Healthy eating and drinking in maintained schools in Wales

Consultation response form

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Responses should be returned by 29 July 2025 to:

Food in Schools Team
Support for Learners Division
Education Directorate
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and sent to:

email: foodinschools@gov.wales

Who you are

Please select all that apply to you below.

Primary school learner	
Secondary school learner	
Education workforce	
Local authority	
Catering provider	
Healthcare practitioner	
Supplier	
Local producer	
Farmer	
Parent or carer (the term 'parent' has been used as a shorthand to include mothers, fathers, foster carers, adoptive parents, stepparents, 'kinship' parents and grandparents, guardians)	
Other (please specify) UK Nutrition Charity	✓

Lunch in primary schools

Question 1 – To what extent do you agree or disagree with the proposals that relate to increasing the provision of fruit, vegetables and starchy carbohydrates?

Strongly	Agree	✓	Neither	Disagree	Strongly	
agree			agree nor		disagree	
			disagree			

Supporting comments

Agree

A strong commitment to increasing plant-rich foods in school meals is important for promoting healthy eating. Enhancing both the quantity and variety of fruit and vegetables and wholegrains is critical to supporting plant-rich healthier dietary patterns in children, especially given evidence from dietary surveys that highlights poor intake of vegetables and wholegrains, particularly among socioeconomically disadvantaged groups.

National Dietary and Nutrition Survey (NDNS) data indicates that, in the UK, we largely eat the same types of fruit and vegetable (apples, citrus, banana, peas, sweetcorn, carrots, tomatoes). Introducing a wider variety will help to familiarise children with a greater variety of produce, including some of the more bitter green vegetables. The proposal to focus on variety is therefore a welcome and important shift, as it supports the

delivery of a broader range of essential nutrients and bioactives associated with good health in young people.

Whilst appreciating the practical constraints encountered within school food provision, such as cost, waste and logistics, there is a potential limitation in how 'variety' is implemented within the proposal - menus could cycle through the same six vegetables/four fruits each week. To counter this, it may be beneficial to reference 'seasonal and/or local where possible' so that repetition across weeks is limited, and environmental sustainability is promoted. In addition, as a future forward approach, it may be of interest to monitor uptake, preference and waste with a higher use of vegetables/beans within dishes, as well as those served alongside meal centres.

Healthy eating guidelines recommend that less refined starchy carbohydrates should form the basis of meals, suggesting these should be provided <u>daily</u> rather than at least 3 x week as is currently indicated in the proposed change. Furthermore, a stronger/more ambitious guideline to encourage variety of wholegrain starchy or higher fibre foods (including **potatoes with skins**) could be included as the standard. The current proposal 'At least one portion of pasta, noodles or rice must be provided each week' could potentially allow as an example for potatoes 4 x week, with rice once a week.

As well as the 50% wholegrain for bread guideline, a more stringent guideline for popular dishes using flour bases, such as pizzas, could also be directed so that these contain ≥50% wholemeal flour as this will help children to become more familiar with higher fibre options in popularly selected items. The term '50% wholegrain' for breads could be adapted to wholemeal/wholegrain as the term wholemeal may be a more familiar description for breads.

Question 2 – To what extent do you agree or disagree with the proposals that relate to meat, red meat and fish?

Strongly	Agree	✓	Neither	Disagree	Strongly	
agree			agree nor		disagree	
			disagree			

Supporting comments

Agree

Nutritional adequacy in any dietary pattern, whether including or limiting animal-based proteins, is important. Plant foods can provide important nutrients including fibre, vitamins and minerals, and unsaturated fats. Consuming a more plant-rich diet that contains a wide variety of different foods from the main food groups can provide the range of nutrients the body needs to stay healthy, as well as be more environmentally friendly. However, it is important to note that animal food sources also make an important contribution to some nutrients in the UK diet (e.g. protein, iron, zinc, omega 3 fatty acids), and these may be more bioavailable. Bioavailability is sometimes omitted from discussions on plant and animal food sources yet may be an important consideration particularly where intakes of micronutrients such as zinc and iron are low. Guidance for schools around eating a healthy, more sustainable diet should encourage diversifying protein sources, including more plant-based versions, but not excluding animal derived foods completely. It's about providing options, encouraging a healthy diet and getting the balance right and promotion of plant-based foods that are high in the nutrients animal based foods contain e.g. pulses for iron.

