



**Royal College of
Paediatrics and Child Health
Cymru**

Leading the way in Children's Health

Healthy eating and drinking in maintained schools in Wales

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Summary

The Royal College of Paediatrics and Child Health (RCPCH) Wales welcomes the opportunity to respond to the Welsh Government's consultation on Healthy Eating in schools in Wales. Healthy school meals play a vital role in shaping children's dietary habits, helping to prevent obesity and tooth decay¹. Evidence from the World Health Organisation (WHO) also shows that improving the school food environment reduces the risk of noncommunicable diseases in children².

We were pleased to see the Welsh Government review the nutritional standards of school food and are broadly supportive of the proposed standards to reflect current UK dietary recommendations. Ensuring all children in Wales have access to nutritious, balanced and sustainable nutritious meals during the school day is a vital step toward improving health outcomes, reducing inequalities, and fostering lifelong healthy eating habits. We are particularly supportive of the Welsh Government's proposals in relation to increasing the provision and variety of vegetables, reducing the intake of processed meat, portion sizes and removing fruit juice and other sweetened or blended drinks from school menus.

While we welcome the Welsh Government's proposals to improve healthy eating standards in schools, we believe there is scope to go further in several key areas. These include ensuring the regular provision of oily fish and starchy carbohydrates, establishing a clearer link between food standards and nutrition education, and phasing out processed meat and processed vegetarian alternatives in primary schools. We also recommend explicitly referencing beans, pulses, lentils, and eggs in the statutory guidance to support diverse and nutritious non-meat meal options. Additionally, we urge the Welsh Government to go further in reducing the frequency of fried and pastry-based items on school menus.

¹ Micha R, Karageorgou D, Bakogianni I, Trichia E, Whitsel LP, Story M, Peñalvo JL, Mozaffarian D. Effectiveness of school food environment policies on children's dietary behaviors: A systematic review and meta-analysis <https://pmc.ncbi.nlm.nih.gov/articles/PMC5875768/>

² World Health Organisation (WHO) European Childhood Obesity Surveillance Initiative (2021) <https://iris.who.int/bitstream/handle/10665/274792/WHO-NMH-PND-ECHO-18.1-eng.pdf?ua=1> and <https://www.who.int/europe/news/item/03-03-2021-how-healthy-are-children-s-eating-habits-who-europe-surveillance-results>

We believe the draft statutory guidance could be strengthened to ensure greater clarity, consistency, and impact. This includes assigning Estyn responsibilities to monitor both the promotion of healthy eating and compliance with the new Regulations, incorporating a review mechanism to assess whether the standards are achieving their intended outcomes, and reconsidering proposed exemptions for food brought in from home, which risk undermining the positive impact of the new standards.

We would also urge the Welsh Government to be mindful of the potential for unintended consequences of the new standards, such as the risk of reduced school meal uptake and children rejecting healthier options. To ensure the success of these reforms, the Welsh Government must work closely with schools, caterers, and families to develop strategies that support children through this transition. This includes making healthier food more appealing, fun, and engaging. Children are more likely to try new foods when they feel involved in the process—through tasting sessions, menu development, and feedback opportunities. Their participation is not only empowering but also critical to the long-term success of these changes. Equally important is the role of food and nutrition education, which we believe has not been sufficiently referenced or connected to the current proposals. Helping children understand why healthy eating matters - for their learning and wellbeing - can foster more positive attitudes toward nutritious food and support lifelong healthy habits.

Question 1.

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

Fruit and vegetables

RCPCH Wales strongly agrees with the Welsh Government's proposals in relation to the provision of fruit and vegetables on school menus. We are particularly supportive of proposals to increase the provision and variety of vegetables in school meals.

The proposed changes are a proportionate and evidence-based step toward aligning school food with the UK's Eatwell Guide and national dietary recommendations³. Increasing vegetable intake is essential for improving children's health outcomes and reducing the risk of diet-related diseases. Given that fruit and vegetable consumption remains below recommended levels - particularly in more deprived communities across Wales - these standards are also vital for addressing health inequalities. We recognise potential implementation challenges, including cost, procurement and supply chain issues, and children's food preferences, but believe these can be managed through phased implementation and a whole-school approach - particularly around food and nutrition education and promoting healthy eating.

³ Eatwell Guide <https://www.gov.uk/government/publications/the-eatwell-guide>

With UK vegetable production in decline, the implementation of the new standards also offers an opportunity to adopt the approach of countries such as Finland⁴, Japan⁵ and France⁶ in supporting the use of locally-grown produce. In 2022, just 6% of vegetables bought for the public sector in Wales was sourced from Welsh food producers⁷. The Welsh Government should closely align policy around health eating in schools with wider priorities on sustainability, climate change mitigation, food security, and supporting local economies. Public procurement has a powerful role to play in shaping a healthier and more sustainable food system. As Food Sense Wales state in a recent report on Welsh vegetables in schools, “with the right planning and significant investment in infrastructure, around 25% of all veg in schools across Wales could be Welsh organic by 2030”⁸. We encourage the Welsh Government to prioritise sourcing healthy school food from local producers wherever possible and to provide advice and guidance to food producers to better link to procurement systems, including through establishing consortia to bid for contracts, as well as continuing to adequately resource Farming Connect Horticulture to provide support and training. These actions would not only support children’s health but also strengthen local food supply chains, reduce environmental impact through shorter transport routes, and contribute to the resilience of Welsh agriculture and rural communities.

