

# BDA submission to School Food Standards consultation

## June 2026

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### 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

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

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

The proposed standards represent a strong, 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.

The restriction of foods high in free sugars (e.g. chocolate spreads, syrups) and the removal of fried and highly processed items is appropriate given the well-established 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.

Similarly, the exclusion of processed meats reflects current public health guidance to reduce consumption of these foods. We would suggest providing schools with a clear list of foods that are considered 'processed' to avoid confusion. Similarly, adding a clarifying statement to this standard 'fried potato products are not permitted' to explain this includes oven baked hashbrowns would be welcome to avoid confusion amongst schools. Evidence shows that the most commonly eaten processed meat dishes in schools and educational institutions include but are not limited to: ham; sausages; and sausage rolls [1].

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. Additionally, clearer definitions and examples of what constitutes "fruit spreads" and "savory spreads" would support consistency across settings and reduce ambiguity for providers.

Evidence from School Food Matters' Nourish programme supports the practical delivery of the proposed breakfast standards. Prior to intervention, breakfast provision in many schools relied heavily on foods that would not meet the proposed standards, and staff often feared children would resist healthier breakfast options. In practice, these concerns rarely materialised, and schools successfully introduced and sustained healthier breakfast menus [2].

The programme also identified significant knowledge and implementation gaps among staff delivering breakfast provision. In some cases, staff believed existing breakfast offers already met the standards despite serving pastries, honey, jam and juice. Nourish found that schools benefited from practical guidance and staff training alongside menu changes [2].

The inclusion of unsweetened, fortified dairy and plant-based alternatives in the standards is a particular strength, ensuring nutritional adequacy (e.g. calcium, iodine, vitamin D, B12) while supporting dietary diversity and inclusion. We suggest adding fortified unsweetened pea milk alternative to the list of permitted plant-based alternatives.

The proposed drink 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. The phased approach for secondary schools is pragmatic and may support implementation, however we would urge the government to consider moving to water, milk and tea only in secondary schools, to match the standard for primary.

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] 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](https://foodfoundation.org.uk/sites/default/files/2025-05/TFF_Meat%20Facts.pdf)

[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>

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

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.

This proposal is consistent with current public health guidance, which recommends limiting processed meat consumption due to its association with adverse health outcomes [1] [2] [3] [4].

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. WHO IARC classifies processed meat as carcinogenic, and Cancer Research UK estimates it causes 13% of new bowel cancer cases in the UK annually. Even small amounts carry risk: each additional 50g per day increases bowel cancer risk by around 18%. Furthermore, each additional 25g increases dementia risk by 44% [6] [2] [7].

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 [5].

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.

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

[1] 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/>

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

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

[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?utm\\_source=chatgpt.com](https://www.cancerresearchuk.org/about-cancer/causes-of-cancer/diet-and-cancer/does-processed-and-red-meat-cause-cancer?utm_source=chatgpt.com)

[5] 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://www.thelancet.com/journals/lanonc/article/PIIS1470-2045\(15\)00444-1/fulltext](https://www.thelancet.com/journals/lanonc/article/PIIS1470-2045(15)00444-1/fulltext)

[6] 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](https://eating-better.org/site/assets/files/6465/its_time_to_act_on_processed_meat_final-1.pdf)

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

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

• Strongly agree

• Agree

• Neither agree nor disagree

• Disagree

• Strongly disagree

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

Honey is classified as a free sugar and, from a nutritional perspective, has similar impacts to other sugars such as syrups and table sugar [1]. High intakes of free sugars are associated with an increased risk of dental caries and excess energy intake, particularly in children [2] [3]. 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 [4]. 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] 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.

[2] 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.

[3] 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.

[4] 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?

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

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

The BDA strongly supports the wider principle of a Whole School Food Approach, where healthy eating is embedded consistently throughout the school environment rather than treated solely as a catering issue. Whole School Food Approaches can positively influence children's dietary behaviours, improve uptake of school meals, reduce stigma associated with healthier choices and support children to develop positive lifelong relationships with food. Evidence from universal free school meal programmes suggests that where schools create supportive food cultures, children are more willing to try new foods and engage positively with healthier eating.

This approach can also support wider public health and sustainability objectives by creating stronger demand for fresh and locally sourced produce, encouraging sustainable procurement and strengthening local food systems. Effective Whole School Food Approaches are most successful where they involve collaboration between school leadership, caterers, educators, dietitians, pupils and local communities. However, the BDA believes the success of a whole school day approach will depend on ensuring that standards are implemented consistently and do not contain avoidable loopholes. Particular consideration should be given to how foods high in fat, salt and sugar are provided outside formal mealtimes, including through celebrations, rewards, fundraising activities and other informal food occasions that contribute significantly to children's dietary intake and the wider food culture within schools.

The BDA would therefore encourage government to consider whether additional guidance or restrictions relating to HFSS foods in celebrations and reward-based activities may be appropriate as part of a genuinely whole-school approach to healthy eating. While proportionality and flexibility are important, schools should be supported to move away from cultures where high sugar or high fat foods are routinely associated with reward, achievement or celebration.

At the same time, implementation should remain practical and inclusive. Schools will require clear guidance, adequate funding and flexibility to ensure that a whole school day approach supports all children, including those with SEND, medical dietary needs or restricted diets, without unintentionally creating exclusion or reducing school meal uptake.

## **Increasing fibre and starchy foods:**

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

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

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

Additional clarity is needed regarding the practical interpretation and implementation of some of the proposed fibre requirements. In particular, the proposal that at least 50% of pasta and rice served should be brown, wholegrain or white varieties with added fibre may create ambiguity in practice. Further definition is needed regarding how the 50% threshold should be interpreted, measured and monitored operationally by schools and caterers.