Fish: Sustainably sourced fish should be encouraged in schools in line with recommendations in healthy eating guidelines, yet oily fish, in particular, is poorly consumed. Oily fish provide important nutrients for children's health and development including vitamin D and long chain omega 3s. Whilst waste is an issue both in relation to cost and sustainability, perhaps the shift in proposal could be to try and find ways to encourage fish rather than limit its inclusion in menu cycles. For example, oily fish recipes that are more popular with young people could be included in a supplemental publication rather than reducing provision. We note that in England and Scotland the standard is for oily fish served once or more every 3 weeks. Consideration could be given to the addition of the words 'sustainably sourced' ¹in every occasion that fish appears in the proposed change to more clearly outline we need to shift to dietary patterns that not only healthier but more sustainable.

Meat: The British Nutrition Foundation acknowledges the need to shift healthier and more sustainable diets at population level, including a reduction in total red and processed meat intakes in line with the Eatwell Guide. However as widely recognised and demonstrated by NDNS, meat currently contributes number of important nutrients to children's diets. NDNS data indicates that the average contribution from meat and meat products in 4-10 year olds and in 11-18 year olds to protein intakes is 26% and 31%; iron intakes 14% and 19%; vitamin B12 intakes 20% and 26% and zinc intake 24% and 28% respectively. Furthermore, on average, almost half of girls aged 11-18 in the UK are reported to have low iron intakes, and whilst, iron can be obtained from a variety of plant sources, the haem iron obtained from meat is better absorbed by the body than iron from plant-based sources. As efforts are made to replace some red meat with plant-based options as could be indicated by the proposal, it is essential that alternative sources of the key nutrients it contains are carefully integrated into menus. This shift will require careful menu planning, with a key focus on what is being substituted in place of animal-derived foods to maintain nutritional adequacy.

Including red meat in school meals may be particularly important in view of the high levels of food insecurity in households with children. From a public health perspective, schools are crucial settings to promote healthy eating since children consume at least one main meal per day at school, and this may be the only regular hot meal that is available to them during the week. Therefore, if they are not getting a varied, balanced diet at home, menus that conform to the school food standards containing nutrient dense foods will be particularly important contributors of essential nutrients to their diets

In relation to meat, we would urge consideration to be given to expanding the proposed change to potentially include:

- local supply chains/animal welfare criteria;
- standards around saturated fat e.g. using lower fat mince, leaner cuts of meat;
- recommendations for substituting some meat with beans / how to encourage some substitution or hybrid options with high fibre plant base protein main ingredients like beans and pulses.

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¹ The Marine Stewardship Council has a guide to finding seafood from sustainable sources. Seafish has information on responsible sourcing of seafood.

Question 3 – To what extent do you agree or disagree with the proposals that relate to processed meat? • Processed meat or products containing meat limited to once a week. Disagree Strongly Neither Strongly Agree П disagree agree agree nor disagree **Supporting comments** Strongly agree Reduction of processed meat, as well as being of benefit to environmental sustainability, could support lower salt and saturated fat, as discussed in our recent paper Meat and the future of sustainable diets – Challenges and Opportunities. It may be useful to include more detailed description of 'processed meat' to differentiate between red meat preparations mentioned in the proposal, which are red meat with the addition of ingredients of egg, beans, pulses, vegetables, breadcrumbs, flour, seasoning (including small amounts of salt) and 'products containing meat.' as this could be ambiguous. The place of processed white meat (chicken slices/pieces) could be clarified as all current examples are processed red meat. Question 4 - To what extent do you agree or disagree with the proposals that relate to nonmeat options (specifically, restricting cheese-based dishes and processed meat and fish alternatives)? Processed alternatives to meat and fish limited to twice weekly. Lunch where cheese is the main protein source limited to twice weekly Strongly **Agree** Neither **Disagree** Stronaly agree agree nor disagree disagree