Starchy carbohydrates

In relation to starchy carbohydrates, we support the introduction of a new standard for school meals, particularly the emphasis on wholegrain options. However, we feel that the proposed standard does not go far enough to align with the Eatwell Guide⁹ or to meaningfully improve children’s fibre intake and long-term health outcomes. It is also the case that the proposed standard is ambiguously worded, which risks limiting their provision to just three days a week. This would fall short of national dietary recommendations¹⁰. Indeed, the Eatwell Guide recommends basing meals on starchy foods - preferably wholegrain - and this should be reflected in a requirement for daily provision. The intention of the standard should be to increase the *variety* of starchy carbohydrates offered across the week and to progressively increase the *proportion* of wholegrain options, which are the most beneficial for children’s health. Clearer wording and a phased implementation plan toward 100% wholegrain provision would help ensure the standard delivers on its ambition to improve fibre intake and support healthier long-term eating habits. This would also provide clarity for school and caterers.

⁴ School Meals Coalition – Finland Case Study https://schoolmealscoalition.org/sites/default/files/2024-05/Kuusipalo_Manninen_2023_Food_Meals_Case_Study_Finland.pdf

⁵ School Meals Coalition – Japan Case Study https://schoolmealscoalition.org/sites/default/files/2024-05/MEXT_MAAF_2023_School_Meals_Case_Study_Japan.pdf

⁶ School Meals Coalition – France Case Study https://www.schoolmealscoalition.org/sites/default/files/2024-05/Avallone_etal_2023_School_Meals_Case_Study_France_.pdf

⁷ <https://www.foodsensewales.org.uk/app/uploads/2025/04/ENGWVFullReport2204.pdf>

⁸ Food Sense Wales report ‘Tonnes of Change: Welsh veg in schools 2023-25’ <https://www.foodsensewales.org.uk/app/uploads/2025/04/ENGWVFullReport2204.pdf>

⁹ Eatwell Guide <https://www.gov.uk/government/publications/the-eatwell-guide>

¹⁰ SACN – Carbohydrates and health https://assets.publishing.service.gov.uk/media/5a7f7cc3ed915d74e622ac2a/SACN_Carbohydrates_and_Health.pdf

Food and nutrition education

The absence of a clear link to food and nutrition education in the current proposals represents a missed opportunity. Schools are not only vital in terms of ensuring our children eat well, but also for ensuring our children learn about the importance of eating well. Embedding food education within the school environment is essential to fostering lifelong healthy eating habits. Countries such as France¹¹ and Japan¹² place a strong emphasis on nutrition education as a core part of the school experience—linking classroom learning with practical food skills and healthy meals. Wales should follow this example by integrating food education into the curriculum and school ethos, ensuring primary school-age children not only eat well at school but also understand *why* healthy eating matters. This holistic approach would reinforce the impact of improved nutritional standards and support long-term public health goals.

Question 2.

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

Meat

We strongly support the proposed standard that distinguishes between red, white, and processed meat, and agree that aligning with UK dietary guidance is a proportionate and evidence-based approach. Reducing the intake of processed meat and limiting red meat is consistent with efforts to lower long-term health risks, including bowel cancer, while still recognising the nutritional value of meat, particularly as a source of iron.

That being said, we believe it is important to acknowledge the cultural and emotional significance of certain meat-based meals for children. For many children, familiar meat and non-meat alternative dishes are a source of comfort and enjoyment, and sudden changes to these options could risk disengagement from school meals altogether. We believe it is important to listen to children's views on the meals they enjoy and involve them meaningfully in the design of new menus, within the wider context of education around food and nutrition.

We believe a phased transition is the best way to avoid or mitigate the impact of any unintended consequences. This will not only support schools and caterers to plan ahead and develop strategies to reduce the risks of lower uptake but also allow time for pupils and families to adapt.

Overall, we support the direction of the proposed standard relating to meat and red meat. We urge the Welsh Government to be guided by a commitment to respecting the importance of children's agency and involvement as this will be crucial to the successful delivery of the proposed changes, as will practical support for schools and caterers. Taking this approach can

¹¹ <https://schoolmealscoalition.org/school-meals-case-study-france>.

¹² https://schoolmealscoalition.org/sites/default/files/2024-05/MEXT_MAAF_2023_School_Meals_Case_Study_Japan.pdf

ensure that the proposals are not only nutritionally sound but also inclusive, engaging, and sustainable.

