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## **Technical Report: Rapid review of school nutritional and food- based standards in Wales and the UK**



## Health Improvement Division

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- Public Health Wales and Health Board Local Public Health Team colleagues working on school food
- Dietetic colleagues working on school food.

### Purpose and Summary of Document:

This document presents the findings of a rapid review undertaken to:

- Describe the current 2013 Healthy Eating in Schools (Nutritional Standards and Requirements) Regulations in Wales
- Compare these standards to the latest evidence including guidance from the Scientific Advisory Committee on Nutrition (SACN)
- Summarise school nutritional and food-based standards across the UK.

The report details the updates that are required to the school nutrient and food-based standards in Wales for them to be consistent with the latest scientific advice, notably on free sugars criteria and recommendations, and dietary fibre recommendations. Updates are required for across the school day in primary and secondary schools.

It also details other factors for consideration that are outside the current school nutrient and food-based standards in Wales, including:

- Further specification of age-appropriate portion size
- The type and variety of protein-based foods included
- The preparation and processing of food and drinks
- Sustainability and the food supply chain.

To encourage a whole school approach to healthier eating and provide consistent advice, a review of the exemptions is also recommended.

The findings of the rapid review will be used by Welsh Governments Healthy Eating in Schools Regulations Steering Group as part of a public consultation for the review of the Regulations.

**Work Plan reference:** Healthy Weight, Healthy Wales Moving ahead in 2022-2024 Priority Area 4: Reviewing the regulations on school food nutrition in line with the latest nutritional standards and guidelines and update current standards.

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# 1 Introduction

Improving the health and wellbeing of all children is a public health priority in Wales and across the UK (Welsh Government, 2020). The options and opportunities we all have available to us affect how healthy we are. We can improve children's health by improving the flow of affordable, healthy food options and opportunities to learn and play (Welsh Government, 2019). Childhood obesity is a significant concern in Wales, but there are concrete steps we can take to tackle this and help all children to be healthy (Welsh Government, 2022).

School environments present a valuable opportunity to improve the quality of children's diets, ensuring all children have a nutritious meal and do not go hungry, as well as promote, through a whole school approach, sound eating behaviours which can positively influence health across the lifespan (Welsh Government, 2020). Healthy school meals are an important aspect of the school food environment and can account for a third or more of a child's weekday food.

As part of Welsh Governments ambitions for the people of Wales, and future generations, to have the best start in life and live longer and happier lives the Healthy Weight Healthy Wales Strategy committed to recommence work to inform revisions to the Healthy Eating in Schools (Nutritional Standards and Requirements) (Wales) Regulations 2013 (Welsh Government, 2019).

Revision of the Regulations creates the opportunity to understand the strengths of the existing Regulations and overcome their challenges. Additionally, a revision will ensure the Regulations reflect the most up to date scientific evidence for nutrients and food whilst considering the broader societal goal of sustainability.

To inform initial discussions about the scope of the revisions required Public Health Wales was asked by Welsh Government to undertake a rapid evidence review. The purpose of the review being to understand how the current Regulations in Wales compare to the latest guidance from the Scientific Advisory Committee on Nutrition (SACN) and Welsh Policy objectives e.g., carbon reduction and to describe school nutrition and food-based standards across the UK. The findings of the review will be used to support Welsh Governments Healthy Eating in Schools Regulations Steering Group develop a public consultation for the review of the Regulations.

This Technical Report provides

- An overview of the existing Healthy Eating in Schools Regulations
- An overview of updates to the SACN recommendations since 2010

- Rapid review methodology
- The report summarises the following key information:
  - Approaches used by the UK nations for school nutrient and food-based standards
  - Nutrient standards for primary and secondary schools
  - Food-based standards for primary and secondary schools
  - Factors for consideration beyond nutrient and food-based standards

## 2 Background

### 2.1 Current Healthy Eating in Schools Regulations (Wales)

In June 2014 Welsh Government published 'Healthy eating in maintained schools; Statutory Guidance for local authorities and governing bodies' to help schools comply with the provisions of the Healthy Eating in Schools (Wales) Measure 2009 and The Healthy Eating in Schools (Nutritional Standards and Requirements) (Wales) Regulations 2013. This primary and secondary legislation were developed as part of Welsh Governments strategy to improve the health and wellbeing of school aged children by; improving the food children consume in schools and encouraging the development of good eating habits in childhood (Welsh Government, 2014).<sup>1</sup>

The Regulations set out the nutritional standards for an average school lunch as well as the food and drink requirements throughout the school day.

The **nutritional standards** specify minimum or maximum values for energy and 13 nutrients, which apply to an average school lunch (including drinks) calculated over each week of a menu cycle. The school menu should provide a balanced meal which meets approximately one third of a child's recommended daily energy requirement (taking account

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<sup>1</sup> Throughout the rest of the document 'Regulations' refers to The Healthy Eating in Schools (Nutritional Standards and Requirements) (Wales) Regulations 2013. 'Statutory Guidance' refers to the Healthy eating in maintained schools – Statutory Guidance for local authorities and governing bodies.

of age and gender), with an average lunch meeting the daily nutrient-based standards.

The **food-based standards** describe the types of food and drink that must be provided, restricted and not permitted between breakfast and 6pm. The regulations also apply to all food/drinks served in any on-site outlet such as tuck-shops, vending machines and sixth-form cafes and similar.

A few exemptions to the regulations apply such as food provided at social events, school fundraisers or food preparation/cooking lessons, however, the guidance encourages a whole school approach to healthy eating be adopted to maintain a strong school ethos and overall consistency with the regulations.

The Healthy Eating in Schools (Wales) Measure 2009 sets out the roles and duties for ensuring the standards and requirements are met, with Local Authorities and governing bodies required to take account of the guidance. Local Authorities have a duty to act in schools to implement the guidance. The schools governing body should include the actions taken by the school to promote healthy eating in their annual reports. Estyn report on the arrangements made by schools to promote healthy eating and drinking, however they do not monitor compliance with the Regulations or report on the quality of food provision (Welsh Government, 2014). The Welsh Local Government Association (WLGA) offer Local Authorities support through a voluntary Certificate of Compliance process, their remit does not include monitoring and compliance or enforcement of the Regulations and Statutory Guidance. Certificates of Compliance awarded by the WLGA can be used as evidence during Estyn inspections and Welsh Network of Healthy School Schemes National Quality Award assessments (Welsh Local Government Association, 2014).

## **2.2 Updates to Scientific Advisory Committee on Nutrition (SACN) nutrition advice**

The Scientific Advisory Committee on Nutrition (SACN) is the formal independent advisory body to Government across the UK to support the setting of food and nutrition policy. There have been changes to the SACN recommendations since the Wales School Food Regulations and Statutory Guidance were last reviewed in 2013. A summary is detailed below.

## Free Sugars

The dietary intake of free sugars has been proposed in the context of energy intake appropriate to maintain a healthy weight and decrease risk of dental caries.

The term free sugars has replaced the terms Non-Milk Extrinsic Sugars (NMES) and added sugars used in previous advice (SACN, Carbohydrates and Health, 2015). Free sugars are all monosaccharides and disaccharides added to foods by the manufacturer, cook, or consumer, plus sugars naturally present in honey, syrups and unsweetened fruit juices. The sugars naturally present in milk and milk products (lactose) and the sugars in the cellular structure of foods are excluded.

The term 'free sugars' has clearer, more precise criteria to capture sugars present in processed fruit and vegetables:

"All added sugars in any form; all sugars naturally present in fruit and vegetable juices, purées and pastes and similar products in which the structure has been broken down; all sugars in drinks (except for dairy-based drinks); and lactose and galactose added as ingredients. The sugars naturally present in milk and dairy products, fresh and most types of processed fruit and vegetables and in cereal grains, nuts and seeds are excluded from the definition" (Swan, Powell, Knowles, Bush, & Levy, 2018).

