

15 December 2005

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Dear Emma Seymour

### **Consultation Response: Turning the Tables - Transforming School Food**

I am pleased to submit a response to the above consultation on behalf of the Children's Food Bill Campaign which is co-ordinated by *Sustain: the alliance for better food and farming* (please see [www.childrensfoodbill.org.uk](http://www.childrensfoodbill.org.uk)). A draft of this response has been circulated for comment to all 158 national organisations which currently support the campaign (see Appendix I).

The Second Reading of the Children's Food Bill took place in the House of Commons on Friday 28 October and a date in June 2006 has been set for the continuance of the debate. The Bill aims to improve children's health and well-being and prevent diet-related ill-health, such as childhood obesity. As well as national and local supporting organisations, thousands of parents have registered their individual support and more than 270 cross-party MPs have signed House of Commons Early Day Motion 378 in support of the Bill.

The Bill's provisions include measures to ensure that every child, whatever their background and wherever they live, benefits from healthy school food environments. The coalition of supporting organisations therefore has a major interest in this consultation and is committed to ensuring that new regulations are comprehensive and effective in serving the interests of children.

### **Welcoming the recommendations**

We warmly welcome the thrust of the 35 recommendations made by the DfES School Meals Review Panel (SMRP), published in its report *Turning the Tables – Transforming School Food*.

However, whilst the purpose of the recommendations is generally clear, some should be strengthened to ensure that their implementation results in the benefits to children's nutrition, health and well-being. Accordingly, we present our comments and supplementary recommendations below.

**Detailed comments on SMRP’s recommendations**

We comment here in detail on the SMRP’s recommendations 1-35 (concerning the standards, delivering change, getting started, financial investment and monitoring and evaluation).

**We make 18 specific recommendations which are listed below as Recommendations A to R.**

**The standards: Recommendations 1-10**

**Recommendation 1:** The nutrient and food and drink standards proposed in the Report should be adopted and applied to the provision of school lunches.

We welcome this recommendation, which is one of the provisions of the Children’s Food Bill. We note that 14 nutrient-based standards are proposed, based on Caroline Walker Trust recommendations and, if introduced on a statutory basis, consider these would dramatically improve the nutritional quality of school meals. The nutrient standards recommended by the SMRP should not be relaxed.

**Recommendation 2:** Food provided at lunchtime in schools should meet the combination of nutrient and food-based standards over a period of five consecutive school days.

We agree that it is appropriate to complement the prescribed nutrient based standards with a set of mandatory food based standards. We make the following comments about the specific set of food standards proposed by the SMRP:

<b>SMRP Food Standards Recommendation about foods provided at lunchtime</b>	<b>Comment</b>
<p><b>Fruit and vegetables</b> Not less than 2 portions per day per child, at least one of which should be salad or vegetables, and at least one of which should be fruit.</p>	<p>We support the aim of this recommendation to increase fruit and vegetable consumption. However, we propose that a specification of <b>not less than 3 portions per day</b> would help to reduce health inequalities by disproportionately benefiting the health of children from low income families.</p> <p>As per our comments under Recommendation 8 below, <b>measurable targets for sustainable supplies should be set.</b></p>
<p><b>Oily fish</b> On the school lunch menu at least once every 3 weeks.</p>	<p>We support this recommendation, but in line with our comments under Recommendation 8 below, <b>all fish should come from sustainable sources with Marine Stewardship Certification.</b></p>
<p><b>Deep fried products</b> Meals should not contain more than two deep fried products in a single week.</p>	<p>We support the aim of this recommendation to limit the consumption of deep fried products and would like to see <b>the availability of these high fat options further limited in the future.</b></p>

