

Sustain response to Government Consultation on School Food Standards for England

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 submission was made on 11 June 2026 by Sustain's Children's Food Campaign Manager Barbara Crowther. It should be read in complement to submissions made by individual members of the Sustain Alliance and the School Food Review, the Real Bread Campaign, colleagues in the Eating Better and TILT networks and members of the Obesity Health Alliance.

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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?

- Strongly agree**

We welcome the proposed standards as an evidence-based approach to improving the nutritional quality of breakfast provision in schools. The emphasis on lower sugar options, higher fibre breads, and the inclusion of fruit or vegetables aligns well with UK dietary recommendations and supports improved satiety, concentration, and overall diet quality in children. Crumpets are typically made from highly-refined white flour, which is relatively lower in fibre. We strongly recommend that they, and any other morning goods served at breakfast, should meet the same minimum fibre and low salt requirements as for all other breads and baked products. Please see our response to Q14 for more detail on higher fibre bread that should also be applied at breakfast time, as well as the consultation submission from the Real Bread Campaign.

We are concerned that there is little reference to salt levels overall. Excess salt intake raises blood pressure from an early age, and increases the risk of heart attack, stroke and kidney disease later in life. As well as salt in bread and morning goods mentioned above, we note that breakfast cereals are among the top 10 food groups contributing to children's salt intake, accounting for approximately 3% total salt intake in children aged 4-18 [1]. The salt content of breakfast cereals, particularly those marketed to children, varies widely from 0.0g/100g to as much as 1.2g/100g [2]. Appropriate lower-salt alternatives should therefore be procured at scale.

The restriction of foods high in free sugars (e.g. chocolate spreads, syrups) and the removal of fried and highly processed items reflects the evidence around links between excess sugar and saturated fat intake and poor health outcomes, including dental decay and obesity. We would like to see clearer guidance on pancakes within the standards as this is a common food served in schools and is not clearly addressed, but needs to follow similar guidance around higher fibre and wholemeal flour.

The proposed drinks standards, especially prioritising water and removing fruit juice and fruit-juice-based combination drinks from the list of permitted drinks, are also consistent with best practice.

We welcome inclusion of unsweetened, fortified dairy and plant-based alternatives in the standards. This is a particular strength, ensuring nutritional adequacy (e.g. calcium, iodine, vitamin D, B12) while provide greater options and variety for both caterers and students, supporting dietary diversity and inclusion.

We agree with the government's proposed requirements that plain soya or oat drinks served at breakfasts must be unsweetened or no sugar and fortified with micronutrients: calcium, iodine, vitamin D, riboflavin, vitamin B12. Soy milk in particular has a high level of amino acids, whereas oat and rice milks are higher in carbohydrates. Including these drinks is in keeping with SACN and COT guidance, which states that fortified and unsweetened plant-based drinks are an acceptable alternative to cow's milk for children over five and adults. [3]

We recommend adding fortified unsweetened pea milk to the list of permitted plant-based alternatives, recognising its high protein content.

We note that inclusion of plant-based milks will also support education institutions to deliver on their climate action plans, given multiple studies have found that plant-based milks have lower greenhouse gas emissions, land use and water use than animal milk, [4, 5] as well as favourable health profiles. [5]

However, we oppose the phased approach for secondary schools' drink standards and recommend the standards require water, milk and unsweetened plant-based milk alternatives only in secondary schools, to match the standard for primary, within the same timeframe (see response to question 18 and 19).

We also welcome exclusion of processed meats from breakfast provision, as this reflects current public health guidance to reduce consumption of these foods. Processed meats such as sausages, bacon and ham rank in the top 10 contributors of excess salt in children's diets. We would suggest providing schools with a clear list of foods that are considered 'processed' to avoid confusion and ensuring this definition aligns with the NHS definition of processed meats [6]. Evidence shows that the most

commonly eaten processed meat dishes in schools and educational institutions include (but are not limited to) ham, sausages, bacon and sausage rolls [7].

There are some areas where further clarity would support implementation. For example, it would be helpful to clarify whether foods such as baked beans are intended to be limited in frequency, or whether they can be offered daily at breakfast, and if included the requirement to serve low salt, low sugar varieties. Additionally, clearer definitions and examples of what constitutes “fruit spreads” and “savory spreads” would support consistency across settings and reduce ambiguity for providers, along with levels of sugar or salt permitted. Similarly, it would be helpful to clarify the standard stating that ‘fried potato products are not permitted’ to explain precisely what this does and does not include would aid interpretation by school kitchens and caterers.

Sustain member School Food Matters’ has strong evidence via its Nourish programme supporting the practical delivery of the proposed breakfast standards. Despite school concerns that children would reject healthier breakfast options, a combination of staff training on healthy standards and engagement with pupils has aided menu change. Practical guidance has been key to this. [8].

Polling conducted on behalf of Sustain’s Children’s Food Campaign with 1020 parents of primary and secondary pupils in May 2026 supports the overall shift towards healthier school food, with 78% agreeing that food served in schools should reflect what children are learning about healthy nutrition [9].

Guidance for caterers should explicitly require alignment with the Government Buying Standards for Food and Catering Services (GBSF), which recognised salt reduction as an important objective and aligns with the UK’s 2024 salt reduction targets [10]

Overall, the standards are well aligned with current nutrition evidence and public health priorities, but successful implementation will depend on ensuring that meals remain appealing, accessible, and feasible for schools to deliver.

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

[2] Pombo-Rodrigues S, Hashem KM, He FJ, MacGregor GA. Salt and sugars content of breakfast cereals in the UK from 1992 to 2015. *Public Health Nutr.* 2017 Jun;20(8):1500-1512. doi: 10.1017/S1368980016003463. Epub 2017 Feb 7. PMID: 28166847; PMCID: PMC10261404.

[3] Office for Health Improvement & Disparities, ‘SACN and COT Assessment of the Health Benefits and Risks of Consuming Plant-Based Drinks: Summary’, GOV.UK, 16

July 2025, <https://www.gov.uk/government/publications/plant-based-drinks-health-benefits-and-risks/sacn-and-cot-assessment-of-the-health-benefits-and-risks-of-consuming-plant-based-drinks-summary>.

[4] Joseph Poore and Thomas Nemecek, 'Reducing Food's Environmental Impacts through Producers and Consumers', *Science* 360, no. 6392 (2018): 987–92, <https://doi.org/10.1126/science.aag0216>;

[5] Marco Springmann, 'A Multicriteria Analysis of Meat and Milk Alternatives from Nutritional, Health, Environmental, and Cost Perspectives', *Proceedings of the National Academy of Sciences* 121, no. 50 (2024): e2319010121, <https://doi.org/10.1073/pnas.2319010121>

[6] NHS, accessed 28 May 2026, Meat in Your Diet, <https://www.nhs.uk/live-well/eat-well/food-types/meat-nutrition/>

[7] The Food Foundation. (2025). Meat Facts: What meat is the UK eating and why does it matter? Available at https://foodfoundation.org.uk/sites/default/files/2025-05/TFF_Meat%20Facts.pdf

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

[9] Suration/Sustain (2026) Polling of 1020 parents aged 18+ in England with children currently in primary and/or secondary schools. Fieldwork was conducted 5-12 May 2026. Evidence submitted separately to SFS Consultation team 3 June 2026. Data tables available on request.

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

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

No. 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 early in the day. Prioritising minimally processed, nutrient-dense protein sources (such as eggs, beans, and pulses, which are already included in the proposed standards) supports this aim while contributing fibre and other beneficial nutrients.

Processed meats are often high in salt and contribute significantly to children's salt intakes, as noted in our response to Q.10. NHS guidance states that children aged 4-6 should consume no more than 3g salt per day and 7-10 year olds no more than 5g/day, but evidence suggests children are exceeding this, as noted by Sustain alliance member Action on Salt and Sugar. This proposal is consistent with current public health guidance [1], which recommends limiting processed meat consumption due to its association with adverse health outcomes [2], including increasing risks of various types of cancer [3] [4] [5] [6] [7], cardiovascular disease [8], diabetes [9], dementia [10], with studies suggesting every additional 25g increases dementia risk by 44% [6] [2] [7]. Cancer Research UK estimates processed meat causes 13% of new bowel cancer cases in the UK annually [4]. Even small amounts carry risk: each additional 50g per day increases bowel cancer risk by around 18%. Several Sustain members and partner organisations recommend limiting processed meat [4] [11] [12] [13]. The World Cancer Research Fund recommends eating 'very little, if any' processed meat given its strong association with bowel cancer, with no safe level of consumption established [11].

Children eat proportionally more processed meat than adults – with over a third (36%) of meat eaten by children coming from processed meat (Based on analysis of the NDNS waves 9-11) – making this a particular concern [14].

Excluding processed meats also aligns with the wider direction of the proposed standards, which emphasise reducing foods high in salt, saturated fat, and additives. Maintaining consistency across food categories is important for clear messaging and implementation.

There is evidence that this measure will be supported by parents of schoolchildren. Polling of parents in England with school age children that was conducted in May 2026 by Survation on behalf of Sustain's Children's Food Campaign shows 85% of parents would like school meals to be prepared with fresh, minimally processed ingredients [15].

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

[1] NHS. (2023) Processed Food. Available at: <https://www.nhs.uk/live-well/eat-well/how-to-eat-a-balanced-diet/what-are-processed-foods/>

[2] Salter, A. M. (2018). 'The effects of meat consumption on global health', *Revue Scientifique et Technique*, 37(1), pp. 47–55. Available at: <https://pubmed.ncbi.nlm.nih.gov/30209430/>

[4] Cancer Research UK (2025) Does processed and red meat cause cancer? Available at: <https://www.cancerresearchuk.org/about-cancer/causes-of-cancer/diet-and-cancer/does-processed-and-red-meat-cause-cancer?> Also Katie Patrick, 'How

Does Processed Meat Cause Cancer and How Much Matters?', Cancer Research UK - Cancer News, 17 March 2021, <https://news.cancerresearchuk.org/2021/03/17/bacon-salami-and-sausages-how-does-processed-meat-cause-cancer-and-how-much-matters/>

[5] Maryam S. Farvid et al., 'Consumption of Red and Processed Meat and Breast Cancer Incidence: A Systematic Review and Meta-Analysis of Prospective Studies', International Journal of Cancer 143, no. 11 (2018): 2787–99, <https://doi.org/10.1002/ijc.31848>.

[6] Alessio Crippa et al., 'Red and Processed Meat Consumption and Risk of Bladder Cancer: A Dose-Response Meta-Analysis of Epidemiological Studies', European Journal of Nutrition 57, no. 2 (2018): 689–701, <https://doi.org/10.1007/s00394-016-1356-0>.

[7] Seong Rae Kim et al., 'Effect of Red, Processed, and White Meat Consumption on the Risk of Gastric Cancer: An Overall and Dose-Response Meta-Analysis', Nutrients 11, no. 4 (2019): 4, <https://doi.org/10.3390/nu11040826>.

[8] Keren Papier et al., 'Meat Consumption and Risk of Ischemic Heart Disease: A Systematic Review and Meta-Analysis', Critical Reviews in Food Science and Nutrition 63, no. 3 (2023): 426–37, <https://doi.org/10.1080/10408398.2021.1949575>.

[9] Lukas Schwingshackl et al., 'Food Groups and Risk of Type 2 Diabetes Mellitus: A Systematic Review and Meta-Analysis of Prospective Studies', European Journal of Epidemiology 32, no. 5 (2017): 363–75, <https://doi.org/10.1007/s10654-017-0246-y>.

[10] Huifeng Zhang et al., 'Meat Consumption and Risk of Incident Dementia: Cohort Study of 493,888 UK Biobank Participants', The American Journal of Clinical Nutrition 114, no. 1 (2021): 175–84, <https://doi.org/10.1093/ajcn/nqab028>.

[11] World Cancer Research Fund. (2024). Meat and cancer. Available at: <https://www.wcrf.org/preventing-cancer/topics/meat-and-cancer/#processed-meat>

[12] Eating Better (2023). It's time to act on processed meat. Available at: https://eating-better.org/site/assets/files/6465/its_time_to_act_on_processed_meat_final-1.pdf

[13] The Food Foundation (2025), Meat Facts, Available from: <https://foodfoundation.org.uk/publication/meat-facts>

[14] Bouvard, V., Loomis, D., Guyton, K.Z., Grosse, Y., El Ghissassi, F., Benbrahim-Tallaa, L., Guha, N., Mattock, H. and Straif, K., on behalf of the International Agency for Research on Cancer Monograph Working Group. (2015). 'Carcinogenicity of consumption of red and processed meat', The Lancet Oncology, 16(16), pp. 1599–1600. Available at: <https://pubmed.ncbi.nlm.nih.gov/26514947/>

[15] Suration/Sustain (2026) Polling of 1020 parents aged 18+ in England with children currently in primary and/or secondary schools. Fieldwork was conducted 5-12 May 2026. Evidence submitted separately to SFS Consultation team 3 June 2026. Data tables available on request.

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

• Strongly agree

We agree that honey should not be permitted, because honey is extremely high in sugar content, which should be limited according to the NHS Eatwell Guide due to negative health impacts. [1]

From a nutritional perspective, honey has similar impacts to other sugars such as syrups and table sugar [2]. Honey is included in classifications of free sugars which are associated with an increased risk of dental caries and excess energy intake, particularly in children [3] [4]. Therefore, excluding honey is consistent with the overall aim of the proposed standards to reduce free sugar consumption in school food environments.

Maintaining consistency in messaging is also important. Allowing honey while restricting other sources of free sugars could create confusion for both providers and children and young people, and may undermine the intent of the standards. This will require clear communication to parents and pupils as there are widespread misconceptions that honey is healthier than other forms of sugar.

In practice, portion control of honey in breakfast club settings can be difficult to implement effectively. School Food Matters' Nourish programme has observed that limiting portions is not consistently adhered to, which can lead to higher-than-intended sugar intake [5]. This practical challenge strengthens the case for a clear and simple approach that excludes honey altogether.