Adjustment of the dietary recommendations for sugar for all those over 2 years of age, from not exceeding 10% NMES (COMA, 1991) to:

Free sugars should not exceed a total of 5% of a person's daily dietary energy intake (SACN, Carbohydrates and Health, 2015). For children this means:

- Age 4-6yrs 19g total free sugars per day.
- Age 7-10yrs 24g total free sugars per day.
- Age 11+ 30g total free sugars per day.

An average school lunch should therefore provide no more than approximately 5.7g free sugars for 4-6yr olds, 7.2g for 7-10yr olds and 9g age 11+.

## Dietary Fibre

There is a strong evidence base showing a link between increased dietary fibre intakes and a lower risk of cardio-metabolic disease and colo-rectal cancer. As a result, the recommended fibre intake for adults has been increased from 18g/d (NSP Englyst method) to 30g/d (AOAC method). No previous recommendations were made for children however the SACN report on carbohydrate and health has recommended the following:

- Age 5-11yrs minimum 20g fibre per day.
- Age 11-16yrs minimum 25g fibre per day (SACN, Carbohydrates and Health, 2015).

## Saturated Fat

The SACN Report Saturated fats and health (SACN, Saturated Fat and Health, 2019) provided a comprehensive review of the evidence linking dietary fat intake and health. The report concluded that:

- reducing saturated fat consumption reduces the risk of cardiovascular disease and coronary heart disease events, lowers total, LDL and HDL cholesterol and improves indicators of glycaemic control
- reducing saturated fats is unlikely to increase health risks for the general UK population.

This SACN report retained previous advice that the average contribution of saturated fat to total dietary energy should be reduced to no more than about 10%) (SACN, Saturated Fat and Health, 2019). This recommendation applies to adults and children aged 5 years and older.

## Red and Processed Meat<sup>2</sup>

Red and processed meat is a source of iron in the diet of the UK population. The possible link between consuming high levels of red and processed meat and increased bowel cancer risk has led to a recommendation to limit the amount of red and processed meat consumed for adults:

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<sup>2</sup> Although the SACN advice has not changed since the Regulations were written in 2013, and the advice specifies adults, it is important evidence that should be used to inform the review of the Regulations due to their intended role of influencing healthy eating behaviours and when considering sustainable diets.

- Consuming more than 90g per day are advised to cut down to 70g (cooked weight) or less per day (SACN, Iron and Health, 2010).

### 3 Methodology

The rapid review aimed to understand the status of school nutrient and food-based standards across the Nations of the United Kingdom (UK) and the alignment of standards in Wales with the latest scientific advice from SACN. The work was undertaken in three phases by Registered Nutritionists working for Public Health Wales and was overseen by Consultant in Public Health and Director of Health Improvement between April and June 2022.

#### **Phase 1 Approaches used by the UK Nations for school nutrient and food-based Standards**

Current standards were obtained from respective government websites and data was extracted based on changes and differences in the contents of standards related to Wales Healthy Eating in Schools Regulations 2013. Clarification was sought by email correspondence with relevant policy colleagues where required.

#### **Phase 2 Updates to nutrition guidance and evidence**

Reports and guidance published by SACN between 2010 and 2021 were reviewed and updates to nutritional advice not reflected in Wales Healthy Eating in Schools Regulations 2013 were documented. Tables were created outlining the current nutrient and food-based standards and whether updates would be required as part of Regulation revision.

#### **Phase 3 Collate findings and make recommendations**

Guidance referenced in the standards from across the UK nations were reviewed and the results table updated accordingly. Phase 1 and phase 3 additionally enabled the exploration of factors beyond nutrient and food-based standards that the revision of the Wales Regulations could consider. These factors are discussed in Chapter 4 section 5.

### 4 Findings

Chapter four presents the findings of the three phases of the rapid review and details the updates that are required to the nutrient and food-based standards in Wales for them to be consistent with the latest scientific advice from SACN. Recommended updates have also been highlighted.

The findings are presented as:

Approaches used by the UK nations for school nutrient and food-based standards

Nutrient standards primary and secondary

Food-based standards primary and secondary

Factors for consideration beyond nutrient and food-based standards

Specific nutrient and food-based updates are provided in tables in Appendix B of this report.

#### **4.1 Approaches used by the UK nations for school nutrient and food-based Standards**

The findings of the rapid review on comparative approaches to school food nutrient or food standards are presented in Table 1. The table provides a summary of whether the UK nations use food and/or nutrient based standards. If they include updated SACN advice on free sugars, fibre, and incorporate other factors beyond nutrient and food-based standards such as sustainability into their Standards. **Detailed findings are provided in Appendix A**

Table 1: Summary of approaches used by the UK nations for School Food and Nutrient Based Standards

	<b>Scotland</b> (Scottish Government, 2021)	<b>Northern Ireland</b> (Department of Education, 2020)	<b>England</b> (Department for Education, 2014)
<b>Standards last updated</b>	2020	2020 (draft)	2014
<b>Includes nutrient based standards</b>	Yes	Few	No
<b>Includes food-based standards</b>	Yes	Yes	Yes
<b>Includes SACN free sugars guidance</b>	Yes (7.5% of total dietary energy for free sugars) (interim guidance)	Yes (5% of total dietary energy for free sugars)	No

<b>Includes SACN dietary fibre guidance</b>	Yes	Yes	No
<b>Includes red and processed meat guidance</b>	Yes	Yes	No
<b>Daily energy tolerance criteria</b> <b>An acceptable daily energy standard, reducing variation in energy content compared to a weekly energy tolerance.</b>	Yes	NA	NA
<b>Nutritionally analysed meal options</b>	Yes	NA	NA
<b>Portion size guidance with age specific criteria</b>	No	No	No
<b>Meat free / vegetarian criteria &amp; guidance</b>	Yes	Yes	Yes
<b>Processing and cooking of food criteria or guidance</b>	No	No	No
<b>Specific sustainability criteria &amp; guidance</b>	No	No	Yes

## 4.2 Nutrient Standards Primary and Secondary

Section 4.2 presents findings from the review of reports and guidance published by SACN between 2010 and 2021 and documents updates to nutritional advice not reflected in Wales Healthy Eating in Schools Regulations 2013 nutrient standards.

Updates to the nutrient standards that are required or recommended as part of Regulation revision have been summarised and further detail about the current provision expected and the required and recommended updates is provided in Appendix B.

#### 4.2.1 Breakfast in Maintained Schools

There are no specific criteria regarding calculating the average nutrient composition of a school breakfast. However, all breakfast provision must adhere to the principles of the main Statutory Guidance. The guidance does not specify criteria for assessing nutrient standards for breakfasts (e.g. 20% total dietary energy) or the calculations used e.g. percentage split by age. This may require clarification or further guidance.

#### 4.2.2 Lunch in Maintained Schools

A school lunch (averaged across five days) should meet the daily nutrient requirements, as per the Regulations (Welsh Government, 2013).

The daily nutrient requirements are set at 30% for macronutrients (including energy) and 35% for most micronutrients. Exceptions include iron, zinc and calcium set at a minimum of 30% due to significant difficulty in meeting a 35% target for secondary pupils.

Nutrient standards are based on greatest need within the target population and calculated using a percentage split of age ranges on the assumption of pupils receiving school meals as per School Census 2010 (Welsh Government, 2014). That is the assumption that 60% receiving school meals were four to six years of age and 40% seven to ten years for Primary, and 70% were aged 11 to 14 years and 30% 15 to 18 for Secondary. This approach may therefore require updating subject to whether this is representative of the current percentage split, whether this is the best approach to splitting the age ranges and ultimately whether it is the most appropriate evidenced based approach for calculating the nutrient standards. In addition, the introduction of free school meals for all primary school pupils could further impact this approach.

Food and drinks provided within the lunch provision should be nutritionally analysed. A nutritional analysis guide is available to assist with calculating the nutritional content of an average school lunch (Welsh Local Government Association, 2014). This guide will require updating to align with the latest SACN guidance on free sugars, dietary fibre.

#### 4.2.3 Required and recommended updates (See Appendix B for further detail)

##### **Required**

- Ensure alignment with SACN free sugars guidance.

- Ensure alignment with SACN dietary fibre recommendations.

