

New School Food Standards for England

The Real Bread Campaign thanks the government for agreeing with us that the proposed 3% minimum fibre level for bread and bread-type products was too low and for setting a higher minimum.

When drafting the final version of the new School Food Standards and accompanying guidance, we urge you to review the proposals we laid out in our response to the public consultation, which we have [summarised in this article](#).

These are the Real Bread Campaign's further comments and questions on [the government's response to the public consultation](#), plus [annexes](#) and [practical guidance](#).

Government response to consultation

Fibre

'bread product exemptions from the fibre requirements, including crumpets, pizza bases and tea cakes. These products have been exempted because higher-fibre equivalents are not widely available or routinely used within school catering, and applying the fibre requirement to them could create unnecessary implementation challenges without materially impacting overall fibre provision.'

We do not agree with exempting pizza bases, teacakes and crumpets from the 4% minimum fibre content requirement. As pizza can be served twice a week (and potentially every day if at least some are marinara, or other cheese-free, versions) and teacakes or crumpets can be served at two breakfasts a week, the exemption could collectively add up to many missed opportunities to increase children's fibre intake.

We propose replacing the ambiguous term 'homemade'. For example: 'OR when the bread is made from scratch on site, or by a local SME bakery without the ability to measure the fibre content, then at least 50% of the flour used must be wholemeal.'

Question: By teacakes, do you also mean all / some other types of bread dough based, enriched, fruited bun, such as hot cross buns? If so, we propose you include this clarification.

Fat

'no more than 5g fat per 100g'

We urge you to review this standard. This could encourage (or, at least, won't prevent) schools serving plain bread / bread-type products with unnecessary added fat or oil. We urge you to use the proposal we made in our submission to the consultation: '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.' If you still feel an upper limit is needed to this, it could be added thus: 'Where oil/fat is necessary in this way, it must account for no more than 5% of product weight.'

Salt

Despite the National Diet and Nutrition Survey reporting that bread and bread-type products make a major contribution to salt intake, the SFS documents makes no direct reference to reducing salt levels in bread. In line with the Government Buying Standards, we propose the target maximums should be explicitly stated in the SFS, or that the guidance links directly to the relevant GBS ['Nutrition standards: technical guidance'](#) document.

Guidance

Fibre

As per our submission to the consultation, the proposed standards and guidance make repeated use of unregulated terms, for example:

'Wholegrain varieties of bread and pasta are good sources of fibre...'
'you can...use at least half wholemeal or granary flour when making bread...'
'there will be new requirements around foods such as wholewheat,'

Despite our ongoing lobbying for the government to introduce a legal definition of wholegrain, it is not defined in the Bread and Flour Regulations or any official guidance. Similarly, multigrain, granary [sic.], wholewheat, brown etc. are not defined in any legislation or official guidance. As there are no standards or restrictions to what millers / manufacturers can market using such terms, they are technically meaningless. Rather than a generic term, Granary is a registered trademark for a specific brand of non-wholemeal, malted flour and products made by (or under license from) the TM holder.

When referring to bread and bread-type products using any such unregulated terms, we propose you make it clear how you define each of them. Better still, we propose you to remove them and just refer to fibre and the regulated term wholemeal. For clarity, we also propose you rephrase '[wheatgerm breads](#)' in line with the definition in the Bread and Flour Regulations. For example: 'bread with at least 10% added wheat germ'.

'[look for products with higher fibre](#)'. We propose you clarify what you mean by higher fibre. For example: 'choose products with more fibre than the 4% minimum required by the standards, ideally ones that are high fibre, meaning 6% or more.' Or, in line with Government Buying Standards, 'at least 25% of all bread provided contains at least 6g per 100g'.

As the minimum fibre standard for schools is higher than the one laid out in the [Government Buying Standards](#), we propose you make clear in the guidance that the SFS take precedence over the GBS on this point.

'[Bread must be available every day](#).' '[bread – with no added fat or oil – must be available daily](#)' If this means: 'bread – served without additional oil or fat, such as butter or non-daily spread – must be available at least at lunch time every day', we propose that you rephrase the guidance this way.

Salt

The guidance does not explicitly state a target maximum salt level for bread and baked goods. Instead, it advises: 'Remember to use sustainable procurement: the government buying standards alongside these standards to help reduce salt, saturated fat and sugar in children's diets.' This links to another page, on which users have to select a link to a page of guidance for food and catering, on which they then have to select the '[Nutrition standards: technical guidance](#)' document. For simplicity, we propose you name the document and link directly to it, or to the page the document is on.

Other

The guidance suggests one way to '[boost their intake of](#) calcium is '[bread \(except wholemeal\)](#)'. This can be taken to mean that wholemeal bread does not contain any calcium, or as a reason / encouragement not to serve wholemeal bread, counter to the government's ambition to raise fibre intake. We propose either removing this note, or rephrasing, for example: 'bread (wholemeal wheat flour contains calcium, while non-wholemeal wheat flour has added calcium)'

Question: In one place, the practical guidance says schools can '[serve savoury crackers or breadsticks at lunch with fruit, vegetables or dairy food](#)' but in another place it says they must not serve savoury crackers

and breadsticks. Does this mean: 'savoury crackers or breadsticks can only be served at lunch, when they must be accompanied by fruit, vegetables or dairy food'?

Question: Noting that ['the government will provide training, resources and guidance'](#), to help schools to comply with the new standards, will this include funded (or funding for) classes to help school cooks make Real Bread in-house?

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