There is also a need to recognise that products marketed as "higher fibre" or "added fibre" are not necessarily nutritionally equivalent to wholegrain products. A simple "50/50" interpretation may therefore

not always reflect comparable nutritional value. The BDA would encourage the Department for Education to provide more detailed quantitative definitions and practical implementation guidance to support consistency across settings and avoid confusion for schools and catering providers. Learning from approaches already developed in Wales around defining and implementing higher fibre and 50% wholegrain products may be particularly beneficial.

The acceptability of higher fibre foods among pupils will also be critical to the success of these proposals. For children who are less familiar with wholegrain products or higher fibre starches, taste preferences and familiarity may need to be developed gradually over time. Recipe development, menu testing and meaningful consultation with pupils will therefore be important to ensure increased fibre provision does not unintentionally reduce school meal uptake or increase reliance on packed lunches.

Gradual reformulation approaches are likely to be particularly important for maintaining meal familiarity, palatability and acceptability while still improving nutritional quality overall. Schools should therefore be supported to implement changes progressively and in partnership with pupils, families, caterers and dietitians.

## Fruits 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

• Agree

• Neither agree nor disagree

• Disagree

• Strongly disagree

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

Strengthening the nutritional quality of grab and go provision is particularly important given the significant role these options play within secondary school food environments and the high proportion of pupils who rely on them during the school day.

However, the BDA would encourage the Department for Education to consider whether requiring two portions of vegetables and/or salad alongside grab and go meals would better align with wider dietary recommendations and ambitions to increase vegetable intake among children and young people. This could also represent an important opportunity to improve fibre intake, which remains significantly below recommended levels across the child population.

The BDA also recommends clearer guidance regarding the role of pulses within these standards. Pulses such as lentils, chickpeas and beans can make an important contribution to vegetable intake, fibre provision and sustainability objectives and should be recognised within implementation guidance as contributing towards vegetable portions where appropriate.

The success of this proposal will depend heavily on the acceptability, accessibility and affordability of grab and go meals. Schools and caterers should be supported to develop innovative and appealing ways of incorporating vegetables into portable meal options, including through wraps, salads, grain bowls, soups, vegetable-based fillings and pulse-containing dishes. Meaningful consultation with pupils will also be important to ensure these options are attractive and widely taken up.

At the same time, improving grab and go provision should not replace efforts to make sit-down meals more achievable and attractive for pupils. Time pressures, queuing, dining environments and social factors can all influence food choices within schools, particularly in secondary settings. A Whole School Food Approach should therefore aim both to improve the nutritional quality of grab and go provision and to create environments where pupils are able and encouraged to access balanced sit-down meals where possible.

Finally, the BDA strongly recommends that healthier grab and go options containing vegetables, salad or higher fibre ingredients are not more expensive than less healthy alternatives. Cost remains a major driver of pupil choice, particularly for children and young people receiving Free School Meals or from lower income households. Pricing structures should therefore support, rather than undermine, healthier choices.

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

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

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

The BDA strongly supports the proposal for primary schools to have at least one day each week where fruit is the only dessert option. This is a practical and proportionate measure that can help reinforce healthier dietary norms, contribute to reducing free sugars intake and support increased fibre consumption among primary-aged children. Establishing fruit as a normal and enjoyable dessert option within the school environment can play an important role in shaping positive dietary behaviours from an early age.

Evidence demonstrates that children's current intake of free sugars remains substantially above recommended levels, while fruit and fibre intake remain too low. Increasing regular exposure to fruit within school meals is therefore an important public health intervention with the potential to support healthier long-term dietary habits.

The BDA also welcomes evidence from School Food Matters' Nourish programme, which suggests that fruit-only dessert initiatives can be well received by pupils when implemented gradually and with meaningful pupil involvement. Schools participating in these approaches found sustained pupil engagement, and some reported increased fruit selection beyond designated fruit-only days over time. This highlights the importance of repeated exposure, presentation and pupil participation in shaping food preferences.

To maximise effectiveness, implementation guidance should emphasise variety, presentation and acceptability. Offering a rotating selection of seasonal fruits, including fresh fruit salads, prepared fruit options and attractively presented whole fruit, will be important to maintaining pupil engagement and minimising food waste. Schools should also be encouraged to involve pupils in selecting fruit options and shaping menus through pupil voice approaches, food ambassadors and menu consultation activities.

However, the BDA believes further clarification is needed regarding how this proposal interacts with the wider dairy and dessert standards. In particular, members raised concerns that restricting desserts to fruit-only options on one day each week may create practical challenges in meeting fibre, calcium and micronutrients requirements across the week, especially alongside existing restrictions on cheese-based options and baked desserts. As currently drafted, there appears to be some ambiguity regarding how schools are expected to achieve recommended dairy and other nutrient provision while remaining compliant with the dessert standards overall.

For example, the standards mention a fruit-bun, greater clarity is needed on why this has been selected. A fruit bun could have sugar levels that are >10g total sugar/100g. Could this selection of suitable options be extended, such as 50% fruit based and total sugar content <10g/100g. This would increase variety and give a firmer basis to dessert selection.

The BDA would therefore welcome clearer implementation guidance regarding:

- how dairy and other nutrient provision should be interpreted across the school week

- whether fruit-only dessert days are intended to exclude all dairy-based accompaniments or options
- how schools can balance reduced sugar provision with maintaining nutritional adequacy, including calcium intake
- Nutritional analysis, implementation guidance and sample primary school menus would go some way in achieving this.

The BDA also encourages the government to align these proposals with wider sustainability and procurement ambitions. Schools should be encouraged, through procurement guidance and catering frameworks, to increase sourcing of fruit from local and sustainable British producers where feasible, supporting both environmental sustainability and regional food systems alongside improved child nutrition.