Supporting comments

Diets rich in vegetables, wholegrains and pulses should be encouraged and non-meat options that are less nutrient rich/HFSS (e.g. high salt meat alternative products) should be limited. In transitioning to more plant-rich diets there could be a distinction between healthier processed alternatives and those that are HFSS. In the proposal 'mycoprotein' is limited yet in nutrition guidelines plain mycoprotein is not typically considered as HFSS but rather included in recommended non-dairy protein products i.e. from NHS website on

vegetarian diets 'tofu, mycoprotein (such as Quorn), textured vegetable protein and tempeh', as well as pulses.

In order to encourage better choices and increase the nutritional value of non-meat options, perhaps a positive guideline that recommends good sources of non-dairy protein, use of pulses (environmentally friendly, high in protein, high in fibre) would be particularly helpful to support the common use of cheese in non-meat options. Looking at what should be offered, rather than only what should be limited, could be a positive approach. Ensuring vegetarian/vegan meals are varied is important. UK guidelines recommend ensuring vegetarian meals are as varied as the rest of the menu by using pulses twice a week, soya, tofu, or mycoprotein-based meat substitutes once or twice each week, and eggs and cheese once or twice each week and encourage all children to have a meat-free day each week.

Question 5 – To what extent do you agree or disagree with the proposals that relate to potatoes cooked in oil, fried foods, sweetened baked goods and desserts, and pastry?

Strongly	✓	Agree	Neither	Disagree	Strongly	
agree			agree nor		disagree	
			disagree			

Supporting comments

We would comment that some of the **supporting text** in the consultation document may need rephrasing. Firstly, the focus on fat reduction in a healthy, balanced diet should be more precisely framed around reducing saturated fat, rather than total fat. Healthy fats, such as those from unsaturated oils, are an important component of the diet and included (although in small amounts) within the Eatwell Guide. According to NDNS data, children aged 4-10 years are, on average, meeting recommendations for total fat intake (33.4% of energy vs recommendation <35%). Secondly, whilst children should be eating plenty of fruit and vegetables, in terms of **quantities** in a balanced diet children should be getting most of their calories from higher fibre starchy foods, good quality protein sources and dairy foods. Thirdly, potatoes and potato products are, according to NDNS, contributing only 2% of total trans fat intakes.

We agree that the use of fried products and potato products should be limited but better cooking methods (e.g. changing oil regularly and controlling temperatures) when frying should be employed. Clarifying that the use of unsaturated oils in some potato dishes, for example in a potato salad or mashed potatoes made with olive oil, is acceptable.

NDNS data suggest that biscuits, cakes, pastries, pies and puddings contribute around 20% of free sugars intake in 4-10 year olds. Savoury and sweet pastries high in saturated fats, sugar and salt should be limited, but the current proposal could go further by introducing more stringent guidelines for desserts. There should be a shift towards offering fruit and yoghurt-only desserts on the majority of days, rather than routinely serving standard sweet desserts accompanied by fruit. In addition, where desserts are served, it should be recommended that they contain at least 50% fruit as a core ingredient.

Drinks in primary schools

Question 6 – To what extent do you agree or disagree with the proposals that relate to providing only plain water, plain milk and plain plant-based drinks in primary schools?