Overall, the exclusion of honey is aligned with current public health guidance and may be more effective and easier to implement than a portion-controlled approach.

[1] NHS, 'Sugar: The Facts', Nhs.Uk, 3 March 2022, <https://www.nhs.uk/live-well/eat-well/food-types/how-does-sugar-in-our-diet-affect-our-health/>

[2] Raatz, S.K., Johnson, L.K. and Picklo, M.J., 2015. Consumption of honey, sucrose, and high-fructose corn syrup produces similar metabolic effects in glucose-tolerant and-intolerant individuals. *The Journal of nutrition*, 145(10), pp.2265-2272.

[3] Mahboobi, Z., Pakdaman, A., Yazdani, R., Azadbakht, L. and Montazeri, A., 2021. Dietary free sugar and dental caries in children: A systematic review on longitudinal studies. *Health Promotion Perspectives*, 11(3), p.271.

[4] Gibson, S., Francis, L., Newens, K. and Livingstone, B., 2016. Associations between free sugars and nutrient intakes among children and adolescents in the UK. *British Journal of Nutrition*, 116(7), pp.1265-1274.

[5] School Food Matters (2026) Evaluation of the Nourish Programme. London: School Food Matters. Available at:

<https://www.schoolfoodmatters.org/sites/default/files/2026-01/N-report-DIGITAL.pdf>

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**

We strongly agree with standards that support a whole school day approach to food, which is in line with public health and behavioural insights in supporting healthy eating. We believe that consistent and strong standards across the entire school day, from breakfast clubs through break times, lunch and after school provision, is the best way of avoiding mixed messages on healthy eating and supporting nutritional intakes. Aligning standards across all eating occasions supports better overall diet quality and is more likely to have a meaningful impact on health outcomes.

We also believe that this provides clarity and consistency for schools and caterers, as well as pupils and parents. There is clear evidence from Sustain's member School Food Matters that a whole school day approach works in practice. Evidence from their Nourish programme revealed that through consistent application of food standards and food culture across the whole school day, improvements in one setting often generated positive ripple effects elsewhere. For example, changes made at breakfast then triggered further reviews and changes in lunch or after-school food [1].

In practice, schools may use different providers for pre- or post-school childcare and food provision, so having clear standalone standards that apply in a consistent manner from a nutritional and environmental point of view will support all providers in a school to deliver against a healthier school food policy.

Overall, this change strengthens the coherence, clarity, and effectiveness of the standards and is in line with best practice in school food policy.

We remain deeply concerned that the government has not extended this approach to special occasions, including celebrations, school trips, events. These loopholes are exploited by major food companies with special school offers on pizzas, doughnuts as part of fundraising packages. These high fat, salt and/or sugar (HFSS) marketing activities are undermining school healthy food policies and also the government's

own restrictions on marketing and advertising to children. We urge the government to close these loopholes, and include strong guidance to schools to avoid HFSS promotions and products as part of rewarding students, or during their events.

We believe that the changes to the standards need to be well communicated to parents. Evidence from polling on behalf of Sustain's Children's Food Campaign by Survation reveals that only 1 in 2 parents (45%) are aware of the existence of school food standards. However there is strong evidence that parents would welcome clear communication around healthy eating in schools: 87% think schools should play a role in ensuring children eat healthily and 88% agree that learning about healthy eating in school is important [2].

[1] School Food Matters (2026) Evaluation of the Nourish Programme. London: School Food Matters. Available at:

<https://www.schoolfoodmatters.org/sites/default/files/2026-01/N-report-DIGITAL.pdf>

[2] Survation/Sustain (2026) Polling of 1020 parents aged 18+ in England with children currently in primary and/or secondary schools. Fieldwork was conducted 5-12 May 2026. Evidence submitted separately to SFS Consultation team 3 June 2026. Data tables available on request.

Increasing fibre

Starchy foods

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

- **Agree**

We support proposals that increase the amount of fibre in school meals. The percentage of age groups not meeting fibre recommendations for 4 to 10 year olds and 11 to 18 year olds is 86% and 96% respectively, according to the National Diet and Nutrition Survey [1]. While consumption of fibre is low for all groups, it is 17% lower in the lowest quintile than in the highest quintile. Therefore measures to increase fibre in school meals, alongside the current expansion of free school meals to all children in households receiving Universal Credit, are well aligned with reducing health inequalities, and the government's commitment to tackle child poverty. Measures to increase fibre in school food would also contribute towards fewer absences, given the increasing incidences of constipation and other bowel-related problems amongst pupils. [2, 3]

We support the proposal to ensure at least 50% of rice and pasta is wholemeal, and encourage the government guidance to clarify that this is the minimum only, and encourage schools to go further to use wholegrains wherever possible. Wholegrain rice contains substantially more fibre than white (around 3.2g per cup versus 0.6g)

[4] and wholegrain pasta can contain two to three times the fibre of regular pasta (an extra 2–3g per 100g serving). However we also urge the government to add further clarity on whether this means 50% of menu items, 50% of days or 50/50 white and wholemeal mixed in the same meal. The proposal has the potential to meaningfully increase fibre intake if loopholes are closed to ensure it leads to increased uptake of these foods.

We agree that the standards should set a minimum fibre content for all bread and baked products. Sustain's Real Bread Campaign has submitted a separate response with further detail on how government can align guidance and standards for school food with increasing consumption of healthier high fibre, additive free, minimally-processed bread.

We are concerned that the proposed threshold of 3g/100g does not align with a higher fibre recommendation as it would still permit industrially processed white loaves to be served widely in schools – in short, the fibre minimum for bread proposed is far too low. It should at the very least align with the 50/50 white/wholemeal threshold recommended on bread. For a secondary school student, the recommended intake is 25g per day and therefore bread with only 3g/100g of fibre would contribute less than 8% of their recommended intake in a two slice portion.

Our analysis of 50/50 loaves found in major supermarkets indicates these typically fall in the range of 4.2-4.7g fibre per 100g, with some containing over 5g. For example, Hovis Best of Both Medium sliced loaf contains 5.6g/100g; Kingsmill 50/50 medium sliced loaf contains 4.7g/100g, Sainsbury's Both in One medium sliced loaf contains 4.5g; Warburton's Half and Half loaf is 4.2g/100g.

A fibre threshold of 3g/100g would only serve to maintain the current status quo when it comes to lower fibre Chorleywood processed white bread. Whilst it would rule out some brands and white loaf options, it would still allow exclusively white bread to be served in schools. For example, Tesco processed medium sliced white loaf contains exactly 3g/100g of fibre, Asda's Just Essentials processed white loaf is 3.2g/100g, Hovis 'signature' white loaf is 3.5g/100g.

We would advocate higher ambition from the government. Schools need to be encouraged and incentivised to support higher fibre consumption by increasingly offering more wholemeal options, which typically contain double the current proposal – over 6g of fibre per 100g. For example Tesco wholemeal medium sliced loaf contains 6.3g per 100g, Warburton's wholemeal contains 6.2g [5]. We strongly urge the Government to support schools to make wholemeal their default option.

We urge the government to increase the minimum threshold on fibre in bread to a minimum of 4.5g or 5g per 100g, with good practice guidance to encourage 6g/100g

in line with wholemeal breads. We are concerned that simply providing a fibre guideline in grams per 100g of finished product is challenging for any school kitchens making their own bread from scratch, and risks increasing purchase of ultra-processed industrial products containing additives and preservatives, because the fibre per 100g is stated. The government should be encouraging schools to make their own real bread – including teaching students to make bread served at lunchtimes. We would recommend that accompanying guidance should include recipes, tables of ratios of wholemeal to white flour and other information to help cooks ensure bread, breakfast goods and other baked products meet the minimum fibre requirement.

There is good evidence that, with the right support, there is good acceptance of higher fibre bread by school children (where there are no other complicating dietary factors). As part of the H3: Healthy Soil, Healthy Food, Healthy People programme (part of UKRI's Transforming UK Food Systems Programme), researchers on a 2025 UK study into serving more higher-fibre bread in schools reported that where white bread is served alongside wholemeal or seeded options, it will often be chosen and this could contribute to wastage of higher fibre options. However, where higher fibre wholemeal or 'half and half' options were offered as default, "child preferences were not a major barrier. When provided with higher fibre foods, children ate and enjoyed them." They cited Sustain's member Magic Breakfast's success in replacing all white with high fibre, high protein half-and-half products. [6] A change to 50% wholegrain in the USA (where, unlike the UK, the term is defined) began in 2012. [7]

We accept that schools may need to adapt their offer in relation to inclusion of children with SEND, sensory or neurodiversity challenges when it comes to higher fibre options, but we believe that normalising the consumption of higher fibre bread will also support parents with improving their children's consumption of higher fibre starchy foods.

We recommend that the restrictions proposed on focaccia and ciabatta are given greater nuance. Focaccia is a feasible bread for schools to make from scratch on site at scale and would be a better option than buying in ultra-processed products. We therefore recommended that focaccia is permitted as a bread option where it is made on site by schools using 50% wholemeal flour, with additional guidance around level of permitted oil. Ciabatta that is made without oil, should also be permitted.

Bread quality should not be defined only by fibre content. Bread, wraps, baps, sandwiches, pizza bases and other dough-based products are high-volume school foods especially in secondary schools with a higher use of grab and go options. We strongly recommend also limiting salt content of all bread products, whether sourced externally or baked in schools, in line with the government's current, or most recent, salt reduction programme targets, and lower salt options are specified.

We agree that starchy foods that are cooked using fat or oil (including during manufacture) may be served on no more than two meal occasions each week and only when they form part of a meal. The percentage of calories from saturated fat exceeds the recommended daily maximum of 10% among children from families of all income levels, with an average intake of 13.1% [7]. High saturated fat intake is linked to heart disease, stroke and certain cancers in adults [8].

The acceptability of this by 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.

[1] National Diet and Nutrition Survey 2019 to 2023

<https://www.gov.uk/government/statistics/national-diet-and-nutrition-survey-2019-to-2023/national-diet-and-nutrition-survey-2019-to-2023-report>

[2] 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>

[3] Constipation in children: How common is it? NICE, last revised August 2025.

<https://cks.nice.org.uk/topics/constipation-in-children/background-information/prevalence/>

[4] Khalua, R.K., Tewari, S. and Mondal, R., 2019. P.997. Nutritional comparison between brown rice and white rice. *Magnesium*, 5, p.20.

[5] Data on fibre levels in bread accessed 2 June 2026 on company websites as follows: [Hovis 50:50 Best of Both medium sliced 800g](#); [Kingsmill 50:50 medium sliced 800g](#); [Warburton's Half and Half sliced 800g](#); [Sainsbury's Both in One medium sliced 800g](#); [Tesco medium sliced white 800g](#); [Asda Just Essentials White 800g](#); [Tesco Wholemeal Medium sliced 800g](#); [Warburton's Wholemeal Medium sliced 800g](#);

[6] 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>

[7] The US bread regulation covers 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.

[8] The Food Foundation (2025), Broken Plate, Available from: https://foodfoundation.org.uk/sites/default/files/2025-04/TFF_The%20Broken%20Plate%202025.pdf

[9] NHS (2026) How to get more fibre into your diet. Available at: <https://www.nhs.uk/live-well/eat-well/digestive-health/how-to-get-more-fibre-into-your-diet/>

Fruit and vegetables

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

- **Strongly agree**

We strongly support 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. Data from the National Diet and Nutrition Survey shows that on average, children in the UK aged 11 to 18 years consume 2.8 portions of fruit and vegetables a day, and fewer than 1 in 10 (9%) meet the '5 A Day' recommendation. Mean consumption of 5 A Day portions by income quintile is lowest in the lowest income quintile and highest in the highest income quintile.[1]

However, we recommend amending this requirement for both main meals and grab-and-go options to at least *two* servings of vegetables, as an accompaniment or as part of the main meal. The inclusion of two portions of vegetables and/or pulses in every meal is a key recommendation of the joint-policy briefing 'Serving Up', endorsed by 25 health and sustainability organisations [2]. A review is needed of what an appropriate 'portion' of vegetables should amount to, and we support inclusion of pulses and legumes within the category of permitted vegetables allowing more variety for students. Practical advice on how to implement this requirement for caterers, particularly in grab-and-go options, to ensure uptake and minimise food waste. An increase to a minimum of one portion of vegetables in grab-and-go should be introduced from 2026. However, increasing to two portions of vegetables in grab-and-go could also be phased.

Parents support including more vegetables in school meals, with 75% saying they support the proposed increase in a recent poll conducted by Survation on behalf of Sustain's Children's Food Campaign. Support is consistent across primary (75%) and secondary parents (73%), with parents of children in both school types highest at 82% [3].

Grab-and-go options have become very popular in secondary schools. A 2025 survey of 2,000 secondary school students found that a third (32%) of students surveyed buy grab-and-go at morning break at least 3-4 times a week. It's even more

popular at lunch, with 60% of students surveyed purchasing at least once a week and 40% at least 3-4 times per week. The dominance of grab-and-go disproportionately impacts students who receive free school meals (FSM): 56% of students on FSM buy grab-and-go at least 3-4 times weekly, compared to 36% of students not on FSM. [4]

Grab-and-go done in a healthy balanced way can play a role in feeding very large numbers of children on busy school days. However, current provision often falls short of government recommendations for a balanced diet. Students in the North West described grab-and-go bags containing a sandwich, drink and dessert such as a cookie, or hot options such as baguettes in a research study by Sustain member Food Active [5]. Menu analyses and interviews with school food stakeholders show that typical options are carbohydrate-based items such as pizza, sausage rolls and chips. Only 1 in 3 of students feel such meals provide sufficient energy to concentrate during lessons. [4]

Nonetheless, improving the grab-and-go offer is important, desired by students and achievable. To be effective, vegetables should be incorporated in appealing, convenient formats; case studies demonstrate how this can work. For example, a two-day pilot at Launceston College by Sustain member Chefs in Schools overhauled the breaktime offer with freshly made vegetarian items priced at £1, including cauliflower wings, pea fritters and noodle boxes; this led to record breaking gross income. [6]

An increase in vegetable provision 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 [7]. 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. [8]

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 [5]. This is also raised by parents as an increasing concern raised by their children, not enough time to use the bathroom, queue for lunch, eat with friends and have active social time at lunch. 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. 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).