SMRP Food Standards Recommendation about foods provided at lunchtime	Comment
<p><b>Processed foods</b> Should not be reformed/reconstituted foods made from “meat slurry”.</p>	<p>We support this recommendation.</p>
<p><b>Bread (without spread)</b> Available unrestricted throughout lunch.</p>	<p>We support this recommendation, but in line with healthy eating principles, would like to see an emphasis on <b>the provision of a variety of wholegrain breads in preference to white bread.</b></p>
<p><b>Confectionery and savoury snacks</b> Not available through school lunches.</p>	<p>Although we fully support the aim of this recommendation, we note the need for those <b>foods which should not be available to be identified according to the Food Standards Agency’s nutrient profiling model</b> which uses health-related criteria to classify less healthy foods not appropriate for promotion to children. <b>This is important to avoid the many anomalies resulting from the SMRP’s definition of ‘confectionery’ and ‘savoury’ snacks, which permit, for instance, sweet muffins, cake bars, iced buns, doughnuts and custard style yoghurts</b> (see SMRP Report Appendix 3.4). Foods excluded by this standard should not be available for sale anywhere on school premises.</p>
<p><b>Salt/highly salted condiments</b> Not available at lunch tables or at the service counter.</p>	<p>We support this recommendation.</p>
<p><b>Drinks</b> The only drinks available should be water (still or fizzy), skimmed or semi-skimmed milk, pure fruit juices, yoghurt and milk drinks with less than 10% added sugar, or combinations of these (e.g. smoothies).</p>	<p>We support this recommendation in part. Our concerns are:</p> <ul style="list-style-type: none"> <li>• We recognise the health benefits of fruit juices, for instance as a good source of vitamin C. However, there is concern that the acidity and natural sugar content of pure fruit juices may be detrimental to children’s oral health and be inappropriate for children with diabetes. A possible solution is <b>to permit the provision of diluted juice drinks</b>, which result in less dental erosion. Pure fruit juice diluted with water also has a lower per unit volume sugar content.</li> <li>• We are pleased that the recommendations exclude carbonated drinks. As it is slightly acidic, fizzy water also has erosive potential for teeth and should not be available.</li> <li>• We can see <b>no health-based rationale for allowing 10% sugar to be added to children’s drinks.</b></li> </ul>

	Drinks excluded by this standard should not be available for sale anywhere on school premises.
<b>Water</b> Easy access to free, fresh, chilled drinking water.	We support this recommendation. For environmental reasons, water should be from mains supplies rather than pre-bottled. As per our comments above, carbonated water should not be available.

Many of the organisations and parents which support the Children’s Food Bill are very concerned about the detrimental effect that artificial sweeteners, flavourings, colourings and preservatives may have on children’s health, behaviour and educational performance. In line with the provisions of the Children’s Food Bill, we recommend a precautionary approach to ensure that food and drinks available during lunch times do not contain additives that have been associated with adverse reactions in children.

In summary, we recommend that:

- A. the food and drinks which should not be available during lunch times should be identified according to the Food Standards Agency’s nutrient profiling model which uses health-related criteria to classify less healthy foods which are inappropriate to promote to children.**
- B. the food based standards should state that the unrestricted availability of bread provided through school lunches is of a range of wholegrain varieties.**
- C. drinks available during lunch times should not contain added sugar, but pure fruit juice drinks which are diluted with water should be permissible. Freely accessible drinking water should be provided from mains supplies, rather than pre-bottled, and carbonated water should not be available.**
- D. food and drinks available during lunch times should not contain additives that have been associated with adverse reactions in children.**

**Recommendation 3:** Schools should aspire to achieve the highest quality of provision, which is a hot meal, cooked on-site, from fresh and seasonal ingredients. Whilst we accept that this level of provision is not possible to achieve in all schools at present, we recommend that schools work towards this.

We support this recommendation. The emphasis on using seasonal ingredients is welcome as this is one of the key ways of ensuring UK and local produce is used where possible – note our comments under Recommendation 8 below.

**Recommendation 4:** At present only the school lunch standards are statutory. The Panel recommends that pre-school and children in other settings should be similarly protected. It recommends that the Government, as a priority, supplements these lunch standards with standards for other food and drink service provision: break-time snacks, breakfast and after school clubs.

We support this recommendation. It is essential that similar standards exist for all foods and drinks provided to children within the school environment, including pre- and post- school provision. We note the evaluation in the Regulatory Impact Assessment (RIA) accompanying the SMRP report that, “by extending the scope of the standards across all food there is likely to be a far more robust impact on eating patterns and therefore on resulting health benefits” (Paragraph 5.3.19). These standards should also be applicable to food and drink provided for children attending nursery, and all other educational establishments (as per the Children’s Food Bill).

**E. We recommend that similar standards be developed urgently for food and drinks provided throughout the school day, not just at lunchtime, and that mandatory standards should also be developed for children attending nursery and in all educational establishments.**

**Recommendation 5:** The panel recommends to schools that, from September 2006, the food standards be applied to lunch time and that similar standards for 'processed foods'; 'confectionery and savoury snacks'; and 'drinks' be applied to tuck shops, vending and other similar food services. The panel recognises that meeting the voluntary Target Nutrient Specifications for processed foods will require some product development and therefore may take longer.