Strongly	Agree	Neither	✓	Disagree	Strongly	
agree		agree nor			disagree	
		disagree				

Supporting comments

Agree for lunch, but not breakfast

Water, as well as plain milk and plain fortified plant-based drinks are suitable for healthier hydration, but 150ml unsweetened fruit/vegetable juices and smoothies are also included in Eatwell Guide. Although most schools will only serve water at lunchtime, limited portion sizes (150ml) of unsweetened fruit juice may be particularly useful at breakfast where not only would they provide nutrients like vitamin C (NDNS data indicates fruit and vegetable juices and smoothies contribute 20% of vitamin C intake in children aged 4-10 years) but can also help iron absorption of non-haem iron from commonly eaten breakfast foods like bread and cereals. We note that fruit juice has been disallowed but other free sugar sources are limited but included.

Portion sizes in primary schools

Question 7 – To what extent do you agree or disagree with the proposals aimed at providing more appropriate portion sizes in primary schools for those in nursery to Year 2 and Year 3 to Year 6?

Strongly	Agree	Neither	Disagree	√	Strongly	
agree		agree nor			disagree	
		disagree				

Supporting comments

There is clearly a need to consider portion sizes, and ranges of these, across ages both from an obesity and waste perspective. However, portion sizes for a 3-year-old at nursery may not be suitable for a 7-year-old in year 2. Early years settings portion size guidance would be relevant for nursery, and consistency across such early years guidelines should be reviewed, although practically this may be difficult for school caterers.

There may also be a benefit of translating portion sizes by weight into practical measures e.g. spoons, and there may be some issues with translating different portion sizes to foods that are individually portioned e.g. yogurts.

Some of the portion sizes allocated may benefit from reconsideration. For example, the same portion size is allocated for red and processed meat, although the nutrients from red meat are likely to be more beneficial.

Some interesting reference for portion sizes include:

https://assets.ctfassets.net/dvmeh832nmjc/10EirRzB8F7iMahdZkWNDb/3e7eb82bf9 5af23b06266b7fced62575/Portion_sizes.pdf

https://shura.shu.ac.uk/31975/1/jhn.13183.pdf

Breakfast in	prima	ary scho	ools						
Question 8 – preakfast prov			nt do y	ou agree or dis	agree	with the p	roposals rela	ating to	
Strongly agree		Agree	9 🗸	Neither agree nor disagree		Disagre	ee 🗆	Stron disag	
Supporting o	omm	ents							
example, alticlear limit on incorporating that are red for the permitted where less some	the some sof unation of the sof	n cereals ugar con ctive crit gar). nsweete guideling le fruits eakfast, nt regula ations que e draft st	s should ntent in eria, so ned fru e and n should althoug ations a	guidance supp	ed with eals. The celsm celsm n incred but inot concerea	n sugar', the support and crite coothie is peasing iron colusion of unt as a pool and yogu	nere doesn't this we reco ria (e.g. rest art of Eatwe absorption of f 150ml fruit ortion of fruit rt and sweet	seem to be ommend tricting those fl Guide from plant- juice shoul particularl t spreads.	se d
mplement the			ions su	fficiently clear?			Not su	re	✓
Supporting of		.	<u> </u>	NO		<u> </u>	1101 30		<u> </u>
with regards In implement ease of imple likely require viable school	regulation tation ement furth I food	ations th , it is imp tation ar er suppo service	nere are portant nd to re ort to ac	d by school foo e two important to work closely view barriers a chieve full comp onsiderations s	facet with nd fac olianc	s – implem the schools ilitators. S e whilst ma	nentation and s and catere chools and d aintaining a f	d monitorin rs to ascer caterers wil inancially	tain

account. Menu examples/what works/good practice resources may be helpful. It may be that concentration on reducing free sugars and increasing fibre could form the basis of

It may also be interesting to refer to the results of the FSA compliance with school food standards to identify particular areas that may be difficult for compliance officers to

interpret or where areas of non-compliance may be higher.

practical guidelines.

