Dairy and plant-based options

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

- [Neither agree or disagree](#)

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

[This is outside the scope of the Real Bread Campaign's mission and work. Please see the Children's Food Campaign's response.](#)

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?

• Agree

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

In line with the work of Sustain member organisation Action on Salt & Sugar (and others) the Campaign recommends the new standards should require that sodium / salt in bread does not exceed the Government's current / most recent target maximum. Underpinning this are the needs, as highlighted by Action on Salt & Sugar, for the Government to continue periodic reviews of the salt reduction targets and revise them as necessary.

While we support salt reduction, we do not seek to eliminate it from bread altogether. We propose, therefore, that the standards allow breadsticks to be low in salt, rather than requiring them to be made without it.

The proposed 'bread that does not contain added fat or oil must be available every day' standard lists brioche, ciabatta and focaccia as specific examples of breads that this requirement would exclude. Ciabatta can be made without oil, so we recommend removing it from the list of named examples, as the general 'no added fat or oil' will exclude ciabatta that is made with it.

The Campaign recommends that focaccia made with extra virgin olive oil should be an exemption from this restriction. This type of Real Bread is a simple, healthy and cost-effective option for many school caterers. Where a school kitchen is fitted with even basic equipment, additive-free focaccia can be made from scratch easily in-house from four or five basic ingredients, baked on large trays and sliced into portions. One chef in the Chefs in Schools network gave the example of making focaccia in-house, with rosemary and extra virgin olive oil, for just 1.6p per portion.

Furthermore, the Campaign believes it is inconsistent to limit serving focaccia to a maximum of twice a week, while placing no such restriction on baguettes and other sandwiches that are filled with cheese and / or served with butter or non-dairy spreads. EV olive oil is high in monounsaturated fats, polyphenols and antioxidants; and there is evidence that it can increase absorption of nutrients such as vitamins A, D, E and K.

We agree with limiting sweetened baked products to one portion a week. Outside school hours, parents and carers have many chances to choose whether or not to allow their children to eat sweets, sugary puddings, sweet snacks etc. with corporate marketing tactics placing enormous pressure on them to do so. Acting in loco parentis, the school canteen should be a place of safety, where children are protected from excess sugar.

The proposed standards include exempting 'fruited bread based buns' from the requirements and restrictions applied to other desserts and baked products. In a meeting with DfE and DHSC, we were advised that the proposed standards for such buns do not include any minimum fibre requirement, or limit to sugar, salt and fat. We were also told that the proposed standards do not limit the number of times a week that a school can offer them. This loophole would allow a school to serve enriched buns (potentially made from low-fibre white flour, and laden with salt, fat and sugars) every day, simply on account of them also having a scattering of dried fruit. We can't see any need or justification for hot cross buns, tea cakes etc. being given separate, preferential treatment.

We recommend that fruited buns should simply be included in the sweetened baked products category and governed by its restrictions. A (less simple) alternative is for fruited buns to be subject to the same fibre requirement, fat / oil restriction and salt limit as all other bread and baked / morning goods, with a maximum level for total sugars.

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

• Neither agree nor disagree

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

While the Campaign has no specific interest in cheese, we note that the proposed standards would limit serving pizza and cheese panini to a maximum of twice a week. We question the reasoning behind the lack of consistency in not placing this same restriction on cheese being used as the filling for 'bread-based products, such as sandwiches or baguettes.' Please also see the Children's Food Campaign response.

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?

- Neither agree or disagree

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

This is outside the scope of the Real Bread Campaign's mission and work. Please see the Children's Food Campaign's response.

Reducing desserts

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

- Agree

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

Children have opportunities to eat sweets, puddings and sweet snacks at home and out of home; there is no need for schools, acting in loco parentis, to add to this. Please see comments above on 'fruited bread based buns' and also the Children's Food Campaign's response.

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

- Agree

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

As per answer for primary schools.

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

- Neither agree or disagree

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

Please see the Children's Food Campaign's response.

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?

- Neither agree or disagree

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

This is outside the scope of the Real Bread Campaign's mission and work. Please see the Children's Food Campaign's response.

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?

- Neither agree or disagree

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

This is outside the scope of the Real Bread Campaign's mission and work. Please see the Children's Food Campaign's response.

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

- Neither agree or disagree

Protein

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

- Neither agree or disagree

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

This is outside the scope of the Real Bread Campaign's mission and work. Please see the Children's Food Campaign's response.

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?

- Neither agree nor disagree

Overall question

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

- To some extent

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?

