



Llywodraeth Cymru
Welsh Government

Review of the Healthy Eating in Schools Regulations – Draft Statutory Guidance

The draft Healthy Eating in Schools (Nutritional Standards and Requirements) (Maintained Primary Schools) (Wales) Regulations (“the draft Healthy Eating Regulations”) – draft Guidance for Local authorities and Governing Bodies

Draft Guidance for Consultation

Guidance document no: 299/2025

Date of issue: May 2025

Audience Everyone who is involved with the provision of school food and drink in maintained schools. This includes local authorities and governing bodies of maintained schools (including maintained nursery schools), those working in schools, e.g. headteachers and teachers, parents/carers, learners, private/in-house catering providers and other stakeholders, e.g. health professionals, dietitians, healthy schools coordinators, etc

Overview This is a draft version of Statutory Guidance for Local Authorities and Governing Bodies for consultation purposes only, to be read with the draft Healthy Eating Regulations which will apply to maintained primary schools. This draft Guidance does not relate to the Healthy Eating in Schools (Nutritional Standards and Requirements) (Wales) Regulations 2013.

Action required Responses to this consultation should be submitted by **29 July 2025** at the latest. You can either complete our online form or email or post your response to the following addresses:

Online form

email: foodinschools@gov.wales

Food in Schools Team
Support for Learners Division
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Further information Large print, Braille and alternative language versions of this document are available on request.

The consultation documents can be accessed from the Welsh Government's website at gov.wales/consultations

Contact details

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Additional copies This document can be accessed from the Welsh Government's website at
<https://www.gov.wales/healthy-eating-schools>

Related documents The Healthy Eating in Schools (Wales) Measure 2009

The Healthy Eating in Schools (Nutritional Standards and Requirements) (Maintained Primary Schools) (Wales) Regulations 202[X]

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
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Review of the Healthy Eating in Schools Regulations – Draft Statutory Guidance

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Introduction

- 1.1. The Welsh Government has committed to review the Healthy Eating in Schools (Nutritional Standards and Requirements) (Wales) Regulations 2013 and the supporting Statutory Guidance¹. The aim of the review is to increase the availability of tasty healthy nutritionally balanced school food and drink, and that healthy eating is promoted in schools with the aim of reducing both health and attainment inequalities. Draft guidance on the duty to promote healthy eating in schools is set out in a separate document.

¹ <https://www.gov.wales/healthy-weight-strategy-healthy-weight-healthy-wales>

- 1.2. This draft Guidance, along with the proposed draft Healthy Eating Regulations, are designed to help children develop healthy eating habits and ensure they have the energy and nutrition they need to get the most from their whole school day.
- 1.3. This Guidance clarifies how the provision within the draft Healthy Eating Regulations should be applied. Local authorities and governing bodies are required to have regard to this Guidance. This means that they must take it into account and if they decide to depart from it have clear and justifiable reasons for doing so.

Who do the draft Healthy Eating Regulations apply to?

- 1.4. The draft Healthy Eating Regulations apply to a local authority or governing body of a maintained primary school that provides food or drink before 6pm on a school day to registered pupils, whether on school premises or at a place other than school premises (e.g. on a school trip).-Where 'maintained primary schools' is used in this guidance this includes maintained nursery schools, and middle schools, special schools and PRUs that provide primary education.

Food covered under the draft Healthy Eating Regulations

- 1.5. The draft Healthy Eating Regulations impose requirements and standards about the following:

Regulation 4 and Schedule 1	School breakfast in maintained primary schools sets out the four food and drink categories permitted to be provided in all maintained primary schools as part of breakfast provision. The requirement applies regardless of whether or not a charge is made for the breakfast. Schedule 4 contains further provisions about drinks. Information on Free Breakfast in Primary Schools (FBIPS) can be found in the statutory guidance ² .
Regulation 5 and Schedule 2	Food provided as part of a School Lunch in Maintained Primary Schools states what foods must and must not be provided as part of school lunch and specifies the frequency that particular foods can be provided as part of a school lunch.
Regulation 6 and Schedule 3	Requirements for food provided otherwise than as part of a school breakfast or a school lunch sets out the requirements that apply to food provided in maintained primary schools before 6pm on a school day outside of breakfast and lunch provision. The Schedule specifies the type of food that must and must not be provided

² <https://www.gov.wales/sites/default/files/publications/2018-12/free-breakfast-in-primary-schools-statutory-guidance-for-local-authorities-and-governing-bodies.pdf>

	e.g. at mid-morning break, afterschool clubs, etc.
Regulation 4,5 and 7 and Schedule 4	Drinks provided in Maintained Primary Schools as part of a school breakfast, school lunch and at other times before 6pm specifies what drinks can and cannot be provided across the entire school day
Regulation 5 and Schedule 5	Nutritional standards for lunch in maintained primary schools sets out the amount of energy that must be provided in an average school lunch on a daily basis and the amount of energy and nutrients that must be provided in an average school lunch in a menu cycle.

Who is responsible for ensuring compliance?

- 1.6. Local authorities and governing bodies of maintained primary schools who provide food or drink (including where they arrange the provision) must comply with the draft Healthy Eating Regulations. Anyone else who is involved in providing food and drink in maintained schools in Wales should be aware of the statutory requirements if they plan menus, purchase and procure food and prepare food and drink for/in schools. This includes those working in schools, e.g. headteachers and teachers, parents/carers, pupils, private/in-house catering providers and other stakeholders, e.g. health professionals, dietitians, healthy schools coordinators, etc.

What food and drink do the draft Healthy Eating Regulations apply to?

- 1.7. The draft Healthy Eating Regulations apply to all food and drink provided by, or under arrangements made by, the local authority or governing body to pupils across the whole school day before 6pm in all maintained primary schools. This includes at breakfast, break times, lunchtimes, afternoon break and after-school-clubs; whether such food and/or drink is provided by the local authority, in-house by the school or by a contract caterer. The draft Healthy Eating Regulations also apply to food and drink provided to pupils at any outlet on school premises throughout the school day before 6pm where the food and drink is provided by, or under arrangements made by, the local authority or governing body, e.g. school tuck shop, vending machine, outside serving area, canteen, etc.

Exemptions

- 2.1. The draft Healthy Eating Regulations do not apply to food and drink in the following list. However, it is recommended that those organising any events still encourage and promote healthier options in keeping with the requirements and standards under the Regulations and as part of a whole-school ethos towards healthy eating. Therefore, such food and drink can still be subject to restrictions at the discretion of the local authority or governing body of a school. Organised 'theme' days (days when the usual menu is not provided, eg to highlight a cultural event or encourage learners

to try different foods) are not exempt and should comply with the food requirements and standards. It is recommended that these should be held no more than once per half term.

- At any school social event or school recreational event to mark any religious or cultural occasion.
- At fund-raising events;
- For use in teaching food preparation and cookery skills provided that any food so prepared is not provided to pupils as part of a school breakfast or school lunch;
- By a parent or pupil for the pupil's own consumption on school premises;
- As part of any medically prescribed dietary requirements;
- To pupils at a boarding school as part of an evening meal.

Food brought into school by pupils/parents/carers to celebrate birthdays, etc.

- 2.2. Food brought into school by pupils/parents/carers to celebrate birthdays, etc. It is recommended that schools develop policies for restricting birthday foods in line with the ethos of the requirements and standards under the draft Healthy Eating Regulations, for example, advising parents/carers that the food will be given to the pupils to take home with them at the end of the school day. Schools and governing bodies should consider whether allowing children to bring birthday cake into school is in accordance with the duty to promote healthy eating and drinking.