Finally, we urge Government to support schools in increasing procurement of any fruit or vegetables in line with the commitment to source 50% of produce from local, sustainable producers where possible. There is an opportunity, especially with the proposed expansion of free school meals to children in households on Universal Credit, to maximise public sector supply chains for British farmers for key ingredients such as carrots, potatoes, brassicas. [9] The government could build on lessons from existing initiatives in Wales and Scotland and case studies of schools already increasing use of UK grown agro-ecological and organic produce in school meals, and ensuring the school food system benefits children, farmers and the planet. [10]

[1] OHID (2025) National Diet and Nutrition Survey 2019 to 2023: report <https://www.gov.uk/government/statistics/national-diet-and-nutrition-survey-2019-to-2023/national-diet-and-nutrition-survey-2019-to-2023-report>

[2] Foodrise and Sustain, Serving Up: Aligning Public Procurement of Food for UK Public Institutions with Healthy Sustainable Diets (Foodrise and Sustain, 2025), <https://feedbackglobal.org/wp-content/uploads/2025/03/Feedback-2024-Serving-Up-public-procurement-briefing.pdf>.

[3] Survation poll conducted on behalf of Sustain, online survey of English parents aged 18+ with children in primary and/or secondary education. Fieldwork conducted 5-12th May 2026. Sample size 1020. Submitted to SFS Consultation inbox 3 June 2026.

[4] Bite Back (2026). Quick, cheap and profitable: Who is benefitting from the rise in grab-and-go canteen culture at the expense of child health?

[5] Food Active (2024) Fuelling the Future: How does secondary school food fare for our young people? <https://foodactive.org.uk/fuelling-the-future-how-does-secondary-school-food-fare-for-our-young-people/>

[6] Chefs in Schools (2024) Snack takeover success | Chefs in Schools. Available at: <https://chefsinschools.org.uk/n-i/news/chefs-in-schools-snack-takeover/>; Davies, J. (2024) 'Launceston school joins initiative to transform child health through school food', Cornish and Devon Post, 3 December. Available at: <https://www.thepost.uk.com/> (Accessed: 9 January 2026).

[7] Devine, L.D. et al. (2023) 'Factors that influence food choices in secondary school canteens: a qualitative study of pupil and staff perspectives', *Frontiers in Public Health*, 11. Available at: <https://doi.org/10.3389/fpubh.2023.1227075>., McHugh, C. et al. (2021) 'Enablers and barriers English secondary schools face in promoting healthy diet and physical activity behaviours', *Health Promotion International*, 37(2), p. daab148. Available at: <https://doi.org/10.1093/heapro/daab148>.; Ryan, D., Holmes, M. and Ensaff, H. (2022) 'Adolescents' dietary behaviour: The interplay between home and school food environments', *Appetite*, 175, p. 106056. Available at: <https://doi.org/10.1016/j.appet.2022.106056>.; Woodside, J. et al. (no date) 'Opportunities for intervention and innovation in school food within UK schools', *Public Health Nutrition*, 24(8), pp. 2313–2317. Available at: <https://doi.org/10.1017/S1368980020004668>.

[8] Murphy, M. et al. (2021) 'Acceptability and feasibility of strategies to promote healthy dietary choices in UK secondary school canteens: a qualitative study', *BMC Research Notes*, 14(1), p. 365. Available at: <https://doi.org/10.1186/s13104-021-05778-3>.

[9] Sustain and Bremner & Co (2025) Follow the Carrot: Can free school meal expansion boost the UK food and farming economy? <https://www.sustainweb.org/reports/sep25-follow-the-carrot/>

[10] Sustain & Bridging the Gap (2026) Bridging the Gap: How to make school food work for children, farmers and planet <https://www.sustainweb.org/reports/mar26-how-to-make-school-food-work-for-children-farmers-and-planet/>

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

• Strongly agree

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.

Recent polling, conducted by Survation on behalf of Sustain's Children's Food Campaign, found that two thirds of primary school parents (63%) support replacing sugary desserts with healthier alternatives like fresh fruit and yoghurt in school meals

[2]. This indicates a good level of support but also a need to ensure parents and pupils alike understand the reasons for this change. Overall parents have told us that they support the reduction of sugary desserts but also want healthier dessert options to be offered and modelled, rather than the concept of dessert being 'demonised'.

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.

Fruit-only dessert initiatives can be well received when introduced gradually and with pupil involvement, as shown by Sustain member School Food Matters' Nourish programme [2]. Schools that trialled fruit-based dessert approaches found broad and sustained pupil support, and in one school a weekly "Fruity Fridays" initiative led to students increasingly choosing fruit on other days too, suggesting that regular exposure can help shift preferences over time. Pupil involvement in selecting and promoting fruit options, including through student food ambassadors, was identified as an important factor in sustaining uptake.

We urge the government to incorporate into guidance for schools that they should specify that 50% of fruit should be sourced from local, 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.

[1] Survation poll conducted on behalf of Sustain, online survey of English parents aged 18+ with children in primary and/or secondary education. Fieldwork conducted 5-12th May 2026. Sample size 1020.

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

Reducing sugar

Healthier drinks

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

- Strongly agree

We strongly agree with the proposal to restrict the list of permitted drinks in primary schools. Fruit juice accounts for a significant proportion of free sugars intake in primary-aged children, as evidenced in the consultation document, and removing them from the school environment is a straightforward, evidence-based intervention. Frequency and volume of fruit juice consumption is also negatively associated with risk of dental caries. Tooth decay remains the leading cause of hospitalisation of children aged between 5 and 9 years in England [1].

Establishing these habits during primary years is likely to generate lasting benefits, given the well-evidenced relationship between early dietary patterns and long-term health outcomes. Concerns that removing fruit juice will compromise children's micronutrient intake are not well-founded in the context of these 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 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.

Recent polling carried out on behalf of Sustain found that 60% of parents support only water and milk (or unsweetened plant-based alternatives) in schools [2], whilst 16% of parents disagreed. Whilst this shows a significant majority of parental support, it also indicates a need to educate parents about the reasons for removing juices from schools alongside guidance on healthy levels of consumption in NHS guidance. In focus groups with parents conducted to inform Sustain's response, several parents commented that schools removing flavoured waters and juices would provide consistent messaging that also makes it easier to encourage water and milk consumption at home, and support parents' own efforts on healthy food and drink.

Concerns that children will become dehydrated if they don't like plain water is not well supported by the evidence. Children's drink preferences are largely shaped by what they are routinely offered and if sweetened drinks are consistently unavailable at school, the vast majority of children will drink water. This is borne out by experience in schools that have already moved to water-only policies. Work by the Greater London Authority on restricting sugary drinks in primary schools has already demonstrated that this approach is both practical and effective, and that children adapt readily when healthier options are consistently available. An evaluation of the Mayor of London's Water Only Schools initiative, which surveyed over 2,000 schools, found positive attitudes toward water-only policies amongst staff, parents, and students, with schools reporting a tangible shift in children's behaviours and attitudes toward water [3].

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 [4]. 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.

We agree with the government's proposed requirements that any plant based alternatives to milk must be unsweetened or no sugar and fortified with each of these micronutrients: calcium, iodine, vitamin D, riboflavin, vitamin B12. This is in keeping with SACN and COT guidance, which states that fortified and unsweetened plant-based drinks are an acceptable alternative to cow's milk for children over five and adults. [5] Multiple studies have found that plant-based milks have lower greenhouse gas emissions, land use and water use than animal milk, [2,3] as well as favourable health profiles. [6, 7]

Preference in guidance should be given to soya drinks over oat drinks, due to its higher protein content and good provision of all nine essential amino acids – this is in keeping with SACN and COT guidance. [5] Oat drinks can be higher in carbohydrate content – though they can be good alternatives for children with soya allergies.

We note the omission of rice drinks for primary schools, but not secondary schools. We urge the government to consider adding pea-based drinks to the list of permitted options, at least for secondary if not both primary and secondary schools, given their high protein content. For all dairy and non-dairy drinks there will need to be necessary safeguards around allergens.

[1] Office for Health Improvement and Disparities, Short statistical commentary for hospital tooth extractions in 0 to 19 year olds 2024, published 12 November 2025 (accessed 3 June 2026) <https://www.gov.uk/government/statistics/hospital-tooth-extractions-in-0-to-19-year-olds-2024/short-statistical-commentary-for-hospital-tooth-extractions-in-0-to-19-year-olds-2024>

[2] Suration polling conducted on behalf of Sustain, online survey of English parents aged 18+ with children in primary and/or secondary education. Fieldwork conducted 5-12th May 2026. Sample size 1020. Submitted directly to DFE 3 June 2026.

[3] Yusuf, H. et al. (2025) "'I drink tap water as it is convenient and quick" – a mixed methods evaluation of water only school policies in London', *Health Education Research*. Available at: <https://doi.org/10.1080/09581596.2025.2507228#>

[4] See for example: <https://www.radnorhills.co.uk/shop/radnor-fizz/sour-cherry/>

[5] Office for Health Improvement & Disparities, 'SACN and COT Assessment of the Health Benefits and Risks of Consuming Plant-Based Drinks: Summary', GOV.UK, 16 July 2025, <https://www.gov.uk/government/publications/plant-based-drinks-health-benefits-and-risks/sacn-and-cot-assessment-of-the-health-benefits-and-risks-of-consuming-plant-based-drinks-summary>.

[6] Joseph Poore and Thomas Nemecek, 'Reducing Food's Environmental Impacts through Producers and Consumers', *Science* 360, no. 6392 (2018): 987–92, <https://doi.org/10.1126/science.aag0216>;

[7] Marco Springmann, 'A Multicriteria Analysis of Meat and Milk Alternatives from Nutritional, Health, Environmental, and Cost Perspectives', *Proceedings of the National Academy of Sciences* 121, no. 50 (2024): e2319010121, <https://doi.org/10.1073/pnas.2319010121>.

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

- Disagree

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

We recommend that the secondary school drinks standards aligns with the proposals for primary schools, permitting only water, milk or plant-based milk alternatives that are unsweetened and fortified. Consistency across primary and secondary schools ensures that the positive habits and preferences developed during primary school are maintained. Recent polling conducted on behalf of Sustain's Children's Food Campaign found this position supported by parents, with 73% saying the same food standards should apply to both primary and secondary schools [1].

The proposal to allow low-sugar drinks that can contain sweeteners is concerning given the evidence of low compliance with current drinks standards [2]. 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 food in secondary school. The WHO's 2023 guidance advises against non-sugar sweeteners as a tool for improving health outcomes in children, noting potential undesirable effects from long-term use [3]. 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 [4].

Government should also ensure that restricting the drinks list is accompanied by funding for water fountain installation and maintenance, and that access to free, fresh drinking water is subject to regular external monitoring by an appropriate inspection

body. Despite being a legal requirement, Food Foundation research found that students were unable to access free drinking water easily in their schools due to water fountains being broken or the location of the water fountain not being in locations that were easily accessible. Where jugs of water were available in the lunch hall, students found that they could not trust them to be clean, so did not use them [5]. Dehydration is a risk if water is not genuinely accessible, convenient and appealing throughout the school day. This is why investment in well-maintained, clean, easily-accessible water fountains and refill stations is essential, not optional. A child who has to queue, hunt for a working fountain or drink from an unpleasant tap will avoid drinking water regardless of what else is on offer. This is where government resource and external monitoring of water provision becomes critical.

Furthermore, reliance on bottled drinks can have a disproportionate impact on students who receive free school meals, as spending on bottled drinks in the eventuality of an unreliable free water supply directly reduces what they can afford to buy to eat.

Having engaged with caterers as part of a series of roundtable discussions about school food standards and school meal funding, we understand that many caterers have concerns about the impact of reduced drink sales in secondary schools, where drinks represent a major source of revenue. However, we think on balance that the impact on child health and the environment overrides the commercial concern.

[1] Survation poll conducted on behalf of Sustain, online survey of English parents aged 18+ with children in primary and/or secondary education. Fieldwork conducted 5-12th May 2026. Sample size 1020.

[2] Pallan, M. et al. (2024) 'School food policy in secondary schools in England and its impact on adolescents' diets and dental health: the FUEL multiple-methods study', *Public Health Research*, 12(12), pp. 1-167. Available at: <https://doi.org/10.3310/TTPL8570>.

[3] World Health Organisation. (2023). Use of non-sugar sweeteners: WHO guideline. Available from: <https://www.who.int/publications/i/item/9789240073616>

[4] OHID (2025). SACN statement on the WHO guideline on non-sugar sweeteners: summary. Available from: <https://www.gov.uk/government/publications/sacn-statement-on-the-who-guideline-on-non-sugar-sweeteners/sacn-statement-on-the-who-guideline-on-non-sugar-sweeteners-summary>

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

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

• Disagree

We oppose 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. 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.

Parent polling by Survation on behalf of Sustain's Children's Food Campaign shows that almost 3 in 4 parents (73%) believe the same standards should apply in both primary and secondary schools, rising to 76% of parents of secondary pupils. Meanwhile 60% support water and milk only policies,

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 strongly advise against this.

Moreover, phased introduction undermines the progress on healthier drink choices and habits for primary school students who will benefit from the new drinks standards in primary schools in 2026, but would then move to the looser, phased standards in secondary schools where such drinks were still allowed in 2027. Survation polling showed 68% support for water and milk only policies amongst parents with children in both primary and secondary schools at present.