## Reducing sugar, healthier drinks

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

• Strongly agree

• Agree

• Neither agree nor disagree

• Disagree

• Strongly disagree

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

Restricting the permitted drinks list in primary schools is one of the most impactful proposals in the updated standards. 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.

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 on the environment by reducing plastic waste generated by bottled drinks.

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. John Scurr Primary School in Tower Hamlets became a water only, meaning parents didn't need to supply a drink anymore. As evidenced by the change in this school's food policy, the school now has children who eat, as well as drink well throughout the day which can only improve their educational attainment [1]. 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 [2].

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 [3]. 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.

[1] London Assembly Health Committee (2019) *Keeping the Tooth Fairy Away: Child Dental Health Inequalities*. London: Greater London Authority. Available at: <https://www.london.gov.uk/media/40390/download>

[2] 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#>

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

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

- Strongly agree
- Agree
- Neither agree nor disagree
- **Disagree**
- Strongly 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 found this position supported by parents, with 73% saying the same food standards should apply to both primary and secondary schools [5].

The proposal to allow low-sugar drinks that can contain sweeteners is concerning given the evidence of low compliance with current drinks standards [4]. 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 [1]. 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. [2]

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, young people frequently report being unable to access free water easily in schools. 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 don't use them. [3]

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 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; spending on bottled drinks directly reduces what they can afford to eat.

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

[2] 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>

[3] 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](https://foodfoundation.org.uk/sites/default/files/2023-11/TFF_FSM%20Allowance_Report_FINAL.pdf)

[4] 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>.

[5] 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.

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

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

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

If the final permitted drinks list for secondary schools remains inconsistent with primary school standards in allowing sweetener-containing drinks, then phasing simply delays an inadequate outcome rather than delivering a genuinely healthier one.

The phasing would be more appropriate if it were as a transition toward full alignment with primary school standards, with a firm commitment to reviewing and tightening the secondary list beyond September 2028. Without this commitment, there is a risk that the phased approach becomes a permanent compromise rather than a stepping stone to best practice.

Allowing hot chocolate and flavoured milks in secondary schools during the phasing in period would undermine other standards that do not permit use of chocolate or confectionery, removal of honey elsewhere and alignment in reducing sugar overall, and we would therefore strongly advise against this.

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?

Drinks standards for secondary schools should align with those for primary schools. The nutritional and public health rationale for restricting sugary and sweetener-containing drinks does not weaken with age, and maintaining a more permissive approach within secondary schools risks creating inconsistent messages around healthy hydration and nutrition during adolescence.

Adolescence remains a critical period for dietary habit formation, cognitive development and educational attainment. Evidence highlights the important relationship between diet, hydration, mood, attention and learning in children and young people. The [British Dietetic Association's guidance on diet, behaviour and learning in children](#) highlights that regular nutritious food and drink intake supports mood, concentration and attention, while hydration is important for cognitive performance and classroom behaviour. School food environments therefore play an important role not only in supporting physical health, but also readiness to learn and engagement within education settings.

The BDA recognises that secondary schools may face additional operational and commercial challenges in transitioning towards stricter drinks standards, particularly where vending machines, meal deals and existing catering contracts are involved. A phased approach towards alignment may therefore be reasonable. However, this should be framed as a clear long-term policy direction with defined

implementation expectations and timelines, rather than an indefinite distinction between primary and secondary standards.

The proposed divergence between primary and secondary drinks standards may also undermine healthy habits established during primary education. Under the revised proposals, primary-aged children will have significantly reduced exposure to sugary and sweetener-containing drinks throughout their early school years. Reintroducing broader access to these drinks at secondary level risks weakening those behaviours and reinforcing reliance on sweetened beverages during adolescence.

The BDA also notes the wider benefits of aligning standards across phases of education. Consistent standards may simplify implementation and communication for schools, families and caterers, while also contributing to environmental sustainability objectives by reducing reliance on bottled drinks and associated plastic waste.

Regardless of the final approach adopted, it is essential that all schools provide consistent access to safe, free and appealing drinking water throughout the school day, in line with existing legal requirements. Schools should also be supported to promote water as the default and most accessible drink option within a wider Whole School Food Approach that encourages healthy dietary behaviours across the school environment.

## Dairy and plant-based options:

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

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

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

The BDA broadly agrees with the proposed changes to the dairy and plant-based requirements, as they have the potential to support both improved nutritional standards and greater inclusivity within school food provision. Maintaining a requirement for daily milk provision helps ensure that children and young people continue to have access to important sources of nutrients such as calcium, iodine, protein and vitamin B12, which are essential for growth and development.

At the same time, the inclusion of plant-based alternatives alongside dairy provision is a positive and necessary development. This supports pupils with a range of dietary needs and preferences, including children who are lactose intolerant, vegan, have allergies or other medical dietary requirements, or come from cultural backgrounds where dairy consumption may be lower.

However, we believe the wording and framing within the standards could place stronger emphasis on inclusivity and equitable access. Plant-based alternatives are important not only for lifestyle choices, but also for ensuring safe and appropriate provision for children with allergies, intolerances and medical dietary needs. The standards and accompanying guidance should therefore make clear that providing suitable alternatives is an integral part of inclusive school food provision.

The BDA would also recommend that fortified unsweetened pea-based drinks are explicitly included within the list of permitted plant-based alternatives, alongside other fortified milk alternatives. Ensuring that all permitted plant-based drinks are fortified with key micronutrients such as calcium, iodine, vitamin D, riboflavin and vitamin B12 is essential to support nutritional adequacy and closer equivalence with dairy-based options.

The proposed reduction in sugar thresholds for yoghurt products is also welcome. Clear limits on sugar content across both dairy and plant-based products are important in helping reduce children's intake of free sugars while still allowing schools flexibility in providing acceptable and inclusive options.