Basic overview – Lunch

Food category	Primary
Vegetables	<p>At least 2 portions of vegetables must be provided each day.</p> <p>At least 6 varieties of vegetables must be provided each week.</p> <p>Vegetables includes salad but excludes potatoes</p> <p>Different vegetables provided as a single portion count as one vegetable.</p>
Fruit	<p>At least 1 portion of fruit must be provided each day.</p> <p>At least 4 different fruit must be provided each week.</p> <p>Different fruits provided as a single portion count as one fruit</p>
Starchy carbohydrates	<p>A portion of starchy carbohydrates must be provided at least three times each week.</p> <p>At least one portion of starchy carbohydrates provided each week must be pasta, noodles or rice containing at least 50% wholegrain.</p>
Bread	<p>All bread (except garlic bread, naan bread, pizza bases, tea cakes and crumpets) provided must be at least 50% wholegrain</p> <p>Supplementary bread (with no added fat or oil) must be available every day at lunchtime to those learners who want it.</p>
Fish	<p>A portion of fish must be provided at least once each week</p> <p>At least one portion of fish provided every four weeks must be oily fish</p>

	<p>All fish provided must be sustainably sourced.</p> <p>Fish combined with at least one other ingredient to form a fish product must contain at least 50% fish</p>
Red meat	<p>A portion of red meat must be provided at least once a week</p> <p>Red meat must not be provided more than twice a week.</p>
Processed meat and products containing meat	A portion of processed meat or a product containing meat must not be provided more than once each week
Processed alternatives to meat and fish	A processed alternative to meat and fish must not be provided more than twice a week.
Cheese-based main courses	A school lunch where cheese is the main source of protein must not be provided more than twice each week.
Potato and potato products	A portion of potato or potato products cooked in fat or oil must not be provided more than twice each week , and where provided no more than one portion may be deep-fried.
Deep-fried or flash-fried or where coating contains oil	A deep fried or flash fried food or where coating contains oil must not be provided more than once each week.
Pastry and pastry products	Pastry or products containing pastry (whether sweet or savoury) must not be provided more than once a week.
Sweetened baked products and desserts	Sweetened baked products and desserts (other than milk-based desserts) must not be provided more than three times a week.
Fruit and Vegetables in desserts	All desserts must contain or be accompanied by a dessert portion of fruit and/or vegetables
Condiments and salt	No salt is to be added to food, or to be made available to pupils to add to food, after the cooking process is complete.

	The portion of any condiment made available to pupils must not exceed 10ml.
Confectionery	Confectionery and food containing confectionery must not be provided
Savoury snacks	Savoury snacks must not be provided

Breakfast in Maintained primary schools

3.1 Only food and drinks from the following food and drink categories can be provided during breakfast on each school day, other than plain water which can also be provided.

3.2 Each registered pupil attending the breakfast session must be given the option to choose one item from each of the food and drink categories.

3.3 By 'infants' we mean registered pupils in Nursery to Year 2 and by 'juniors' we mean registered pupils in Year 3 to Year 6.

Food and drink categories	Suggested items (where 'must' is used, this is a mandatory requirement)	Recommended portion sizes
Milk and plain plant-based drinks	Milk must be plain semi-skimmed, skimmed or 1% fat milk (or whole or semi-skimmed milk in nursery)	At least 125ml for juniors and infants
Cereals	Whole-wheat cereals Bran flakes Porridge Cornflakes Rice-based cereals Cereals provided must not be coated or flavoured with sugar, chocolate or cocoa powder.	At least 20g for one whole-wheat cereal biscuit At least 30g for all other cereals
Fruit and vegetables	Fresh fruit (whole or cut into pieces) Vegetable sticks Canned fruit in natural fruit juice Dried fruit to add to cereals.	Fruit – At least 60g for juniors and at least 40g for infants Vegetables - At least 60g for juniors and at least 40g for infants Dried fruit – At least 20g for juniors, at least 15g for infants
Bread and toppings	All bread provided must be at least 50% wholemeal* Unsaturated spreads, including vegetable, olive, rapeseed and sunflower varieties. *relates to the percentage of wholegrain flour within the bread (as a percentage of total flour).	At least 1 slice for juniors and infants

Nursery pupils

3.4 Milk served to pupils in a nursery school or a nursery class must not be skimmed or 1% fat milk.

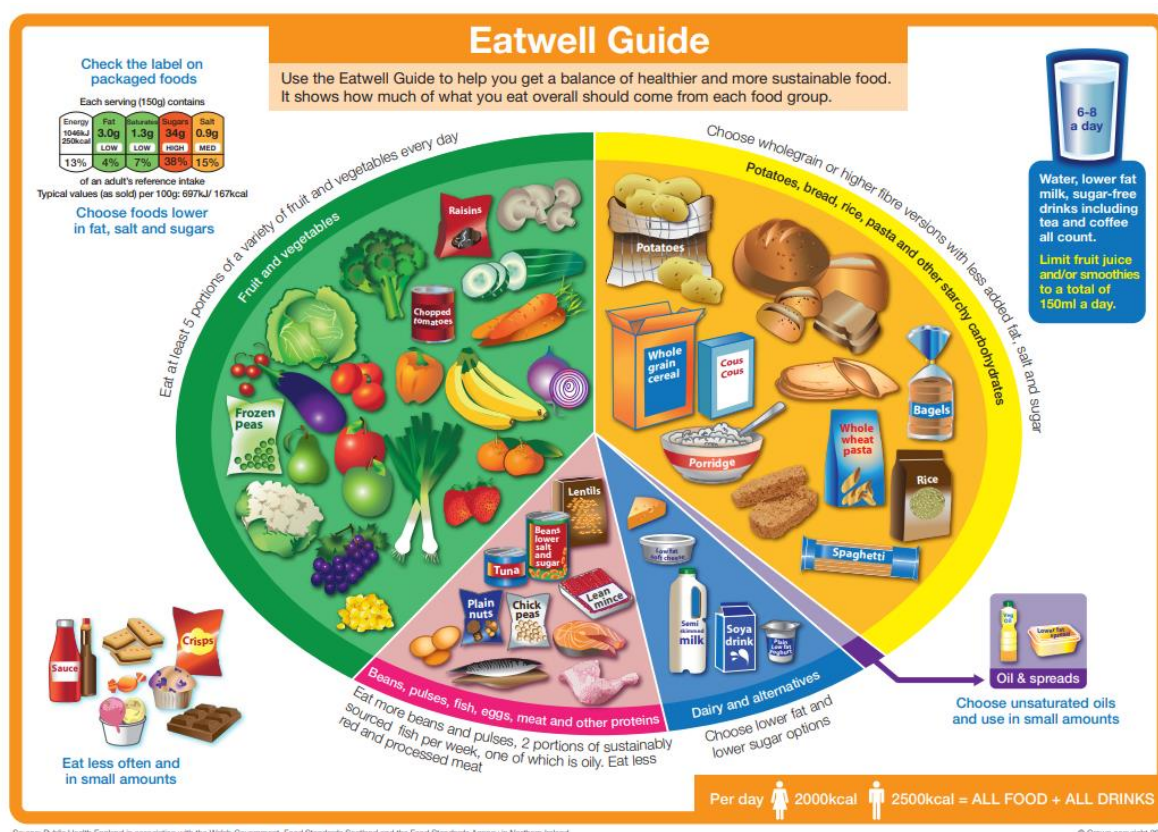
Primary schools

- 3.5 In addition to the breakfast requirements under the draft Healthy Eating Regulations, any maintained primary school providing free breakfast to pupils is also required to have regard to the statutory guidance for *Free breakfast in primary schools* (FBIPS).

Lunch in Maintained Primary Schools (applicable to nursery pupils where lunch is provided)

4.1 The draft Healthy Eating Regulations and draft guidance have been informed by the Eatwell Guide - the guide is a policy tool used to show UK government advice on eating healthily and achieving a balanced diet.

4.2 The proposed food and drink requirements for primary school lunches within the draft Regulations and in this draft guidance have been organised under the sections of the Eatwell Guide (see below) and are in line with UK healthy eating advice.



4.3 For each section below, the Eatwell guide advice is included, followed by the requirements in the draft Healthy Eating Regulations.

4.4 'Requirements' in this section of the draft guidance are the requirements set out in Schedule 2 to the draft Healthy Eating Regulations relating to food which must and must not be provided as part of school lunches in maintained primary schools. The requirements must be complied with.

4.5 The requirements relate to ‘provision’. **This means the offer of food and drink, at the point of ordering or service, that pupils *could* take up.** ³

4.6 Food and drink that is to be promoted as part of a healthy balanced diet must be provided. For example, ‘**at least 2** portions of vegetables must be provided each day’. This means that **at least 2** portions of vegetables must be actively offered to pupils for them to take up as part of their school lunch each day.

4.7 Food and drink that is to be limited based on healthy eating guidance is described as food that “must not be provided more than X times a week”. For example, ‘**no more than 1** portion of deep-fried or flash-fried foods must be provided each week’. This means that **no more than 1** portion of deep-fried or flash-fried foods can be offered to pupils for them to take up as part of their school lunch each week. Alternative deep-fried or flash fried foods (such as a non-meat alternative) can be offered at the same time, on the same day because pupils can only take up 1 of these options.

4.8 Food and drink that is to be prohibited based on healthy eating guidance is described as food that ‘Must not be provided’ For example, ‘Confectionery **must not be provided.**’

Portion sizes

4.9 There are two portion sizes set out within this Guidance – juniors and infants. By ‘juniors’ we mean registered pupils in Year 3 to Year 6 and by ‘infants’ we mean registered pupils in Nursery (maintained settings) to Year 2.