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. This is also supported by parents as per previous responses to Q19 and Q20. The nutritional rationale for restricting sugary and sweetener-containing drinks does not weaken with age, and maintaining a more permissive secondary list creates an unjustifiable distinction that is hard to defend on public health grounds. Given that

primary school pupils will have had no exposure to sweetener-containing drinks throughout their primary education under these new standards, allowing them at secondary level risks undermining habits built during those primary years.

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

Dairy and plant-based options

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

- Agree

We agree with the proposed changes as they support improved nutritional standards and greater inclusivity through the recognition of plant-based alternatives.

Maintaining a requirement for daily milk provision ensures that pupils continue to have access to a reliable source of essential nutrients, while allowing flexibility through plant-based drinks. This is in keeping with SACN and COT guidance, which states that fortified and unsweetened plant-based drinks are an acceptable alternative to cow's milk for children over five and adults [1]. Providing plant-based dairy alternatives is important to accommodate the cultural, religious, and special dietary needs of diverse local communities – including lactose intolerance (affecting 8% of the UK population [2]), religious dietary observances around certain animal products, vegan and vegetarian and diets (estimated as 7% of the UK population and increasing trends around flexitarian diets (an estimated 13% of UK population. [3])

The inclusion of plant-based alternatives supports pupils with different dietary needs and preferences, including those who are lactose intolerant, vegan, or from religious or cultural backgrounds where dairy consumption is lower.. Requiring these products to be fortified with key micronutrients such as calcium, iodine, vitamin D, riboflavin and vitamin B12 is particularly important to ensure nutritional equivalence with dairy options.

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

We agree with the government's proposed requirements that plain soya or oat drinks, must be unsweetened or no sugar and fortified with each of these micronutrients: calcium, iodine, vitamin D, riboflavin, vitamin B12. We suggest adding fortified unsweetened pea milk alternatives to the list of permitted plant-based alternatives, recognising its high protein content.

School Food Standards currently require that: “Lower fat milk and lactose reduced milk (sub-group D1) must be made available on every school day at a time during school hours.” We recommend that plant-based alternatives to milk (such as plain soya or oat drinks) should also be “made available on every school day at a time during school hours”, as is currently the case for animal milk – subject to the requirements on sugar and fortification mentioned above.

[1] Office for Health Improvement & Disparities, ‘SACN and COT Assessment of the Health Benefits and Risks of Consuming Plant-Based Drinks’.

[2] Christian Løvold Storhaug et al., ‘Country, Regional, and Global Estimates for Lactose Malabsorption in Adults: A Systematic Review and Meta-Analysis’, *The Lancet Gastroenterology & Hepatology* 2, no. 10 (2017): 738–46, [https://doi.org/10.1016/S2468-1253\(17\)30154-1](https://doi.org/10.1016/S2468-1253(17)30154-1).

[3] YouGov, ‘Dietary Choices of Brits (e.g. Vegetarian, Flexitarian, Meat-Eater Etc)?’, YouGov, 2024, <https://yougov.co.uk/topics/society/trackers/dietary-choices-of-brits-eg-vegetarian-flexitarian-meat-eater-etc>.

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?

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

We support the proposals on high fat, salt and/or sugar (HFSS) which are long overdue and reflect current evidence showing that children are consuming far more saturated fat, salt and sugar than recommended, significantly increasing their lifetime risk of cardiovascular disease, type 2 diabetes and obesity [1]. Limiting deep-fried foods, processed meats, batter-coated items and pastry-based products, alongside sugar reduction, aligns directly with SACN guidance and will meaningfully reduce exposure to these nutrients during a critical period of dietary habit formation.

Rebalancing the school food environment away from foods associated with excess sugar, saturated fat and salt intake, is crucial in ensuring every child gets the fuel they

need to thrive. The UK government recommends that no more than 5% of energy comes from free sugars. Overall, less than 1 in 10 children (9%) meet the recommendation, with average intake at 10.5% of energy for children. The recommendation is that the population average contribution of saturated fats to energy intake should be no more than 10%; only 16% of children meet it. [1] Salt intakes similarly exceed age-specific limits in children, with knock on effects on blood pressure [2]. Currently, one in three children leave primary school experiencing obesity [3].

Evidence from our May 2026 polling of parents conducted by Survation, reveals that 70% of parents are concerned about whether their child is eating healthily, whilst 87% think it is important for schools to play a role in ensuring children eat healthily [4]. There is a clear expectation from parents that schools should model good nutrition that is not always matched by the reality.

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. [5,6,7] Because these types of items are often sold both at breaktime and lunchtime on the same day, the standards should additionally specify that when, for example, a batter coated or breadcrumb coated item is sold at breaktime and resold at lunchtime on the same day, this should count as being sold twice in one week.

In line with the work of Sustain alliance member organisation Action on Salt and Sugar, the new School Food Standards should explicitly require that sodium/salt in bread does not exceed the Government's current / most recent targets, and align with updated Government Buying Standards for Food and Catering (2024) which reflects these. This does not mean eliminating salt from bread altogether as it is a key ingredient alongside water and flour, but ensuring the standards are clear that bread products should be low in salt. As illustrated by the work of Sustain alliance member Chefs in Schools, we note that focaccia (when made with a lower proportion of oil and salt than typically in restaurant or commercial bakeries) can easily be made in-house by school chefs from four or five basic ingredients in large trays and sliced into portions. It is typically prepared with olive oil, which is high in mono-unsaturated fats, polyphenols and antioxidants, and is associated with absorption of vitamins A, D, E and K. Focaccia is typically eaten without addition of butter or non-dairy spreads. Therefore, as long as there is clear guidance on levels of oil and salt, we believe the standards could allow focaccia to be served by schools more than twice per week. We note that ciabatta is not necessarily made with oil, so should also be removed from the list of exclusions.

In relation to the proposed exemption of fruited bread based buns from restrictions, we note that this would allow them to be made with added fat and sugar, while the dried fruit they contain poses challenges for dental health. We disagree with exempting these products from the restrictions on what can be served (eg at breakfast), which should instead be included in the sweetened baked products restriction. They should also have to meet the minimum fibre content requirement for bread.

We are concerned that whilst it is clear that salt must not be provided to be added to meals, the standards do not explicitly require schools to limit the amount of salt used during food preparation on site. The Government Buying Standards for Food and Catering Services (GBS) which apply to public sector food contain explicit recommendations on this, but are currently not mandatory for school food. We urge the government to ensure that School Food Standards and school food procurement processes are fully aligned with the GBS, as well as reflecting the up-to-date nutritional guidance on salt consumption for children. Accompanying guidance for schools and recipe suggestions could also promote flavour development through the use of healthier herbs, spices and other seasonings to ensure food remains appealing and tasty and supports uptake of school meals.

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 (SFS), with the greatest challenges relating to restrictions on food and drink high in fat, salt and sugar. A recent assessment of compliance at 36 secondary schools across the school day, found that only 6% of schools met the current standard banning confectionery, chocolate and chocolate-coated products, 17% complied with the restriction on cakes and biscuits outside lunchtime, and just 11% met the limit on deep-fried, batter-coated or breadcrumb-coated foods. [7] We would like to see guidance for schools to ensure that healthy options are never more expensive than less healthy alternatives: testimony from secondary school students suggests that healthier options, particularly fruit, are often more expensive than cakes, cookies or sugary drinks.

We further recommend that the list of foods restricted to one serving per week (or no more than two combined across the week) also include highly processed plant-based alternatives that are high in fat, salt and sugar. We strongly 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-based options. The nutritional profile of plant-based meat alternatives varies widely [9,10]. 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.

Processed meat is not part of the UK Eatwell Guide. The guide recommends eating less red and processed meat. We noted the negative health impacts of processed meat in our response to Q10 supporting the removal of processed meats from the breakfast standards. The inclusion of processed meat is incongruous when other unhealthy food (such as deep fried foods) are fully restricted. Setting a limit on the amount of processed meat served was a key recommendation of the joint-policy briefing 'Serving Up', endorsed by 25 health and sustainability organisations. [11] We would encourage the government to consider tightening the restrictions on processed meats to encourage the blending of meat and plant-based products, which would actively normalise healthier blended products. There are already examples of this public sector food, with blended products being served in NHS hospitals [12].

Finally, we disagree with the timeline around phasing for secondary schools. Evidence from the UK Sugar Reduction Programme shows that extended voluntary timelines can have limited impact [13]. We believe a one-year implementation period would better reflect the government's ambition to create the healthiest generation of children ever.

[1] OHID (2025) National Diet and Nutrition Survey 2019 to 2023: report <https://www.gov.uk/government/statistics/national-diet-and-nutrition-survey-2019-to-2023/national-diet-and-nutrition-survey-2019-to-2023-report>

[2] He FJ, Marrero NM, Macgregor GA. Salt and blood pressure in children and adolescents. *J Hum Hypertens*. 2008 Jan;22(1):4-11. doi: 10.1038/sj.jhh.1002268. Epub 2007 Sep 6. PMID: 17823599.

[3] NHS Digital. (2025). National Child Measurement Programme, England, 2024/25 School Year

[4] Suration poll conducted on behalf of Sustain, online survey of English parents aged 18+ with children in primary and/or secondary education. Fieldwork conducted 5-12th May 2026. Sample size 1020.

[5] Bite Back (2025). Fuel Us, Don't Fool Us: An investigation into Big Food in schools. https://cdn.bitebackmedia.com/media/documents/Bite_Back_Report__Big_Food_School.pdf

[6] Bite Back (2021) Spill the Beans https://biteback.contentfiles.net/media/documents/Spill_the_Beans_School.pdf

[7] Bite Back (2026). Quick, cheap and profitable: Who is benefitting from the rise in grab-and-go canteen culture at the expense of child health?

[8] Pallan, M. et al. (2024) 'School food policy in secondary schools in England and its impact on adolescents' diets and dental health: the FUEL multiple-methods study',

Public Health Research, 12(12), pp. 1–167. Available at:

<https://doi.org/10.3310/TTPL8570>.

[9] The Food Foundation (2024), Rethinking plant-based meat alternatives, <https://foodfoundation.org.uk/sites/default/files/2024-08/Rethinking%20Plant-Based%20Meat%20Alternatives.pdf>,

[10] Espinosa S. N. et al. (2026), Plant-based analogues to meat and dairy for sustainable food systems, Proc Nutr Soc, 2026 Feb 16:1-12. doi: 10.1017/S0029665126102237 <https://pubmed.ncbi.nlm.nih.gov/41693439/>

[11] Foodrise and Sustain, Serving Up: Aligning Public Procurement of Food for UK Public Institutions with Healthy Sustainable Diets (Foodrise and Sustain, 2025), <https://feedbackglobal.org/wp-content/uploads/2025/03/Feedback-2024-Serving-Up-public-procurement-briefing.pdf>. acking positions via Serving Up briefing

[12] Quorn, 'Quorn & NHS Partner on the Let's Meat Halfway Initiative', Quorn Pro, October 2024, <https://www.quornpro.com/en-gb/news/quornpro-nhs-lets-meat-halfway-initiative>.

[13] Office for Health Improvement & disparities (2022), Sugar reduction programme: industry progress 2015 to 2020 <https://www.gov.uk/government/publications/sugar-reduction-programme-industry-progress-2015-to-2020>

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

• Strongly agree

We strongly agree with restricting the serving of cheese as a main ingredient. Whilst it can be a source of nutrients including calcium and protein, it is also a significant source of saturated fat and salt in children's diets [1]. According to the UK Eatwell Guide, most cheeses contain between 20g and 40g of fat per 100g, which qualifies them as high fat foods (over 17.5g of fat per 100g), some are high in saturated fat, and many cheeses are also high in salt (more than 1.5g salt per 100g). [2] There is also a significant variation in the salt content of different types of cheese. [3]

Therefore we strongly agree with proposals that cheese (including plant-based versions) can only be used as a main ingredient in meals on up to two days per week. This is consistent with government aims to reduce children's consumption of food high in salt and saturated fat. This practical suggestion still allows cheese to feature as a topping or accompaniment, preserving flexibility for caterers while reducing saturated fat load across the week.

We also note that cheese has a very high environmental impact per 100g protein – an average of 11kgCO₂eq of greenhouse gas emissions per 100g protein (higher than both pork and chicken, over 5 times higher than tofu and 13 times higher than pulses, on average). [4] In its assessment of healthy diets within planetary boundaries, the authoritative Planetary Health Diet therefore recommends no more than around 25-30g of hard cheese per day, for those who choose to eat dairy. [5] This proposal supports the government and schools to deliver on their climate action plans in reducing the environmental impact of food consumption.

We also believe that introducing limits on use of cheese as a main protein will increase variety and choice for pupils who are vegetarian, vegan or lactose-intolerant, where there is often an over-reliance on cheese throughout the week, resulting in lower take up of school meals by pupils with these dietary requirements. Many parents would therefore actively welcome a broader range of non-cheese based options being offered to their children, and encourage taste testing of alternative recipes with pupils to aid the transition and familiarity with new menu alternatives. This perspective was reinforced in workshops held with parents by the Children's Food Campaign.

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

[2] NHS, 'Dairy and Alternatives in Your Diet', Nhs.Uk, 23 February 2022, <https://www.nhs.uk/live-well/eat-well/food-types/milk-and-dairy-nutrition/>.

[3] Action on Salt & Sugar. 2024. The salt content of cheddar and other hard-pressed cheese. <https://www.actiononsalt.org.uk/salt-surveys/2024/cheese/>

[4] Joseph Poore and Thomas Nemecek, 'Reducing Food's Environmental Impacts through Producers and Consumers', Science 360, no. 6392 (2018): 987–92, <https://doi.org/10.1126/science.aag0216>

[5] BDA, 'The EAT-Lancet Commission 2.0 on Healthy, Sustainable and Just Food Systems: A Commission by The Lancet', British Association of Dietitians, 2025, <https://www.bda.uk.com/resource/the-eat-lancet-commission-2-0-on-healthy-sustainable-and-just-food-systems-a-commission-by-the-lancet.html>.