In schools that already serve additive-free, lower salt, wholemeal (or other higher-fibre) bread, there will be no transition to be made in this regard. Depending on the current situation in other schools / contractors, their cooks / chefs and / or their supplier(s) will need practical and perhaps financial support to make amendments to their procurement, recipes, or training to meet the new criteria.

Advice to encourage children's uptake of wholemeal, and other higher-fibre, breads is available^{12, 13} but the guidance accompanying the standards should be tailored to children in the UK. Children should be involved in creating or choosing the Real Bread that is served, by means such as taste tests, surveys and perhaps even competitions. Taking a whole-school approach, this could be done as class project work. While this will require time and effort, creating a genuine sense of agency and ownership should help to improve uptake and reduce waste.

For more general recommendations, please see the Children's Food Campaign's response.

¹² EUFIC. Easy ways to encourage whole grains to young adults, Switch To Whole Grains.

<https://switchtowholegrains.com/tips-for-getting-your-family-on-board-with-whole-grains>

¹³ Whole Grain Resource for the National School Lunch and School Breakfast Programs: A Guide to Meeting the Whole Grain-Rich Criteria, USDA Food and Nutrition Service, January 2014. <https://fns-prod.azureedge.us/sites/default/files/resource-files/tn-whole-grain-resource.pdf>

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?

• 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?

• Agree

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

Working with external, specialist organisations that provide guidance and skills training in cooking and serving healthy and sustainable food. Reviewing suppliers to ensure they use ones that also embrace the spirit, and not just the letter, of the new standards.

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

Adequate funding for schools so that they can afford staffing, training, equipment / facilities and procurement to not just meet but embrace higher, healthier standards. Funding to support organisations / initiatives that provide training and guidance in cooking and serving healthy and sustainable food; and for local authorities to carry out inspections.

Maintaining a searchable database of producers / suppliers that offer food that meet / exceed the standards, to which companies can submit their details easily. A central bank of recipes that comply with the standards, to which school cooks / caterers can submit ones that have been popular, would be useful.

There must be no preferential treatment for larger catering companies / suppliers, or barriers that are relatively higher for smaller schools and companies with less staff time available and without the ability to employ people who specialise in public sector procurement processes.

Culture, equality and diversity

Under the Equality Act 2010, there are nine protected characteristics in the UK that shield individuals from discrimination, harassment, and victimisation in employment, education, and service provision.

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

Positive

The standards must incorporate requirements and scope / exemptions that ensure and enable each school to meet dietary requirements of all pupils, be they religious or cultural; medical (e.g. a child with IBS, who has to limit fibre intake); or psychological (e.g. a child who is neurodivergent, who can / will only eat something familiar, soft and white).

Going beyond this, good practice guidance should encourage schools to offer options across the week that are not only appropriate to the backgrounds and identities of its pupils but also give them opportunities to enjoy Real Bread from a wide range of traditions / heritage.

Environmental principles

The UK's five core environmental principles, mandated by the Environment Act 2021, are integration, prevention, rectification at source, polluter pays, and precautionary principles. These principles guide UK

ministers and policymakers to embed environmental protection, such as reducing pollution and preventing damage, into policy development from the outset.

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

- Positive

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

The new standards could and should lead to reduced negative, and increased positive, effects on the environment. Raising the minimum fibre level of bread and baked goods to 5%, accompanied by good practice guidance that states and preference for wholemeal, would increase the amount of the grain that ends up directly in children's stomachs¹⁴, rather than being diverted to animal feed, waste or other streams.

The good practice guidance accompanying the standards should state a preference for bread and flour is certified organic, or otherwise the product of agroecological farming. These systems have lower negative impacts on soil, waterways and climate than agriculture that relies on nitrogen-based fertiliser, chemical biocides and other agrochemicals. Certified organic flour will also ensure that children do not eat residues and byproducts of glyphosate and other agrochemical 'plant protection products'.

Localised production and storage of grains (particularly those that are locally adapted) and flour, and production of Real Bread, is more resilient to environmental and other supply chain shocks / crises outlined by Professor Tim Lang et al's 2025 report for the National Preparedness Commission.¹⁵ A growing number of farms, mills and bakeries within the Real Bread Campaign and the UK's regional non-commodity grain networks are working on this.

Closing question

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

The Real Bread Campaign welcomes the government reviewing the School Food Standards for England, which create a rare opportunity to update and improve them.