We welcome the commitment to introduce the food based standards from September 2006. However, in line with our Recommendation A above, it is important that the foods and drinks which should not be available for sale in tuck shops and vending machines are identified on the basis of health-related nutrient criteria. The use of food based definitions gives rise to many anomalies (see our comments in the table above for examples) which still permit the sale of fatty, sugary and salty products.

**F. We recommend that foods and drinks which should not be for sale in other food services such as tuck shops and vending machines should be identified according to the Food Standards Agency’s nutrient profiling model which uses health-related criteria to classify less healthy foods that are inappropriate to promote to children.**

Furthermore, in line with our Recommendations C and D above, the addition of sugar to drinks available for sale is unnecessary and should not be permitted. A precautionary approach should be adopted for all food additives which may affect children’s health, behaviour and educational performance.

**G. We recommend that drinks available for sale in tuck shops, vending machines or other points of sale in the school should not contain added sugar and should not be carbonated. Pure fruit juice drinks which are diluted with water should be permissible.**

**H. We recommend that food and drinks for sale in tuck shops, vending machines or other points of sale in the school should not contain additives that have been associated with adverse reactions in children.**

**Recommendation 6:** School caterers should ensure that choice is available for all children right through to the end of lunchtime service in order that children eating later in the food service are not disadvantaged.

We support this recommendation. This is a commonsense approach which will overcome one of the problems highlighted in the survey of secondary school meals published jointly last year by the FSA/DfES – that healthy options, where available, run out towards the end of the lunch service.

**Recommendation 7:** There should be easy access to free, fresh, chilled drinking water throughout the school day.

We support this recommendation, which we believe is important to children’s health and well-being and which addresses the common problem of a lack of easily available drinking water. As noted in the table and in our Recommendation C above, for environmental reasons, water should be from mains supplies, rather than pre-bottled.

**Recommendation 8:** The procurement of food served in schools should be consistent with sustainable development principles and schools and caterers should look to local farmers and suppliers for their produce where possible, tempered by a need for menus to meet the new nutritional standards and be acceptable in schools.

Further to this recommendation, we note the SMRP’s strong support for sustainable procurement principles, expressed in Paragraph 2.23 of its report, which states, “Caterers should use local, seasonal and organic foods wherever possible to support the development of supply chains, and should ensure that the training for school catering staff includes information on seasonal, local and organic food.”

Elsewhere, the SMRP reflects upon the fact that the 3.5 million school meals served each day, equate to about 20% of the total spent by the public sector in England on food and catering, and it concludes that “it is critical that school meals support sustainability” (paragraph 1.26). The benefits arising from a sustainable approach are also acknowledged in the RIA, which explains that “by sourcing food from local suppliers and farmers this would have a positive impact on the local economy and help to promote sustainable development” (Paragraph 5.3.25).

We too believe that it is essential that provision of healthy school meals is consistent with sustainable development and, wherever possible, supports local producers.<sup>1</sup> We therefore strongly support this recommendation. To fulfil this valuable opportunity, mandatory standards for sustainable school food procurement, including targets for fresh, seasonal and organic ingredients, should be set. Targets should also specify meat that is extensively reared (for instance, grass fed beef and free range chicken), and limit supplies of fish to those which comply with the Marine Stewardship Council’s environmental standard for sustainable and well-managed fisheries.<sup>2</sup> Measurable targets would ensure that the SMRP’s recommendation becomes a reality, rather than merely existing as a statement of good intention.

**I. We recommend that measurable and mandatory targets are developed to ensure that sustainable school food provision becomes a reality.**

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<sup>1</sup> See also: *Double dividend?*, Sustainable Consumption Roundtable, September 2005, which explains how school meals can be both nutritious and sustainable.

<sup>2</sup> See: [www.msc.org/assets/docs/fishery\\_certification/MSCPrinciples&Criteria.doc](http://www.msc.org/assets/docs/fishery_certification/MSCPrinciples&Criteria.doc)

During 2004-05, *Sustain* was commissioned by the London Development Agency to produce a report on the opportunities for more sustainable food in London schools.<sup>3</sup> This work included providing support to one London LEA as it carried out a Best Value Review of its school meal service. The contract specifications developed with this LEA could form the basis of sample specifications for school meals that encourage more sustainable food procurement.