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

- Agree

We recognise that there may be challenges in particular for secondary schools to implement the proposals, and the need for caterers to develop appealing meal alternatives and engage pupils to ensure acceptability. The proposal to limit cheese as a main protein option to three portions per week from September 2027, reducing to two from September 2028 provides adequate time to do this, while still delivering the nutritional benefit of the full restriction within two years. Where possible, schools and caterers might be encouraged to trailblaze good practice to achieve a faster timeframe, and phasing should not become a reason to delay menu progress by caterers and schools.

Reducing desserts

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

- **Strongly agree**

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 key stage for establishing taste preferences and eating patterns. Replacing sugary desserts with fruit and lower-sugar dairy options on other days provides a genuine opportunity to shift norms around sweetness and improve overall diet quality.

The latest National Diet and Nutrition Survey shows that only 8% of primary pupils meet the free sugars guidelines. Sweet biscuits, cakes and puddings make up 19% of free sugars intake in primary school aged children. [1]

There is strong but not unanimous parental support for limiting sweetened baked goods and desserts in school meals, as evidenced in the polling conducted by Survation on behalf of Sustain's Children's Food Campaign. 63% of parents support replacing sugary desserts such as cakes and puddings with fresh fruit and yoghurt, whilst only 24% are neutral and 12% oppose this. [2]

In workshops with parents to inform our response to this submission, there was also strong but not unanimous support for total removal of desserts, with some parents feeling there is no need for desserts at all in school settings whilst others felt schools can also play a role in modelling healthier dessert options and working with pupils to develop low sugar options that are appealing and enjoyable. Parents are concerned about replacement of sugar with artificial sweeteners, and welcome measures to prevent this approach to menu reformulation. In Parents are concerned about potentially 'demonising' any individual foods rather than using the opportunity to model healthier recipes that also contribute essential vitamins, fibre and other nutrients, whilst limiting total sugar intake. A good example of innovative approach on this was tested in primary schools in Aberdeen, Scotland as part of the Give Peas a

Chance project managed by Soil Association and supported by the Bridging the Gap programme. Organic split peas produced in Aberdeenshire added protein, dietary fibre, and micronutrients including iron, manganese, thiamine and folate to this dessert option and were very popular. Therefore the reduction rather than total removal of desserts feels proportionate at this time.

However, it should be made clear to schools and caterers that the once a week limit on desserts is a maximum, rather than a requirement to serve desserts; moving towards fruit and fruit and yogurt only policies, where supported by children, parents and staff, should be encouraged. We note that there are already many examples of schools who have already achieved progress on removing and replacing sugary desserts which could be used as case studies to support and train schools to make the necessary transition. The need for clear teacher, parent and pupil understanding of the reasons behind this change are going to be critical for acceptance of the policy.

[1] OHID (2025) National Diet and Nutrition Survey 2019 to 2023: report
<https://www.gov.uk/government/statistics/national-diet-and-nutrition-survey-2019-to-2023/national-diet-and-nutrition-survey-2019-to-2023-report>

[2] Suration poll conducted on behalf of Sustain, online survey of English parents aged 18+ with children in primary and/or secondary education. Fieldwork conducted 5-12th May 2026. Sample size 1020.

[3] Soil Association (2025) Give Peas a Chance! Impact report
<https://www.soilassociation.org/what-we-do/soil-association-scotland/food-for-life-scotland/how-give-peas-a-chance-increased-organic-spend-in-aberdeen-city/>

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

• 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. The latest National Diet and Nutrition Survey shows that only 5% of secondary pupils meet the free sugars guidelines. Sweet biscuits, cakes and puddings make up 16% of free sugars intake in secondary school aged children. [1]

There was no major difference in levels of support for replacing sugary desserts with fruit or yoghurt between parents of primary vs secondary school, at around 62% of parents of secondary pupils. However it rose to 68% of parents with children of both primary and secondary age, suggesting a desire for consistency. [2]

However, it should be noted that secondary schools can present more challenges in implementing dessert reductions, compared to primary schools. Research by School Food Matters and the University of Birmingham that looked at barriers and enablers to delivering a whole-school approach to food in secondary schools found that pupils at this age have greater autonomy over food choices and are more strongly influenced by the food environment outside of school, making them more likely to disengage from school meal provision if changes feel imposed. Evidence from secondary schools found that pupils are significantly more likely to accept and sustain new food norms when they have had a genuine role in shaping them, with one student reflecting that changes were something "we helped create." [3] Schools should be actively supported to co-design menu changes with students as dessert reductions are introduced.

[1] OHID (2025) National Diet and Nutrition Survey 2019 to 2023: report
<https://www.gov.uk/government/statistics/national-diet-and-nutrition-survey-2019-to-2023/national-diet-and-nutrition-survey-2019-to-2023-report>

[2] Suration poll conducted on behalf of Sustain, online survey of English parents aged 18+ with children in primary and/or secondary education. Fieldwork conducted 5-12th May 2026. Sample size 1020. Submitted to consultation portal 3 June 2026.

[3] School Food Matters and University of Birmingham (2026) Whole School Approaches to Food in Secondary Schools: Available at:
<https://www.schoolfoodmatters.org/sites/default/files/2026-04/Nourish-Secondaries-summary-report.pdf>

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

- Strongly agree
- Agree
- **Neither agree nor disagree**
- Disagree
- Strongly disagree

Recognising the specific challenges in removing sugary desserts that may present in secondary school contexts, and especially the need for clear awareness and engagement amongst pupils and parents that may be required to support removal of sugary desserts across the school day, we support phased implementation (two portions per week from September 2027, reducing to one from September 2028) as a reasonable concession to the operational realities of secondary school catering, and

one that might support displacement from school meals to brought in food items. 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. We would encourage the government to support dissemination of case studies and best practice from schools and caterers in working with staff, parents and pupils that could help accelerate progress ahead of September 2028 in practice.

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?

- Strongly agree

We welcome the requirement for meal deals to include at least one portion of vegetables or salad and one portion of fruit, while excluding drinks, as an improvement on current practice, providing an important step forward to ensuring children eat the "5 a day". 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 and left at risk of dehydration. The Department for Education is nominally in receipt of income from Soft Drinks Industry Levy (SDIL) revenues, and could consider establishing a specific capital investment fund for schools who need to upgrade their water fountains or additional water points, as was successfully modelled by the Children's Health Fund in 2016-17 [1], or other types of kitchen or dining facility modifications that may be needed as part of expansion of free school meals.

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. [2].

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

[1] Sustain Children's Health Fund (2018) Children's Health Fund: Where does the money go? <https://www.childrenshealthfund.org.uk/projects/>

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

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?

- Strongly agree

We agree with the requirement to be included within or alongside all main menu options at least once a week - this is an excellent proposal with strong nutritional justification. Pulses are nutrient-dense, high in fibre, low in saturated fat, and a good source of plant-based protein and iron. This requirement also gently normalises pulse consumption among children who may have limited exposure to them at home, supporting longer-term healthy eating habits. Secondary school aged children (11-18 years) eat the smallest amount of beans across all age groups, the equivalent of just 2/3 of a portion of beans consumed a week. In contrast, primary school aged children eat on average the largest amount of beans a week, at 1.2 portions a week [1].

Haricot, lentils, chickpeas and kidney beans dominate UK bean consumption, contributing to 90% of total bean consumption for children. However, when we look at the most popular bean-containing dishes eaten in the UK, half of children's bean intake (50%) comes from baked beans. While baked beans might be considered a British classic, it demonstrates potential for a greater diversity of beans to be consumed [1].

Dinner is the most likely meal to contain beans for children. Lunch and breakfast are further opportunities throughout the day for beans and bean-containing foods to be eaten.

The percentage of age groups not meeting fibre recommendations for 4 to 10 year olds and 11 to 18 year olds is 86% and 96% respectively. [2] Children eating less than one portion of beans per week are 47% more likely to be below the LRNI for potassium, 58% more likely for magnesium, 30% more likely for zinc and 20% more likely for iron [2]. Eating more beans could therefore close this nutrient gap.

Pulses contain high fibre, protein and micronutrients (such as iron and potassium) – and are associated with many health benefits, such as reduced obesity and cancer-risk.[3] This is why many European dietary guidelines recommend higher consumption of legumes [4], such as Spain which recommends eating at least 4 servings a week and ideally daily consumption, [5] and Greece which recommends at least 3 servings a week [4].

Increasing use of pulses and legumes would also ensure school food supports planetary health and UK food security. Legumes are also good for soil health: they fix nitrogen in soils – reducing reliance on synthetic fertilisers – sequester carbon, and facilitate the circulation of soil nutrients and water retention.[6] Replacing meat with legumes can result in significant reductions in greenhouse gas emissions: on average, beef (from beef rather than dairy herds) causes 62 times more emissions compared with pulses, per 100g protein[7]. Research suggests that even beef from dairy herds using some of the lowest emissions production methods causes over 11 times more emissions than pulses per 100g protein [7]. Pork has on average over 9 times higher emissions than pulses per 100g protein. [7]

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. [8] The guidance for schools could provide further examples of how pulses and legumes could successfully be included as the main protein, blended with other ingredients or as a side option, dip or sandwich filling. ProVeg's School Plates initiative provides many examples of recipes which incorporate blended meals such as pulses served blended into a bolognese containing mince (either meat or plant-based). [9] Aberdeenshire's innovative integration of locally grown organic split peas into school menus, as part of the Soil Association's Give Peas a Chance project, included a traditional mince recipe that was reformulated to add peas and reduce mince, cutting emissions by 42% without reducing children's uptake and enjoyment of the meal, and showed the versatility and creativity of chefs to introduce pulses across a wide range of savoury and dessert options. [10]

We note that this proposal for pulses to be included alongside all meal options at least once a week sits alongside the inclusion of pulses in the list of proteins to be served three times per week. We would support the government showing further ambition in the standards to encourage schools to serve up pulses at least three times per week, either as a main meal option or alongside main meals. Requiring two portions of vegetables/pulses alongside all main meals would be another good way to achieve this increase in pulse and legume consumption.

[1] The Food Foundation. (2025) *Bean Facts: Spilling the Beans — Why Beans, Peas and Other Legumes Are a Triple Win for Health, Environment and Affordability*.

London: The Food Foundation. Available at:

https://foodfoundation.org.uk/sites/default/files/2025-10/TFF_Beans%20Facts_DIGITAL.pdf

[2] Office for Health Improvement and Disparities (2025) *National Diet and Nutrition Survey 2019 to 2023: Report*. London: Department of Health and Social Care / Food Standards Agency. Available at: <https://www.gov.uk/government/statistics/national-diet-and-nutrition-survey-2019-to-2023/national-diet-and-nutrition-survey-2019-to-2023-report>

[3] Chelsea Didinger and Henry J. Thompson, 'The Role of Pulses in Improving Human Health: A Review', *Legume Science* 4, no. 4 (2022): e147, <https://doi.org/10.1002/leg3.147>.

[4] European Commission, 'Health Promotion and Disease Prevention Knowledge Gateway: Food-Based Dietary Guidelines Recommendations for Legumes', Knowledge for Policy, 2025, https://knowledge4policy.ec.europa.eu/health-promotion-knowledge-gateway/food-based-dietary-guidelines-europe-table-6_en.

[5] Spanish Agency for Food Safety and Nutrition (AESAN), *HEALTHY AND SUSTAINABLE DIETARY RECOMMENDATIONS* (Spanish Agency for Food Safety and Nutrition (AESAN), 2022), https://www.aesan.gob.es/AECOSAN/docs/documentos/nutricion/RECOMENDACIONES_DIETETICAS_EN.pdf.

[6] Fabio Stagnari et al., 'Multiple Benefits of Legumes for Agriculture Sustainability: An Overview', *Chemical and Biological Technologies in Agriculture* 4, no. 1 (2017): 2, <https://doi.org/10.1186/s40538-016-0085-1>.

[7] Joseph Poore and Thomas Nemecek, 'Reducing Food's Environmental Impacts through Producers and Consumers', *Science* 360, no. 6392 (2018): 987–92, <https://doi.org/10.1126/science.aag0216>;

[8] Food Foundation. (2026) How the quality of school food can be improved to increase uptake. London: The Food Foundation. Available at: https://foodfoundation.org.uk/sites/default/files/2026-04/TFF_School%20food%20quality%20%26%20uptake_FINAL_0.pdf

[9] ProVeg UK, 'School Plates - The Recipes', *ProVeg UK*, 2025, <https://proveg.org/uk/school-plates/the-recipes/>.

[10] Soil Association (2025) Give Peas a Chance! Impact report <https://www.soilassociation.org/what-we-do/soil-association-scotland/food-for-life-scotland/how-give-peas-a-chance-increased-organic-spend-in-aberdeen-city/>

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

- **Agree**

The phased implementation for secondary schools (requiring compliance around pulse inclusion across menus every two weeks from September 2027, increasing to weekly from September 2028) is a sensible approach, although we would also hope that many schools might progress much faster than this timeline.

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, and timelines are not allowed to slip any further.

This is consistent with evidence from secondary school food transformation work, which found that strong catering team involvement and adequate time for recipe development are essential conditions for embedding new ingredients successfully, particularly within grab-and-go formats where pulse inclusion presents greater practical challenges than in sit-down provision [1].

We urge the government to ensure that compliance systems in place from September 2027 encourage school leaders, governors and external monitors to pay attention to progress and action plans to ensure that any phased transitions are completed on schedule.

[1] School Food Matters and University of Birmingham (2026) Whole School Approaches to Food in Secondary Schools: Findings from the Nourish Programme. London: School Food Matters. Available at:

<https://www.schoolfoodmatters.org/sites/default/files/2026-04/Nourish-Secondaries-summary-report.pdf>

Protein

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

- Strongly agree

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 enhances nutritional quality and sustainability of food served in schools, as well as menu flexibility. Pulses are high in fibre and low in saturated fat and salt, which are nutrients where children's intakes are not currently meeting recommendations, making them a nutritionally superior complement or partial substitute for 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. Ensuring a healthy plant-based meal options are always available in schools meals is a key recommendation of Sustain alongside 25 leading health and sustainability organisations [1]. Current vegetarian school meal options frequently rely heavily on cheese, which is high in salt and saturated fat or alt-meat processed products which can also be high in salt and artificial additives. This proposal directly addresses that imbalance and strengthens the nutritional integrity of the vegetarian offer.