As with other aspects of the revised standards, implementation guidance will be important to support consistency across settings. Schools and caterers may require additional practical guidance around selecting nutritionally appropriate plant-based products, managing allergens and ensuring children with medical or restricted diets are able to access suitable options safely and without stigma.]

## 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

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

The BDA broadly welcomes the proposed changes and believes they have the potential to significantly improve the nutritional quality of school meals, particularly through the stronger emphasis on healthier food provision, reduced availability of foods high in fat, salt and sugar, and increased focus on whole foods and dietary quality. The proposed restrictions are well evidenced and long overdue. Current dietary data demonstrates that children are consuming substantially more saturated fat and sugar than recommended, increasing lifetime risk of obesity, cardiovascular disease and type 2 diabetes. Strengthening restrictions on deep-fried foods, processed meats, batter-coated products and pastry-based items aligns closely with current nutritional evidence and wider public health objectives.

Rebalancing the school food environment away from foods associated with excess sugar, saturated fat and salt intake is essential if every child is to have access to the nutrition needed to learn, develop and thrive. Current evidence indicates that very few children meet dietary recommendations for free sugars and saturated fat intake, while approximately one in three children leave primary school living with obesity. Evidence from schools across England also suggests that foods high in fat, sugar and salt remain widely available across the school day, particularly within secondary school settings. Strengthening the standards therefore represents an important opportunity to improve the overall nutritional environment experienced by children and young people.

However, the BDA believes there remains a strong case for introducing some form of nutritional analysis alongside the revised standards to ensure that meals consistently meet children's nutritional needs in practice. The proposed standards are food based - which specifying the types and frequencies of foods and drinks that should or should not be provided. While this approach supports menu planning and encourages dietary variety, it does not fully assess the overall nutritional composition of meals.

In contrast, Scotland and Wales operate both food-based and nutrient-based standards. Nutrient-based approaches set specific nutritional targets for meals, including limits on fat, sugar and salt and minimum levels of nutrients such as fibre, iron and calcium. This provides greater assurance that meals delivered in practice meet children's dietary requirements, rather than simply meeting food provision rules alone.

While the BDA recognises the practical and operational challenges associated with full nutrient-based monitoring, the absence of any nutritional analysis risks limiting the ability to assess whether the revised standards are delivering meaningful improvements in dietary quality overall. Compliance with food-based standards does not necessarily guarantee nutritionally balanced meals in practice, particularly where reformulated or highly processed products are used to meet technical requirements. BDA Members also raised concerns regarding insufficient guidance on portion sizes, which nutritional analysis would support the standardisation of.

The BDA would therefore encourage government to consider proportionate mechanisms for nutritional analysis, monitoring or evaluation alongside the revised standards. This could include periodic nutritional assessment of menus, strengthened compliance frameworks, or phased approaches to nutrient analysis

that support continuous improvement without creating disproportionate administrative burden for schools and caterers.

The success of the revised standards will also depend heavily on robust implementation, monitoring and enforcement. Existing evidence suggests that many schools, particularly secondary schools, face significant challenges in complying with current restrictions relating to foods high in fat, salt and sugar. The BDA would welcome stronger accountability measures alongside clearer guidance for schools and caterers to support consistent implementation across the school day. This should include consideration of pricing and accessibility, ensuring healthier options are not more expensive or less available than less healthy alternatives.

Finally, the BDA has concerns regarding extended phased implementation periods for secondary schools. While implementation support is important, evidence from previous voluntary reformulation programmes suggests that prolonged timelines can reduce overall impact and delay meaningful change. The BDA believes implementation timelines should reflect the scale and urgency of improving children's dietary health and reducing nutrition-related inequalities.

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

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

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

The BDA broadly agrees with the proposed restrictions on the serving of cheese as a main ingredient. Cheese is a significant contributor to saturated fat intake in children's diets, and limiting cheese-based main dishes to no more than two days per week represents a proportionate and practical approach to reducing overall saturated fat consumption while still allowing flexibility within school menus. Importantly, the proposal does not remove cheese entirely from school food provision, as it may still be used in smaller quantities as a topping, accompaniment or ingredient within composite dishes. This provides schools and caterers with flexibility to maintain menu familiarity and acceptability while supporting wider nutritional objectives.

Reducing excessive saturated fat intake is an important public health priority. Current evidence shows that average saturated fat intake among children exceeds recommended levels, increasing longer-term risk of cardiovascular disease and other adverse health outcomes. Measures to rebalance school food provision away from foods contributing disproportionately to saturated fat intake are therefore welcome. However, the BDA believes further clarity is needed regarding how these restrictions interact with the wider dairy and dessert requirements within the proposed standards. Members raised concerns that limiting cheese provision alongside proposals for fruit-only dessert days and restrictions on dairy-based desserts may create practical challenges for schools attempting to ensure adequate dairy provision across the week.

As currently drafted, there is some ambiguity regarding how schools are expected to balance reduced saturated fat and sugar provision with maintaining sufficient intake of important nutrients commonly provided through dairy foods, including calcium, iodine and protein. This is particularly relevant for children and young people who may already have restricted dietary intake, limited food variety or increased nutritional vulnerability.

The BDA would therefore welcome clearer implementation guidance on:

- how overall dairy provision should be interpreted across the school week
- how schools can ensure nutritional adequacy while complying with restrictions on cheese and dairy desserts

- appropriate use of lower-fat and fortified dairy or plant-based alternatives
- how these standards should be applied in ways that maintain meal acceptability and school meal uptake
- a sample menu for primary schools

The acceptability of menu changes will also be important. Overly restrictive approaches may risk unintended consequences, including reduced meal uptake or increased reliance on packed lunches, particularly among older pupils. Gradual reformulation, recipe development and meaningful engagement with pupils will therefore be important to ensure healthier menu patterns remain appealing, satisfying and nutritionally adequate.