Targets must be underpinned by advice and practical help on sustainable food procurement, including information on making links with local producers, setting up alternative supplies and drawing up contract specifications for sustainable food. We urge DfES to support DEFRA's Public Sector Food Procurement Initiative which aims to expand opportunities for involving small and sustainable food producers in public sector food procurement. Our experience shows that progress towards sustainable food procurement is achieved most rapidly when bespoke assistance is available from dedicated staff.<sup>4</sup>

**J. We recommend progression towards sustainable school food procurement targets is facilitated by the development of tools and guidance and the availability of first-hand expert advice.**

**Recommendation 9:** The standards should be reviewed in 2011. At this time the standards should be applied to food consumption as well as food provision.

We support this recommendation and the emphasis on what children actually eat. However, there is also a need for an annual review to ensure that steady progress towards implementation is maintained at a national level.

**K. We recommend that in addition to a major review in 2011, that ongoing monitoring is reviewed by DfES on annual basis.**

**Recommendation 10:** The Department for Education and Skills (DfES) should encourage schools to adopt the voluntary target nutrient specifications circulated for consultation by the Food Standards Agency.

We do not support this recommendation because it does not make sense for the target nutrient specifications for processed foods to be introduced on a voluntary basis. The *Turning the Tables* Appendices suggests that the SMRP itself would prefer a requirement for meeting the nutrient specifications for manufactured foods. For example, paragraph 58 states, "The Panel also wanted to discourage the use of over processed food, and so recommended that **as a minimum** such products **must meet** the Food Standards Agency's target nutrient specifications for manufactured products used in school meals which are currently being consulted on." [our emphases].

Furthermore, the Food Standards Agency's Regulatory Impact Assessment which accompanied its recent consultation on target nutrient specifications for manufactured products in school, states that a mandatory approach would "bring about the most (indeed, maximum) amount of product reformulation and the concurrent benefits to the overall diet and health of schoolchildren throughout the UK" (Paragraph 5.3.14). It goes on to say that a voluntary approach to target nutrient specifications may, according to the FSA, lead to an "inconsistency of benefit to children

<sup>3</sup> *Sustainable Food Procurement in London's Public Sector: Report on sustainable food procurement for London's schools*, London Development Agency, November 2005

<sup>4</sup> *Getting more sustainable food into London's hospitals - Can it be done? Is it worth it? (Interim Report)*, Sustain, October 2005

overall” (Paragraph 4.1.2). The reasons for such inconsistency are explained in our campaign publication, *The Children’s Food Bill – Why we need a new law, not more voluntary approaches*, published in July 2005.<sup>5</sup>

It is therefore clear that it is in the best interests of children’s health for these specifications to be made mandatory within a set timescale. There would then be no need for the DfES to “encourage” schools to adopt the targets (as per SMRP Recommendation 10), as they would be obliged to do so.

**L. We recommend that a mandatory approach to the implementation of nutrient specification standards for manufactured products used in school meals is adopted within a set timescale.**

#### **Delivering change: Recommendations 11-16**

**Recommendation 11:** Schools and caterers should conduct a needs analysis (skills, equipment, preparation time) and train all relevant staff (including catering staff and midday supervisors) to ensure they are able to support pupils in making healthy choices.

**Recommendation 12:** Catering staff need to be central to the whole school approach. Their practical skills should be valued and utilised to the full, and they should be represented on groups like School Nutrition Action Groups.

We support these recommendations as we recognise that improvements in school food will not happen without well-trained and motivated catering staff. An important way of valuing catering staff is to ensure that their training in practical cooking skills is acknowledged by appropriate remuneration. In addition, if more ingredients are going to be fresh, local and unprocessed, then catering staff will need additional paid time for preparation. Catering managers, procurement officers, school heads, teachers and governors will also need appropriate training to encourage consistent approaches to food provision which reinforce classroom messages about healthy eating.

As well as covering nutrition, training for school meal providers should include techniques on marketing healthy options and presenting healthy food choices to make them attractive to children. Training should also include the case for sustainable food, the obstacles to its provision and how they can be overcome.

**M. We recommend that training includes sustainable food policies and practices.**

**Recommendation 13:** All schools should audit their current food service and curriculum, and develop, implement and publish a whole-school food and nutrition policy. The Panel recommends that schools’ whole-school food policies should be made available to parents and carers and be referred to in the school prospectus and school profile.

We support this recommendation. Policies should also include sustainability issues (for example, see the model food policy from *Sustain’s ‘Grab 5!’* Project ([www.grab5.com](http://www.grab5.com))).