Increasing beans and pulses on menus is also a cost-effective shift. 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 [2]. Standards should ensure that plant-based meals are as affordable as the meat option. Ensuring plant-based meals are as affordable and available, filling and nutritionally balance will support inclusive school meals for pupils. A 2021 Bite Back survey of secondary school pupils reported that vegetarian and vegan options were often quite limited, unfilling and poorly stocked. [3]

The government should provide further clarity on plant-based proteins, ensuring they are required every day, providing a clear vegan and vegetarian option for pupils every day of the week. This will ensure there is always a nutritious option available for those that want to choose a plant-based protein or have a dietary preference to do so. We recommend that this category should include pulses, other legumes, tofu, tempeh, seitan, mycoprotein, soya (or pea-based) mince, chunks or pieces.

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 minimally processed plant-based proteins such as pulses, tofu and mycoprotein in preference to highly processed manufactured meat alternatives. However, we suggest that this list could also include other alternatives such as tempeh and seitan [4]. Accompanying

guidance could also encourage schools to offer variety in the plant-based proteins offered.

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). 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. The nutritional profile of plant-based meat alternatives varies widely [4,5].

Therefore, we do support priority being given to whole foods such as pulses and beans given they provide the highest health benefits, and agree strongly that on at least three days per week, vegetarian/vegan meals should include pulses as the protein source.

Clarification is needed on the restriction to maximum two servings a week of plant-based alternatives marketed as meat alternatives to account for such alternatives being '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 could be permitted without restrictions, as they are unlikely to contain the artificial additives or high levels of sodium or fats that sometimes characterise commercial ultra-processed versions of these products, which must be restricted.

We believe much more clarity and definition is required therefore in relation to the lists of permitted plant-based meat alternatives, recognising the most recent evidence on health, nutritional and environmental benefits of these products. A 2026 study found that when plant-based alternatives to meat "are fortified, they generally match their animal-based counterparts in contributing to the delivery of the recommended daily allowance of key micronutrients such as Fe, Ca and vitamins B₁₂, B₂ and D". [5] Preference could be given for meat alternatives that also contain additional fortification (in line with plant-based milk standards), with micronutrients such as iron, calcium and vitamins B₁₂, B₂ and D. We also recommend that any plant-based meat alternatives should comply with NHS guidance around limits on salt and saturated fats, in line with our proposals above on inclusion of these products in the HFSS section of the standards.

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.

We also recommend that a limit is set on how much red meat can be served per week to no more than twice per week. This is also a key recommendation of Sustain and 25 health and sustainability organisations in our joint policy briefing [1]. This limit is due to the links between red meat and several negative health outcomes including cancer and cardiovascular disease [6], as well as the environmental impact of red (and other) meat production, including driving greenhouse gas emissions and biodiversity loss [7]. The independent National Food Strategy recommended a 30% reduction in UK meat consumption by 2032 in order to meet both climate and health goals [8], and the Climate Change Committee has recommended the UK reduce meat consumption by 25% by 2040 and 35% by 2050 to remain on track to meet climate targets [9].

The National Diet and Nutrition Survey data shows that whilst adults are slightly reducing their consumption of red and processed meat, children are increasing theirs, with 22% of boys aged 11 to 18 years old eating above the recommended safe levels of red and processed meat (90g) a day [10]. This consumption also exceeds the Eat Lancet Commission's Planetary Health diet recommended maximum of 43g of meat a day (no more than 14g of red meat and 29g of white meat) in order to keep the impact of the food system within sustainable planetary boundaries [9].

Scotland's Nutritional Requirements for Food and Drink in Schools (Scotland) Regulations 2020 require that "No more than a total of 175g of red and red processed meat (cooked weight) can be provided in school lunches over the course of the school week, of which no more than 100g (cooked weight) can be red processed meat". [11] We recommend that a lower limit be applied for school meals to serve no more than one portion of red meat per week (equivalent to about 100g in secondary schools, or 50-80g in primary schools) – in line with the Planetary Health Diet [12] – of which no more than 50g can be red processed meat. Two smaller half portions (equal to 50g each) of red meat could also be permitted if used in blended products (half meat, half plant-based) or as part of a meal mixed with other plant-based proteins like pulses, other legumes, mycoprotein or soya mince, chunks or pieces. Denmark's 2021 Budget Guide provides a good template – which stipulates that the government's canteen suppliers must provide beef or lamb on no more than one day per week [13].

In summary, the government should ensure consistency in the standards by removing red meat from the list of proteins that should be served three times per week, and instead inserting a specific limit on no more than one serving of red meat per week, with clarity on size of portion or overall weight of red meat permitted across the week via blended options.

[1] Foodrise and Sustain, *Serving Up: Aligning Public Procurement of Food for UK Public Institutions with Healthy Sustainable Diets* (Foodrise and Sustain, 2025), <https://feedbackglobal.org/wp-content/uploads/2025/03/Feedback-2024-Serving-Up-public-procurement-briefing.pdf>

- [2] The Food Foundation (2025), Bean Facts: Spilling the beans: why beans, peas and other legumes are a triple win for health, environment and affordability. Available: https://foodfoundation.org.uk/sites/default/files/2025-10/TFF_Beans%20Facts_DIGITAL.pdf
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[13] Ministry of Food, Agriculture and Fisheries of Denmark, Danish Action Plan for Plant-Based Foods (Ministry of Food, Agriculture and Fisheries of Denmark, 2023), 15, <https://en.fvm.dk/Media/638484294982868221/Danish-Action-Plan-for-Plant-based-Foods.pdf>

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?

- Strongly agree

Overall question

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

- To a great 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?

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, pupils and parents alike.

Implementation of the new 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.

The standards and guidance for caterers and chefs must support schools to transition to lower use of salt and sugar in any on-site preparation, to complement the procurement of non-HFSS pre-prepared products and avoidance of table salt. On savoury dishes, schools and caterers should be supported to enhance flavour through herbs, spices, garlic, citrus, vinegars and other seasonings that do not add to total salt intake. References to adding salt within recipe cards, menu guidance and catering resources should be removed, as they risk reinforcing children's preference for salty foods. Where additional flavour enhancement is considered necessary, lower-sodium alternatives, for example reduced-salt stock, reduced-salt gravy, reduced salt baked beans and ketchups, lower salt breads and sauces, and lower-sodium salt substitutes could be considered as optional tools for caterers and suppliers, complementing rather than replacing a broader approach focused on building children's preferences for less salty foods. Likewise on sugar reduction, caterers and school chefs should be supported in innovating on healthy alternatives and testing these with pupils, with case studies, recipes and guidance.

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 school 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 commissioned by School Food Matters 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) [1]. Evidence from the Nourish programme also found that 62% of school staff identified budget pressures as the greatest risk to sustaining food improvements once external support ended [2].

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.

[1] School Food Matters and Impact on Urban Health (2024) Calculating the Cost of a Nutritious, Sustainable School Lunch. London: School Food Matters. Available at: <https://www.schoolfoodmatters.org/sites/default/files/2024-10/CoaSM-report.pdf>

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[3] School Food Matters and University of Birmingham (2026) Whole School Approaches to Food in Secondary Schools: Available at: <https://www.schoolfoodmatters.org/sites/default/files/2026-04/Nourish-Secondaries-summary-report.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?

- 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?

- 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. There is strong support from parents for these policies - 74% support a named governor and 83% agree with schools publishing their food policies [1]. 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.

Evidence from School Food Matters' five-year Nourish programme evaluation shows that standards alone are insufficient to drive lasting change. Prior to intervention, school staff frequently lacked awareness of how existing standards applied in practice, and the gap between what was required and what was served was significant. Governor involvement was a significant factor in sustaining food improvements: in one school, a lead governor helped secure capital investment in the dining environment that would not otherwise have been possible [2].

A named governor or trustee helps embed school food within formal school accountability structures and creates clear ownership of school food at governance level, rather than treating it solely as an operational issue. However, the evaluation also found that many governors were unaware of their existing statutory duties in relation to school food. A named governor is only meaningful if they are trained and supported. The proposal should therefore be accompanied by clear guidance and practical training resources for governors, alongside inclusion within Ofsted's consideration of school food governance structures.

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 [2].

Compliance checking addresses the separate, but important, question of whether the standards are actually being met in what children are served day to day. Schools should be required to use a standardised self-reporting compliance tool to verify their menus against the standards. In addition, this should be complemented by a national school food audit scheme delivered through Environmental Health Officers, providing independent verification across all settings. The combination of self-assessment and independent audit ensures broad coverage without placing disproportionate burden on any single school.

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 required to use a recognised quality assurance scheme, and School Food Improvement Officers should be introduced in every local authority to provide hands-on support, and mandatory training should be introduced across the whole school food workforce. Without these support mechanisms, accountability and compliance risk becoming punitive rather than genuinely effective.

Schools can help meet the School Food Standards within budget by taking advantage of the relative cost-savings provided by substituting meat for pulses in more meals. Pulses are already on average considerably cheaper than meat in the UK – and the trend is towards more expensive meat as climate change affects global supply chains. For instance, the price gap between shelf stable beans and beef has increased from £6.78 in 2020 to £10.54 per kg in 2025. [3] A Food Foundation study from 2024 found that beans cost on average 2.6 times less per 100g than meat. [4]

There are numerous positive examples of schools achieving cost savings as a result of a shift to more plant-based foods. For instance, councils participating in the London Food Purchasing Commitment found that cutting the carbon footprint of public meals in local schools reduced costs by up to 7% - largely by swapping out high-carbon ingredients such as beef – and that delivering menu and procurement changes at scale was ambitious but achievable, with councils developing innovative approaches despite budgetary and contractual constraints [5]. ProVeg UK's plant-based recipes are on average 59p per primary school portion [6] – significantly less than the average meat-based school meal. For instance, ProVeg found that a plant-based spaghetti bolognese (made with lentils and soya mince) cost approximately 43% less than a spaghetti bolognese made with beef mince – 41 pence per meal compared to 72 pence per meal. [7] They similarly found that a plant-based Sri Lankan coconut curry was 24% cheaper than a chicken-based equivalent (56 pence per meal compared to 74 pence per meal). This results in significant savings for schools they have partnered with. For instance, one UK academy trust which worked

with ProVeg UK, which looks after 5,000 children across 7 schools in the Peterborough and Cambridgeshire area, estimated it saved 20% on purchasing costs by boosting plant-rich options on its menus – whilst also achieving around a 26% reduction in greenhouse gas emissions. [7] A catering manager at a private school who worked with ProVeg UK also said that using more pulses in their main meals had helped with reducing costs. [5] Likewise, a study of catering at UK universities found that plant-based meals were on average 30% cheaper than meat-based meals. [8]

There is also clear evidence that schools can increase provision of healthy school meals without negatively affecting uptake. For instance, the UK academy trust which worked with ProVeg UK mentioned above, saw overall meal uptake rise by about 20%, in tandem with boosting plant-rich options on its menus [7]. Moreover, councils participating in the London Food Purchasing Commitment found that improving sustainability and nutrition went “hand in hand” and was well-received by staff, parents and children.[5] School Food Matters found that shifts to healthier food as part of its Nourish programme did not result in resistance from students [2].

Guidance for schools could include methods to ensure transition to healthier and more plant-based, fibre and protein rich menus include strategies such as:

- Making plant-based meals the default choice, including plant-rich versions of existing popular dishes
- Introducing plant-based days when all the dishes served are plant-based only – building on the successes of the Meat Free Mondays campaign
- Reducing the amount of meat in a dish, replacing some meat with protein-rich chickpeas, lentils, beans and pulses in blended recipes.
- Including salad bars as a default option
- Pricing strategies that ensure healthier, vegetable and plant-based options are affordable and attractive to students (especially in secondary)
- Celebrating cuisines from places with traditionally more sustainable and plant-based diets reflecting the diversity of student population and supporting food education

Schools should be encouraged to co-design menus and meals with communities and nutritionists to ensure they have the buy-in of the community, are culturally appropriate and cater to diverse needs. This should be integrated into existing Diversity, Equity and Inclusion (DEI) strategies.

[1] Survation poll conducted on behalf of Sustain, online survey of English parents aged 18+ with children in primary and/or secondary education. Fieldwork conducted 5-12th May 2026. Sample size 1020. Submitted to consultation portal 3 June 2026.

[2] School Food Matters (2026) Evaluation of the Nourish Programme. London: School Food Matters. Available at:

<https://www.schoolfoodmatters.org/sites/default/files/2026-01/N-report-DIGITAL.pdf>

[3] Madre Brava, 'Meat's Affordability Crisis', Madre Brava, 3 December 2025, [https://www.madrebrava.org/latest/price-gap-between-meat-and-plant-proteins-widening---new-uk-data?cf-turnstile-response=.](https://www.madrebrava.org/latest/price-gap-between-meat-and-plant-proteins-widening---new-uk-data?cf-turnstile-response=)

[4] Food Foundation, *Bean Facts* (Food Foundation, 2025), https://foodfoundation.org.uk/sites/default/files/2025-10/TFF_Beans%20Facts_DIGITAL.pdf.