4.10 The portion sizes throughout the Guidance are the **cooked weight**, unless stated otherwise. Where there are requirements to encourage certain food categories, there is a minimum weight specified - where food categories are restricted, there is a maximum weight. Where food is not restricted, a weight range is provided as a guide. The minimum and maximum portion sizes should be adhered to unless there is a clear justification why they cannot or should not be adhered to.

4.11 **Pupils should be encouraged to take up all elements of the school lunch provided to them, particularly the promoted food and drink.** This will provide a tasty, balanced meal in line with the nutritional standards for an average school lunch.

4.12 It is recommended that taster portions are offered to introduce pupils to dishes they may not have tried before.

³ Please note however that Fruit and/or Vegetables within or with desserts must be served.

Eatwell Guide	Fruit and vegetables
	Eat at least 5 portions of a variety of these each day. These are a good source of vitamins, minerals and fibre.
Subsection	Vegetables
Requirements	<p>At least 2 portions of vegetables must be provided each day.</p> <p>At least 6 varieties of vegetables must be provided each week.</p> <p>Vegetables includes salad but excludes potatoes</p> <p>Different vegetables provided as a single portion count as one vegetable.</p>
Interpretation	<p>Can be fresh, frozen, canned or vacuum-packed.</p> <p>Includes beans and pulses which count towards 1 portion and should be encouraged throughout the menu – please see Annex for more information.</p> <p>Mixed vegetables and mixed salad count as 1 portion and as 1 variety</p> <p>Portions can be provided separately and/or within a recipe</p> <p>Excludes potatoes and tinned pasta in tomato sauce.</p>
Recommendations	<p>Baked beans in tomato sauce should be reduced sugar and salt varieties and should not be provided more than 3 days per week.</p> <p>If a portion of vegetables is within a recipe, at least 1 portion of vegetables should also be provided separately each day.</p> <p>Provide a variety of seasonal vegetables.</p> <p>Display vegetables prominently and attractively to encourage take-up.</p>
Portion sizes	<p>At least 60g for juniors</p> <p>At least 40g for infants</p>

Subsection	Fruit
Requirements	<p>At least 1 portion of fruit must be provided each day.</p> <p>At least 4 different fruit must be provided each week.</p>

	Different fruits provided as a single portion count as one fruit
Interpretation	<p>Can be dried, fresh, frozen or, canned (in fruit juice only)</p> <p>Portions can be provided separately and/or within a recipe.</p> <p>Fruit salad and fruit cocktail will count as 1 portion and as 1 variety .</p>
Recommendations	<p>Should not contain added sugar. For example, canned in syrup.</p> <p>Provide a variety of seasonal fruit.</p> <p>Display prominently and attractively to encourage take-up.</p>
Portion sizes	<p>At least 60g (fruit) or at least 15g and no more than 20g (dried fruit) for juniors.</p> <p>At least 40g (fruit) or at least 15g and no more than 20g (dried fruit) for infants.</p>

Eatwell Guide	Potatoes, bread, rice, pasta and other starchy carbohydrates
	<p>Meals should be based around starchy carbohydrates.</p> <p>Choose wholegrain or higher fibre versions with no or lowest added fat, salt and sugar.</p> <p>These are a good source of energy and the main source of a range of nutrients in our diet.</p>
Sub-section	Potatoes, rice, pasta and other starchy carbs
Requirements	<p>A portion of starchy carbohydrates must be provided at least three times each week.</p> <p>At least one portion of starchy carbohydrates provided each week must be pasta, noodles or rice containing at least 50% wholegrain.</p>
Interpretation	<p>The minimum wholegrain requirement for rice relates to the percentage of wholegrain rice within portions (as a percentage of total rice).</p> <p>The minimum wholegrain requirement for pasta and noodles relates to the percentage of wholegrain flour within products (as a percentage of total flour) or the percentage of wholegrain</p>

	<p>pasta or wholegrain noodles within portions (as a percentage of total pasta or noodles).</p> <p>See below for separate requirements for potatoes cooked in fats or oils.</p>
Recommendations	<p>Work with suppliers and manufacturers to develop other bread-based products (for example, pizza, naan and garlic bread) that are at least 50% wholegrain, in relation to their percentage of wholegrain flour (as a percentage of total flour.)</p> <p>Gradually increase the wholegrain percentage from 50% to 100%, being mindful of consumption and waste.</p> <p>If potatoes or potato products cooked in fat or oil have been provided, offer an alternative from this category</p> <p>Where possible, leave the skin on potatoes to maximise consumption of fibre.</p>
Portion Size	<p>Baked potatoes At least 150g juniors, At least 100g infants</p> <p>Mashed and boiled potatoes At least 160g juniors, At least 105g infants</p> <p>Rice At least 115g cooked (approx. 45g dried) juniors, At least 75g cooked (approx.30g dried) infants</p> <p>Pasta At least 115g cooked (approx. 55g dried) juniors, At least 75g cooked (approx. 35g dried) infants</p> <p>Noodles At least 115g cooked (approx. 55g dried) juniors, At least 75g cooked (approx. 30g dried) infants</p> <p>Cous-cous At least 100g cooked (approx. 50g dried) juniors, At least 65g cooked (approx. 33g dried) infants</p>
Sub-section	Bread
Requirements	<p>All bread (except garlic bread, naan bread, pizza bases, tea cakes and crumpets) provided must be at least 50% wholegrain</p> <p>Supplementary bread (with no added fat or oil) must be available every day at lunchtime to those pupils who want it.</p>

Interpretation	<p>The minimum wholegrain requirement for bread relates to the percentage of wholegrain flour within the bread (as a percentage of total flour).</p> <p>Includes bread within sandwich-type foods where ingredients are placed between or wrapped in bread. Examples include, but are not limited to, sandwiches, baguettes and wraps.</p> <p>Supplementary bread is bread that does not form part of a sandwich or a set meal. This is provided in addition to the food and drink that is included within the nutritional analysis of an average primary school lunch. It is intended for pupils who are still hungry after taking up and consuming the school lunch provided to them. Supplementary bread must not be included within nutritional analysis calculations.</p>
Recommendations	<p>Work with suppliers and manufacturers to develop other bread-based products (for example, pizza, naan and garlic bread) that are at least 50% wholegrain, in relation to their percentage of wholegrain flour (as a percentage of total flour.)</p> <p>Gradually increase the wholegrain percentage from 50% to 100%, being mindful of consumption and waste.</p>
Portion sizes	<p>Supplementary Bread No more than 2 slices of medium bread for juniors and no more than 1 slice of medium bread for infants.</p> <p>We encourage caterers to use their discretion for pupils who may require additional portions.</p> <p>Bread as a portion of starchy carbohydrates 50g – 70g for juniors and infants Bread as a portion of secondary starchy carbohydrate (e.g naan/garlic bread) 25g – 30g for juniors and infants</p> <p>Pizza At least 55g but no more than 95g (per slice including the topping)</p>

Eatwell Guide	<p>Beans, pulses, fish, eggs, meat and other protein foods Eat more beans and pulses.</p> <p>Eat 2 portions of sustainably sourced fish per week, one of which should be oily.</p>
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	<p>Eat less red and processed meat.</p> <p>These foods are good sources of protein, vitamins and minerals.</p>
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Subsection	Fish
Requirements	<p>A portion of fish must be provided at least once each week</p> <p>At least one portion of fish provided every four weeks must be oily fish</p> <p>All fish provided must be sustainably sourced.</p> <p>Fish combined with at least one other ingredient to form a fish product must contain at least 50% fish</p>
Interpretation	<p>Can be fresh, frozen or canned.</p> <p>Fish are a good source of vitamins and minerals, however, oily fish is particularly high in omega-3 fatty acids. Examples of oily fish include, but are not limited to, salmon, mackerel, sardines and pilchards. Tuna is not classed as an oily fish.</p> <p>Fish products fortified with omega-3 fatty acids do not count towards the oily fish requirement.</p>
Recommendations	<p>Canned fish should not be in brine or oil.</p> <p>Using oily fish fillets (fresh, frozen or canned) provides significantly more omega-3 fatty acids than coated oily fish products</p>
Portion sizes	<p>Fish and Oily Fish = At least 50g for juniors and infants.</p> <p>Fish combined with at least one other ingredient to form a fish product = At least 25g fish for juniors and infants.</p>

Subsection	Red meat
Requirements	<p>A portion of red meat must be provided at least once a week</p> <p>Red meat must not be provided more than twice a week.</p>
Interpretation	<p>Red meat includes beef, lamb, mutton, pork, veal, venison and goat meat, and may be minced or frozen. This does not include offal or processed meat.</p> <p>Includes red meat preparations, which are red meat with the addition of ingredients of egg, beans, pulses, vegetables, breadcrumbs, flour, seasoning (including small amounts of</p>

	<p>salt) and spices – please see Annex for further information. Such red meat preparations are not considered processed meat (see below sub-section) regardless of whether they are prepared from scratch by catering services or manufactured.</p> <p>This does not include white meat. ‘Meat’ is defined in the Annex</p>
Recommendations	<p>Replace some of the red meat in recipes by adding beans, pulses or more vegetables. This will also increase fibre and reduce the saturated fat content of meals.</p> <p>Use leaner cuts of meat, trim off visible fat, skim off excess fat during cooking and use mince with a lower fat content</p>
Portion sizes	No more than 55g for juniors and infants.