<sup>5</sup> *The Children’s Food Bill – Why we need a new law, not more voluntary approaches* (40 pages and 181 references) is available from *Sustain*, price £25 (£10 to voluntary and public interest organisations).



**Recommendation 14:** All children should be taught food preparation and practical cooking skills in school in the context of healthy eating. Far more emphasis should be placed on practical cooking skills within the curriculum space currently devoted to Food Technology, and the KS3 review should consider this.

**Recommendation 15:** Supply links between local producers and schools should be strengthened, with improvements to children’s knowledge about growing and cooking food. Schools should be encouraged to visit farms, ideally where some of their food is produced.

We support these recommendations and note the assessment in the RIA that the benefits from introducing practical cooking skills as part of the curriculum for Key Stage 3 “might be enormous” (Paragraph 5.3.28). It further explains that this would “offer a chance to break out of the current cycle of obesity and enable children to lead healthier lives thus creating a culture of healthier eating in the country as a whole”. We note and support the SMRP’s view that there is “huge scope for linking sustainable food procurement with improved education for children about where their food comes from” (Paragraph 2.23).

However, we are concerned that whilst highlighting the importance of Key Stage 3, the SMRP recommendation does not sufficiently take account of children’s learning prior to this stage. Cooking, domestic food skills and food education should be a central and important part of the curriculum for all children as they grow up, from nursery provision, through primary school to secondary school education. From a young age, children can learn a lot from growing their own food and we recommend that every school should have its own garden.

**N. We recommend every school should have its own garden, so that all children benefit from the learning experience and enjoyment of growing food.**

As per the Children’s Food Bill, food education and skills should form a compulsory part of the curriculum for all age groups and every child should leave school equipped with knowledge about how food is produced and the skills to prepare healthy meals from fresh ingredients.

**O. We recommend that food education and practical skills, including cooking and growing, are incorporated as compulsory elements of the curriculum throughout children’s pre-school and school education.**

Further to our comments below relating to financial investment, we support the SMRP Recommendation 25 that school building specifications should enable kitchen facilities to be used for teaching practical cooking skills to all pupils, as well as the preparing main meals. Investment in the facilities needed to teach cooking skills to children should be a priority.

**Recommendation 16:** Whole-school food policies, developed through partnerships, should include consideration of the impact of packed lunches and food brought into school. However, where parents and carers wish to continue with packed lunches, guidance is available from the Food Standards Agency.

We support this recommendation. Research published by the FSA last year shows that packed lunches contain unacceptably high levels of fat (especially saturated fat), sugar and salt. It is therefore important for parents to understand how the new standards have been implemented to improve the quality of school meals, and for whole-school policies food to address positively the quality of children’s packed lunches.

### **Getting started: Recommendations 17-20 (listed in Appendix II)**

We are supportive of these recommendations, but make the following comments:

We note that Recommendation 17 states that the new standards should be fully achieved as soon as possible, and at the latest, for all primary schools by September 2008 and for all secondary schools by September 2009. This provides a more than generous lead time for the implementation of the nutrient-based standards and we strongly support the comments made by the Secretary of State in her foreword to the consultation, where she explains that “these should be seen as the timescale for the last schools to meet the standards, and not as a target date for the majority”. It is essential that schools, local authorities and caterers are fully aware of this deadline and that the DfES carefully monitors schools’ progress towards its achievement.

We agree that this will require the early development of further tools and guidance (SMRP Recommendation 19). In line with our comments under Recommendation 8 above, these should include guidance and expert assistance on the practicalities of sustainable food provision.

### **Financial investment: Recommendations 21-30 (listed in Appendix II)**

We are supportive of these recommendations, but make the following comments / recommendations:

The SMRP notes that steep increases in prices to parents and carers could lead to a decreased uptake in school meals (Paragraph 23, Executive Summary). This would result in an increase in the numbers of children eating packed lunches, probably with a high fat, sugar and salt content to the detriment of their short and long-term health. The RIA also acknowledges that “the manner in which the costs are distributed are crucial to the success or failure of the proposal” (Paragraph 5.2.10).

For this reason, we believe that only a proportion of the additional costs of improved quality meals should be passed on to parents or carers. In addition to supporting Recommendation 30, that school meals should be a priority during the Government’s Comprehensive Spending Review 2007, we therefore call upon the Government to limit school meal price increases.

**P. We recommend that only a proportion of the extra costs of meeting the new standards are passed on to families and that the Government ensures that price increases are limited.**

Notwithstanding this recommendation, there should be long-term goal to persuade parents that it is worth paying more for good quality, healthy and sustainable school food for their children.