### Recommended

- Addition of nutrient standards for breakfast.
- Approach to calculations of nutrient standards (Energy) and inclusion of daily energy tolerances.
- Update of lunch provision nutrition analysis guidance.

## 4.3 Food-Based Standards in Primary and Secondary

Section 4.3 presents findings from the review of reports and guidance published by SACN between 2010 and 2021 and documents updates not reflected in Wales Healthy Eating in Schools Regulations 2013 food-based standards.

Updates to the food-based standards that are required or recommended as part of Regulation revision have been summarised and further detail about the current provision expected and the required and recommended updates is provided in Appendix B.

### 4.3.1 Breakfast (current Regulations and Standards)

A local authority or governing body that provides a breakfast service has the flexibility to decide the form of the breakfast content as long as the food served is within the four permitted food categories (milk-based drinks or yoghurts, cereals, fruit and vegetables, breads and toppings) which must be available during breakfast.

### 4.3.2 Lunch (current Regulation and Standards)

The food standards for primary and secondary lunch state the type of food across specific food categories that can form part of the school lunch provided on each day.

**An overview of the provision required by the current Regulations is provided in the tables in Appendix B.**

*To note food standards for secondary schools, apply across the whole school day, covering multiple food purchasing occasions including breaks.*

- Required and recommended updates (See Appendix B for tables outlining specific updates required and recommended to nutrient and food-based standards for primary and secondary schools).

#### 4.3.3

##### **Required**

The description of the main food groups should be updated in line with the Eatwell Guide which has replaced the Eatwell Plate since the publication of the current Regulations (Welsh Government, 2018).

For breakfast and lunch provision

Align with SACN free sugars recommendations and criteria for:

- Milk based drinks / yoghurts.
- Cereals.
- Breads and toppings.
- Fruit and vegetables.
- Condiments.

For drinks

Align with SACN free sugars recommendations and criteria for:

- Fruit or vegetable juice (still or sparkling).
- Soya, rice or oat drinks.
- Fruit or vegetables juice combined with plain water (still or carbonated).
- A drink made singly or in combination with a blend or puree of fruit, vegetables, fruit or vegetable juice
- Tea or Coffee (secondary only)
- Hot Chocolate (secondary only)

#### **4.4 Food and drink provision outside of breakfast and lunch (Primary and Secondary)**

Food and drink provision outside of breakfast and lunch must adhere to the food and drink standards as laid out in the 2013 regulations to ensure a consistent and coherent approach is applied. This includes the following food and drinks provision:

- Tuck shops.
- Counter services.
- Break times.
- Vending.
- On-site coffee shops.

- After school clubs.

Practical suggestions are provided within the guidance for appropriate snack provision.

## **4.5 Factors for consideration beyond nutrient and food-based standards**

### 4.5.1 Portion sizes

The current Standards provide advice about portion sizes within each of the food categories (and provide detailed examples within Annex 1) for primary and secondary schools. However, there is currently no differentiation of portion sizes for the age groups represented within the two settings.

There is a gap in information regarding portion sizes for breakfasts, particularly for breakfast cereals and bread toppings. The use of front-of-pack portion sizes are not appropriate for children as these are based on adult portions.

### 4.5.2 Red and processed meat

The SACN Iron and Health (2010) report recommended that adults reduce their consumption to less than 70g (cooked weight) of red and processed meat per day. Children are advised to eat a healthy balanced diet that is appropriate for their age. This includes consuming a range of protein-based foods which may also encourage more varied food choices and healthy routines to take into adulthood.

Other UK nations have included red and processed meat standards. They have specified that there must be at least three days each week where no processed meat is served and included clear red and processed meat categorisation and criteria with maximum recommended intakes per week.

For example, Scottish standards include:

Food and Drink Standards for Primary Schools:

No more than a total of 175g of red and red processed meat (cooked weight) can be provided in school lunches over the course of the school week, of which no more than 100g (cooked weight) can be red processed meat.

Food and Drink Standards for Secondary Schools:

No more than a combined total of 230g of red and red processed meat (cooked weight) can be provided in the analysed school lunch, non-

analysed school lunch options and at all other times of the day over the course of the school week, of which no more than 130g (cooked weight) can be red processed meat.

Introducing red and processed meat guidance will impact the meat and meat products food-based standards.

#### 4.5.3 Meat-free alternatives

Meat-free options are an important consideration in terms of meeting the latest SACN advice on reducing red and processed meat consumption (SACN, Iron and Health, 2010), dietary trends and is a key aspect of sustainable diet recommendations to consume less meat (World Health Organisation, 2019).

The current Regulations and Statutory Guidance provide practical advice about vegetarian and vegan sources of protein, iron and zinc. A specific meat-free section with further consideration of what subsections and criteria are required within (vegetarian, vegan, plant-based) in the future could help expand the advice and provide clarity.

Other UK nations have included some vegetarian meal criteria to their school food standards and guidance (Dept of Education, 2020) (Department for Education E., 2014) and some specific vegetarian meal criteria.

#### 4.5.4 Ultra-processed foods

Consideration may also need to be taken regarding the use of processed and ultra-processed foods (UPFs) in schools. Processed foods can often be high in calories, fat, salt and sugar, and UPF's are often mass-produced, packaged items. Consumption of ultra-processed foods has been linked to weight gain and risk of obesity (Rauber, et al., 2021)(Chang, et al., 2021). However, the nutritional quality of foods overall is an important consideration, as not all processed foods are unhealthy (The British Dietetic Association, 2021).

The NOVA food system classification list has been used to define UPFs in recent studies into the consumption of UPFs (Cordova, et al., 2021)(Monteiro, et al., 2019). However, there is reported inconsistency within the NOVA classification and with the examples used within the UPF category. Further discussions regarding the classification of processed and ultra-processed foods would therefore be required before making recommendations for food in schools.

#### 4.5.5 Sustainability criteria

The current Statutory Guidance offers brief consideration of sustainability with a focus on the importance of personal responsibility through enhancement of understanding of food, including its relationship with the environment, and the importance of healthier eating (based on the principles of The Eatwell Guide) to reduce the future burden of disease (Welsh Government, 2018).

The core principles of a sustainable diet, as presented in reports by Eat Lancet (EAT-Lancet, 2019), WHO (World Health Organisation, 2019) and the BDA (British Dietetic Association, 2020), are widely agreed as the following:

- Reduce consumption of animal products; eat less meat / less dairy.
- Eat more fruit, vegetables and legumes.
- Choose foods in season.
- Choose local produce.
- Choose sustainable fish.
- Reduce overconsumption.
- Reduce food waste and packaging.

The Food Foundation Report on school food (Kenton-Lake, Heger, Tobi, & Gurung, 2021) suggested sustainable school menus should comprise the following:

- Include more vegetables / pulses in meals.
- Provision of fewer processed foods.
- Provision of less (and better) meat.
- Appropriate food sourcing.
- Limiting food waste.

Other UK nations' sustainability recommendations are limited and a specific sustainability section to set out clear criteria and recommendations is lacking in all UK nations' standards. The information included in Scotland and Northern Ireland's updates include ensuring all fish is sustainable and reducing red and processed meat consumption, but this is not explicitly from a sustainability perspective. England's current guidance has the most detail by providing guidance on sustainable approaches and food choices including sourcing seasonal and local produce, sustainable fish and reducing food waste with links to further support.

Further consideration is required regarding the establishment of sustainable school food criteria and guidance for incorporating sustainable eating principles into school menu development and sourcing of food.

#### 4.5.6 Additional factors

Additional factors which may need to be considered as part of the revision and update of the Statutory Guidance include:

- The preparation and processing of food and drink, with priority for healthier approaches.
- Hot vs Cold food provision: nutritional and practical implications of providing hot and cold food.
- Food supply chain: sustainability issues for bought in items, and local procurement and regulation including for bought in items.
- References in the current Regulations to EU law that no longer apply should be removed.
- The guidance should encourage a whole school approach to healthier eating and provide consistent advice, and therefore a review of the exemptions is also recommended.