Budget advice may providing meals tha	•		nd food in	flation increasing the o	cost of
Special diets Question 10 – Is the dietary requirements	•	•	=	of medically prescribe y clear?	ed
Yes		No	✓	Not sure	
the children and the Standards, some clowhere the diversity implications of this control to prevent absentee specific special diet practice. There is all diversity and this control to preferences; for example of the standards o	re best placed to to food provir families, as we arer support wo for needs mix in a djustments ary needs. Son so very little will uld be address ample, halal, ko onal needs and	sion, taking into vell as schools' of vould be beneficinon-specialist section for school provisions of inappropriate case studies of thin the guidelines and vegand disabilities, and	account the bligations al. This is a chools is impose se school for could be used around in to consider food is incless.	e individual circumsta under the School Foo a highly complex issue	d e, r need e with and ry tudents
Regulatory and wid	·				
Question 11 – What draft regulatory impa	-		should be t	further recognised with	nin the
n/a					
Question 12 – What the draft regulatory ir	•	•	eel should	be further recognised	l within
n/a					

Question 13 – What		•		•	
particularly the impact disadvantage and per		•		•	
be considered)?					
n/a					
Question 14 – What	comments.	if anv. do vou have	on how costs	s would be impacte	d on
(including evidence y		•		,	
n/a					
Promoting healthy e	ating statu	itory guidance: pri	mary and se	econdary schools	
Question 15 – Is the governing bodies to d clear? (Feel free to pr	eliver their	duties to promote h	ealthy eating	and drinking, suffic	
Yes		No		Not sure	
Supporting commer	nts				
n/a					
Call for evidence: se	econdary s	chools			
Question 16 – How of secondary schools? (supports your respon	Feel free to				

Numerous publications have highlighted the lower compliance with School food standards in secondary schools in comparison to primary schools. The following points are some suggestions/recommendations to support improved take up

- The need for more robust behavioural insight including choice architecture to move provision to take up nutritious food is only nutritious if eaten

 See Murphy et al. Changing the food environment in secondary school canteens to promote healthy dietary choices: a qualitative study with school caterers

 https://bmcpublichealth.biomedcentral.com/articles/10.1186/s12889-024-19513-7
- Being aware of the school dining environment (incl. time constraints) as well as the food provided

https://pmc.ncbi.nlm.nih.gov/articles/PMC10375012/

- Incorporating meaningful food education in schools, including education in food waste and a holistic whole school approach; In addition to providing energy and nutrition, meals can be used as an educational tool not least within the school's mission to provide pupils with knowledge about an environmentally sustainable and healthy lifestyle;
- Multicomponent food policies that that increase the availability and accessibility of healthier foods should also include nutrition education initiatives such as taste testing and cooking classes.
- Establishing connections with the out of school environment including the immediate environment outside of schools and the close proximity of cheap fast food near schools for young people
- Better communication with parents/carers
- Monitoring for compliance and the cost of this
- Training and real life practical translation of guidelines to draw on
- supporting schools to work alongside local research institutions to draw on research expertise to develop a robust evidence base and data for improvement

There are a number of research publications that have explored secondary school provision that may be useful:

'Doing school food!': a practical toolkit for adopting a whole school food approach a practical framework for schools was developed and informed further to research that sought to understand the factors which influence healthy school food provision and the adolescent's food choice https://foodactive.org.uk/wp-content/uploads/2023/10/PPH-school-food-paper-2023.pdf

The British Nutrition Foundation's Breakfast paper (No food for thought–How important is breakfast to the health, educational attainment and wellbeing of school-aged children and young people?) calls for more inclusive and accessible

options https://onlinelibrary.wiley.com/doi/full/10.1111/nbu.12652

The Guys and St Thomas Report Serving up children's health highlights opportunities and barriers in the school food system to prioritise nutritious food for our young people https://urbanhealth.org.uk/wp-content/uploads/2020/12/Serving-up-childrens-health.pdf
The CPAG Improving secondary school food provision - barriers and solutions.pdf

Mandatory questions

Question 17 – What, in your opinion, would be the likely effects of the legislation on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

Supporting comments

l r	l n/a	
	11/a	

Question 18 – In your opinion, could the legislation be formulated or changed so as to:

- have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or
- mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

Supporting comments

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l n/a		
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Question 19 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Regarding Part 3: secondary school food – a call for evidence

The consultation has said:

"For secondary schools, we need more information. The eating patterns in secondary schools are more complex due to the popularity of grab-and-go options, and the wide variety of foods being available during both morning and lunch breaks.