At the same time, we support Recommendation 21 which calls for measures to prevent the adverse affect of price increases on low income families. This is very important as better quality school food will have a proportionately larger impact on the nutritional balance and health of children from low income families. However, the corresponding reduction in health inequalities will result only if families are not penalised by price increases.

**Q. We recommend an increase in the free school meals threshold so that the children from a larger proportion of low income families will benefit from healthy, improved quality school food.**

Evidence from case studies shows that sustainable school food procurement can often be introduced at reduced, or no extra cost. However, it is inevitable that in some cases, sustainable food will incur additional costs. We welcome the recognition (Recommendation 27) that the economic costs arising from the proposed changes should be modelled against the economic benefits. As well as taking account of the hidden costs of cheap food (for example, in treating diet-related disease and the environmental impact of intensive food production), this analysis should include the benefits to local food economies and reduction in ‘food miles’ from local food supplies.

We support those recommendations that prioritise funding for the renovation and refurbishment of school kitchens, and construction as part of capital investment programmes and primary capital investments (Recommendations 23, 24 and 26). We also share the SMRP’s concern to ensure that partners in Private Finance Initiative (PFI) deals are bound by the new standards and support its Recommendation 25 that the existence of long-term contracts cannot be allowed to adversely affect the health of pupils.

It is important that the physical quality of dining areas ensures that children’s school meal experience is pleasurable and supportive of their social development. Assessment of the deficiencies in individual school dining areas, referred to in Recommendation 28, should include the attractiveness of the designated area and the practicability of service points (e.g. salad bars) and other systems to reduce queuing.

### **Monitoring and Evaluation: Recommendations 31-35 (listed in Appendix II)**

Monitoring, inspection and evaluation will be important to the success of new standards and ensuring their implementation in every school and accordingly, we support these recommendations.

As per our comments under Recommendations 8 and 19 above, the checklist proposed as part of further tools and guidance (Recommendation 33) should be designed not only to support the implementation of nutrient- and food-based standards, but also to help introduce sustainable food standards.

We see a number of significant advantages in the use of cashless smartcard system for paying for school food. In addition to facilitating sophisticated monitoring of children’s food choices and consumption (particularly relevant to Recommendations 9, 31, 32 and 34), they can:

- prevent children spending dinner money in local shops on junk food;
- ensure that set combinations of choices always give rise to a healthy, balanced meal;
- allow for promotional offers of healthy food through the use of points schemes; and
- remove the stigma often felt by children receiving free school meals.

### **R. We recommend that Government encourages financial investment in the use of smartcard systems for payment of school lunches and that all secondary schools have cashless systems by September 2009.**

Furthermore, children themselves are likely to value improved school meals more if they do not feel rushed by reduced periods for dining. The protection of the time available for lunch within the school day will help children to appreciate and enjoy the improved quality food. We also consider that children are also more likely to enjoy and value school lunches if these are served with proper crockery and cutlery.

**In conclusion**

We are confident that if the SMRP's recommendations are strengthened in line with our comments, their full implementation will bring about significant and positive change to the food being served at school and subsequently to children's health. However, we are concerned that part implementation of the recommendations as they exist will not afford children maximum health benefits and we therefore urge the DfES to adopt our 18 recommendations listed above.

As explained earlier, standards for healthy school meals, the restriction on the sale on unhealthy foods in schools, and children's practical food education are central provisions of the Children's Food Bill. We look forward to further news from the DfES that the highest possible standards to improve children's school food environments will be implemented on a statutory basis and at no, or minimal, extra costs to parents.