[5] Sustain (2026), Unpublished briefing. For more info on London Food Purchasing Commitment, see: ReLondon, *Circular Food Procurement - London's Food Purchasing Commitment*, 22 November 2022, <https://relondon.gov.uk/circular-food-procurement>

[6] ProVeg UK, 'School Plates - Case Studies', ProVeg UK, 2026, <https://proveg.org/uk/school-plates>

[7] ProVeg UK, 'ProVeg School Plates - The Guide', ProVeg UK, 2025, <https://proveg.org/uk/school-plates/the-guide>

[8] Billy Nicholles and Chris Bryant, *Climate-Conscious & Cost-Effective: The Case for Plant-Based University Catering* (Bryant Research and Plant Based Universities, 2024), <https://bryantresearch.co.uk/wp-content/uploads/2024/10/Case-for-Plant-Based-University-Catering.pdf>.

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. Research commissioned by School Food Matters found 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) [1]. It is important to note that healthier and more sustainable 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. Funding must also recognise that in expanding free school meals to more pupils in households on Universal Credit, this may disproportionately affect schools in more disadvantaged areas, if the per pupil funding rate does not adequately cover the true costs of providing healthy food in line with standards, or if the school or caterer has been cross subsidising through paid-for meals or sales of additional items such as bottled drinks or HFSS snacks that are being delimited in School Food Standards. This is already a major challenge for schools on increasingly tight budgets, regardless of the update to the Standards currently taking place. It is absolutely imperative that 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 school and catering staff as well as lead governors for school food. School leadership is absolutely critical to embedding a healthy food culture that will support healthy uptake of nutritious school meals - both heads and their wider staff teams plus any staff involved in meal services or supervision. 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.

Pupil and Parent Engagement: Young people should be meaningfully involved in the national rollout of the new standards, including in the development of guidance materials and communications. Recent polling conducted on behalf of Sustain found that 45% of parents were not aware of the School Food Standards at all and prior to participating in the survey, 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. The government needs to address this with a

clear communications campaign that explains the 'why' as well as the 'what', with diverse parent, public figures and professional voices at the forefront, and focuses on how healthy, sustainable food can be delicious as well as nutritious. It would be helpful for government to provide additional guidance and resources to schools to support parent and public communication. Schools that are already delivering high quality, nutritious food should be identified and supported to share their approaches, and government could support facilitation of networks and platforms for peer learning and best practice exchange.

There is clear evidence that schools can increase provision of healthy school meals without negatively affecting uptake. For instance, the UK academy trust which worked with ProVeg UK mentioned above, saw overall meal uptake rise by about 20%, in tandem with boosting plant-rich options on its menus.[3] Moreover, councils participating in the London Food Purchasing Commitment found that improving sustainability and nutrition went "hand in hand" and was well-received by staff, parents and children.[4] School Food Matters found that shifts to healthier food as part of its Nourish programme did not result in resistance from students.[5] Children's Food Campaign ambassadors include parents whose children's schools have successfully removed sugary drinks or introduced water and milk only policies, reduced servings of sugary desserts, and managed to maintain or even increase uptake.

Challenge structural lunch break barriers: Government should conduct a review of 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. This has been raised as a major barrier to children's enjoyment of school meals, levels of uptake and is cited as a key reason for moving to packed lunches by pupils and parents alike. The expansion of free school meals to children from households in receipt of Universal Credit is an incredibly positive step that is strongly welcomed, but must be accompanied by a clear commitment to quality. Whilst the precise management of breaks is the decision for individual schools, there is a role for Government to play in providing frameworks and guidance, and possibly additional funding streams to support any infrastructural costs in scaling up numbers of pupils able to sit down to a meal, reduce queuing by creating additional meal access points, installation of water fountains to reduce reliance on bottled water and more. It is critical that the increase in uptake does not place unsustainable pressure on catering teams or dilute the standards being introduced.

Invest in Universal Access: To support the right to food, we urge government to continue to expand access to free school meals and roll out of full universal school meals across all education settings. This is supported by hundreds of civil society groups including members of the School Food Review. Communities in over 1000

places across the UK supported Sustain's Say YES to School Food For All campaign [6], whilst the NEU's Free School Meals For All Campaign is backed by over 200 civil society groups, plus councils, public figures and parliamentarians [7]. Universal school meals would deliver against the government's commitment to fully inclusive education that is free at the point of access, and help deliver the government's Child Poverty Strategy [8]. Evaluations of the longstanding individual local authority programme of universal primary school meals reveal increased school meal uptake and slowing the increase in obesity and overweight amongst pupils [9] and whilst early qualitative evaluation of the Mayor of London's more recent universal primary school meals funding across the whole of the capital [10] demonstrated the multiple economic, social, inclusion, parent-school relationship and mental health benefits of fully inclusive school meal systems. In the recent polling by Survation on behalf of Sustain's Children's Food Campaign, universal free school meals have the support of 80% of parents (84% parents of primary, 74% parents of secondary and 85% support of parents of children in both settings). [2]

Enforcement and Improvement. In addition to setting standards, and the proposals around governance and role of Ofsted as mentioned in the compliance section we recommend that the UK government creates a monitoring and enforcement regime, which could be delivered through the local authorities and food standards or environmental health officers, building on the recent FSA pilot monitoring work [11]. This would also help to create a culture of compliance and ensure a level playing field for companies bidding for contracts. This could include audits and inspections, to complement self-reporting through a standardised self-reporting compliance tool, and is vital to ensure the effectiveness of the updated Standards – for instance, a recent study covering 36 secondary schools found that there was very low compliance with current School Food Standards limiting confectionery, chocolate, cakes, biscuits, deep-fried foods and breadcrumb foods. [12]

Increase UK producer access to school food markets. The switch to more legumes and pulses is an opportunity to support growth in the horticulture industry in the UK, which would increase the availability of these products and make sourcing easier. The Bridging the Gap project has demonstrated how, with support, organic fruit, vegetables and pulses can be incorporated into school menus. [13] Such a transition requires initial investment, and we recommend the government uses farm innovation grants and other agricultural funding to support farmers to diversify into legume production, invest in processing and supply chains intended for schools, and unlock UK supply chains for these foods. This could be an exciting growth area for UK farming businesses, but requires investment.

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- [2] Suration poll conducted on behalf of Sustain, online survey of English parents aged 18+ with children in primary and/or secondary education. Fieldwork conducted 5-12th May 2026. Sample size 1020. Submitted to DFE consultation email 3 June 2026.
- [3] ProVeg UK, 'School Plates - The Recipes', *ProVeg UK*, 2025, <https://proveg.org/uk/school-plates/the-recipes/>.
- [4] Sustain (2026), Unpublished briefing. For more info on London Food Purchasing Commitment, see: ReLondon, *Circular Food Procurement - London's Food Purchasing Commitment*, 22 November 2022, <https://relondon.gov.uk/circular-food-procurement>
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- [6] Sustain campaign for School Food For All <https://www.sustainweb.org/school-food-for-all/>
- [7] National Education Union, Free School Meals For All <https://freeschoolmealsforall.org.uk/>
- [8] Child Poverty Action Group & NEU (2025), Child Poverty and Education briefing <https://cpag.org.uk/news/cpag-and-neus-child-poverty-and-education-briefing> .
- [9] University of Essex (2022), Angus Holford and Birgitta Rabe, *Impacts of Local Authority Universal Free School Meal Schemes on Child Obesity and Household Food Expenditure* (MiSoC Explainer, 2022), <https://www.iser.essex.ac.uk/misoc/explainers/universal-free-school-meals-reduce-child-obesity-and-help-with-the-cost-of-living>.
- [10] Impact on Urban Health (2024) More than a Meal, Independent Evaluation of Universal Primary School Meals for Children in London, GLA/Impact on Urban Health <https://urbanhealth.org.uk/insights/reports/more-than-a-meal>
- [11] Food Standards Agency (2025) School Food Standards Compliance Pilot: Discovery and Feasibility Research <https://www.food.gov.uk/research/innovative-regulator/school-food-standards-compliance-pilot-discovery-and-feasibility-research>
- [12] Miranda Pallan et al., 'School Food Policy in Secondary Schools in England and Its Impact on Adolescents' Diets and Dental Health: The FUEL Multiple-Methods

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<https://doi.org/10.3310/TTPL8570>.

[13] Sustain & Bridging the Gap (2026) Bridging the Gap: How to make school food work for children, farmers and planet <https://www.sustainweb.org/reports/mar26-how-to-make-school-food-work-for-children-farmers-and-planet/>; *Bridging the Gap: How to Fix the Food System for Everyone* (Sustain, Bridging the Gap, Alexandra Rose Charity, Growing Communities, Nourish Scotland and Food Sense Wales, 2025), <https://www.sustainweb.org/assets/bridging-the-gap-how-to-fix-the-food-system-for-everyone-1764673053.pdf>.

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?

Age: Whilst supporting the overall recommendation that Early Years settings should follow the EYFS guidance rather than School Food Standards, this is taking place within a context of rapid expansion of school-based nursery places, with a projected 40% increase in funded childcare hours by 2027 and an additional 300 school based nurseries envisaged as part of this, as well as expansion of Free School Meals to families in receipt of Universal Credit which will increase those eligible in early years settings too. We share the concerns expressed on this topic in the detailed submission from the Early Years Food Coalition (led by Bremner & Co), of which Sustain's Children's Food Campaign is a member. In particular, there is evidence that food served to nursery age children in schools is often not adapted to early years requirements and portion sizes, and that school caterers are not trained or equipped to adapt menus and recipes to support the specific developmental needs of nursery age children. We urge the Government to additional support and guidance for school caterers will be needed to ensure nursery meals remain appropriate for the specific developmental needs of pre-Reception children. We urge the government to issue very clear guidance, training and support for schools and caterers to support them in operating the EYFS and SFS together in school-based nurseries, to avoid schools simply defaulting to the School Food Standards in slightly smaller portions. Guidance issued in support of the updated School Food Standards should ensure clear cross reference to the EYFS for use in nurseries, reception and Year 1, and where possible signpost suggested menus and recipes that support schools to ensure nutritional requirements for the different age groups are met. Likewise, any monitoring and compliance regime should ensure that school policies and practices encompass both EYFS and SFS, where relevant to the school. Sustain's Children's Food Campaign

supports the detailed recommendations in the Early Years Food Coalition submission, which have been informed by practitioners in these settings.

At the other end of the age spectrum, 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, especially in urban settings including many areas of high deprivation which are associated with poorer access to healthier food overall.

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 and dietary inclusivity: Schools will need clear guidance on how to ensure compliant menus remain culturally inclusive.. Providing a greater variety of plant-based meal and pulse based options is important to accommodate the cultural, religious, and special dietary needs of diverse local communities where pulses are more of a staple. This is likely to support a wide range of pupils including those with lactose intolerance (which affects 8% of the UK population) [1], enable religious dietary observances around certain animal products, vegan and vegetarian and diets (estimated as 7% of the UK population) and flexitarian diets (an estimated 13% of UK population). [2] We urge the government to ensure 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.

Evidence from the Adapt-Ed study, led by the University of Hertfordshire with School Food Matters as a research partner, found that access to preferred or "safe" foods can be crucial for children's sense of security and mental health, and that poorly managed experiences with school food can negatively affect eating both at school

and at home [3]. A blanket approach to implementing the standards without appropriate flexibility risks excludes some of the most vulnerable children from school food altogether and could lead to dangerous consequences for their overall health and wellbeing. The Adapt-Ed study also found low uptake of free school meals in special schools, despite children with SEND being significantly more likely to be FSM-eligible, underscoring the importance of inclusive implementation. Practical approaches that have supported children with SEND include gradual food transitions, maintaining familiar foods during menu changes, sensory activities outside of mealtimes, ensuring pupils know what to expect, and providing a range of ways for them to make informed choices and provide feedback.

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 [4] 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.[5]

[1] Christian Løvold Storhaug et al., 'Country, Regional, and Global Estimates for Lactose Malabsorption in Adults: A Systematic Review and Meta-Analysis', *The Lancet Gastroenterology & Hepatology* 2, no. 10 (2017): 738–46, [https://doi.org/10.1016/S2468-1253\(17\)30154-1](https://doi.org/10.1016/S2468-1253(17)30154-1).

[2] YouGov, 'Dietary Choices of Brits (e.g. Vegetarian, Flexitarian, Meat-Eater Etc)?', YouGov, 2024, <https://yougov.co.uk/topics/society/trackers/dietary-choices-of-brits-eg-vegetarian-flexitarian-meat-eater-etc>

[3] Department for Education, (2026), Free school meals: guidance for local authorities, local -authority-maintained schools, academies and free schools. <https://www.gov.uk/government/publications/free-school-meals-guidance-for-schools-and-local-authorities/free-school-meals-guidance-for-local-authorities-local-authority-maintained-schools-academies-and-free-schools>

[4] O'Connell, R., Denyer, L., Holford, A., Hamilton, L. and O'Brien, C. (2025) *Improving School Food for Children with SEND: Policy Brief*. University of Hertfordshire. Available at: <https://openresearch.nihr.ac.uk/articles/5-50>

[5] O'Connell R, Ludlow A, Holford A et al. Adapt-Ed: Co-designing adaptations to a whole school intervention to improve the uptake and impact of food provision in special schools – scoping research for a future trial [version 1; peer review: 2 approved with reservations]. NIHR Open Res 2025, 5:50
<https://doi.org/10.3310/nihropenres.13897.1>

Environmental principles

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

• Positive

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-forward menus. Plant-based foods generally have a substantially lower carbon footprint than meat and dairy products, and beans especially have a vastly smaller carbon footprint relative to animal products. 1,8 kilograms of GHGEs are emitted on average globally when producing a kilogram of beans, in comparison to 99 kilograms of GHGEs emitted on average globally when producing a kilogram of herd beef [1].