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?

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

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

The phased approach for secondary schools (three portions per week from September 2027, reducing to two from September 2028) gives caterers adequate time to develop appealing alternatives without disrupting service, while still delivering the nutritional benefit of the full restriction within a clear timeframe.

## Reducing desserts

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

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

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

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]

It should be made clear to schools and caterers that the once a week limit on desserts is a maximum, rather than a requirement; moving towards fruit and fruit and yogurt only policies, where supported by children, parents and staff, should be encouraged.

[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>

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

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

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]

However it should be noted that secondary schools present distinct challenges in implementing dessert reductions that are not present in primary settings. 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." [2] Schools should be actively supported to co-design menu changes with students as dessert reductions are introduced.

The acceptability of alternative dessert options will therefore be critical. Schools and caterers should be supported to provide appealing, varied and age-appropriate fruit and lower-sugar dessert options that remain attractive to pupils. Meaningful pupil engagement, menu consultation and gradual reformulation approaches will be important in supporting behaviour change while maintaining uptake.

The BDA also believes it should be made explicitly clear within implementation guidance that limits on sweetened desserts represent maximum allowances rather than requirements. Secondary schools should not feel obligated to provide sweet baked desserts in order to demonstrate compliance. Schools wishing to adopt more ambitious approaches, including increased provision of fruit- and yoghurt-based desserts, should be encouraged and supported to do so.

At the same time, reductions in sugary desserts must be balanced with maintaining nutritional adequacy and sufficient energy intake for adolescents. Secondary-aged children and young people have significant nutritional requirements to support growth, cognitive development, concentration and learning. The [British Dietetic Association healthy eating guidance for children](#) highlights the importance of regular access to balanced meals containing starchy carbohydrates, fruit and vegetables, protein-rich foods and calcium-containing foods to support growth, energy needs and overall health. ([bda.uk.com](http://bda.uk.com))

The BDA would therefore welcome:

- clearer guidance on how schools can maintain nutrient density while reducing sugary desserts
- practical advice on balancing fibre, calcium, protein and energy provision across weekly menus
- example compliant secondary school menus demonstrating how schools can meet the revised standards in practice while maintaining meal appeal and nutritional adequacy
- proportionate nutritional analysis or monitoring approaches to assess whether revised menus continue to meet the nutritional needs of adolescents overall

This will be particularly important for nutritionally vulnerable groups, including pupils experiencing food insecurity, children with SEND, and young people with restricted or medically prescribed diets. Secondary schools should also be supported to implement changes gradually and within a wider Whole School Food Approach that promotes healthy eating consistently across the entire school environment.

[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] 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

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

The phased implementation (two portions per week from September 2027, reducing to one from September 2028) is a reasonable concession to the operational realities of secondary school catering. 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.

The BDA therefore believes any phased approach should include clear timelines and expectations for full implementation, rather than becoming an indefinite compromise. Schools should also begin pupil engagement, recipe development and menu testing immediately to support successful transition towards lower-sugar dessert provision.

Meaningful involvement of pupils will be essential to maintaining meal uptake and ensuring healthier alternatives are appealing, acceptable and sustainable 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
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

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

Requiring meal deals to include at least one portion of vegetables or salad and one portion of fruit, while excluding drinks, is an improvement on current practice. 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 which 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.

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 [1]. 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].

The BDA therefore believes this proposal further strengthens the case for universal free school meals. Universal provision would help remove financial barriers that currently shape and limit children's food choices within schools, while also reducing stigma and supporting more equitable access to nutritious meals. Evidence from existing universal provision schemes demonstrates that when all children can access school meals within a positive food environment, uptake increases, dietary inequalities are reduced, and children become more willing to try a wider variety of foods.

To maximise the impact of these proposals, implementation should be accompanied by sufficient funding, meaningful engagement with pupils on menu design and meal deal composition, and a wider Whole School Food Approach that ensures healthy options are affordable, appealing and consistently accessible to all children and young people.

[1] 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](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

• Agree

• Neither agree nor disagree

• Disagree

• Strongly disagree

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

Requiring pulses to be included within or alongside all main menu options at least once a week 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 [2].

Dinner is the most likely meal to contain beans for children. Lunch contributing less, shows that are 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. [3] 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 [4]. Eating more beans could therefore close this nutrient gap. However, successful implementation will depend on practical support for schools and caterers. Pulses can be incorporated successfully into school meals through a range of approaches, including blended dishes, soups, sauces, curries, wraps and familiar composite meals, but schools may require additional

support around menu design, recipe development and pupil engagement to ensure acceptability and uptake.

The BDA also believes this proposal further strengthens the case for some form of nutritional analysis or monitoring alongside the revised standards. While pulses offer important nutritional benefits, there should be clarity regarding how products such as baked beans are accounted for within the wider nutritional framework, including consideration of sugar and salt content. Nutritional analysis would help ensure that increased pulse provision contributes positively to overall dietary quality and nutrient density rather than relying heavily on more processed options alone.

Dietetic leadership and expertise will be important in supporting implementation of these changes. Dietitians can support schools and caterers through menu planning, nutritional analysis, recipe development and strategies to improve pupil acceptability and uptake. This will be particularly important to ensure pulse-based dishes are nutritionally balanced, culturally inclusive and acceptable to children with SEND, sensory sensitivities or restricted diets.

Overall, the BDA views this proposal as an important opportunity to improve fibre intake, diversify children's diets and support healthier and more sustainable eating patterns across the school food system.

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

[2] *ibid*.

[3] *ibid*.

[4] 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>

[5] 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](https://foodfoundation.org.uk/sites/default/files/2026-04/TFF_School%20food%20quality%20%26%20uptake_FINAL_0.pdf)

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

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

No space to add comment to question number. 30.