### **Recommended**

Update criteria for the following food categories:

- Meat and meat products
- Fish to consider and include sustainability criteria
- Confectionery, cakes and biscuits

Inclusion of recommendations and criteria for:

- Meat free alternatives
- Age-appropriate portion sizes
- Sustainability.
- Cooking and processing of food and drink.

## **5 Conclusion**

The Welsh food and nutrient based standards require updating to align with the latest scientific evidence base for nutrition, notably the SACN report on Carbohydrate and Health (SACN, Carbohydrates and Health, 2015) new free sugars criteria and recommendations, and dietary fibre recommendations.

Updates are required for breakfast, lunch and drinks in primary and secondary schools.

### **Nutrient Standard Updates**

- Align with SACN free sugars and dietary fibre guidance.
- Consider approach to calculations and modification of daily tolerances for recommended total daily energy intake for meals.

- Align nutrition analysis guide with latest SACN evidence base.

### **Food Standard Updates**

- Align with SACN new free sugars guidance and dietary fibre recommendations.
- Drinks standards to align with SACN free sugars guidance.
- Inclusion of sustainability criteria.
- The food standards relevant to EU law, such as sweeteners, should be updated to reflect withdrawal from the European Union.

### **Other factors for consideration**

- Further specification of age-appropriate portion size within Primary and Secondary.
- The type and variety of protein-based foods included.
- Inclusion of a 'meat free alternatives' category.
- Hot and cold food provision.
- The preparation and processing of food and drinks.
- Sustainability and the food supply chain.
- The guidance should encourage a whole school approach to healthier eating and provide consistent advice, and therefore a review of the exemptions is also recommended.

The current difficulties schools are facing such as staff shortages, disruption to the school day including shortening and staggered eating times and limited catering resources may present barriers to any updates to school food standards. Therefore, the achievability, acceptability and potential impact for pupils, parents and all staff involved including catering staff must be explored.

Potential unintended consequences, such as reduced uptake of school meals, leaving some children hungry as a result of introducing portion criteria, protection of FSM pupil identity or a negative impact on eating and learning time must also be considered as part of revisions and plans for implementation.

## 6 References

- British Dietetic Association, B. (2020). *Eating patterns for health and environmental sustainability*. Retrieved from <https://www.bda.uk.com/uploads/assets/539e2268-7991-4d24-b9ee867c1b2808fc/a1283104-a0dd-476b-bda723452ae93870/one%20blue%20dot%20reference%20guide.pdf>
- Chang, K., Khandpur, N., Neri, D., Touvier, M., Huybrechts, I., Millett, C., & Vamos, E. P. (2021). Association Between Childhood Consumption of Ultraprocessed Food and Adiposity Trajectories in the Avon Longitudinal Study of Parents and Children Birth Cohort. *JAMA Pediatrics, 175*(9).
- COMA. (1991). *Dietary Reference Values for Food Energy and Nutrients for the United Kingdom*. London: TSO. Retrieved from [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/743786/Dietary\\_Reference\\_Values\\_for\\_Food\\_Energy\\_and\\_Nutrients\\_for\\_the\\_United\\_Kingdom\\_\\_1991\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/743786/Dietary_Reference_Values_for_Food_Energy_and_Nutrients_for_the_United_Kingdom__1991_.pdf)
- Cordova, R., Kliemann, N., Huybrechts, I., Rauber, F., Vamos, E. P., Levy, R. B., . . . al, e. (2021). Consumption of ultra-processed foods associated with weight gain and obesity in adults: A multi-national cohort study. *Clinical Nutrition, 40*(<https://doi.org/10.1016/j.clnu.2021.08.009>), 5079-5088.
- DEFRA. (2017). *Sustainable procurement: the Government Buying Standards (GBS)*. Retrieved from <https://www.gov.uk/government/collections/sustainable-procurement-the-government-buying-standards-gbs>
- Department for Education, D. (2021). *School food standards practical guide*. Retrieved from [gov.uk: https://www.gov.uk/government/publications/school-food-standards-resources-for-schools/school-food-standards-practical-guide](https://www.gov.uk/government/publications/school-food-standards-resources-for-schools/school-food-standards-practical-guide)
- Department for Education, E. (2014). *The Requirements for School Food Regulations*. Retrieved from <https://www.legislation.gov.uk/ukxi/2014/1603/contents/made>
- Dept of Education, N. I. (2020). *Draft Update to Nutritional Standards for School Food*. Retrieved from education-ni: <https://www.education-ni.gov.uk/sites/default/files/consultations/education/Draft%20Updated%20Nutritional%20Standards.pdf>

- EAT-Lancet. (2019). *Healthy Diets from Sustainable Food Systems: Food Planet Health*. Retrieved from [https://eatforum.org/content/uploads/2019/07/EAT-Lancet\\_Commission\\_Summary\\_Report.pdf](https://eatforum.org/content/uploads/2019/07/EAT-Lancet_Commission_Summary_Report.pdf)
- Kenton-Lake, S., Heger, S., Tobi, R., & Gurung, I. (2021). *The Food Foundation; Feeding our Futures*. Retrieved from <https://live.foodfoundation.89up.org/publication/feeding-our-futures>
- Long, R., Danechi, S., & Roberts, N. (2022). *School meals and nutritional standards in England*. Retrieved from <https://researchbriefings.files.parliament.uk/documents/SN04195/SN04195.pdf>
- Monteiro, C. A., Cannon, G., Levy, R. B., Moubarac, J.-C., Louzada, M. L., Rauber, F., . . . Jaime, P. C. (2019). Ultra-processed foods: what they are and how to identify them. *Public Health Nutrition*, 22(DOI: 10.1017/S1368980018003762), 936-941.
- NHS. (2018). *5 A Day*. Retrieved from <https://www.nhs.uk/live-well/eat-well/5-a-day/>
- Public Health England, P. (2016). *Government Dietary Recommendations; Government recommendations for energy and nutrients for males and females aged 1 -18 years and 19+ years*. Retrieved from gov.uk: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/618167/government\\_dietary\\_recommendations.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/618167/government_dietary_recommendations.pdf)
- Rauber, F., Chang, K., Vamos, E. P., Louzada, M. L., Monteiro, C. A., Millett, C., & Levy, R. B. (2021). Ultra-processed food consumption and risk of obesity: a prospective cohort study of UK Biobank. *European Journal of Nutrition*, 60(DOI: 10.1007/s00394-020-02367-1), 2169-2180.
- SACN. (2003). *Salt and Health Report*. Retrieved from [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/338782/SACN\\_Salt\\_and\\_Health\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/338782/SACN_Salt_and_Health_report.pdf)
- SACN. (2004). *Advice on fish consumption: benefits and risks*. Retrieved from [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/338801/SACN\\_Advice\\_on\\_Fish\\_Consumption.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/338801/SACN_Advice_on_Fish_Consumption.pdf)

- SACN. (2010). *Iron and Health*. Retrieved from gov.uk: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/339309/SACN\\_Iron\\_and\\_Health\\_Report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/339309/SACN_Iron_and_Health_Report.pdf)
- SACN. (2011). *Dietary Reference Values* . Retrieved from gov.uk: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/339317/SACN\\_Dietary\\_Reference\\_Values\\_for\\_Energy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/339317/SACN_Dietary_Reference_Values_for_Energy.pdf)
- SACN. (2015). *Carbohydrates and Health*. Retrieved from gov.uk: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/445503/SACN\\_Carbohydrates\\_and\\_Health.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/445503/SACN_Carbohydrates_and_Health.pdf)
- SACN. (2017). *Update on Folic Acid*. Retrieved from gov.uk: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/637111/SACN\\_Update\\_on\\_folic\\_acid.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/637111/SACN_Update_on_folic_acid.pdf)
- SACN. (2019). *Saturated Fat and Health*. Retrieved from gov.uk: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/814995/SACN\\_report\\_on\\_saturated\\_fat\\_and\\_health.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/814995/SACN_report_on_saturated_fat_and_health.pdf)
- Scottish Government, S. (2021). *Healthy eating in schools: guidance 2020*. Retrieved from gov.scot: <https://www.gov.scot/publications/healthy-eating-schools-guidance-2020/pages/2/>
- Swan, G. E., Powell, N. A., Knowles, B. L., Bush, M. T., & Levy, L. B. (2018). A definition of free sugars for the UK. *Public health nutrition*, 21(9), 1636–1638. Retrieved from <https://doi.org/10.1017/S136898001800085X>
- The British Dietetic Association. (2021, January). *Position Statement Processed Food*. <https://www.bda.uk.com/uploads/assets/06661eb4-b635-44a7-b3a1f753525c8f99/53f7356a-51eb-42c9-b1fbc6680230fbf3/Processed-Food-Position-Statement-FINAL-approved.pdf>.
- Welsh Government . (2019). *Healthy Weight Healthy Wales*. Retrieved from Healthy Weight Strategy (Healthy Weight Healthy Wales): [https://gov.wales/sites/default/files/publications/2019-10/healthy-weight-healthy-wales\\_0.pdf](https://gov.wales/sites/default/files/publications/2019-10/healthy-weight-healthy-wales_0.pdf)