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. Sustain's Bridging the Gap programme found that every £2.10 spent on organic fruit and vegetables in school food would generate wide ranging benefits, including for climate and nature (worth 97p), for local economic growth (£1.44), for health and wellbeing (£3.11) and stronger communities (£3.94) for a total return on investment of £9.46. Government should take this opportunity to make compliance with Government Buying Standards a requirement alongside the updated School Food Standards. [2]

Eco-Schools and Keep Britain Tidy's report 'Count Your Carbon', based on data from over 2,000 schools, estimated that approximately 16% of UK schools' total carbon

footprint is from food procurement – and in primary schools, food is the single largest contributor to school emissions.[3]

If the School Food Standards therefore incentivise plant-rich diets, with lower consumption of meat and dairy, this is likely to have significant positive environmental impacts. A recent study found that if high-income nations aligned their diets with the Planetary Health Diet (which is plant-rich and involves reductions in meat and dairy) this would reduce annual agricultural production emissions associated with their diets by 61% - and additionally result in enough spared land to sequester as much as 98.3 GtCO₂eq. [4] A recent study of UK diets found that low-meat diets have approximately half the emissions and land use of high meat diets, whilst vegan diets have around a quarter of the emissions and land use as a high meat diet. [5] A meta-study of the impact of serving plant-based meals as the default option, found that the policy reduced meat consumption by between 53-87%. [6]

The government could go further to align school food systems with climate change strategy commitments and achieve greenhouse gas emissions reduction from school meals. For example, the Department could set a binding target for average emissions per meal – with the method of achieving this left up to public institutions and caterers in consultation with their local communities, but through a common reporting mechanism. Targeting average emissions per meal provides flexibility, since some meals can exceed this limit providing other meals offset this to bring the average down. Such a limit could be set in line with the Planetary Health Diet's daily average dietary emissions of 2.13 kgCO₂eq per person in emissions [7], which equates to 0.64 kgCO₂eq per 750kcal meal for lunch and dinner (assuming 30% of daily dietary emissions each for lunch and dinner – plus 20% for breakfast, 20% for snacks). This limit could be phased in gradually, with higher limits set initially. Large food businesses should be required to report publicly on their emissions, for example through the Food Data Transparency Partnership. This is a key recommendation of the joint-policy briefing 'Serving Up', endorsed by 25 health and sustainability organisations. [8]

There are already positive examples of per meal emissions targets in public sector food in action. In 2023, four Labour councils – Hackney, Hounslow, Lambeth and Newham – signed up to the London Food Purchasing Commitment (LFPC) [9], which includes a target that by 2030, local school menus must have an average greenhouse gas emissions of no greater than 1.04kgCO₂eq per 1000 kcal meal, in line with the UK's Paris Agreement pathway (around a 38% cut by 2030 for many councils).[10] Sustain estimates this can also be achieved through one or two meat-free days, one fish day, and by being careful about meat on the other days. The LFPC also has targets to halve avoidable food waste by 2030, and measure and report local/sustainable sourcing, with an optional goal to spend 30% of the food budget on

local and sustainable produce by 2030. In 2025, Sustain examined how the first four London councils to adopt the LFPC implemented its standards, and what impacts they experienced on cost, meal quality, emissions and procurement processes. They found that if all London free school meals met LFPC emissions targets, over 11,000 tonnes of GHG emissions could be avoided annually. [11]

However, realising these environmental benefits will require active intent. The Labour Party pledged its 2024 Manifesto to “set a target for half of all food purchased across the public sector to be locally produced or certified to higher environmental standards” [12]. For that manifesto commitment to be met, it is vital that the Government Buying Standards for food and catering services is mandatory for all public institutions, including schools, which represent an estimated 60% of current public sector spending on food and drinks. These revised Government Buying Standards should also ensure that the food served contributes to a radical reduction in GHG emissions, supports sustainable farmers in the UK and overseas, and does not exacerbate species loss and deforestation through imported deforestation-risk foods. Any development of requirements for sourcing more local and sustainable food should go hand in hand with developing the UK’s domestic horticultural production, to help reduce barriers to schools sourcing more British produce. Analysis conducted by Bremner & Co on behalf of Sustain’s Children’s Food Campaign estimated a potential £600 million uplift for British farming economy that could be achieved by aligning procurement with the expansion of universal free school meals – even the current expansion of meals to pupils on Universal Credit will deliver an estimated 7% increase in produce on school plates that could be aligned to this ambition, with the right procurement frameworks and incentives in place. Realising such benefits however require supply chain barriers to be addressed, including infrastructure, market access routes and support with procurement. [13]

Reduction in heavily processed foods, including deep-fried items, processed meats, bottled drinks and confectionery, may also reduce packaging waste associated with individually wrapped and manufactured products.

One potential short-term negative effect worth acknowledging is an increase in food waste during the transition period, as pupils adapt to less familiar ingredients and menu changes. However, this is likely to diminish as familiarity increases and as schools invest in pupil engagement and menu co-design. Government guidance on managing the transition should explicitly address food waste minimisation strategies to mitigate this risk.

However, Sustain’s polling with Survation reveals a solid base of parental support for school meals to align with positive environmental impact. This includes support for school meals to be made with fresh, minimally processed ingredients (85% net support), to include more vegetables in grab and go options (75%), to use local

sourcing and environmentally friendly food (60%), to increase the amounts of beans and pulses in meals (61%). [14] Polling from 2021 found that 68% of the public agreed that public sector food should provide a healthy and sustainable diet and 80% said public canteens should help people minimise their impact on the environment and limit climate change. [15]

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London: The Food Foundation. Available at:

https://foodfoundation.org.uk/sites/default/files/2025-10/TFF_Beans%20Facts_DIGITAL.pdf

[2] Sustain & Bridging the Gap (2026) *Bridging the Gap: How to make school food work for children, farmers and planet* <https://www.sustainweb.org/reports/mar26-how-to-make-school-food-work-for-children-farmers-and-planet/>

[3] Eco-Schools and Keep Britain Tidy, 'Towards Net Zero: Measuring the Carbon Impact of Schools in England', *Count Your Carbon*, 19 January 2026, 56,

<https://www.countyourcarbon.org/towards-net-zero-measuring-the-carbon-impact-of-schools-in-england/>.

[4] Zhongxiao Sun et al., 'Dietary Change in High-Income Nations Alone Can Lead to Substantial Double Climate Dividend', *Nature Food* 3, no. 1 (2022): 1,

<https://doi.org/10.1038/s43016-021-00431-5>.

[5] Peter Scarborough et al., 'Vegans, Vegetarians, Fish-Eaters and Meat-Eaters in the UK Show Discrepant Environmental Impacts', *Nature Food* 4, no. 7 (2023): 7,

<https://doi.org/10.1038/s43016-023-00795-w>.

[6] Johanna Meier et al., 'Review: Do Green Defaults Reduce Meat Consumption?', *Food Policy* 110 (July 2022): 102298, <https://doi.org/10.1016/j.foodpol.2022.102298>;

Lucia A. Reisch and Cass R. Sunstein, 'Plant-Based By Default', *One Earth* 4, no. 9 (2021): 1205–8, <https://doi.org/10.1016/j.oneear.2021.08.007>.

[7] Cristina Cambeses-Franco et al., 'Co-Benefits of the EAT-Lancet Diet for Environmental Protection in the Framework of the Spanish Dietary Pattern', *The Science of the Total Environment* 836 (August 2022): 155683,

<https://doi.org/10.1016/j.scitotenv.2022.155683>.

[8] Foodrise and Sustain (2025), *Serving Up: Aligning Public Procurement of Food for UK Public Institutions with Healthy Sustainable Diets* <https://feedbackglobal.org/wp-content/uploads/2025/03/Feedback-2024-Serving-Up-public-procurement-briefing.pdf>.

[9] Sustain (2023) 'Hackney, Hounslow, Lambeth and Newham Councils Pave the Way for London's Food System Transformation | Sustain', Sustain, 2023, https://www.sustainweb.org/news/jul23-london_procurement_commitment/.

[10] ReLondon (2023), 'Circular Food Procurement', ReLondon, 2023, <https://relondon.gov.uk/circular-food-procurement>.

[11] Sustain (2026), Unpublished briefing, available on request.

[12] The Labour Party, 'Change: Labour Party Manifesto 2024', The Labour Party, 2024, <https://labour.org.uk/change/>.

[13] Sustain (2025) Follow the Carrot: Can free school meal expansion boost the UK food and farming economy? Sustain, Bremner & Co, Ampney Brook Foundation <https://www.sustainweb.org/reports/sep25-follow-the-carrot/>

[14] Survation poll conducted on behalf of Sustain, online survey of English parents aged 18+ with children in primary and/or secondary education. Fieldwork conducted 5-12th May 2026. Sample size 1020. Submitted to DFE consultation email 3 June 2026.

Closing question

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

Parent and Public Engagement: To inform our response to this consultation we conducted polling with Survation of over 1000 parents of primary and secondary aged children in England [1], as well as holding two workshops with Children's Food Campaign parent ambassadors to discuss the topics raised by the consultation [2]. Parent ambassadors helped to develop a parent guide to the consultation which was circulated widely, in order to boost parent engagement in the consultation [3]. We have shared detailed findings in earlier questions. However, of particular concern is that nearly half of all parents (45%) are unaware of the existence of School Food Standards (prior to participating in our survey), and 50% were unaware of a consultation on the standards taking place. We strongly urge the government to implement a clear parent communications strategy, including equipping schools and caterers with resources to support positive engagement in menu change and encourage continued uptake of school meals. The expansion of free school meals to all pupils on Universal Credit is also a huge opportunity to communicate a combined support package to families, including better access alongside better quality of meals supporting children's health.

Health impact = economic impact: The School Food Standards represent an ambitious plan to improve children's health. Healthy eating will help improve health

outcomes, reducing NHS costs – for instance, an Oxford University study found that reducing average meat consumption in the UK to two to three servings per person per week could prevent 45,000 premature deaths and reduce NHS costs by £1.2 billion per year. [4] A peer-reviewed study estimated that the EAT-Lancet diet would be 17% cheaper than the UK's current average diet in 2017 – when also factoring in savings to health and climate change costs, and assuming food waste is halved, it would be 35% cheaper.[5]

Salt: While some aspects of salt reduction are reflected in the limits on processed meat and HFSS foods in general, and whilst it restricts use of salt at table, it does not adequately acknowledge children's overconsumption of salt, nor the salt already contained in pre-prepared or manufactured foods, or which may be added during preparation in kitchens. We urge the government to address this and clarify salt reduction ambitions within the School Food Standards. A number of countries have successfully incorporated salt reduction into school food policies [5]. Japan's Standards for the School Lunch Program sets mandatory salt limits for each meal [6], while the United States Department of Agriculture's National School Lunch Program sets average salt limits by age group, with further reductions planned for 2027 [7].

These examples demonstrate that clear, measurable salt standards can be implemented successfully at scale. School food represents one of the largest publicly funded food procurement programmes in England, and therefore presents a major opportunity to improve children's diets through procurement standards, yet there is no requirement to comply with Government Buying Standards Framework (GBSF). At a minimum, foods procured for schools should meet the latest government salt reduction targets for 2024, particularly for foods that contribute most to children's salt intakes. This would provide a practical and proportionate mechanism for reducing salt intake and support the government's wider salt reduction programme, while ensuring consistency across public sector settings. Third, the use of salt during food preparation should be restricted. Schools and caterers should instead be supported to enhance flavour through herbs, spices, garlic, citrus, vinegars and other seasonings that do not add to total salt intake. References to adding salt within recipe cards, menu guidance and catering resources should be removed, as they risk reinforcing children's preference for salty foods. Where additional flavour enhancement is considered necessary, lower-sodium alternatives, for example reduced-salt stock, reduced-salt gravy, reduced salt baked beans and ketchups, lower salt breads and sauces, and lower-sodium salt substitutes could be considered as optional tools for caterers and suppliers, complementing rather than replacing a broader approach focused on building children's preferences for less salty foods.

Procurement: The Government has committed to increase the proportion of public sector food that is sourced to local and high environmental standards. The strongest

single policy to achieve this would be to align school food procurement with updated Government Buying Standards. This would also support alignment around salt reduction as mentioned above, as the GBSF recognises salt reduction as an important public health objective and aligns with the UK's 2024 salt reduction targets [8, 9]. As an estimated 60% of the UK's £5 billion spending in public sector food, the school food sector represents a hugely influential player that could deliver against multiple health, environmental and economic benefits through stronger alignment with this framework.

[1] Suration poll conducted on behalf of Sustain, online survey of English parents aged 18+ with children in primary and/or secondary education. Fieldwork conducted 5-12th May 2026. Sample size 1020. Submitted to DFE consultation email 3 June 2026.

[2] Sustain (2026) Report from workshops held with Children's Food Campaign parent ambassadors, 10 June 2026, available at:
https://www.sustainweb.org/assets/sustain_school_food_standards_consultation_parent_evidence_2026-1781182660.pdf

[3] Sustain (2026) School Food Standards Consultation: A parents guide to responding. <https://www.sustainweb.org/assets/parent-guide-to-the-sfs-consultation-1780360476.pdf>

[4] Pete Scarborough et al., *Modelling the Health Impacts of the Diets Described in 'Eating the Planet'* Published by Friends of the Earth and Compassion in World Farming, 2010, 13.

[5] Marco Springmann et al., 'The Global and Regional Costs of Healthy and Sustainable Dietary Patterns: A Modelling Study', *The Lancet Planetary Health* 5, no. 11 (2021): e797–807, [https://doi.org/10.1016/S2542-5196\(21\)00251-5](https://doi.org/10.1016/S2542-5196(21)00251-5) Supplementary appendix 3 - GBR figures - flexitarian diet - market and market-waste figures in 2017.

[5] Storcksdieck Genannt Bonsmann S, Kardakis T, Wollgast J, Nelson M, Louro Caldeira S. Mapping of National School Food Policies across the EU28 plus Norway and Switzerland. EUR 26651. Luxembourg (Luxembourg): Publications Office of the European Union; 2014. JRC90452

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[7] USDA Food and Nutrition Service (2024). *Sodium Limits for School Meal Programs*. Retrieved from <https://www.fns.usda.gov/school-meals/nutrition-standards/sodium-limits> Office for Health

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[9] Public Health England. Salt reduction targets for 2024, 2020.

<https://www.gov.uk/government/publications/salt-reduction-targets-for-2024>

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