Subsection	Processed meat and products containing meat
Requirements	A portion of either processed meat or a product containing meat must not be provided more than once each week
Interpretation	<p>Processed meat means meat, offal and meat by-products such as blood, that has been preserved through salting, curing, smoking or adding preservative⁴ including sausages, bacon, ham, gammon and pepperoni.</p> <p>Product containing meat means a food that contains one of the following as an ingredient whether or not the food also contains any other ingredient—</p> <ul style="list-style-type: none"> mechanically separated meat; the heart, the tongue, the muscles of the head (other than masseters), the carpus, the tarsus, or the tail of any mammalian or bird species recognised as fit for human consumption. <p>This requirement does not apply to ham provided as part of a school lunch on a school trip, and in calculating the number of times processed meat or products containing meat are provided each week, ham provided on a school trip must not form part of the calculation.</p>
Recommendations	Gradually reduce the provision from one portion each week to none each week.

⁴ Further policy work being undertaken to clarify where possible how to identify a product that has been preserved

Portion sizes	No more than 55g for juniors and infants.
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Subsection	Processed alternatives to meat and fish
Requirements	A processed alternative to meat and fish must not be provided more than twice a week.
Interpretation	<p>Industrially produced products that mimic meat or fish products. These generally include ingredients you would not find at home. Examples include, but are not limited to, mycoprotein fillets, fishless fingers and plant-based sausages.</p> <p>Excludes soya mince. Baked beans, hummus and nuts are not included as these do not come within this description..</p>
Recommendations	Gradually reducing the offer from two portions per week to one/none per week.
Portion sizes	No more than 55g for juniors and infants

Eatwell Guide	Dairy and alternatives
	<p>These are an important source of calcium and a good source of protein and some vitamins.</p> <p>Choose lower fat, sugar and/or salt options.</p>

Subsection	Cheese-based main courses
Requirements	A school lunch where cheese is the main source of protein must not be provided more than twice each week.
Interpretation	<p>Cheese-based main courses that contain more cheese than other protein foods (e.g beans, pulses, egg) per portion. If a portion of baked beans is provided as one of the vegetable choices on a day, the main course will not be counted as a cheese-based main course because there will be more baked beans than cheese.</p> <p>Depending on the above caveat, examples include, but are not limited to cheese and tomato pizza, macaroni cheese, cauliflower and broccoli bake, cheese and leek pasta bake, cheese and potato pie.</p> <p>Does not apply to a school lunch provided on a school trip where cheese in a cheese sandwich is the main source of protein.</p>
Recommendations	<p>Instead of cheese-based meals, utilise beans, pulses and eggs as these are a good source of protein and fibre and are low in fat.</p> <p>Choose lower fat cheese</p>
Portion sizes	At least 25g but no more than 30g for juniors and infants

Eatwell Guide	Oils and spreads
	Choose unsaturated oils and spreads, and eat in small amounts.
Interpretation	Includes vegetable, olive, rapeseed and sunflower oils and spreads.
Recommendations	Be sure to keep fats and oils to small amounts in your diet and add small amounts during cooking. All types of fat are high in energy and should be eaten in small amounts.

Eatwell Guide	Other foods high in fat, salt and sugars⁵
	If consuming foods and drinks high in fat, salt or sugars have these less often and in small amounts. These foods are not needed in our diet.
Note	Recipes and products developed for primary schools are not usually high in fat, salt or sugar, but are restricted to convey consistent healthy eating messages.

Subsection	Potato or potato products cooked in fat or oil
Requirements	A portion of potato or potato products cooked in fat or oil must not be provided more than twice each week , and where provided no more than one portion may be deep-fried .
Interpretation	Any potato or potato products cooked in fat or oil. This includes fat or oil added to potatoes before or during the cooking process and fat or oil in the coating of potato products. Examples include, but are not limited to, chipped potatoes, potato shapes, hashbrowns, roast potatoes, diced potatoes and potato wedges.
Recommendations	Check product specifications to identify if the potato product has been coated in or cooked in fat or oil during the manufacturing process. Take steps to remove deep fat fryers altogether. Provide an alternative starchy carbohydrate, not cooked in fat or oil, to pupils.
Portion sizes	Potatoes cooked in fat or oil (other than roast potatoes) = No more than 85g for juniors and no more than 60g for infants

	Roast potatoes cooked in fat or oil = No more than 115g for juniors and no more than 75g for infants
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Subsection	Deep-fried or flash fried food or where coating or breadcrumb contains oil
Requirements	A deep fried or flash fried food or where coating or breadcrumb contains oil must not be provided more than once each week.
Interpretation	<p>Alternative deep-fried or flash-fried foods can be offered at the same time, on the same day, because pupils can only take up 1 of these options.</p> <p>Deep-fried means to cook by immersing in a deep utensil of fat or oil. Flash-fried means to cook quickly in hot fat or oil. They apply to manufactured or prepared-from-scratch foods.</p> <p>Includes foods that have been coated or breaded with the addition of oil during the manufacturing process. Such foods may be baked rather than deep-fried or flash-fried.</p> <p>Does not include potato and potato products</p>
Recommendations	<p>Take steps to remove deep fat fryers altogether.</p> <p>Check with suppliers or manufacturers whether products have been deep-fried or flash-fried.</p> <p>Check product specifications to identify if the food has been coated or breaded with the addition of oil.</p>
Portion sizes	The food items that would be included within this section have been attributed portion sizes under other food categories

Subsection	Pastry and pastry products
Requirements	Pastry or products containing pastry (whether sweet or savoury) must not be provided more than once a week.
Interpretation	Alternative pastry and pastry products can be offered at the same time, on the same day, because pupils can only take up 1 of these options. This means you cannot serve a sweet and savoury pastry product on the same day.
Recommendations	When making pastry from scratch, the flour should be at least 50% wholegrain. Work with suppliers and manufacturers to develop pastry products where the flour is at least 50% wholegrain.
Portion sizes	No more than 40g of pastry for juniors and no more than 25g of pastry for infants

Subsection	Sweetened baked products and desserts
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Requirements	Sweetened baked products and desserts must not be provided more than three times a week. This restriction does not apply to milk-based desserts.
Interpretation	<p>Sweetened baked products and desserts contain ingredients which are a source of saturated fat and free sugars that have been added to make them sweeter. Such an ingredient includes but is not limited to, sugar, fruit juice, honey syrup and artificial sweeteners.⁶</p> <p>Includes sweet (but not savoury) pastry and products containing pastry.</p> <p>Examples include, but are not limited to, jelly, ice cream, whips, cakes and biscuits.</p> <p>Excludes milk-based desserts, such as yoghurt, custard and rice pudding. Pre bought frozen yoghurt is however high in sugar so consider restricting this in the same way as other sweetened baked products and desserts.</p> <p>A list of sweetened baked goods and desserts can be found in the Annex.</p>
Recommendations	<p>When making sweetened baked products and desserts from scratch, the flour should be at least 50% wholegrain.</p> <p>Work with suppliers and manufacturers to develop sweetened baked products and desserts where the flour is at least 50% wholegrain.</p> <p>Whilst artificial sweeteners are considered safe for consumption, ensure that sugary products are not simply replaced with artificially sweetened products that continue to teach pupil's palates to expect sweet tasting food and drink</p> <p>Gradually phase out the frequency of sweetened baked products and desserts to support children in making healthier choices. It is important that children are taught to see this type of product as one that should be enjoyed occasionally as part of a balanced diet rather than something to be consumed every day.</p>
Portion sizes	<p>Biscuits* No more than 30g for juniors and infants</p> <p>Cakes* No more than 40g for juniors and infants</p>

⁶ [Approved additives and E numbers | Food Standards Agency](#)