Fish

While we welcome the inclusion of sustainably sourced fish in school food standards, we are disappointed by the proposal to reduce the frequency of oily fish provision from once every two weeks to every four weeks. This change represents a backward step in promoting children's health and does not align with the Eatwell Guide, which recommends at least one portion of oily fish per week.

The rationale provided for extending the timeframe - that oily fish leads to higher food waste and lower meal uptake - is understandable but ultimately defeatist. Rather than lowering standards, this challenge should be met with leadership, innovation, and support. Oily fish is a rich source of omega-3 fatty acids, which are essential for heart and brain development. Reducing its presence in school meals risks missing a vital opportunity to improve children's long-term health outcomes, particularly for those children who rely on school meals as a primary source of nutrition.

We recommend that the Welsh Government:

- Give food and nutrition education sufficient priority within the Health and Wellbeing Area of Learning to help children understand the health benefits of oily fish.
- Provide guidance for schools and caterers on engaging pupils directly in shaping how oily fish is introduced through activities such as taste tests, recipe development, and feedback mechanisms.
- Support caterers with training and resources to prepare oily fish in ways that are appealing and familiar to children. Initiatives like 'Chefs in Schools'¹³ could be engaged to provide practical advice and training.
- Encourage schools and caterers to develop strategies on gradual familiarisation, using small portions and creative presentation to build acceptance over time.
- School should also engage parents through newsletters, recipe cards, or family tasting events to help reinforce healthy eating messages at home.

Reducing the frequency of oily fish sends the wrong message and risks entrenching poor dietary habits. Increasing the frequency and quality of fish served in schools - especially for children from lower-income backgrounds who may rely heavily on school meals - is a key opportunity to reduce health inequalities. We urge the Welsh Government to reconsider its approach to the provision of oily fish and instead demonstrate bold leadership in tackling dietary inequalities and promoting lifelong healthier eating habits through the school food system.

¹³ Chefs in Schools <https://chefsinschools.org.uk/>

Question 3.

To what extent do you agree or disagree with the proposals that relate to processed meat?

RCPCH Wales welcomes the Welsh Government's proposal to introduce a specific standard on processed meat in school meals and to reclassify ham, gammon, and bacon in line with UK dietary guidance.

In terms of the proposal to limit processed meat to once per week, while this is a step in the right direction, we question whether this proposal is ambitious enough given the well-established health risks associated with processed meat consumption^{14 15}.

Processed meats are classified by the World Health Organisation as Group 1 carcinogens, meaning there is strong evidence that they increase the risk of certain cancers¹⁶. These products are also typically high in salt and saturated fat, contributing to poor cardiovascular health and dietary inequalities, as evidenced by the SACN¹⁷. Given these risks, we believe there is a strong case for going further.

We note that some countries have already taken bold steps in this direction. For example:

- Mexico has passed legislation banning 'junk food' - including processed meats - from school meals and from being sold near school grounds¹⁸.
- Chile has implemented strict nutritional profiling and labelling laws, which have led to the removal of many processed foods from schools¹⁹.
- In California, a Bill has recently been introduced to phase out ultra-processed foods from school meals by 2032²⁰.

Wales has an opportunity to show similar leadership by setting a clear trajectory towards phasing out processed meats in primary settings, where children are forming lifelong dietary habits.

¹⁴ SACN rapid evidence update summary (2025)

<https://www.gov.uk/government/publications/processed-foods-and-health-sacns-rapid-evidence-update/processed-foods-and-health-sacns-rapid-evidence-update-summary>

¹⁵ Eating Better report 'It's Time to Act on Processed Meat' (2023) https://www.eating-better.org/site/assets/files/6465/its_time_to_act_on_processed_meat_final-1.pdf

¹⁶ World Health Organisation (2015) <https://www.who.int/news-room/questions-and-answers/item/cancer-carcinogenicity-of-the-consumption-of-red-meat-and-processed-meat/>

¹⁷ SACN rapid evidence update summary (2025)

<https://www.gov.uk/government/publications/processed-foods-and-health-sacns-rapid-evidence-update/processed-foods-and-health-sacns-rapid-evidence-update-summary>

¹⁸ The Independent 'Mexican schools have 6 months to ban the sale of junk food or face heavy fines' (2024) <https://www.independent.co.uk/news/mexican-ap-schools-mexico-city-latin-america-b2633031.html>

¹⁹ Health Policy Watch 'Chile's Comprehensive Food Policy Offers Global Lesson in Tackling Unhealthy Foods' (2023) <https://healthpolicy-watch.news/chiles-comprehensive-food-policy/>

²⁰ California State Assembly: Assembly Bill (AB) 1264 Pupil nutrition: particularly harmful ultra-processed food: prohibition (2025) https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1264

We also recommend that the Welsh Government:

- Engage with children and families to explore acceptable alternatives to processed meat.
- Support schools and caterers with training and resources to develop appealing, healthier replacements.
- Provide clear guidance to schools and caterers that encourages innovation and signals a long-term ambition to remove processed meats entirely from school menus.