## Protein

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

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

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

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 as well as menu flexibility. Pulses are high in fibre and low in saturated fat 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. Current vegetarian school meal options frequently rely heavily on cheese, which is high in saturated fat. This proposal directly addresses that imbalance and strengthens the nutritional integrity of the vegetarian offer.

Increasing beans and pulses on menus is also likely to be 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 [1]

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.

The restriction on meat alternative products marketed as such to no more than two portions per week is also welcomed, as it encourages the use of minimally processed plant-based proteins such as pulses, tofu and mycoprotein in preference to highly processed manufactured alternatives. We support the use of plant-based alternatives as long as they are non-HFSS.

In relation to meat alternative products, the BDA broadly supports efforts to limit reliance on highly processed products and encourage greater use of minimally processed plant proteins such as pulses, beans, tofu and mycoprotein. However, we believe additional clarity and nuance are needed within the guidance.

The current list of alternative proteins and permitted exclusions does not appear sufficiently comprehensive and should be expanded within accompanying implementation guidance. Schools and caterers would also benefit from clearer practical guidance and examples of acceptable protein sources and menu applications.

At the same time, the BDA notes that the nutritional quality of plant-based meat alternatives varies considerably between products. While some products may be high in salt or saturated fat, others can provide valuable sources of protein and fibre with lower environmental impact than meat-based equivalents. Guidance should therefore prioritise nutritional quality rather than categorising all plant-based meat alternatives uniformly. Lower-fat, lower-salt and higher-fibre products should be encouraged, particularly where they support meal acceptability and uptake among pupils.

The BDA also believes there should be greater recognition of homemade or scratch-cooked plant-based products prepared within schools, such as bean burgers or lentil-based dishes, which may differ nutritionally from commercially manufactured alternatives. Non-HFSS plant-based alternatives and minimally processed whole-food protein sources should be actively supported within implementation guidance.

More broadly, these proposals further reinforce the need for some form of nutritional analysis or monitoring alongside the revised standards. While the shift towards pulses and plant-based proteins is welcome, schools will require support to ensure menus continue to provide sufficient protein quality, iron, zinc, calcium and overall nutrient density across the school week, particularly for growing children and nutritionally vulnerable groups.

The BDA would therefore welcome:

- clearer implementation guidance on protein requirements and acceptable alternative proteins
- expanded lists and definitions of minimally processed plant protein sources
- practical menu examples and recipe support for schools and caterers

- proportionate nutritional analysis to ensure protein and micronutrient adequacy across revised menus
- greater dietetic leadership and support within school food implementation

Dietitians have an important role in supporting menu planning, nutritional analysis and inclusive implementation, ensuring that revised protein standards deliver improvements in both nutritional quality and meal acceptability for all children and young people.

[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. Available:

[https://foodfoundation.org.uk/sites/default/files/2025-10/TFF\\_Beans%20Facts\\_DIGITAL.pdf](https://foodfoundation.org.uk/sites/default/files/2025-10/TFF_Beans%20Facts_DIGITAL.pdf)

[2] The Food Foundation (2024), Rethinking plant-based meat alternatives,

[https://foodfoundation.org.uk/sites/default/files/2024-08/Rethinking%20Plant-](https://foodfoundation.org.uk/sites/default/files/2024-08/Rethinking%20Plant-Based%20Meat%20Alternatives.pdf)

[Based%20Meat%20Alternatives.pdf,](https://foodfoundation.org.uk/sites/default/files/2024-08/Rethinking%20Plant-Based%20Meat%20Alternatives.pdf)

[3] 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/>

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

## Overall question

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

- To a great extent
- To some extent
- To a limited extent
- Not at all
- I'm not sure

## 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?

The consultation does not include a specific question on medical, special dietary or SEND-related provision and special diets are not at all mentioned in the consultation document. This represents a significant gap in an otherwise progressive policy direction and risks unintended exclusion of groups who are most reliant on safe, nutritionally appropriate school food provision.

For many children with SEND, neurodevelopmental conditions, allergies, gastrointestinal disorders, metabolic conditions or other medical needs, food provision is not simply a matter of preference, but an important component of safety, inclusion, nutritional adequacy and educational participation.

The absence of specific reference to special diets risks creating inconsistency in implementation across schools and catering providers, potentially exacerbating existing inequalities in access to safe, appropriate and nutritionally adequate meals. Adapted meals can vary considerably in quality, nutritional balance and acceptability, and there is currently no clear framework within the standards to ensure equitable provision for these groups.

The consultation document also does not adequately address how the revised School Food Standards will align with the recently consulted upon statutory guidance on 'Supporting Children and Young People with Medical Conditions and Allergy in Education Settings'. These policy areas are closely interconnected in practice and should not operate as separate frameworks. Individual Healthcare Plans, allergy management, medically prescribed diets and catering provision all intersect within the school food environment. Greater clarity is therefore needed regarding accountability, implementation and how schools are expected to integrate these requirements operationally.

In addition, neither consultation adequately addresses children and young people who require texture-modified diets due to medical conditions or additional support needs, including those receiving blended diets or enteral feeding support such as PEG-administered nutrition. Explicit recognition of these pupils is essential to ensure they are not excluded from school meal provision.

There is an important opportunity for the Department for Education to learn from approaches already being developed elsewhere in the UK, particularly in Wales. The Welsh Local Government Association has developed dedicated guidance on special diets within schools, recognising that inclusive school food systems must account for both medically prescribed diets and diets linked to protected characteristics. Baseline data from Wales identified that 3.8% of primary school pupils require a medically based special diet, with numbers continuing to increase. These include children requiring provision for conditions such as Coeliac disease, food allergy, Avoidant/Restrictive Food Intake Disorder (ARFID), blended tube feeding and Type 1 diabetes.