	<p>Flapjack* No more than 40g for juniors and infants</p> <p>Sponge Pudding* No more than 40g for juniors and infants</p> <p>Yoghurt At least 80g but no more than 120g for juniors and infants</p> <p>Rice Pudding At least 100g but no more than 120g for juniors and infants</p> <p>Custard At least 60g but no more than 80g for juniors and infants</p> <p>Ice cream and frozen yoghurt 80ml pot portion for juniors and infants</p> <p><u>* exclude any additional fruit/veg/seeds and the weight is for mixes</u></p>
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Subsection	Fruit and/or vegetables with desserts
Requirements	<p>All sweetened baked products and desserts (including milk-based desserts) and cheese (with or without crackers) provided at the end of a school lunch, must contain or be accompanied by a dessert portion of fruit or vegetables</p> <p>A dessert portion of fruit or vegetables is at least 40g (juniors) or 20g (infants) of fruit and/or vegetables</p> <p>At least 15g for juniors and at least 10g for infants of dried fruit</p>
Interpretation	<p>This means that the fruit or vegetables must be provided on the plate.</p> <p>This includes fruit and/or vegetables incorporated into desserts (for example, apple in crumble) or provided as an accompaniment to desserts (for example, sliced fruit.)</p> <p>A combination of fruit and/or vegetables can be provided (for example, beetroot and orange brownie.)</p>
Recommendations	Provide a variety of seasonal fruit

Subsection	Salt and condiments
Requirements	No salt is to be added to food, or to be made available to pupils to add to food, after the cooking process is complete.

	The portion of any condiment made available to pupils must not exceed 10ml.
Interpretation	<p>Salt used in the cooking process must be included in nutritional analysis of an average school lunch.</p> <p>All condiments offered as part of the school lunch must be included in the nutritional analysis.</p>
Recommendations	Don't add salt during the cooking process and if added, must be included in the nutritional analysis of an average school lunch.

Subsection	Confectionery
Requirements	Confectionery and food containing confectionery must not be provided
Interpretation	<p>No confectionery is permitted.</p> <p>Confectionery means the following –</p> <ul style="list-style-type: none"> (a) chewing gum including sugar free chewing gum; (b) cereal bars (whether chewy or crunchy); (a) processed or extruded fruit bars; (b) other non-chocolate confectionery (whether or not containing sugar) including mints; (c) frostings or icings or decorative toppings made from icing sugar; (d) chocolate in any form (e) any product containing chocolate or wholly or partially coated with chocolate; (f) any chocolate flavoured substance (except cocoa powder used in sweetened baked products and desserts (which includes, milk-based desserts and sweet pastry and pastry products)

Subsection	Savoury snacks
Requirements	Savoury snacks must not be provided
Interpretation	<p>Savoury snacks means pre-packaged items (excluding confectionery, sandwiches, biscuits other than as referred to below and cakes) which are ready to eat without further preparation, and</p> <p>consist of or include as a basic ingredient—</p> <ul style="list-style-type: none"> potato or root vegetables (such as crisps); cereals (such as corn puffs or corn snacks); tortilla chips;

	pretzels; popcorn (whether plain, sweetened or salted); prawn crackers; rice cakes (whether plain or flavoured); Bombay mix; flavoured savoury biscuits or crackers; legumes with added salt, sugar or fat (such as chickpea puffs)
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Drinks in maintained primary schools

Eatwell Guide	Drinks Drink 6 to 8 cups or glasses of fluid each day. Water and lower fat milk
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Requirements	Only plain water, plain milk and plain plant-based drinks must be provided
Subsection	Plain water
Interpretation	Still or carbonated Does not contain artificial or natural sweeteners, sugars, honey, colouring or flavouring Pupils in all maintained schools must have easy access at all times to free, fresh drinking water; especially during breakfast sessions and lunchtimes.
Recommendations	Signpost water stations in the dining room and throughout the school. Provide younger children with a cup or glass of water or let them carry water bottles. Where water bottles are used, schools should adhere to the cleaning

	<p>advice provided within the Welsh Government's Think Water guidance.</p> <p>Make sure the supervisors direct children to available water sources at lunchtime.</p> <p>If water can be chilled then it is more appealing but this is not a requirement.</p> <p>Provide jugs of freshly poured tap water together with cups/glasses on tables and at the serving counter.</p>
Subsection	Plain milk
Interpretation	<p>No added substances</p> <p>Nursery children must have semi-skimmed or whole milk</p> <p>For all other pupils, must be semi-skimmed, 1% fat or skimmed milk</p>
Recommendations	<p>Maintained primary schools should take advantage of the free and subsidised milk scheme.</p> <p>Where possible choose lower fat milk as it contains the same amount of calcium, protein and riboflavin as full fat equivalents</p>
Subsection	Plain Plant-based drinks
Interpretation	Means plain soya, oat or other plant-based drinks (but not including plain rice

	drinks), which are unsweetened and fortified with calcium
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The essential need is to provide fresh, readily available drinking water in all maintained schools

Special diets

5.1 A special diet refers to special food requirements provided outside of the standard school menu. A special diet could be requested due to an individual’s healthcare need, such as a metabolic condition, food allergy, intolerance or due to an individual having additional dining needs, such as a texture modified diet. It may also refer to food provided due to cultural or religious reasons.

Duty to make reasonable adjustments under the Equality Act 2010

5.2 There may be specific instances where the individual needs of pupils on roll at a school restrict them from accessing the standard school food offer because of a disability. For example, an impairment such as autism spectrum disorder may require a texture modified diet.

5.3 Under the Equality Act 2010, local authorities and governing bodies are under a duty to make reasonable adjustments for disabled pupils to ensure they are not put at a substantial disadvantage in relation to accessing meals where appropriate.

5.4 Whether this duty to make reasonable adjustments applies will depend on whether the pupil has a disability within the meaning of the Act.⁷

5.5 Local authorities and governing bodies should work with the pupil, their family and any relevant health professionals involved with the care of the learner, to consider the necessary support and to determine the exact nature of any reasonable adjustment in relation to the school food provision.

Duty not to discriminate

5.6 The duty to make a reasonable adjustment only applies to pupils who are considered to have a disability under the Equality Act 2010. More broadly, schools have a duty not to

⁷ A person (P) has a disability if—
(a) P has a physical or mental impairment, and
(b) the impairment has a substantial and long-term adverse effect on P's ability to carry out normal day-to-day activities.

discriminate, either directly or indirectly⁸, against those with a protected characteristic, which could be because of a religion or belief.⁹

5.7 Local authorities and governing bodies should work with the pupil and their family to develop inclusive menus and consider any further support or adjustments in relation to the school food provision.

Making alternative arrangements for pupils with dietary needs

5.8 The duty to make a reasonable adjustment under the Equality Act 2010 only applies to pupils who are considered to have a disability under the Act. More broadly, [Section 175 of the Education Act 2002](#) places a duty on local authorities and governing bodies of maintained schools to make arrangements for ensuring that their functions are exercised with a view to safeguarding and promoting the welfare of children in school or another place of learning. This includes supporting children with healthcare needs, which could be food-related e.g. diabetes, coeliac disease, allergies and intolerances.

5.9 [The Supporting Learners with Healthcare Needs Guidance](#) is issued under Section 175 to assist schools to consider how they can support learners with healthcare needs.

5.10 In making any changes to the standard school food offer, local authorities and governing bodies should consider any risks associated with adjusting the offer so as to ensure learner safety. This may involve the need for them to seek the advice of registered health professionals where appropriate.

5.11 [The draft Healthy Eating Regulations](#) must still be complied with where any alterations are made to the school food offer, whether due to a reasonable adjustment, as not to discriminate or due to a healthcare need, unless food and drink is provided as part of any 'Medically Prescribed Dietary Requirements'.

Medically Prescribed Dietary Requirement

5.12 The draft Healthy Eating Regulations do not apply to food and drink provided as part of any 'Medically Prescribed Dietary Requirements' (MPRD). This means dietary requirements prescribed for a pupil by a registered medical practitioner or a registered dietitian¹⁰. A medical practitioner or dietitian may for example prescribe dietary

⁸ Indirect discrimination applies when a provision, criterion or practice is applied equally to all but has the effect of putting people with a particular characteristic at a disadvantage when compared to people without that characteristic. It is a defence against a claim of indirect discrimination if it can be shown to be a proportionate means of achieving a legitimate aim.

⁹ (1) Religion means any religion and a reference to religion includes a reference to a lack of religion.

(2) Belief means any religious or philosophical belief and a reference to belief includes a reference to a lack of belief.