Welsh Government. (2013). *The Healthy Eating in Schools (Nutritional Standards and Requirements) (Wales) Regulations 2013*. Retrieved from [legislation.gov.uk: https://www.legislation.gov.uk/wsi/2013/1984/contents/made](https://www.legislation.gov.uk/wsi/2013/1984/contents/made)

Welsh Government. (2018). *Eatwell Guide*. Retrieved from [gov.wales: https://gov.wales/eatwell-guide](https://gov.wales/eatwell-guide)

Welsh Government. (2020). *Healthy Weight Healthy Wales Implementation Plan 2020-2022*. Retrieved from <https://gov.wales/healthy-weight-healthy-wales-delivery-plan-2021-2022-html>

Welsh Government. (2022). *Healthy Weight: Healthy Wales 2022 to 2024 delivery plan*. Retrieved from Healthy Weight Strategy (Healthy Weight Healthy Wales): <https://gov.wales/healthy-weight-healthy-wales-2022-2024-delivery-plan>

Welsh Government, W. (2014). *Healthy eating in maintained schools; Statutory guidance for local authorities and governing bodies*. Retrieved from [gov.wales: https://gov.wales/sites/default/files/publications/2018-12/healthy-eating-in-maintained-schools-statutory-guidance-for-local-authorities-and-governing-bodies.pdf](https://gov.wales/sites/default/files/publications/2018-12/healthy-eating-in-maintained-schools-statutory-guidance-for-local-authorities-and-governing-bodies.pdf)

Welsh Local Government Association . (2014). *Healthy Eating in Schools*. Retrieved from [Welsh LGA: https://www.wlga.wales/SharedFiles/Download.aspx?pageid=62&mid=665&fileid=1534](https://www.wlga.wales/SharedFiles/Download.aspx?pageid=62&mid=665&fileid=1534)

World Health Organisation, W. (2019). *Sustainable Healthy Diets Guiding Principles*. Retrieved from <https://www.fao.org/3/ca6640en/ca6640en.pdf>

## 7 **Appendix A: School Food and Nutrient Standards for Scotland, Northern Ireland, and England**

This section summarises Scotland, Northern Ireland, and England's current positions on their standards for schools.

Scotland has set out its main updates in the Scotland Healthy Eating in Schools Guidance 2020 (Scottish Government, 2021). Key details include updating the nutrient standards to reflect the latest SACN reports, such as setting a minimum fibre requirement, limits for red and processed meats and assessing foods to ensure they meet the new 'free sugars' criteria (SACN, Carbohydrates and Health, 2015).

Notably Scotland has set the free sugars requirement at 7.5% of total dietary energy intake instead of 5% as recommended by SACN. This was to move towards achieving a significant reduction in free sugars whilst recognising the 'severity' of moving to a 5% target in one-step.

Also included in the Scottish update are specific nutrient criteria for breakfasts, and a new daily energy tolerance has been suggested to reduce the variation in the energy content of school meals on different days over the 5-day week. The guidance has also focussed on providing separate criteria for Primary and Secondary schools owing to the flexible nature of food choice and purchasing times in Secondary schools; focussing on fruit and vegetable portions rather than variety; and the introduction of a secondary school analysed lunch. Portion size guidance suggests 'reasonable adjustments' be made to meet the range of needs of children separated into Primary and Secondary categories.

A draft update to the nutritional standards for school food in Northern Ireland in 2020 is available from Northern Ireland Department of Education (Dept of Education, 2020). Draft details include updating the nutrient standards to reflect the SACN report on Carbohydrate and Health; definition for free sugars and maximum daily dietary intake for free sugars, and new minimum dietary intake for fibre (SACN, Carbohydrates and Health, 2015). It also specifies red and processed meat minimum and maximum intakes, and vegetarian meal criteria. The guidance provides detailed fruit and vegetable criteria such as composite main courses must contain 40g vegetables per serving (in addition to main veg portions).

The 2022 School Meals and Nutritional Standards in England Report states, although an advisory group met in 2019 to discuss updates to the standards, due to the disruption from the pandemic priority has been given to ensuring the current standards are being met, rather than updated (Long, Danechi, & Roberts, 2022). Therefore, The Requirements

for School Food Regulations 2014 (Department for Education, 2014) are still in use. An exception to this was an update to remove references to EU law that no longer apply and an additional link to the labelling of allergens on prepacked food for direct sales in August 2021 (Department for Education, 2021). England's current guidance recommends use of the sustainable procurement guide alongside the school food and nutrient standards guide: Sustainable procurement the government buying standards (DEFRA, 2017), and provides guidance on sustainable approaches and food choices including seasonal and local, sustainable fish options and reducing food waste.

Specific details for each UK nation's food and nutrient standards are outlined below.

## 7.1 England

The School Food Standards Guidance for England (Department for Education, 2021) detail the following key points as per The Requirements for School Food Regulations 2014 (Department for Education, 2014):

- One or more wholegrain varieties of starchy food per week.
- Dessert must contain at least 50% fruit available minimum twice per week.
- Focus on offering a *variety* of fruit and veg over a week.
- Specific vegetarian meal criteria included: Beans / pulses served as protein in main course must be accompanied by another portion of veg. Non-dairy protein options must be available min 3x per week.
- Oily fish must be available once or more every 3 weeks.
- Meat must be available min 3x per week.
- Meat products available max once per week for Primary / twice per week for Secondary.
- Must not use flavour enhancers MSG or E621 due to salt content.
- Guidance included regarding how to increase iron, zinc and calcium content in meals.
- Advice to use sustainable procurement guide alongside the food standards guide: Sustainable procurement the government buying standards (DEFRA, 2017).
- Guidance provided on sustainable approaches and food choices such as fish.

## 7.2 Scotland

Scotland Healthy Eating in Schools Guidance 2020 (Scottish Government, 2021). Key points:

- Update the nutrient standards to reflect the latest scientific evidence base, such as the latest SACN reports, including setting a minimum fibre requirement and assessing foods to ensure they meet the new 'free sugars' criteria.
- Free sugars requirement set at 7.5% of total dietary energy intake instead of 5% as recommended by SACN.
- New maximum levels set for provision of red and red processed meat across the school week in order to align latest SACN advice.
- New daily energy tolerance to reduce the variation in energy content of meals on different days over the 5-day week.
- Nutrient based criteria for breakfast cereals.
- Separate criteria for Primary and Secondary schools owing to the flexible nature of food choice and purchasing times in Secondary schools.
- Introduction of a secondary school analysed lunch.
- Provision of nutritional analysis manual to support consistent approach.
- Access to two full portions of fruit and vegetables to be established instead of the previous focus on variety.
- Careful consideration suggested regarding use of sweeteners to reduce habit setting of sweet food consumption.
- Consistent messaging to be considered for the use of sugar free soft drinks in secondary schools in order to encourage the development of healthier habits.
- Limit on pastry products.