Question 4.

To what extent do you agree or disagree with the proposals that relate to non-meat options (specifically, restricting cheese-based dishes and processed meat and fish alternatives)?

We welcome the specific standard on non-meat options in school meals. A BBC survey found that 21% of children across the UK were already vegan or vegetarian, with 15% wanting to go vegan and 1 in 5 considering going vegetarian²¹. This is a positive and necessary step to ensure that vegetarian and plant-based meals offered in schools are not only available but also nutritionally balanced and health-promoting.

We support the proposed limit on cheese-based dishes - restricting meals where cheese is the main protein source to no more than twice per week. While cheese can be a valuable source of calcium and protein, it is also high in saturated fat and salt. Over-reliance on cheese-based meals risks undermining the nutritional quality of vegetarian options and may contribute to poor dietary habits over time.

We also welcome the proposal to reduce the frequency of processed meat and fish alternatives. Many of these products are highly processed, high in salt and saturated fat, and offer limited nutritional benefit. However, we believe the Welsh Government could go further. A phased approach to removing processed meat and fish alternatives in primary schools would better align with public health goals and dietary guidance. We do though recognise the implementation challenges in doing so for schools and caterers and would therefore urge the Welsh Government to provide clarity as early as possible on its intentions.

We believe that the standard, as currently drafted, represents a missed opportunity to more regularly include high-fibre, low-fat meat and fish alternatives such as beans, pulses and eggs in school menus. These foods are highlighted in the Eatwell Guide as the healthiest protein choices for vegetarians. Without specific reference to them in the standards or Statutory Guidance, there is a risk that schools and caterers may not include them frequently or consistently in school meals.

We recommend that the Welsh Government:

²¹ BBC Good Food Nation Survey (2021) <https://www.bbc.co.uk/newsround/58653757>

- Strengthen the standard by explicitly requiring the regular inclusion of beans, pulses, lentils, and eggs as part of non-meat meal options.
- Provide guidance and support to caterers on how to prepare these ingredients in ways that are appealing to children.
- Require school governing bodies to monitor implementation to ensure that vegetarian meals are not only available but also nutritionally balanced and diverse.

By taking these steps, the Welsh Government can ensure that non-meat options in schools support children's health, align with UK dietary guidance, and contribute to the development of lifelong healthy eating habits.

Question 5.

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

RCPCH Wales welcomes the Welsh Government's proposals to strengthen standards on foods such as potatoes cooked in oil, fried items, sweetened baked goods, and pastry. The changes represent a significant step forward from the current standards and reflect a growing recognition of the need to reduce consumption by children of saturated fats, sugars and salt. According to the latest statistics from Public Health Wales's Child Measurement Programme (2023-24), 13.7% of children in Wales were overweight and 11.8% were obese²². Wales's childhood obesity rate is higher than that reported for England or Scotland.

These types of foods - particularly desserts - are often among the most popular items on school menus but are major contributors to excess calories, saturated fat, and free sugars in children's diets. While occasional treats can have a place in a balanced diet, these items should only be served occasionally and in small portions, not as regular features of school meals.

We are concerned that, even under the proposed restrictions, children in Wales could eat less healthy foods multiple times per week in school. This risks reinforcing unhealthy dietary patterns, particularly when considered alongside children's diets outside of school, which already include excessive amounts of saturated fat and sugar²³.

This issue is especially pressing for children from more deprived communities, who are more likely to rely on school meals as a primary source of nutrition. These children are also disproportionately affected by diet-related health issues, including obesity. Indeed, the latest

²² Public Health Wales – Child Measurement Programme 2023-24: <https://phw.nhs.wales/services-and-teams/child-measurement-programme/cmp-2023-24/child-measurement-programme-annual-report-2023-2024/>

²³ 'Delivering Better Oral Health: an evidence-based toolkit for prevention', UK Government Department for Health & Social Care (2021) <https://www.gov.uk/government/publications/delivering-better-oral-health-an-evidence-based-toolkit-for-prevention/chapter-10-healthier-eating>

figures from the Child Measurement Programme (2023/24) show that children living in the most deprived areas of Wales are significantly more likely to be overweight or obese²⁴.

Given this context, we believe there is a strong case for the Welsh Government to go further by:

- Taking an evidence-based approach to further reduce the frequency of fried and pastry-based items on school menus over time.
- Limiting desserts and sweetened baked goods to occasional offerings, with a focus on healthier alternatives such as fruit, plain yoghurt, or baked goods made with wholegrains and added fruit.
- Providing clear guidance to caterers on portion sizes and reformulation to reduce sugar and fat content.
- Supporting innovation and inclusion in school kitchens to create appealing, healthier options that children enjoy.