¹⁰ A dietitian who is registered in Part 4 of the Register maintained under [article 5](#) of the [Health Professions Order 2001](#)

requirements for a pupil where there is a need to follow a particular diet due to a medical condition. This could be a need to eat certain foods or to avoid certain foods.

5.13 However, it is recommended that where there are MPDR, local authorities and governing bodies providing food and drink should continue to encourage and promote healthier options in keeping with the requirements and standards under the Regulations and as part of a whole-school ethos towards healthy eating. Therefore, such food and drink can still be subject to restrictions at the discretion of the meal provider.

Portion sizes

The following portion sizes are cooked weights (unless specified otherwise).

Food	Primary portion
Vegetables	
Cooked* *Includes baked beans, pulses and cooked vegetables	Juniors = minimum of 60g Infants = minimum of 40g
Raw* *Includes salad, coleslaw and uncooked veg	Juniors = minimum of 60g Infants = minimum of 40g
Fruit	
Fruit	Juniors = minimum of 60g Infants = minimum of 40g
Dried fruit	Juniors = minimum of 15g and maximum of 20g Infants = minimum of 15g and maximum of 20g
Fruit/Vegetables in /with desserts	
Fruit and vegetables within a sweetened baked product or dessert or as an accompaniment	Juniors = minimum of 40g, or at least 15g of dried fruit Infants = minimum of 20g or at least 10g of dried fruit
Potatoes, bread, rice, pasta and other starchy carbohydrates	
Mashed and boiled potato	<u>Mash</u> Juniors = minimum of 160g cooked Infants = minimum of 105g cooked <u>Boiled</u> Juniors = minimum of 160g cooked Infants = minimum of 105g cooked
Baked potato	Junior – minimum of 150g Infants minimum of 100g
Rice	Juniors = minimum of 115g (cooked) (approx. 45g dried) Infants = min 75g (approx. 30g dried)
Pasta	Juniors= Minimum of 115g

	(cooked) (approx. 55g dried) Infants = min 75g approx. 35g dried
Noodles	Juniors = minimum of 115g (cooked) (approx. 55g dried) Infants = minimum of 75g
Cous-cous	Juniors – min 100g cooked (approx. 50g dried) Infants – min 65g cooked (33g dried)
Bread* *offered as part of a meal	Juniors = 25g – 35g suggested Infants = 25g – 35g suggested
Bread* *Main component of a meal	Juniors = 50g – 70g suggested Infants = 50g – 70g suggested
Supplementary bread	No more than 2 slices of medium bread for juniors No more than 1 slice of medium bread for infants
Jacket potato	see potato section
Pizza	Juniors = at least 55g but no more than 95g (slice composite base and cheese topping) Infants = at least 55g but no more than 95g (slice composite base and cheese topping)
Beans, pulses, fish, eggs, meat and other proteins	
Fish and oily fish portions	Juniors = Minimum of 50g cooked portion Infants = Minimum of 50g cooked portion
Fish and oily fish products	Juniors = Minimum of 50g cooked portion, of which minimum 50% fish content (at least 25g of fish) Infants = Minimum of 50g cooked portion, of which minimum 50% fish content (at least 25g of fish)
Red meat	Red meat Juniors = no more than 55g cooked Infants = no more than 55g cooked
Poultry	Juniors = 40g – 60g suggested Infants = 40g – 60g suggested
Processed meat products	Juniors = no more than 55g cooked Infants = no more than 55g cooked
Processed alternatives to meat and fish	Juniors = no more than 55g cooked Infants = no more than 55g cooked

Cheese within a cheese-based dish	Juniors = At least 25g but no more than 30g Infants = At least 25g but no more than 30g
Cheese (with crackers)	Juniors = 15g – 25g suggested Infants = 15g – 25g suggested
Potato and potato products cooked in fat or oil	
Potato products cooked in fat or oil (potato shapes, hashbrowns, chips, diced and wedges)	Juniors = no more than 85g cooked Infants = no more than 60g cooked
Roast potatoes cooked in fat or oil	Juniors = no more than 115g cooked Infants = no more than 75g cooked
All other potatoes	
Pastry & Pastry Products	
Pastry	Juniors = no more than 40g of pastry Infants = no more than 25g of pastry
Sweetened Baked Products and Desserts	
Homemade and commercially produced baked goods e.g. biscuits, cookies, cakes, brownies, flapjack	Biscuits = no more than 30g Cake (brownies/sponges/Welsh cakes/muffins/cupcakes = no more than 40g Flapjack = no more than 40g All the above are for the mixes – these figures exclude any additional fruit and veg and seeds
Sweetened desserts such as sponge puddings, cheesecakes, crumbles, tarts, jelly	Sponge pudding = no more than 40g for the constituent ingredients (excluding fruit, veg and seeds)
Frozen desserts such as ice cream	Juniors = 80ml pot Infants = 80ml pot
Milk-based desserts	
Yoghurts	Juniors = At least 80g but no more than 120g Infants = At least 80g but no more than 120g
Rice Pudding	Juniors = At least 100g but no more than 120g Infants = At least 100g but no more than 120g













Custard	Juniors = At least 60g but no more than 80g Infants = At least 60g but no more than 80g
Condiments	
Condiments: tomato ketchup, brown sauce, salad cream, mayonnaise, French dressing, tartare sauce, mustard, pickles and relishes	Infants = no more than 10ml Juniors = no more than 10ml

Requirements for food provided otherwise than as part of a school breakfast or a school lunch

6.1 Younger children need healthy snacks between meals that are the appropriate portion size for their age, to meet their nutritional requirement. Snacks to avoid include sugary snacks, savoury pre-packed snacks, nuts and popcorn, tree nuts and peanuts.¹¹


















6.2 Breaktime snack provision for primary pupils other than nursery pupils should consist of fruit and vegetables only. Fruit and/or vegetables must be available in any place on school premises where food is provided.

6.3 The following table outlines food between meals that is recommended during different parts of the day, and food that is prohibited.

<u>Product</u>	<u>Nursery snack provision</u>	<u>Other Primary pupils breaktime provision</u>	<u>After school provision</u>
Recommended provision			
Vegetables			
Fruit			
Protein items such as hummus, tuna and chicken			
Bread based products (at least 50% wholemeal bread, English muffins, crumpets, bagels breadsticks)			

¹¹ [Food and nutrition for childcare settings: standards, guidelines and menu planning](#)

Plain cream crackers, water biscuits and oatcakes			
Small sandwiches/wraps/baguettes with a variety of non-mayonnaise based fillings including salad			
Milk-based desserts			
Dairy products such as yoghurts and cheese			
Foods prohibited			
Red Meat			
Processed meat			
Processed alternatives to meat and fish			

Potato and Potato Products cooked in fat or oil			
Deep-fried or flash-fried foods			
Pastry and pastry products			
Sweetened baked products and desserts (other than milk-based desserts)			
Salt			
Confectionery			
Savoury snacks			

Vending

6.4 Food selected for selling in vending machines must follow the requirements for food provision served outside of breakfast and/or lunch time under the draft Healthy Eating Regulations. Further, where vending is used to provide food at lunchtime, the food available must be nutritionally analysed along with the rest of the lunch provision.

Nutrient standards

7.1 The nutrient standards in the draft Healthy Eating Regulations for an average school lunch are based on the most up-to-date scientific research and dietary guidelines, reflecting the energy and nutrient needs of Primary school aged children¹².

Average School Lunch

7.2 The nutritional standards for an average school lunch are designed to provide a maximum 30 per cent of a child's daily needs for macronutrients (energy, carbohydrates, protein, fat, saturated fat, free sugar and fibre) and a minimum 35 per cent of their daily needs for key micronutrients (iron, calcium, folate, zinc, vitamin A and vitamin C). Sodium is an exception, with a maximum allowance set at 30 per cent of the daily limit.

7.3 These guidelines are based on the assumption that children eat three meals a day, with lunch making up around one-third of their daily intake.

7.4 The energy and nutrients in an average school lunch will be analysed per menu cycle (1-4 weeks) rather than weekly. The energy in an average school lunch will also be analysed on a daily basis. An average school lunch must provide:

- The amount of energy shown in the table below, within a 15 per cent daily tolerance and 5 per cent tolerance per menu cycle.
- No more than the maximum amount shown in the table for fat, saturated fat, free sugars and sodium.
- At least the minimum amount shown in the table for carbohydrate, fibre, protein, iron, zinc, calcium, vitamin A, vitamin C, and folate.