Importantly, Wales has also recognised the need for specialist dietetic leadership within school food systems through the creation of a National Dietitian for Special Diets in Schools role within the Welsh Local Government Association Food in Schools team. This role supports local authorities and catering teams to embed clinical nutrition expertise directly into school meal provision, streamline pathways for families, strengthen allergen and special diet processes, and improve consistency and equity across the system. This represents a significant and progressive recognition that special diet provision is not solely a catering issue, but part of a wider whole-school inclusion and safeguarding approach.

The BDA recommends that the Department for Education and the Office for Health Improvement and Disparities explicitly incorporates consideration of medical diets, special diets and SEND-related nutritional needs within the revised standards and accompanying guidance. This should include:

- clearer expectations around nutritional adequacy, safety and inclusion for adapted meals
- alignment with statutory medical conditions guidance and allergy management requirements
- appropriate training and support for catering and school staff
- consideration of the role of dietitians in supporting complex dietary needs
- monitoring arrangements to ensure equitable provision across settings
- cross-government collaboration between education, health and local authority systems

Without explicit recognition of these groups within the standards, there is a risk that children with SEND and medical dietary requirements remain insufficiently considered within the future school food system, despite being among those who may rely most heavily on safe and nutritionally appropriate school food provision.

## 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
- Agree
- Neither agree nor disagree

- Disagree
- Strongly disagree

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

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

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, publish a school food policy, and report annually on school food activities. 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.

We strongly support the appointment of a lead governor on school food. Evidence from School Food Matters' Nourish programme found that 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 [1].

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 [1].

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.

[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>

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

*“Our members highlighted that schools and caterers will require significant additional funding, catering workforce training, kitchen investment and access to specialist paediatric dietetic input to safely implement the standards. Clear accountability, monitoring and practical implementation guidance will also be essential. Concerns were raised that overly restrictive approaches may unintentionally reduce school meal uptake, increase reliance on packed lunches, or contribute to under-fuelling in some children and adolescents.” [BDA’s Paediatric Specialist Group]*

Dietitians and registered nutritionists remain an under-utilised but essential resource in implementing school food standards and ensuring schools can provide the most nutritionally appropriate and safe meals possible, particularly for children with medical or restrictive diets. Their expertise spans strategic planning through to operational delivery and can significantly strengthen both compliance and outcomes. In practice, dietitians can support schools and caterers by:

- collaborating directly with schools to ensure safe, nutritionally balanced meals for children with special dietary needs, including SEND and medically prescribed diets
- supporting menu planning and recipe development to ensure alignment with nutritional standards while maintaining acceptability and inclusion
- assisting with monitoring compliance with school food standards and supporting interpretation of requirements in complex cases
- contributing to strategies to improve uptake of school meals, including free school meals, through evidence-based behaviour change approaches
- supporting communication and engagement with families to ensure dietary needs are appropriately understood and managed

Government could strengthen implementation by embedding clearer expectations around access to dietetic expertise within school food systems, particularly for schools managing higher levels of medical dietary need.

More broadly, practical implementation would be strengthened through Whole School Food Approaches that embed healthy eating across the entire school environment, rather than focusing solely on compliance with menu-based standards. Such an approach requires coordination between catering teams, school leadership, educators, dietitians and local food system partners.

Where Whole School Food Approaches are effectively implemented, they support not only improved nutritional intake but also wider behavioural change. Evidence from universal school food provision demonstrates that children are more willing to try new foods within a positive food environment, and that consistent access to nutritious meals can support healthier dietary patterns and improve uptake. These approaches can also contribute to wider system benefits, including more stable demand for fresh and locally sourced produce, supporting sustainable procurement and strengthening regional food systems.

To be effective, however, Whole School Food Approaches must be underpinned by strong leadership, cross-sector collaboration, and appropriate professional input.

Effective implementation of the School Food Standards will also require adequate and sustained funding. Schools and catering providers are currently operating within significant financial and workforce pressures, and without appropriate investment there is a risk that the ambition of the revised standards will not be realised consistently in practice.

Government should recognise that inclusive and safe school food provision cannot be delivered through standards alone, and that schools must be appropriately resourced to meet these expectations equitably. Funding should therefore support not only food provision itself, but also workforce development, access to dietetic expertise, catering infrastructure, and the implementation of Whole School Food Approaches that enable long-term cultural and behavioural change around food.

## Culture, equality and diversity

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

These are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

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

The BDA has significant concerns regarding the potential impact on disabled children and young people, including many children with SEND, autism, sensory processing difficulties, medical conditions and highly restricted diets. While the proposals aim to improve nutritional quality overall, a blanket approach to implementation without sufficient flexibility and support risks excluding some children from school food provision altogether.

Children with sensory sensitivities or highly restricted diets may find transitions to wholegrain foods, pulse-based dishes, alternative proteins and reduced-sugar products particularly challenging. For some children, the texture, appearance, predictability and presentation of foods are critical factors affecting whether they can eat safely and adequately within a school environment. Attempts to significantly alter familiar foods or “hide” ingredients may unintentionally increase distress, food refusal and nutritional risk. 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 play an important role in children’s sense of safety, wellbeing and mental health. The study also highlighted that poorly managed experiences with school food can negatively affect eating behaviours both within school and at home. Importantly, it found low uptake of free school meals in special schools despite children with SEND being significantly more likely to be eligible, suggesting existing barriers to inclusive provision are already substantial.

The BDA is therefore concerned that without clear implementation guidance and appropriate flexibility, the revised standards could unintentionally widen inequalities in access to school food for children with SEND and medical dietary needs. This risk is particularly significant given the consultation document currently contains limited explicit consideration of medical diets, sensory needs, texture-modified diets or reasonable adjustments in practice.