As one of the most frequently consumed foods in schools, bread is uniquely positioned to make a significant, positive impact on children's health and wellbeing. Whether in the form of bagels, baguettes, flatbreads, panini, buns or sandwiches, 'bread' is routinely eaten by millions of children across the UK every single day. The ubiquity and frequency mean that even modest improvements will have a substantial, cumulative positive effect on children's nutrition.

In summary, our recommended basic standards for bread and morning/baked goods served in schools are:

- Made without 'processing aids' or other additives (see below).
- Must contain at least 5g of fibre per 100g.
- Salt must not exceed the government's current (or most recent) target maximum.
- Made with no added fat or oil, except when necessary to achieve the usual characteristics of a particular type of bread – olive oil in focaccia, for example.
- Bread and morning / baked goods with any form of added sugars are to be categorised as sweetened baked products / desserts.
- Breakfast options can include bread and morning / baked goods (as above).
- Fried breads, laminated products (e.g. croissants, pains au chocolat) and pastries are not permitted.

¹⁴ Vaughan, A. Wholemeal: better bred bread, Real Bread Campaign, 26 March 2024.

www.sustainweb.org/realbread/articles/mar24-wholemeal-better-bred-bread

¹⁵ Lang, Tim. Neumann, Natalie. So, Anthony. Just in Case: narrowing the UK civil food resilience gap, National Preparedness Commission, February 2025. https://nationalpreparednesscommission.uk/wp-content/uploads/2025/02/NPC-Just-in-Case-Main-Report_PDF-Download.pdf

- Breadsticks are allowed as snacks. They must have no added sugar or oil, and no more salt than the government's current / most recent target maximum.

The standards must incorporate requirements and scope / exemptions that ensure and enable each school to meet dietary requirements of all pupils, be they religious or cultural; medical (e.g. a child with IBS, who has to limit fibre intake); or psychological (e.g. a child who is neurodivergent, who can / will only eat something familiar, soft and white).

Our recommended key points of good practice guidance to accompany the basic standards:

- The preference is for bread with a fibre content of at least 6g per 100g (i.e. a 'good source of fibre' claim, as per Regulation (EC) No 1924/2006) but ideally wholemeal.
- Enrichments should only be used, in limited amounts, where necessary to specific characteristics of particular bread types, e.g. olive oil in focaccia.
- When bread is not made on site, the preference is for schools / caterers to buy it from local SME bakeries, in line with government ambitions and proposals to increase procurement of locally-produced food.
- In line with government ambitions and proposals to increase procurement of food produced to higher environmental production standards, the preference is for certified organic, or otherwise agroecologically produced, bread and flour.
- The preference is for bread made from grain grown and milled as locally as possible to the point of serving. This is in line with government ambitions and proposals to increase procurement of food produced locally and (depending on the farms, mills and bakeries involved) to higher environmental production standards.
- The school should create opportunities for children to experience and enjoy Real Bread from a range of culinary / baking traditions.
- The school should explore taking a whole school approach to food. Running sessions to share Real Bread skills and knowledge (such as that outlined in the Real Bread Campaign's Bake Your Lawn book¹⁶) could help to improve uptake of higher-fibre, healthier bread at – and outside – school.
- Schools should consider the possibility of involving parents / carers and other members of the school community in sharing and learning breadmaking skills and knowledge.
- Setting up and running a microbakery is a project that some schools find is a way to teach children both breadmaking and enterprise skills. It can also offer opportunities for community engagement, for example by selling Real Bread at the school gate on a pay-as-you-can basis.¹⁷

The standards should be in line with the World Health Organization's position that a healthy and sustainable diet is: "based on a great variety of unprocessed or minimally processed foods, balanced across food groups, while restricting highly processed food and drink products."¹⁸ Bread can be made from as few as four natural / minimally processed ingredients: flour, water, yeast and salt – and even that added yeast is not required when making unleavened flatbread or *genuine* sourdough bread. Food additives are, therefore, all unnecessary by definition and there is no justification for exposing children to any of them. While each additive has been tested in isolation, what hasn't been tested for are any consequences of consuming mixtures of additives found across our diets, or even in single products – such as one of the most ubiquitous ultra-processed foods (UPF): the sliced, white, Chorleywood Process factory loaf.