7.5 The nutrient standards are split into two different age groups:

- Juniors (Year 3 to Year 6) based upon the average needs of 7-10 year olds.
- Infants (Nursery to Year 2) based on the average needs of 4-6 year olds. See table below:

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- ¹² **COMA Dietary Reference Values for Food Energy and Nutrients for the United Kingdom;**
 - **SACN Dietary Reference Values for Energy;**
 - **SACN Carbohydrates and Health;**
 - **SACN Iron and Health;**
 - **SACN Salt and Health; and**
 - **SACN Saturated Fats and Health**

Table of energy and nutrient standards for 7 – 10 year olds and 4 – 6 year olds.

Nutrient	Percentage of daily requirement*	7-10	4-6	Minimum or Maximum
Energy (Kcal)	30%	528 (permitted range on a daily basis 449-607 and over a menu cycle 502-554)	429 (permitted range on a daily basis 365-493 and over a menu cycle 408-450)	(15% daily tolerance, 5 % tolerance over a menu cycle)
Fat (g)	30%	20.5	16.8	Max
Saturated fat (g)	30%	6.5	5.3	Max
Carbohydrates (g)	30%	70.4	57.3	Min
Free Sugars (g)	30%	7	5.7	Max
AOAC Fibre (g)	30%	6	5.3	Min
Protein (g)	30%	8.5	5.91	Min
Iron (mg)	35%	3	2.1	Min
Zinc (mg)	35%	2.5	2.3	Min
Calcium (mg)	35%	193	157.5	Min
Vitamin A (µg)	35%	175	140	Min
Vitamin C (mg)	35%	10.5	10.5	Min
Folate (µg)	35%	53	35	Min
Sodium (mg)	30%	499	360	Max

Kcal – kilocalories; g = grams; mg = milligrams; µg = micrograms

Calculating the average school lunch

7.6 Schedule 5 contains formulas to calculate the amount of energy in an average school lunch provided to infant pupils and junior pupils on a daily basis and formulas to calculate the amount of energy and nutrients in an average school lunch provided to infant pupils and junior pupils over a menu cycle.

7.7 The “provision” of food and drink consists of a selection of mains, sides/accompaniments, desserts and drinks. Learners are encouraged to take up each element to create a complete meal for their school lunch and all elements are to be included in the nutritional analysis calculation other than any supplementary bread provided. The energy and nutrients provided in school lunches that are the same as less than 1% of all school lunches are also excluded from the calculations required by Schedule 5.

7.8 Food and drinks provided as part of lunchtime provision must be nutritionally analysed using the appropriate methods (i.e. primary or secondary analysis) set out in the nutritional analysis guide. The Nutritional Analysis Guide provides details on how to nutritionally analyse school lunches to ensure compliance with the nutrient standards for an average school lunch.

Macronutrients

Energy

7.9 An average school lunch must provide 30 per cent of the total daily energy requirement for Primary school age children, within a 15 per cent daily tolerance and a 5 per cent tolerance over one full menu cycle (1-4 weeks):

Nutrient	Percentage of daily requirement	7-10	4-6	Minimum or Maximum
Energy (Kcal)	30%	528 (permitted range on a daily basis 449-607 and over a menu cycle 502-554)	429 (permitted range on a daily basis 365-493 and over a menu cycle 408-450)	15% daily tolerance, 5 % menu cycle tolerance

Why is the energy standard important?

- Energy fuels children's bodies to function well each day.
- Children need the right amount of energy from a variety of nutritious foods each day to grow, be active and maintain a healthy weight.
- Energy helps children to stay alert, engaged and ready to learn, supporting them to thrive throughout the school day.
- Consuming too much energy can lead to weight gain over time, increasing the risk of ill health both now and in the future.

This standard ensures school lunches provide the right amount of energy to support healthy growth and development, helping children feel their best at school every day.

Sources of energy

Energy from food comes from carbohydrate, fat and protein:

- At least 50 per cent of total daily dietary energy should come from carbohydrate, with no more than 5 per cent of this from free sugars.
- Fat should provide no more than 30 per cent, including a maximum of 10 per cent from saturated fat.
- The rest comes from protein.

Protein

7.10 An average school lunch must contain no less than 30 per cent of the total daily protein requirement:

Nutrient	Percentage of daily requirement	7-10	4-6	Minimum or Maximum
Protein (g)	30%	8.5	5.91	Min

Why is the protein standard important?

- Protein is a source of energy and is essential for children's growth and repair, helping to build muscle and strength.
- It also supports other key functions, such as supporting immune health and maintaining bone health.
- Pupils are growing quickly, so getting enough protein is especially important for them.

This standard helps ensure school lunches include a variety of protein sources that support children's satiety, growth, development and long-term health – making every meal a valuable part of their overall wellbeing.

Sources of protein include:

Bean, pulses, lentils, fish, eggs, tofu, soya, *nuts, seeds, poultry and other meat.

**Be aware of nut allergies.*

Practical advice

- Bean and pulses are versatile low fat, high fibre protein sources. Including more beans and pulses in school meals can help children feel fuller for longer and supports their long-term health.
- For meat dishes, using lean cuts, trimming visible fat and removing skin before cooking are simple ways to offer healthier meat options.
- Do not rely on cheese as the only vegetarian protein alternative, a wide variety of non-animal protein rich foods must be available for all pupils.
- Including a range of non-meat sources of protein including beans, pulses and lentils, tofu, soya products, eggs, milk, dairy products will ensure pupils are eating protein from a variety of sources.

Vegan diet excludes all meat, fish and animal products, including eggs, dairy and honey. For vegan or lactose intolerant pupils, ensure soya or oat drinks are provided as an alternative to milk.

Fat

7.11 An average school lunch must contain no more than 30 per cent of the total daily requirement for fat:

Nutrient	Percentage of daily requirement	7-10	4-6	Minimum or Maximum
Fat (g)	30%	20.5	16.8	Max
Saturated fat (g)	30%	6.5	5.3	Max

Why is the fat standard important?

- Fat is an essential part of a healthy, balanced diet in small amounts. It provides energy, supports brain and nervous system health (e.g., Omega-3 fatty acids), and helps absorb important vitamins (A, D, E, K).
- Consuming too much fat over time can impact children's health, contributing to weight gain and increasing the risk of conditions like type-2 diabetes, some cancers, high cholesterol and heart disease.
- However, reducing the amount of saturated fat and replacing it with small amounts of unsaturated fat can support both immediate and long-term health and wellbeing.

This standard ensures school lunches provide the right amount and type of fat to support children's immediate and long-term health and wellbeing, while still delivering meals that are tasty and balanced.

Sources of fat include:

- **Saturated fat:** mainly found in animal products such as fat in meat and meat products, butter, cheese, and cream. Vegetable fats high in saturated fat include cocoa butter, palm and coconut oil. Chips, pasties, deep fried foods, pastries, dressings such as mayonnaise, cakes, biscuits, puddings are often high in saturated fat.
- **Unsaturated fat:** usually found in plant foods such as vegetable oils and spreads, e.g. olive, rapeseed and sunflower oil. Also nuts and seeds.
- **Omega 3 fatty acids:** the best sources are oily fish e.g. sardines, salmon, mackerel. Other sources include walnuts, flax and linseeds and green leafy vegetables.

Practical advice

- Use small amounts of unsaturated oils and spreads—like rapeseed or olive oil—as the healthier choice for cooking.
- Swap saturated fats for smaller amounts of unsaturated fats whenever possible.
- Choose lean cuts of meat, trim visible fat and remove skin before cooking.
- Opt for healthier cooking methods such as steaming, boiling, baking, or grilling instead of frying.
- Remove excess fat during cooking (e.g. by skimming it off sauces or stews).
- Avoid adding butter to food (e.g. vegetables) after cooking.
- Use reduced-fat dairy foods and lean meat options when possible, such as skimmed or semi-skimmed milk, low fat yoghurt and reduced fat cheese.
- Skip spread or mayonnaise in sandwiches if the filling is already moist.
- If using a fat spread, choose a reduced-fat version and use it sparingly.
- When buying pre-prepared products, check nutrition labels—choose options with lower fat. According to the Government's Front of Pack Nutrition labelling scheme:
 - Over 17.5g of fat per 100g is high, 3g or less is low.
 - Over 5g of saturated fat per 100g is high, 1.5g or less is low.

(Note: these are adult guidelines—children should consume even less.)

- Speak to suppliers about the fat content in the products they provide.

Carbohydrate

7.12 There are two types of carbohydrate – starches and sugars. Starchy carbohydrates should provide the main source of energy in the diet and form the main component of a meal. Gram for gram carbohydrate contains less than half the calories of fat. The fats added during cooking and serving with these foods is what increases the calorie content.