Clearer guidance is needed regarding reasonable adjustments and exceptions within school food provision. Schools should be supported to work collaboratively with children, families, caterers, dietitians and nutrition professionals to ensure no child is left without an acceptable, safe and nutritionally appropriate meal. The Department for Education should develop dedicated evidence-based implementation guidance for SEND and specialist settings, recognising the need for flexibility around sensory needs, familiar foods, eating environments and gradual dietary transitions.

Practical approaches identified as supportive for children with SEND include:

- gradual introduction of menu changes and new foods
- maintaining access to familiar or “safe” foods during transitions
- providing clear information about meals and choices in advance
- sensory and picture-based food activities outside mealtimes
- creating supportive dining environments that reduce anxiety and uncertainty
- meaningful opportunities for pupils to shape menus and provide feedback

The BDA also recommends that the Department for Education address the current lack of published data relating to Free School Meal uptake among children with SEND in mainstream settings. Without improved monitoring and disaggregated data collection, it will be difficult to assess whether the revised standards are improving or worsening inequalities for specific groups.

In relation to race, religion and cultural inclusion, schools will also require clear guidance to ensure menus remain culturally inclusive while meeting revised nutritional standards. The increased use of pulse-based dishes may positively reflect dietary traditions within many communities; however, implementation must ensure that menus remain varied, culturally appropriate and acceptable to diverse school populations. Communication materials relating to the revised standards should also be available in accessible formats and multiple languages to ensure families from all backgrounds can engage meaningfully with changes.

Finally, the BDA believes these proposals further reinforce the need for stronger integration between the School Food Standards and the statutory guidance on supporting children and young people with medical conditions and allergies in education settings. These policies should operate as a coherent and inclusive framework, ensuring that all children — including those with disabilities, SEND, medical dietary needs, cultural or religious dietary requirements, and protected characteristics — are able to safely access nutritious school meals with dignity and without barriers.

## Environmental principles

The UK's five core environmental principles, mandated by the Environment Act 2021, are integration, prevention, rectification at source, polluter pays, and precautionary principles. These principles guide UK ministers and policymakers to embed environmental protection, such as reducing pollution and preventing damage, into policy development from the outset.

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

- Positive
- Negative
- Don't know

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

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, Beans have a vastly smaller carbon footprint relative to animal foods. 1,8 kilograms of GHGEs 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.

However, realising these environmental benefits will require active intent. The current School Food Standards do not require compliance with Government Buying Standards, representing a significant missed opportunity. The government has committed to ensuring that at least 50% of public sector food is sourced locally or to high sustainability and environmental standards, and the school food system is critical to achieving this ambition. Enforcing Government Buying Standards within school food procurement would ensure that the environmental potential of the new standards is translated into practice, benefiting schools, society and the wider economy while minimising environmental harm. Government should take this opportunity to make compliance with Government Buying Standards a requirement alongside the updated School Food Standards.

The reduction in heavily processed foods, including deep-fried items, processed meats, 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.

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

## Closing question

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

This response has been informed through extensive engagement with BDA members, including specialist dietitians working across paediatric nutrition, food service, public health, allergy, diabetes, SEND and school food provision. The BDA has also collaborated with stakeholders involved in the School Food Review process to help inform this response. It therefore reflects both the clinical expertise and practical implementation experience of dietitians working directly with children, families, schools and catering systems across the UK.

The BDA would welcome continued engagement with the Department for Education as the standards are further developed and implemented.

The BDA welcomes the ambition of this consultation and supports the overall direction of travel towards a healthier, more consistent and more evidence-based school food system. The proposed reforms represent an important opportunity to improve children and young people's dietary intake, reduce health inequalities and strengthen the role of schools in supporting lifelong healthy eating behaviours. However, the success of the revised standards will depend heavily on practical implementation, adequate funding, clear accountability mechanisms and stronger integration between nutritional policy, inclusion and safeguarding frameworks. Throughout this response, the BDA has highlighted the

importance of ensuring the standards are not only restrictive in nature, but also support nutritional adequacy, meal acceptability and equitable access for all children and young people.

In particular, we urge the Department for Education to strengthen consideration of:

- children with SEND, medical conditions and special dietary requirements
- the relationship between the School Food Standards and the statutory guidance on supporting children and young people with medical conditions and allergies in education settings
- proportionate nutritional analysis and monitoring arrangements
- practical implementation guidance, including example menus and clearer product definitions
- the role of dietitians in supporting menu development, nutritional adequacy, allergen management and inclusive implementation
- Whole School Food Approaches that embed food, nutrition and sustainability consistently across the school environment

The BDA also believes these reforms strengthen the case for universal free school meals. Our *Nourish Every Child: A dietetic vision for universal free school meals in primary schools* [1] resource highlights that children consume around one-third of their dietary intake at school, making school meals one of the most significant nutritional interventions available to government. The resource sets out the evidence that universal provision can improve dietary quality, reduce stigma, support concentration and attainment, and help address food insecurity and widening health inequalities. It also highlights that many children living in poverty remain excluded from current eligibility criteria.

The BDA is therefore calling for governments across the UK to commit to universal free school meals for all primary school children as part of a wider Whole School Food Approach. This should be accompanied by appropriate investment in catering infrastructure, workforce capacity and dietetic leadership to ensure all children can access safe, nutritious and inclusive school meals.

The BDA also encourages the Department to continue learning from approaches being developed elsewhere in the UK, including in Wales, where greater integration between school food policy, inclusion and dietetic leadership is already emerging.

[1] British Dietetic Association (2025) *Nourish Every Child: A dietetic vision for universal free school meals in primary schools*. Birmingham: British Dietetic Association. Available at: [Nourish Every Child report](#) (Accessed: 28 May 2026).