Yours sincerely

Charlie Powell  
Project Officer, Children's Food Bill

## **Appendix I: National organisations supporting the Children’s Food Bill** (as at 01.11.05)

Academy of Culinary Arts	Coeliac UK
Action Against Allergy	Co-operative Group (CWS) Ltd
Active Citizens Transform (ACT)	Communication Workers Union (CWU)
Allergy Alliance	Community Health UK
Allotments & Gardens Council UK	Community Nutrition Group
Alliance for Childhood	Community Practitioners’ and Health Visitors’ Association
Arid Lands Initiative	Compassion in World Farming (CIWF)
Association for the Study of Obesity	Consensus Action on Salt and Health (CASH)
Association of Teachers and Lecturers	Coronary Artery Disease Research Association
Autism Unravelling	Coronary Prevention Group
Baby Milk Action	Countryside Alliance
Barnardo’s	Day Care Trust
Biodynamic Agricultural Association	Diabetes UK
Blood Pressure Association	Digestive Disorders Foundation
British Allergy Foundation	Eating Disorders Association
British Association for Community Child Health	Ecobaby Basics
British Association for the Study of Community Dentistry	Ecological Foundation
British Cardiac Society	End Child Poverty
British Dental Association	Elm Farm Research Centre
British Dental Health Foundation	Faculty of Public Health
British Dental Hygienists’ Association	Family Welfare Association
British Dietetic Association	FareShare
British Ethnic Health Awareness Foundation	Farmers’ Link
British Heart Foundation	FARM
British Heart Foundation Health Promotion Research Group	Federation of City Farms and Community Gardens
British Hypertension Society	Food Additives Campaign Team
British Institute for Allergy & Environmental Therapy	Food and Chemical Allergy Association
British Institute for Brain Injured Children	Food Commission
British Medical Association	Food and Health Research
British Society of Paediatric Dentistry	Food Justice Campaign
British Vascular Foundation	Food Matters
Cancer Research UK	Foundation for Local Food Initiatives
Caritas-Social Action	Foundations UK
Centre for Food Policy	Forum for the Future
Chartered Institute of Environmental Health	Friends of the Earth
Child Growth Foundation	General Consumer Council for Northern Ireland
Child Poverty Action Group	Gingerbread
Children’s Society	GMB: Britain’s General Union
Christian Ecology Link	Good Gardeners’ Association

(PTO)

Guild of Food Writers	Parent Organisation Ltd
Haemolytic Uraemic Syndrome Help (HUSH)	Permaculture Association
Hands Up For	Positive Parenting
Health Education Trust	Real Fathers for Justice
Heart UK	Realfood
Hempsall Consultancies	Royal College of General Practitioners
Homeopathic Medical Association	Royal College of Nursing
Human Scale Education	Royal College of Physicians
Hyperactive Children's Support Group	Royal College of Surgeons
International Society for Food Ecology and Culture	Royal Institute of Public Health
Institute of Health Promotion and Education	Royal Society for the Promotion of Health
Kids' Cookery School	Save the Children UK
Land Heritage	Scottish Consumer Council
Latex Allergy Support Group	Scottish Countryside Alliance
Magic Breakfast	Scottish Countryside Alliance Educational Trust
Maternity Alliance	Scottish Food Fortnight
McCarrison Society for Nutrition and Health	Scottish Heart and Arterial Disease Risk Prevention
Medical Practitioners Union	Small and Family Farms Alliance
Migraine Action Association	Social Equity in Environmental Decisions (SEEDS)
The Mothers' Union	Society of Health Education and Promotion Specialists
NASUWT	Soil Association
National Association of School Governors	Soroptimist International of Great Britain
National Children's Bureau	Steiner Waldorf Schools Fellowship
National Council of Women	Stirrin' Stuff
National Consumer Council	Stroke Association
National Consumer Federation	TOAST (The Obesity Awareness & Solutions Trust)
National Day Nurseries Association	Trading Standards Institute
National Family and Parenting Institute	UK Public Health Association
National Federation of Women's Institutes	UNISON
National Governors' Council	Vega Research
National Heart Forum	Vegetarian and Vegan Foundation
National Obesity Forum	Veggies Catering Campaign
National Oral Health Promotion Group	Viva! (Vegetarians International Voice for Animals)
National Union of Teachers	Weight Concern
NCH – the children's charity	Welsh Consumer Council
The National Youth Agency	Welsh Food Alliance
Netmums	Woodcraft Folk
New Economics Foundation	World Wide Opportunities on Organic Farms
Northern Ireland Chest, Heart and Stroke Association	World Cancer Research Fund
Organix Brands	Young Minds Trust

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*Sustain: The alliance for better food and farming*

## **Appendix II: SMRP Recommendations 17-35**

### **Getting started**

**Recommendation 17:** The introduction of the new standards should be phased in over a period of time to allow the necessary preparation. Implementation will be more difficult in some schools (e.g. where there is a cash-cafeteria food service). The new standards should be fully achieved as soon as possible, and at the latest, for all primary schools by September 2008 and for all secondary schools by September 2009.

**Recommendation 18:** Schools and local authorities should aim for complete take-up of free school meal entitlement; and schools should aim to have at least 10% increase in school meals take-up by the end of the implementation period.