### 7.3 Northern Ireland

Draft update to the nutritional standards for school food in Northern Ireland in 2020 (Dept of Education, 2020). Draft details include the following key points:

- Updated nutrient standards to reflect latest SACN report on Carbohydrate and Health, 2015;
  - Definition of free sugars and maximum daily dietary intake (SACN, Carbohydrates and Health, 2015).
  - Drinks guidance updated as per definition of free sugars.
  - Rice and pasta should be wholegrain. Bread must be 50% wholegrain or higher fibre (inc. 50% of sandwiches).
- More detailed fruit and vegetable criteria including composite main courses such as casseroles / stews must contain 40g vegetables per serving (in addition to main veg portions).
- Specific vegetarian meal criteria: Beans / pulses served as protein in main course must be accompanied by another portion of veg. Cheese should not be served as only vegetarian option more than twice a week.

- Maximum levels set for provision of red and red processed meat across the school week to align latest SACN advice:
  - Red meat served in primary min twice per week / max 3x per week. Secondary min 3x / max 4x per week.

Processed meat max once a week primary. Max twice per week Secondary. Non-meat alternative choices criteria also detailed in draft.

- Oily fish should be available at least once every four weeks. Fish at least once a week in Primary and twice in Secondary.
- Dairy based dessert (with fruit) must be available every day.
- Desserts such as cakes, biscuits, puddings only available max twice per week as part of a lunch time meal.

## 8 Appendix B: Summary tables of required and recommended updates to school food nutrient and food-based standards

### 8.1 Maintained Primary Schools

8.1.1 Table A1: Maintained Primary School comparison of current nutrient standards for lunch and the latest scientific evidence base and dietary advice.

Nutrient	Current standards	Update Required/Recommended	Latest Evidence Base
Energy (kilo calories) Within 5% tolerance +/-	530	Recommended <ul style="list-style-type: none"> <li>Example: Scotland adaptations include new daily energy tolerance to reduce the variation across the week (Scottish Government, 2021).</li> </ul>	Government Dietary Recommendations 2016 (Public Health England, 2016).  SACN DRVs for energy 2011 (SACN, 2011).
Total fat (grams) Max	20.6	No	Government Dietary Recommendations 2016 (Public Health England, 2016).  SACN DRVs for energy 2011 (SACN, 2011).
Saturated fat (grams) Max	6.5	<ul style="list-style-type: none"> <li>Ensure standards align with sat fat total dietary energy recommendations of no more than 10% from age five (population average).</li> </ul>	SACN Saturated Fats and Health 2019 (SACN, 2019).
Total carbohydrate (grams) Min	70.6	No	SACN Carbohydrate and Health 2015 (SACN, 2015).
Non-milk	15.5	Required	SACN Carbohydrate and Health 2015

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extrinsic sugars (grams) Max		<ul style="list-style-type: none"> <li>Amend nutrient definition and supporting information from NMES to free sugars.</li> <li>Ensure no more than 5% total daily dietary energy intake for free sugars.</li> </ul>	(SACN, 2015).
Fibre (grams) Min	4.2	<p>Required</p> <ul style="list-style-type: none"> <li>Align with increase in dietary fibre recommendations for age 5-11yrs 20g/day.</li> <li>Must use established AOAC method for measuring dietary fibre.</li> </ul>	SACN Carbohydrate and Health 2015 (SACN, 2015).
Protein (grams) Min	7.5	No	<p>Government Dietary Recommendations 2016 (Public Health England, 2016).</p> <p>COMA DRVs 1991 (COMA, 1991).</p>
Iron (milligrams) Min	3.0	No	SACN Iron and Health Report 2010 (SACN, 2010).
Zinc (milligrams) Min	2.5	No	<p>Government Dietary Recommendations 2016 (Public Health England, 2016).</p> <p>COMA DRVs 1991 (COMA, 1991).</p>
Calcium (milligrams) Min	193	No	<p>Government Dietary Recommendations 2016 (Public Health England, 2016).</p> <p>COMA DRVs 1991 (COMA, 1991).</p>
Vitamin A (micrograms) Min	175	No	<p>Government Dietary Recommendations 2016 (Public Health England, 2016).</p> <p>COMA DRVs 1991 (COMA, 1991).</p>
Vitamin C	10.5	No	Government Dietary Recommendations

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(milligrams) Min			2016 (Public Health England, 2016). COMA DRVs 1991 (COMA, 1991).
Folate (micrograms) Min	53	No	Government Dietary Recommendations 2016 (Public Health England, 2016). SACN Update on Folic Acid 2017 (SACN, 2017).
Sodium (milligrams) Max	499 Salt must not be available to pupils to add to food.	No	Government Dietary Recommendations 2016 (Public Health England, 2016). SACN Salt and Health Report 2003 (SACN, 2003).

8.1.2 Table A2: Maintained Primary School comparison of current food standards for lunch and the latest scientific evidence base and dietary advice.

Food Group	Current standards	Update Required/Recommended	Latest Evidence Base
Fruit and Vegetables	<ul style="list-style-type: none"> <li>At least one portion of vegetables or salad per day (exc. Potatoes)</li> <li>At least one portion of fruit, fruit salad or fruit juice per day.</li> <li>Fruit based dessert must be provided at least twice a week; with a portion containing at least 40g fruit (weight of raw fruit).</li> <li>Must always be available wherever food is provided.</li> </ul>	Required <ul style="list-style-type: none"> <li>Review foods included within category to ensure alignment with free sugars criteria such as use of fruit and vegetable juices, purees and items used in desserts.</li> <li>May require food exclusions / limitations based on above.</li> </ul>	5 A Day (NHS, 2018).  SACN Carbohydrate and Health 2015 (SACN, 2015).

		Recommended: Review the number of portions to be provided throughout the school day.	
<p>Meat: Includes chicken thigh, breast, cooked sliced meat, bacon, minced meat.</p> <p>Meat Products: Includes burger, sausage, meatballs, canned meat.</p>	<ul style="list-style-type: none"> <li>• Meat must be provided at least two days per week.</li> <li>• No more than two 'meat products' provided per week.</li> <li>• Meat products must contain minimum meat content.</li> </ul>	<p>Recommended</p> <ul style="list-style-type: none"> <li>• Red and processed meat considerations to ensure school menus are mindful of SACN recommendations to limit to no more than 70g day (for adults).</li> <li>• Review product categorisation.</li> <li>• New definitions for red and processed meat may be required to align with SACN advice.</li> <li>• Introduce meat-free alternatives categorisation</li> </ul>	SACN Iron and Health Report 2010 (SACN, 2010).
Fish	<ul style="list-style-type: none"> <li>• A portion of fish must be provided at least once a week.</li> <li>• A portion of oily fish at least twice during any four-week period.</li> </ul>	<p>Recommended</p> <ul style="list-style-type: none"> <li>• Ensure sufficient consideration and availability of sustainable choices.</li> <li>• Consider whether oily fish options align with SACN advice to consume at least one oily fish per week.</li> </ul>	SACN Advice on Fish Consumption 2004 (SACN, 2004).

Potato and Potato Products	<ul style="list-style-type: none"> <li>• Cooked in fat or oil no more than twice a week.</li> </ul>		
Deep-fried or flash fried food	<ul style="list-style-type: none"> <li>• No more than twice a week (exc. potato &amp; potato products).</li> </ul>		
Cakes and Biscuits	<p>Only at lunchtime.</p> <p>Must not contain confectionery.</p>	<p>Required</p> <ul style="list-style-type: none"> <li>• Review category to ensure alignment with free sugars criteria.</li> <li>• May require exclusions / limitations based on impact of overall total dietary energy intake of free sugars across menu.</li> <li>• This category may require further clarification as to what is considered confectionery, and consideration regarding setting a whole school ethos to healthier eating and limiting the impact of conflicting messages for children.</li> </ul>	<p>SACN Carbohydrate and Health 2015 (SACN, 2015).</p>
Other Considerations			

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Sweeteners	Legally permitted based on regulations specified under EU law.	Recommended Review if changes required due to EU exit.	SACN Carbohydrate and Health 2015 (SACN, 2015).
Condiments	Must not exceed 10ml per portion.	Yes	SACN Carbohydrate and Health 2015 (SACN, 2015).
Explicit Sustainability Criteria	Minor with no specific actions other than general healthy eating guidelines.	Yes	Sustainable Procurement: Government Buying Standards (GBS) (DEFRA, 2017).
Other food items:		No	
	<ul style="list-style-type: none"> <li>Confectionery not permitted except cocoa powder which is permitted in cooking. This category may require further consideration regarding setting a whole school ethos to healthier eating and limiting the impact of conflicting messages for children.</li> <li>Savoury Snacks such as crisps, popcorn, rice cakes and pretzels are not permitted. Excludes crackers, water biscuits and oatcakes which are permitted.</li> </ul>		

8.1.3 Table A3: Permitted drinks criteria in maintained Primary Schools comparison of current nutrient standards for lunch and the latest scientific evidence base and dietary advice.