Question 6

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

RCPCH Wales supports the Welsh Government's proposal to limit drinks provided in primary schools to plain water, plain milk, and plain plant-based alternatives. This proposal sends a strong message about the importance of healthy hydration habits and helps to normalise plain water, plain milk and plain plant-based alternatives as the default drink choices for children.

Sugary drinks are a major contributor to excess sugar consumption in children's diets - accounting for around a quarter of their daily sugar intake²⁵. High consumption of sugary drinks is strongly linked to obesity, type 2 diabetes, and tooth decay, all of which are significant public health concerns in Wales. Tooth decay remains one of the most common reasons for hospital admissions among children, and obesity rates are disproportionately high in more deprived communities.

While fruit juice is often perceived as a healthy option, it contains high levels of free sugars and offers limited nutritional benefit compared to whole fruit. Removing fruit juice and other sweetened or blended drinks from school settings is therefore a proportionate and necessary measure to protect children's health. We also welcome the inclusion of plain plant-based drinks, which supports dietary inclusivity and aligns with the Welsh Government's sustainability goals

We know that, on average, children are consuming half of their recommended daily amount of sugar before they step foot in school²⁶. It is therefore vital that steps are taken within school

²⁴ Public Health Wales – Child Measurement Programme 2023-24

²⁵ NHS Better Health, Better Families factsheet <https://www.nhs.uk/healthier-families/food-facts/sugar/>

²⁶ 'Kids devouring too much 'breakfast sugar' warning', BBC News (2017) <https://www.bbc.co.uk/news/health-38467861> data source: [National Diet and Nutrition Survey - GOV.UK](#)

settings to not only prohibit fruit juice but also to support children to make healthier choices outside of school through education and promotion of the benefits of healthy drink choices.

Question 7

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

We support the Welsh Government's proposed changes to portion size standards in school meals. The introduction of age-appropriate portion sizes - with separate standards for infants (Nursery to Year 2) and juniors (Year 3 to Year 6) - is a welcome and necessary improvement. This change addresses longstanding concerns that younger children were being served portions that were too large, contributing to food waste and potential overeating. And evidence from the Children's Commissioner for Wales suggests just 19% of older children in primary schools feel full after their meal. 44% said they could not have more food if they ask for it²⁷.

We particularly welcome the proposal to set maximum portion sizes for foods that should be limited (such as those high in saturated fat, sugar, or salt) and minimum portion sizes for foods to be promoted, such as fruit, vegetables, and starchy carbohydrates. This approach aligns well with the principles of the Eatwell Guide and supports the development of healthier eating habits.

For children with larger appetites, it is important to provide access to additional food without compromising nutritional quality. The inclusion of supplementary bread is welcome, but we believe this should be 100% wholegrain or higher fibre versions with less added fat, salt and sugar as recommended by the Eatwell Guide. We note that the guidance suggests caterers will have discretion in terms of which children may require additional portions. While flexibility is important to accommodate individual needs and operational realities, there is a risk that inconsistent application could undermine the intent of the standards. We urge the Welsh Government to provide clear, practical guidance to caterers on how to apply portion size standards consistently.

Additionally, we encourage the Welsh Government to consider the needs of children with higher energy requirements, including those who are more physically active or experiencing growth spurts. While supplementary bread is an option, further guidance on how schools can provide these children with a variety of supplementary food without relying on less healthy options would be beneficial.

We would also emphasise the importance of engaging children and families in understanding portion sizes and healthy eating. Education around what constitutes a balanced meal - and why

²⁷ Children's Commissioner for Wales school food survey (2024)

<https://www.childcomwales.org.uk/2024/04/only-a-fifth-of-children-answering-survey-are-full-after-school-dinner/#:~:text=Almost%20half%20%2844%25%29%20said%20they%20can%E2%80%99t%20have%20more,views%20on%20a%20vital%20aspect%20of%20their%20lives%E2%80%99>

portion control matters - can help reinforce the standards and support healthier choices both in and outside of school.

Question 8

To what extent do you agree or disagree with the proposals relating to breakfast provision?

We strongly agree with these proposals. The exclusion of fruit juice is in line with UK dietary recommendations to limit free sugars to no more than 5% of energy intake. We also endorse the requirement that all bread served must be at least 50% wholemeal, which will help increase fibre intake and support digestive health. And the introduction of separate portion sizes for infants and juniors is in line with RCPCH's position on developmentally appropriate dietary guidance²⁸.

Question 9

Is the draft statutory guidance supporting primary school food caterers to implement the draft regulations sufficiently clear?

We believe the guidance is clear in its intent and provides a practical overview of the regulatory framework. The inclusion of practical advice, as well as definitions, guidelines and diagrams in the annexes are particularly useful in supporting implementation. However, there are several ways in which the guidance could be strengthened to ensure greater clarity, consistency, and impact:

Monitoring and accountability

While the guidance outlines roles for local authorities and governing bodies, it should go further in explaining how compliance will be monitored and evaluated and what support will be available for schools that may struggle to meet the standards.