Whether or not there is a 'cocktail effect' is as yet unknown, but a succession of large-scale studies have added to a growing body of evidence that raises questions and deep concerns about UPF in our diets. For example, researchers from Imperial College London's School of Public Health collected data on the diets of

¹⁶ Bake Your Lawn, the Real Bread Campaign, Sustain, 20024. www.sustainweb.org/realbread/bake-your-lawn

¹⁷ Dempster, Tyra. Seed to sandwich in Shaky Toon, True Loaf magazine, the Real Bread Campaign, July 2023. www.sustainweb.org/realbread/articles/feb24-seed-to-sandwich-in-shaky-toon

¹⁸ Sustainable healthy diets: guiding principles, World Health Organization, Food and Agriculture Organization of the United Nations, 29 October 2019. <https://iris.who.int/server/api/core/bitstreams/08116cce-1ad5-44cf-bd69-e453322013ef/content>

200,000 people, monitoring their health over 10 years. Their 2023 study concluded that higher consumption of UPF was associated with a greater risk of developing, and dying from, cancer.¹⁹

Authors of an umbrella review, published by the BMJ in 2014, reported: ‘Overall, direct associations were found between exposure to ultra-processed foods and 32 health parameters spanning mortality, cancer, and mental, respiratory, cardiovascular, gastrointestinal, and metabolic health outcomes.’²⁰

The Campaign works to ensure that everyone has a realistic chance to choose additive-free bread, for whatever reason(s) they want or need to choose it. The proposed standards would not support (and even allow caterers to deny) millions of children to have that opportunity, leaving them with the ‘choice’ of additive-laden, UPF baked products or no bread at all. The Campaign, therefore, recommends that the new standards should require all bread / baked goods served across the day to meet the Campaign’s basic Real Bread definition: made without the use of any chemical raising agents, ‘processing aids’ or other additives.

Permitting nurseries to opt for lower standards was not appropriate, however the 2025 EYFS nutrition guidance leaves room for improvement, is open to interpretation and includes a ‘follow it unless there is good reason not to’ loophole that will enable non-compliance. The Campaign recommends that bread standards for nurseries should be in line with our responses here for primary and secondary schools, accompanied by guidance tailored for early years.

Conclusion

We believe our recommends standards and good practice guidance represent an achievable and cost-effective way to improve children’s nutrition. They will also offer a range of potential socio-economic benefits, such as:

- Enhanced skills and professional development (and perhaps job satisfaction) for school cooks, when making Real Bread fresh from scratch.
- Support for local food economies, when procurement is from independent SME bakeries, helping to keep money circulating a school’s community.
- People making bread on site, or at a local bakery, offers opportunities for learning essential cooking skills and wider food education.
- Through hands-on baking sessions, children can have the chance to discover how to make their own Real Bread, and engage in critical thinking about food production, labelling and marketing.
- There is evidence that children enjoy eating healthy food that they have helped to make.²¹ Hackney School of Food told us: ‘Our experience from hands-on school baking programs demonstrates that children do not reject higher-fibre alternatives when they are introduced transparently, along with nutritional knowledge about the slower release of energy from higher fibre carbs(breads) and when baked freshly - they often cannot wait for the breads to cool before eating them.’
- A number of studies have concluded that children engaged with making healthy food are more likely to choose to eat it.

Thanks to the work of exemplary cooks and caterers, and organisations in and beyond Sustain’s alliance (including Chefs in Schools, Hackney School of Food, Food For Life, The School of Artisan Food, School Food Matters and others) there are many islands of good practice putting healthier, higher-fibre, better bread on school menus and timetables. This review is a chance to harness and build on this expertise and

¹⁹ Chang K, Gunter M, Rauber F et al. Ultra-processed food consumption, cancer risk and cancer mortality: a large-scale prospective analysis within the UK Biobank eClinicalMedicine, 2023; 56 [www.thelancet.com/journals/eclinm/article/PIIS2589-5370\(23\)00017-2](http://www.thelancet.com/journals/eclinm/article/PIIS2589-5370(23)00017-2)

²⁰ Lane M M, Gamage E, Du S, Ashtree D N, McGuinness A J, Gauci S et al. Ultra-processed food exposure and adverse health outcomes: umbrella review of epidemiological meta-analyses BMJ 2024; 384 :e077310 doi:10.1136/bmj-2023-077310 www.bmj.com/content/384/bmj-2023-077310

²¹ DeJesus JM, Gelman SA, Herold I, Lumeng JC. Children eat more food when they prepare it themselves. *Appetite*. 2019 Feb 1;133:305-312. doi: 10.1016/j.appet.2018.11.006. Epub 2018 Nov 16. PMID: 30448413; PMCID: PMC6768385. <https://pmc.ncbi.nlm.nih.gov/articles/PMC6768385>

experience to inform and inspire a nationwide landscape in which millions of children are able to enjoy delicious, nutritious, additive-free Real Bread at school. We urge the government to seize this opportunity fully.

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