Permitted	Current standards	Update	Latest Evidence Base
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Product		Required/Recommended	
Water (still or carbonated)	Plain with no added substances.	No	
Milk	<ul style="list-style-type: none"> <li>Plain with no added substances.</li> <li>Must be semi-skimmed or skimmed milk.</li> </ul>	No	
Fruit or vegetable juice (still or sparkling)	Only as part of lunch (or breakfast) and with no added substances other than sugar added for the purpose of regulating acidic taste (with limit).	Required <ul style="list-style-type: none"> <li>Review category to ensure alignment with free sugars criteria.</li> <li>May require exclusions / limitations based on impact of overall total dietary energy intake of free sugars across menu.</li> </ul>	SACN Carbohydrate and Health 2015 (SACN, 2015).
Soya, rice or oat drinks.	Plain with no added substances other than calcium fortification.	Required <ul style="list-style-type: none"> <li>Expand criteria: other fortifications e.g. Vitamin D could be permitted.</li> </ul>	
Fruit or vegetables juice combined with plain water (still or carbonated)	<ul style="list-style-type: none"> <li>Only as part of school lunch (or breakfast) with no added substances other than permitted colours, flavourings, additives as per EU regulations.</li> <li>Must contain minimum 50% fruit or vegetable juice.</li> </ul>	Required <ul style="list-style-type: none"> <li>Review category to ensure alignment with free sugars criteria.</li> <li>May require exclusions / limitations based on impact of overall total dietary energy intake of</li> </ul>	SACN Carbohydrate and Health 2015 (SACN, 2015).

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		free sugars across menu. • EU regulations.	
A drink made singly or in combination with a blend or puree of fruit, vegetables, fruit or vegetable juice.	• As part of lunch if no added substances other than permitted colours, flavourings, additives as per EU regulations.	Required • Review category to ensure alignment with free sugars criteria. • May require exclusions / limitations based on impact of overall total dietary energy intake of free sugars across menu. • EU regulations.	SACN Carbohydrate and Health 2015 (SACN, 2015).
Drinks not permitted: <ul style="list-style-type: none"> <li>• Fruit or vegetable juice combined with plain milk, yoghurt, soya, rice or oat drinks.</li> <li>• Flavoured milk, yoghurt or soya, rice or oat drinks.</li> <li>• Squash</li> <li>• Flavoured water</li> <li>• Sports / energy drinks</li> <li>• Fizzy soft drinks regular / diet / sugar free</li> <li>• Tea or Coffee</li> <li>• Hot chocolate</li> </ul>		No	

## 8.2 Maintained Secondary Schools

8.2.1 Table A4: Co-educational Secondary School comparison of current nutrient standards for lunch and the latest scientific evidence base and dietary advice.

Nutrient	Current standards	Update Required/Recommended	Latest Evidence Base
Energy (kilo calories) Within 5% tolerance +/-	646	Recommended <ul style="list-style-type: none"> <li>Example: Scotland adaptations include new daily energy tolerance to reduce the variation across the week (Scottish Government, 2021)</li> </ul>	Government Dietary Recommendations 2016 (Public Health England, 2016). SACN DRVs for energy 2011 (SACN, 2011).
Total fat (grams) Max	25.1	No	Government Dietary Recommendations 2016 (Public Health England, 2016). SACN DRVs for energy 2011 (SACN, 2011).
Saturated fat (grams) Max	7.9	<ul style="list-style-type: none"> <li>Ensure standards align with sat fat total dietary energy recommendations of no more than 10% from age five (population average).</li> </ul>	SACN Saturated Fats and Health 2019 (SACN, 2019).
Total carbohydrate (grams) Min	86.1	No	SACN Carbohydrate and Health 2015 (SACN, 2015).

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Non-milk extrinsic sugars (grams) Max	18.9	Required <ul style="list-style-type: none"> <li>Amend nutrient definition and supporting information from NMES to free sugars.</li> <li>Ensure no more than 5% total daily dietary energy intake for free sugars.</li> </ul>	SACN Carbohydrate and Health 2015 (SACN, 2015).
Fibre (grams) Min	5.2	Required <ul style="list-style-type: none"> <li>Align with increase in dietary fibre recommendations for age 11-16yrs 25g/day.</li> <li>Must use established AOAC method for measuring dietary fibre.</li> </ul>	SACN Carbohydrate and Health 2015 (SACN, 2015).
Protein (grams) Min	13.3	No	Government Dietary Recommendations 2016 (Public Health England, 2016).  COMA DRVs 1991 (COMA, 1991).
Iron (milligrams) Min	4.4	No	SACN Iron and Health Report 2010 (SACN, 2010).
Zinc (milligrams) Min	2.8	No	Government Dietary Recommendations 2016 (Public Health England, 2016).

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			Health England, 2016).  COMA DRVs 1991 (COMA, 1991).
Calcium (milligrams) Min	300	No	Government Dietary Recommendations 2016 (Public Health England, 2016).  COMA DRVs 1991 (COMA, 1991).
Vitamin A (micrograms) Min	245	No	Government Dietary Recommendations 2016 (Public Health England, 2016).  COMA DRVs 1991 (COMA, 1991).
Vitamin C (milligrams) Min	14	No	Government Dietary Recommendations 2016 (Public Health England, 2016).

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			COMA DRVs 1991 (COMA, 1991).
Folate (micrograms) Min	70	No	Government Dietary Recommendations 2016 (Public Health England, 2016).  SACN Update on Folic Acid 2017 (SACN, 2017).
Sodium (milligrams) Max	714  Salt must not be available to pupils to add to food.	No	SACN Salt and Health Report 2003 (SACN, 2003).

8.2.2 Table A5: Co-educational Secondary School comparison of current food standards for lunch and the latest scientific evidence base and dietary advice.

Food Group	Current standards	Update Required/Recommended	Latest Evidence Base
Fruit and Vegetables	<ul style="list-style-type: none"> <li>At least two portions of vegetables or salad per day (exc. Potatoes).</li> <li>At least one portion of fruit, fruit salad or fruit juice per day.</li> <li>Fruit based dessert must be provided at least twice a week; with a portion containing at least 60g fruit (weight of raw fruit).</li> <li>Must always be available wherever food is provided.</li> </ul>	<p>Required</p> <ul style="list-style-type: none"> <li>Review foods included within category to ensure alignment with free sugars criteria such as use of fruit and vegetable juices, purees and items used in desserts.</li> <li>May require certain exclusions / limitations based on above.</li> </ul>	<p>5 A Day (NHS, 2018).</p> <p>SACN Carbohydrate and Health 2015 – definition of free sugars (SACN, 2015).</p>
<p>Meat:</p> <p>Includes chicken thigh, breast, cooked sliced meat, bacon, minced meat.</p>	<ul style="list-style-type: none"> <li>Meat must be provided at least three days per week.</li> <li>No more than two 'meat products' provided per week.</li> <li>Meat products must contain minimum meat</li> </ul>	<p>Recommended</p> <ul style="list-style-type: none"> <li>Red and processed meat considerations to ensure school menus are mindful of SACN recommendations to limit to no more than 70g day (for adults).</li> </ul>	<p>SACN Iron and Health Report 2010 (SACN, 2010).</p>