Placing the onus on school governing bodies to oversee and report on compliance is insufficient, as they may lack the time, expertise, or resources to carry out this role effectively. Furthermore, the draft statutory guidance does not set out specific responsibilities on Estyn in respect of compliance with the Regulations. Estyn's responsibilities appear to be more limited in scope as the Statutory Guidance on the Promotion of Healthy Eating sets out specific requirements for Estyn to inspect and report on the promotion of healthy eating only.

To ensure consistent and meaningful implementation, we recommend that the Statutory Guidance be amended to place a specific requirement on Estyn to report on compliance with the food and nutrition standards as part of their inspection framework. Without this, there is a

²⁸ RCPCH Clinical Guideline Directory – Nutrition <https://www.rcpch.ac.uk/resources/clinical-guideline-directory#nutrition>

risk that local authorities and schools will be left to effectively mark their own homework, undermining the credibility and impact of the standards.

Evaluation of implementation

Given the scale of the proposed changes and their potential positive impact on children's health, we believe it is important that the Regulations include a statutory duty on the Welsh Government to review implementation and evaluate compliance with the new standards. This would help the Welsh Government, local authorities, schools, parents and carers and wider stakeholders understand if the Regulations are delivering their intended outcomes and provide for an opportunity to make evidence-based adjustments if necessary.

Such a mechanism would demonstrate a clear commitment to accountability, continuous improvement, and the long-term success of the school food system in Wales.

Exemptions

We recognise that exemptions to the school food standards may be necessary in certain limited circumstances. However, we are concerned that these exemptions could undermine the overall impact of the new standards. Children in Wales are not getting the balanced nutrition they need. The consultation document itself states that children spend around 40% of their waking hours at school and that school meals can account for a third or more of their weekday food intake. Schools are therefore a critical setting for shaping dietary habits and promoting health.

Further consideration should therefore be given to the nutritional quality of foods not prepared in schools. Evidence demonstrates that school meals are more nutritious in the UK than packed lunches. School meals in primary schools have already been shown to contain less sugar, saturated fat and total calories than packed lunches²⁹. And a large study covering over 50 schools in England found that school meals were healthier than packed lunches, with children eating school meals having a higher-quality diet during the school day³⁰.

We believe the Welsh Government should place more of an emphasis on the role of schools and local authorities in encouraging parents and guardians to align with the school food standards when providing food from home. This may take the form of a whole-school, whole-community approach through practical advice and guidance on healthier packed lunches and snacks and the role parents and guardians play in supporting their children to develop lifelong healthy eating habits. The Welsh Government may also wish to consider future policy options around restricting foods brought into schools that are prohibited under the standards.

²⁹ 'Dietary quality of school meals and packed lunches: a national study of primary and secondary schoolchildren in the UK', Cambridge University Press (2022)
<https://www.cambridge.org/core/journals/public-health-nutrition/article/dietary-quality-of-school-meals-and-packed-lunches-a-national-study-of-primary-and-secondary-schoolchildren-in-the-uk/C1D0B94710969CA92E765E49DAF4EB19>

³⁰ Evans CEL, Melia KE, Rippin HL, et al. A repeated cross-sectional survey assessing changes in diet and nutrient quality of English primary school children's packed lunches between 2006 and 2016. *BMJ open* 2020;10(1):e029688

Reinforce the role of food and nutrition education

While the guidance touches on the importance of promoting healthy eating, we believe it should be more explicit in linking the standards on schools and caterers to curriculum-based food and nutrition education. Embedding this connection would help children understand the ‘*why*’ behind the changes and support long-term behaviour change.

The guidance could also be strengthened by encouraging schools and caterers to involve pupils in the design and evaluation of school meals, including through tasting sessions, menu development, and feedback mechanisms. This would support uptake, reduce waste, and promote inclusivity, particularly for children with dietary, cultural, or sensory needs.

Greater clarity, stronger monitoring and accountability mechanisms, and a more explicit focus on pupil engagement and education would enhance the effectiveness of the proposed changes. We encourage the Welsh Government to consider these improvements to ensure the successful implementation of the new school food standards.

Question 10

Is the draft statutory guidance on the provision of medically prescribed dietary requirements and other dietary requirements sufficiently clear?

We welcome the Welsh Government’s efforts to clarify expectations around the provision of special diets in schools. With the expansion of the universal primary school meal offer, the demand for special diets has increased, making it more important than ever that schools and caterers are equipped to meet children’s dietary needs safely, consistently, and inclusively.

For medically prescribed diets, we agree that exemptions from the Healthy Eating Regulations are necessary to ensure children receive the food they need for their health and wellbeing. We support moves to encourage caterers to align meals with the spirit of the regulations where possible, promoting healthier options even within the context of medical exemptions.