We're gathering data on consumption habits and issuing a call for evidence as part of this consultation to better understand these settings."

How the British Nutrition Foundation can help

We are sharing the information below as we believe this might support the *Healthy eating* and drinking in maintained schools in Wales consultation, specifically in regard to secondary schools.

Snack-tember 2025

In September 2025, the British Nutrition Foundation is running its first <u>Snack-tember</u>. This is a month-long, UK-wide initiative with the ambition of helping children and young people make and choose healthier, more sustainable snacks. *Snack-tember* is aimed at those aged 5-16 years, but we are having a special focus on pupils in the first two years of secondary school.

Through providing free resources to schools, such as posters, recipes and classroom activity ideas, engaging parent/carers and school caterers, our aim is to help children and young people choose and make snacks that have:

- MORE vegetables and fruit
- MORE wholegrains, beans and pulses
- LESS saturated fat, salt and sugars

The great snack survey

As part of the development of the *Snack-tember* initiative, we undertook *The great snack survey*. We received over 2,500 responses from UK-based children and young people aged 10 – 13 years on their habits and opinions around snacking. Our survey included a question around whether respondents thought that their school canteen (in secondary schools) helped them choose healthier snacks.

The survey has provided us with some useful insights into the motivations of secondary aged pupils when choosing snacks from the canteen – this may be useful for the consultation's work around secondary pupils and lunchtime provision. We would be happy to share our survey questions and data with you.

Conversations with school caterers

In addition to the survey, we have also spoken to a number of school catering organisations to ask them to reflect the *Snack-tember* messages in their provision during September 2025. While enthusiastic about the idea of promoting healthier snacking, most of the caterers have found it difficult to commit to any change to their current provision. Again, we would be happy to share some of the insight we have gleaned from these conversations.

Working with young people

For *Snack-tember*, we have developed six healthier snack <u>recipe videos</u>, specifically targeted at pupils in early secondary education, to engage this age group in exploring, making and trying healthier snacks. To develop the recipe videos, we worked closely with secondary aged pupils who made, tasted and scored the recipes. We will be reviewing the impact of these 'peer-to-peer' recipes on influencing young people's snack choices as part of our *Snack-tember* impact evaluation.

If you would like more information about any of the above, in relation to supporting the consultation, and more specifically, secondary school food provision, please don't hesitate to get in touch. Contact Claire Theobald at: c.theobald@nutrition.org.uk

Regarding Part 2: promoting healthy eating and drinking in schools

The British Nutrition Foundation completely supports a whole school approach to food.

Clear and consistent messages around healthy eating are important, and it is vital that children and young people see what they learn in lessons around food (healthy eating, cooking, where food comes from) reflected in the food and drink they are given at lunchtimes. This reinforces important health messages and healthy eating behaviour.

Having a governor responsible for food across the school day is fundamental to ensuring every child gets the best start with healthy school food. Governor support gives status and recognition to the importance of healthy eating through food provision, and food education, in school.

The British Nutrition Foundation's education programme, <u>Food – a fact of life</u>, champions a whole school approach to food. The programme has provided free, curriculum linked food education resources and training for schools across the UK, for over three decades.

The *Food – a fact of life* resources provide a progressive approach to learning about healthy eating, cooking and where food comes from, for children and young people, aged 3-16 years. The resources support the Curriculum for Wales and include Welsh language resources.

Responses to consultations are likely to be made public, on the internet or in	
a report. If you would prefer your response to remain anonymous, please	
tick here:	