Meat Products: Includes burger, sausage, meatballs, canned meat.	content.	<ul style="list-style-type: none"> <li>Review product categorisation.</li> <li>New definitions for red and processed meat may be required to align with SACN advice.</li> <li>Introduce meat-free alternatives categorisation.</li> </ul>	
Fish	<ul style="list-style-type: none"> <li>A portion of fish must be provided at least twice a week.</li> <li>A portion of oily fish at least twice during any four-week period.</li> </ul>	<p>Recommended</p> <ul style="list-style-type: none"> <li>Ensure sufficient consideration and availability of sustainable choices.</li> <li>Consider whether oily fish options align with SACN advice to consume at least one oily fish per week.</li> </ul>	SACN Advice on Fish Consumption 2004 (SACN, 2004).
Potato and Potato Products.	<ul style="list-style-type: none"> <li>Cooked in fat or oil no more than twice a week.</li> <li>Alternative starchy food not cooked in fat or oil must also be provided.</li> </ul>		
Deep-fried or flash fried food.	No more than twice a week (exc. potato & potato		

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	products).		
Cakes and Biscuits	<p>Must not contain confectionery.</p> <p>Can also be provided outside of lunchtime provision.</p>	<p>Required</p> <ul style="list-style-type: none"> <li>Review category to ensure alignment with free sugars criteria.</li> <li>May require exclusions / limitations based on impact of overall total dietary energy intake of free sugars across menu.</li> <li>This category may require further clarification as to what is considered confectionery, and consideration regarding setting a whole school ethos to healthier eating and limiting the impact of conflicting messages for children.</li> </ul>	SACN Carbohydrate and Health 2015 (SACN, 2015).
<b>Other Considerations</b>			
Sweeteners	Legally permitted based on regulations specified under EU law.	<p>Recommended</p> <ul style="list-style-type: none"> <li>Review if changes required due to EU exit.</li> </ul>	SACN Carbohydrate and Health 2015 (SACN, 2015).

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Condiments	Must not exceed 10ml per portion.	Yes	SACN Carbohydrate and Health 2015 (SACN, 2015).
Explicit Sustainability Criteria	Minor with no specific actions other than general healthy eating guidelines.	Yes	Sustainable Procurement: Government Buying Standards (GBS) (DEFRA, 2017)
<p>Other food items:</p> <ul style="list-style-type: none"> <li>• Confectionery not permitted except cocoa powder, which is permitted in baking. This category may require further consideration regarding setting a whole school ethos to healthier eating and limiting impact of conflicting messages for children.</li> <li>• Savoury snacks such as crisps, popcorn, rice cakes and pretzels not permitted. Excludes crackers, water biscuits and oatcakes which are permitted.</li> </ul>			

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8.2.3 Table A6: Permitted drinks criteria in maintained Secondary Schools comparison of current nutrient standards for lunch and the latest scientific evidence base and dietary advice

Permitted Product	Current standards	Update Required/Recommended	Latest Evidence Base
Water (still or carbonated)	Plain with no added substances.	No	
Milk	<ul style="list-style-type: none"> <li>Plain with no added substances.</li> <li>Must be semi-skimmed or skimmed milk.</li> </ul>	No	
Fruit or vegetable juice (still or sparkling)	With no added substances other than sugar added for the purpose of regulating acidic taste (with limit).	Required <ul style="list-style-type: none"> <li>Review category to ensure alignment with free sugars criteria.</li> <li>May require exclusions / limitations based on impact of overall total dietary energy intake of free sugars across menu.</li> </ul>	SACN Carbohydrate and Health 2015 (SACN, 2015).
Soya, rice or oat drinks.	Plain with no added substances other than calcium fortification.	Yes <ul style="list-style-type: none"> <li>Other fortification e.g. vitamin D could be permitted.</li> </ul>	
Fruit or vegetables juice combined with	<ul style="list-style-type: none"> <li>With no added substances other than permitted colours, flavourings, additives as per</li> </ul>	Yes <ul style="list-style-type: none"> <li>Review category to ensure alignment with free sugars</li> </ul>	SACN Carbohydrate and Health 2015 (SACN, 2015).

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plain water (still or carbonated)	<p>EU regulations.</p> <ul style="list-style-type: none"> <li>• Must contain minimum 50% fruit or vegetable juice.</li> </ul>	<p>criteria.</p> <ul style="list-style-type: none"> <li>• May require exclusions / limitations based on impact of overall total dietary energy intake of free sugars across menu.</li> <li>• EU regulations.</li> </ul>	
Fruit or vegetable juice combined with plain milk or yoghurt.	<ul style="list-style-type: none"> <li>• Must be semi-skimmed or skimmed milk.</li> <li>• Must contain min 50% milk.</li> <li>• No added substances other than permitted colours, flavourings, additives as per EU regulations.</li> </ul>	<p>Required</p> <ul style="list-style-type: none"> <li>• Review category to ensure alignment with free sugars criteria.</li> <li>• May require exclusions / limitations based on impact of overall total dietary energy intake of free sugars across menu.</li> <li>• EU regulations.</li> </ul>	SACN Carbohydrate and Health 2015 (SACN, 2015).
Fruit or vegetable juice with plain soya, rice or oat drinks.	<ul style="list-style-type: none"> <li>• Must contain min 50% soya, rice or oat drink.</li> <li>• No added substances other than permitted colours, flavourings, additives as per EU regulations.</li> </ul>	<p>Required</p> <ul style="list-style-type: none"> <li>• Review category to ensure alignment with free sugars criteria.</li> <li>• May require exclusions / limitations based on impact of overall total dietary energy intake of free sugars across menu.</li> <li>• EU regulations.</li> </ul>	SACN Carbohydrate and Health 2015 (SACN, 2015).

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Flavoured milk, yoghurt or soya, rice or oat drinks.	<ul style="list-style-type: none"> <li>• Must be semi-skimmed or skimmed milk.</li> <li>• Must contain min 90% soya, rice or oat drink.</li> <li>• No added substances other than permitted colours, flavourings, additives as per EU regulations.</li> <li>• May contain less than 5% added sugars or honey.</li> </ul>	<p>Yes</p> <ul style="list-style-type: none"> <li>• Review category to ensure alignment with free sugars criteria.</li> <li>• May require exclusions / limitations based on impact of overall total dietary energy intake of free sugars across menu.</li> <li>• EU Regulations.</li> </ul>	SACN Carbohydrate and Health 2015 (SACN, 2015).
A drink made singly or in combination with a blend or puree of fruit, vegetables, fruit or vegetable juice.	<ul style="list-style-type: none"> <li>• No added substances other than permitted colours, flavourings, additives as per EU regulations.</li> </ul>	<p>Required</p> <ul style="list-style-type: none"> <li>• Review category to ensure alignment with free sugars criteria.</li> <li>• May require exclusions / limitations based on impact of overall total dietary energy intake of free sugars across menu.</li> <li>• EU regulations.</li> </ul>	SACN Carbohydrate and Health 2015 (SACN, 2015).
Tea or Coffee	<ul style="list-style-type: none"> <li>• Semi skimmed or skimmed milk.</li> <li>• No added substances other than permitted colours, flavourings, additives as per EU regulations.</li> </ul>	<p>Recommended</p> <ul style="list-style-type: none"> <li>• EU regulations.</li> </ul>	

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Hot Chocolate	<ul style="list-style-type: none"> <li>• Plain water, plain semi / skimmed milk or plain soya, rice or oat drink.</li> <li>• May contain less than 5% added sugars or honey.</li> <li>• No added substances other than permitted colours, flavourings, additives as per EU regulations.</li> <li>• Max 250ml per portion.</li> </ul>	<p>Yes</p> <ul style="list-style-type: none"> <li>• Review category to ensure alignment with free sugars criteria.</li> <li>• May require exclusions / limitations based on impact of overall total dietary energy intake of free sugars across menu.</li> <li>• EU regulations.</li> </ul>	SACN Carbohydrate and Health 2015 (SACN, 2015).
Drinks not permitted: <ul style="list-style-type: none"> <li>• Squash</li> <li>• Flavoured waters</li> <li>• Sports / energy drinks</li> <li>• Fizzy soft drinks regular / diet / sugar free</li> </ul>	No		