Schools and caterers may need additional training to understand and implement the guidance effectively, particularly in relation to risk assessment and communication with families and healthcare professionals. The guidance could be clearer on how the provision of special diets will be monitored and how schools will be supported to meet their obligations. To ensure consistency and equity across schools, the guidance should clearly define who is responsible for oversight and introduce a standardised monitoring framework that schools and local authorities can use to track and report on special diet provision.

Questions 11 – 14 Regulatory and wider impact assessment

Challenges that should be recognised within the draft regulatory impact assessment

Please see the response to question 9 in respect of monitoring and evaluating implementation. It is essential that the Regulations include a clear and robust framework for monitoring and evaluation. At present, there is insufficient information regarding post-implementation review - there is no reference to when the Regulations will be reviewed or updated to take account of

emerging evidence. We also believe that the draft regulatory impact assessment should more clearly consider and identify which data sources will be used to measure the impact of the proposed standards. Robust and transparent data systems are vital - not only to ensure effective monitoring and evaluation - but also to give parents, guardians, and wider stakeholders confidence that the intended outcomes are being tracked and achieved. This information should either be included in the impact assessments or accompanied by a clear commitment to provide it in future.

What positive effects that should be further recognised within the draft regulatory impact assessment

The long-term health and economic benefits of improving school food are particularly significant for children from lower-income households, who are more likely to rely on school meals and experience poor diet-related health outcomes. A joint report published in 2024 by leading public health organisations, including RCPCH, found that children from lower socio-economic backgrounds are more likely to face barriers in accessing nutritious food, leading to diets that meet fewer dietary UK recommendations³¹. The potential for school food reform to reduce health inequalities and support children's rights to health and development could therefore be more prominently featured.

Impact of the draft regulations on children, families living in socio-economic disadvantage and people with protected characteristics

RCPCH Wales welcomes the inclusion of a Children's Rights Impact Assessment but believes intersectional issues around poverty and disadvantage could be more thoroughly reflected. For example, a disabled child or ethnic minority child is more likely to be living in socio-economic disadvantage. Children from socioeconomically disadvantaged backgrounds are disproportionately affected by poor nutrition and obesity, and they rely heavily on nutritious school meals. If uptake falls or if food brought from home is not aligned with the standards, these children may be further disadvantaged.

The assessments could also more fully consider the specific risks and needs of children with medically prescribed diets, food allergies, disabilities, or sensory processing differences. These children may face significant barriers to accessing school meals that meet both their nutritional and sensory needs. For example, children with ASD or sensory sensitivities may struggle with the texture, smell, or presentation of certain foods, while others may require highly individualised diets due to medical conditions. If these needs are not adequately planned for, there is a risk of exclusion, undernutrition, or increased reliance on packed lunches, which may not meet the same nutritional standards. The impact assessments should explore how the new standards will be implemented in a way that is flexible, inclusive, and supportive, including through staff training, menu adaptation, and engagement with families and healthcare professionals. Ensuring that children with medically prescribed diets, disabilities or sensory

³¹ 'Health of the next generation: Good Food for Children' joint report by RCPCH, the College and the Faculty of Public Health, Royal Society of Medicine, Royal Society for Public Health, Association of Directors of Public Health, School and Public Health School Nurses Associations and the British Association for Child and Adolescent Public Health (2024) <https://www.rcpch.ac.uk/news-events/news/rcpch-partners-launch-new-report-good-food-children>

differences are not left behind is essential to achieving the Welsh Government's goals of equity and improved health outcomes for all.

Costs

While the Regulatory Impact Assessment outlines cost implications for local authorities and caterers, it should also more prominently recognise the potential cost savings to the NHS and public services from improved child health. There is also a need to assess whether additional funding or capital investment will be required to support kitchen upgrades, staff training, and menu development—particularly in schools serving disadvantaged communities.

We recognise the financial pressures currently facing schools, local authorities, and catering providers. However, these cost concerns must not deter the Welsh Government from taking bold, necessary preventative action to improve children's health outcomes. The long-term benefits of healthier school food will far outweigh the cost of the initial investment. Prioritising children's health through school meals is not only a matter of equity and wellbeing, but also a sound economic decision that will yield significant returns for society over time.

Question 15

Is the draft statutory guidance, aimed at supporting local authorities and governing bodies to deliver their duties to promote healthy eating and drinking, sufficiently clear?

We feel the draft statutory guidance is not sufficiently clear or comprehensive in supporting local authorities and school governing bodies to deliver their duties to promote healthy eating and drinking. While the guidance outlines broad responsibilities, it lacks the specificity, accountability mechanisms, and practical tools needed to ensure consistent and effective implementation across schools.

It is not clear which bodies will monitor adherence to the guidance itself and the Regulations. Estyn is expected to have a role in evaluating how well schools promote healthy eating, but their role is not referenced in the statutory guidance on the Regulations, creating confusion about the scope of their oversight. Moreover, Estyn's inspections are not annual for all maintained primary schools, meaning some schools could go years without any external review of compliance.