**Recommendation 19:** Further tools and guidance need to be developed, tested, and made available as early in the implementation process as possible. The DfES should take the lead on this.

**Recommendation 20:** The Food Standards Agency (FSA) should make its food composition data, including any relating to non-milk extrinsic sugars, widely available in an electronic format. This will provide information on foods and nutrients contained in the standards, expressed using analytical or calculation methods which reflect the needs of the standards.

### **Financial investment**

**Recommendation 21:** The Secretary of State should take note of our concerns that low income families may be adversely affected by price increases, and investigate options for mitigating possible nutritional and economic risks.

**Recommendation 22:** Schools and local authorities must improve transparency and accountability in relation to how much they spend on school meals, including food cost per meal; uptake; free school meal numbers; nature of service; level of any subsidy; and any surplus generated by the service and how it is spent. This information should be presented in the whole-school food policy.

**Recommendation 23:** There should be no further degradation of service or provision by individual schools or local authorities from the current position, and kitchens should be a priority under 'Building Schools for the Future'. The DfES should undertake further work to consider the options for schools which no longer have their own kitchens. Schools and local authorities should be encouraged to reach the highest standards of provision and kitchens should be a priority in all schools' capital investment programmes.

**Recommendation 24:** Guidance on formulaic funding delivered to local authorities and schools should prioritise the renovation and refurbishment of kitchens and dining facilities.

**Recommendation 25:** The Government needs to ensure that current Private Finance Initiative (PFI) contracts and 'Building Schools for the Future' (BSF) initiatives do not impose barriers to the improvement of school food and also ensure that in future all school PFIs incorporate building specifications which enable the main meal to be cooked on the premises and practical cooking skills to be taught to all pupils. The Government should require all partners in PFI deals to be bound by the new standards. The existence of long-term contracts cannot be allowed to adversely affect the health of pupils in PFI schools.

**Recommendation 26:** The Panel suggests that kitchens and dining areas should be given priority within primary capital investment.

**Recommendation 27:** The economic costs of the changes should be modelled against the economic benefits. For example the benefits include: sourcing more food from local suppliers will benefit local economies and cut down transport and infrastructure costs; using more fresh ingredients will require longer kitchen assistant hours and this will benefit catering staff; the possible link between better nutrition, educational attainment and associated life-time earnings gain.

**Recommendation 28:** DfES has asked all local authorities to revise their asset management plan data by the end of this year. This information should show up deficiencies in kitchen and dining areas but will not, due to timing, reflect then standards and approach recommended in this report. We recommend that DfES should (i) consider what further work needs to be done to supplement the information gathered from current activity; (ii) use this information to ensure that kitchen and dining areas are a priority in capital spending programmes; and (iii) ensure that all future asset planning takes the new SMRP standards and approach fully into account.

**Recommendation 29:** In line with the Government's expectation that the transformation of school meals should be led by local authorities, we recommend that local level discussions recognise the desirability of phased – as opposed to sudden - price increases.

**Recommendation 30:** The Government should make school meals a priority during the Comprehensive Spending Review 2007.

### **Monitoring and evaluation**

**Recommendation 31:** At appropriate intervals (e.g. of 4 years) a nationwide evaluation of school food provision should be commissioned by DfES, to assess the types of foods and drinks available, their uptake and nutrient contribution to the overall diet. The evaluation should pay particular attention to provision for children who are nutritionally at risk. This evaluation should be timed for completion before the review of the standards in 2011.

**Recommendation 32:** The main approach to external monitoring and evaluation should be through the regular inspections carried out by Ofsted. This should be supported by evidence gathered from the in-depth inspections of a sample of schools carried out by HM Inspectors, supported by nutritionists. The Panel recommends further work should be conducted by Ofsted and DfES to use the pilot inspections planned for November 2005 to develop the methodology and a rigorous set of tools to support those inspections.

**Recommendation 33:** A checklist should be developed, as part of the package of further tools and guidance. It should be piloted to ensure it is effective in bringing about change and supporting implementation of the nutrient and food standards.

**Recommendation 34:** Local authorities should be required to collect and report annually on progress in achieving healthy school standards, provision and uptake of all (including free) school lunches, and steps being taken to work towards the achievement of school lunch standards e.g. use of nutrition software, checklists, smartcards, incorporation of standards in contracts. The DfES should collect and collate this data to provide a national overview of progress.

**Recommendation 35:** The School Food Trust should hold a database of standard compliant menus for schools to use at their discretion; and standard analysis services which would support schools in providing and analysing their own meals service.