The guidance also lacks clarity on how Estyn will report to the Welsh Government on compliance, and what mechanisms will be in place to ensure that findings lead to meaningful action or support. Without a clear national oversight structure, there is a risk of inconsistent implementation and limited accountability.

In addition, while Annex 1 provides examples of activities to encourage school meal uptake, these are vague and lack best practice case studies that schools could learn from. The guidance also fails to identify a specific responsibility for Healthy School Coordinators, who are well-placed to support schools in embedding the Regulations and Statutory Guidance across the curriculum and wider school environment.

It also appears that the Welsh Government has no clearly defined role under the draft guidance in overseeing or supporting the implementation of these reforms. A more proactive role is needed—both in engaging with Estyn and local authorities and in providing national leadership, resources, and evaluation to ensure the success of the new standards.

We recommend that the statutory guidance be revised to:

- Include Estyn's role in compliance with the Regulations, not just promotion of health eating.
- Set out how findings will be reported to and acted upon by Welsh Government.
- Provide practical tools, best practice examples, and a defined role for Healthy School Coordinators.
- Clarify the Welsh Government's own role in oversight and accountability

Question 16

How can we achieve a nutritionally balanced and appealing food offer in secondary schools?

RCPCH Wales recognises that the food environment in secondary schools is significantly more complex than in primary settings. Adolescents have greater autonomy over their food choices, and their eating habits are shaped by a range of factors including time pressures, social dynamics, access to food outside school, and the influence of marketing and convenience.

To ensure that secondary school students have access to nutritious, appealing, and accessible food, we recommend the following:

Healthy 'grab and go' options

- Secondary students often prefer quick, portable meals. Schools should be supported to develop nutritious grab-and-go options such as wholegrain wraps, pasta pots, fruit and yoghurt parfaits, and vegetable snack boxes. These should be affordable, well-promoted, easy to access and packaged in an easily recyclable way.

Address Time and Space Constraints

Short lunch periods and busy canteens can deter secondary school pupils from choosing full meals. Schools should therefore consider:

- Pre-order systems to reduce queuing – many schools already operate these systems and best practice examples should be circulated via school and local authority networks.
- Multiple serving points to reduce congestion
- Flexible dining spaces that accommodate staggered lunch breaks
- The Welsh Government should also consider how it and local authorities can better support school governing bodies to review the timing and quality of break times.

Use cashless systems to promote healthier choices

- Loyalty schemes or discounts for balanced, nutritious meals
- With costs associated with school meals rising, ensure free school meal allowances cover a full, nutritious meal.
- Prevent free school meal allowances from being spent solely on snacks or drinks

Student engagement and co-design

Secondary school students are more likely to choose healthier meals if they feel involved in the process. Equipping them with the knowledge and confidence to make healthy choices at school and at home is vital. Evidence from the British Nutrition Foundation shows that students value practical food lessons and want more opportunities to learn how to prepare healthy, affordable meals that reflect their everyday lives³². Schools should therefore consider the recommendations of the Epic Food Study³³ and consider:

- Tasting sessions and surveys
- Theme days and ‘cook your own’ days
- Involve student councils in menu planning
- Promote peer-led initiatives to encourage healthy eating
- Co-design posters, digital screens, and social media to promote healthy options and educate students on balanced eating.

Monitoring and feedback

Schools should collect data on meal uptake, student satisfaction and barriers to choosing healthier options and this data should inform continuous improvement and be shared with school networks and local authorities to support whole-system learning.

We are also concerned about the negative influence of fast-food outlets located near secondary schools. These outlets often offer cheap, energy-dense foods that compete directly with school meals and undermine efforts to promote healthy eating. We urge the Welsh Government to:

- Work with local authorities to limit the density of fast-food outlets near schools through planning policy.
- Work with local authorities and Estyn to support schools in educating students about the health impacts of these foods.
- Explore incentives and partnerships with organisations who specialise in secondary school food education to make school meals more attractive than external alternatives.

³² ‘Making food education fit for the future’, British Nutrition Foundation (2022)

<https://www.nutrition.org.uk/news/taking-food-education-a-step-ahead-so-it-is-fit-for-the-future/>

³³ ‘Promoting healthier food in secondary schools’, Epic Food Study (2024)

<https://www.birmingham.ac.uk/documents/college-mds/applied-health/epic-study/uob-the-epic-study-a4-final.pdf>

About us

The [Royal College of Paediatrics and Child Health](#) works to transform child health through knowledge, innovation and expertise. We have over 600 members in Wales, 14,000 across the UK and an additional 17,000 worldwide. The RCPCH is responsible for training and examining paediatricians. We also advocate on behalf of members, represent their views and draw upon their expertise to inform policy development and the maintenance of professional standards.

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