7.13 An average school lunch must contain no less than 30 per cent of the total daily requirement for carbohydrate:

Nutrient	Percentage of daily requirement	7-10	4-6	Minimum or Maximum
Carbohydrates (g)	30%	70.4	57.3	Min

Starchy carbohydrates

Why is the carbohydrate standard important?

- Carbohydrates are a central part of a healthy balanced diet and our main energy source.
- Foods that contain carbohydrate provide energy, vitamins, minerals and fibre which support health.
- Wholegrain starchy carbohydrates are healthier options:
 - They digest slowly and are high in fibre, providing lasting energy and keeping children fuller for longer, whilst supporting their digestive health.
 - Rich in vitamins and minerals wholegrains also offer more nutritional benefits than refined carbohydrates.
 - Including them regularly in meals can reduce the risk of conditions like heart disease, certain cancers, type 2 diabetes, and supports a healthy weight — making them a great choice for school menus.

This standard ensures school lunches provide the right amount and type of carbohydrates to support children's long-term health, while keeping them feeling full, satisfied and energised - helping them to thrive every day.

Sources of starchy carbohydrates include:

Cereals (wheat oats, barley, millet, rye), bread of all types, potatoes, yam, cassava, cous cous, rice, noodles and pasta.

Practical advice

- Swap refined cereal foods like white bread, rice and pasta for wholegrain options such as wholemeal bread, brown rice and whole wheat pasta.
- Introduce wholegrains gradually if needed, starting with a 50:50 mix of white and wholegrain, then slowly increasing the amount of wholegrain portion over time.

Free Sugars

7.14 An average school lunch must contain no more than 5 per cent total daily dietary energy of free sugars:

Nutrient	Percentage of daily requirement	7-10	4-6	Minimum or Maximum
Free Sugars (g)	30%	7	5.7	Max

Why is the free sugars standard important?

- Free sugars are sugars added to foods in any form (like biscuits, chocolate, and cake) or naturally found in honey, syrups, fruit juices/ smoothies and similar products where the structure of the fruit or vegetable has completely broken down.
- These foods often have little nutritional value, but consuming too much free sugar over time is linked to weight gain, poor dental health and increased risk of health issues such as heart disease and type-2 diabetes, making it important to limit their presence in school meals.

This standard ensures school lunches align with recommendations to reduce free sugar intake, supporting children with tasty, satisfying healthier choices as part of a balanced diet whilst normalising desserts as an occasional rather than everyday item.

Sources of free sugars include:

- Table sugar
- Syrups, honey, jam
- Confectionery, biscuits, chocolate, cake, pastries, sweets, ice cream
- Sweetened yoghurt and milks
- Fruit and vegetables that are blended, pureed, pastes, or juiced
- Sugar sweetened beverages
- Some other common terms used to label sugar are glucose; fructose; beet sugar; cane sugar; dextrose; and syrup.

The natural sugars found in milk and in whole fruits and vegetables are not free sugars and do not need to be restricted in the same way.

Practical advice

- Whole fruit (and vegetables) contain fibre, vitamins, minerals, making them a healthy alternative to foods high in free sugars.
- Serve fruit-based or dairy-based desserts that provide added nutritional value rather than cakes and biscuits.
- When choosing prepared products, check the label and choose products lower in sugar. According to the Government Front of Pack nutrition labelling scheme:
 - more than 22.5g of sugar per 100g is 'high'
 - 5g or less sugar per 100g is 'low'.

(Note: these are adult guidelines—children should consume even less.)

- Speak to suppliers about the free sugar content in the products they provide.

Fibre

7.15 An average school lunch must contain no less than 30 per cent of the total recommended dietary intake of fibre:

Nutrient	Percentage of daily requirement	7-10	4-6	Minimum or Maximum
AOAC Fibre (g)	30%	6	5.3	Min

Why is the fibre standard important?

- Fibre is essential for maintaining healthy digestion and supporting gut function.
- A high-fibre diet also lowers long term risk of chronic conditions like cardiovascular disease, type 2 diabetes, and bowel cancer - making it an integral part of every school meal to support children's health and wellbeing.

This standard supports children to increase their daily fibre intake, which many find challenging, ensuring they stay full and satisfied at school whilst supporting their long-term health and wellbeing.

Sources of fibre include:

- Wholegrains; brown rice, oats, wholegrain cereals, wholemeal pasta, wholemeal bread.
- Potatoes with the skin on.
- Whole fruit and vegetables with skin on.
- Beans, pulses, lentils.

Practical advice

- **Add** extra vegetables and pulses throughout the menu, such as lentils, into sauces for bolognese, curry and chilli.
- **Swap** white carbohydrates to wholegrain options or start with introducing 50/50 options to help you transition.
- **Leave** the skin on vegetables and fruit when possible.
- Speak to suppliers about the fibre content in the products they provide.

Sodium (Salt)

7.16 An average school lunch must contain no more than 30 per cent of the total recommended dietary intake of salt:

Nutrient	Percentage of daily requirement	7-10	4-6	Minimum or Maximum
Sodium (mg)	30%	499	360	Max

Sodium is a component of salt. To convert sodium into grams (g) of salt you need to multiply the sodium value by 2.5.

Why is the sodium standard important?

- The cells in our body need a small amount of salt to function properly.

- However, too much salt in children's diets can lead to issues like water retention, raised blood pressure and increased risk of heart disease, kidney problems, and stroke later in life.
- Reducing children's intake of salty foods not only supports better health outcomes but can also help them develop a preference for less salty flavours.

This standard helps ensure school lunches stay within safe salt limits, encouraging healthier taste preferences and supporting children's health both now and as they grow.

Sources of sodium include:

Salt is often added during or after cooking, however most of the salt that children eat is already in the food we buy including bread, cheese, soups and sauces, stock and gravy, ready meals, some breakfast cereals, salty snacks (e.g. crisps, salted nuts), sausages and cured meats, condiments.

Practical advice

- Don't add salt during cooking - use herbs, spices, garlic, lemon juice to enhance taste instead.
- When possible, prepare meals from scratch to reduce hidden salt often found in manufactured products.
- When using pre-prepared items, check nutrition labels and choose those lower in salt. According to the Government's Front of Pack labelling scheme:
 - More than 1.5g of salt (0.6g sodium) per 100g is high
 - 0.3g of salt (0.1g sodium) per 100g or less is low

(Note: these are adult guidelines—children should consume even less.)

- Speak to suppliers about the salt content in the products they provide.

Micronutrients

Iron

7.17 An average school lunch must contain no less than 35 per cent of the total recommended dietary intake of iron:

Nutrient	Percentage of daily requirement	7-10	4-6	Minimum or Maximum
Iron (mg)	35%	3	2.1	Min

Why is the iron standard important?

- Iron is essential for growing children, supporting muscle development and helping carry oxygen around the body.
- It also plays a key role in maintaining a healthy immune system.
- During periods of rapid growth—like in childhood—iron needs are higher.
- Without enough iron, children may feel tired and low in energy, making it harder for them to stay focused and thrive at school.

This standard helps ensure school lunches make an important contribution to children's iron intakes as part of a healthy balanced diet, supporting children to feel at their best each day.

Sources of iron include:

- Red meat and offal are rich sources of iron.
- Canned fish
- Eggs
- Plant-based sources of iron include:
 - Pulses and legumes (such as beans, peas, and lentils)
 - Dark green vegetables (such as kale and broccoli)
 - *Nuts and seeds
 - Dried apricots
 - Wholegrains

**be aware of nut allergies*

- Some foods are fortified with iron, such as bread and breakfast cereals.

Practical advice

- Iron from animal sources is more easily absorbed by the body than plant sources but plant sources remain essential, offering important health benefits and contributing significantly to children's overall iron intake.
- Pair plant-based iron sources (like beans, lentils, and wholegrains) with foods rich in vitamin C (such as peppers, citrus fruits, or tomatoes) to help boost absorption.
- Be aware that some foods, like bran-based cereals (high in phytates) and drinks like tea (high in tannins), make it more difficult for the body to absorb iron.
- Ensure vegetarian dishes regularly feature a variety of iron-rich ingredients such as lentils, peas, eggs, dark leafy greens, and whole grains.
- Add iron-rich foods to familiar dishes—for example: lamb casserole, spaghetti bolognese, hummus, shepherd's pie, mixed bean wraps.

Zinc

7.18 An average school lunch must contain no less than 35 per cent of the total recommended dietary intake of zinc:

Nutrient	Percentage of daily requirement	7-10	4-6	Minimum or Maximum
Zinc (mg)	35%	2.5	2.3	Min

Why is the zinc nutritional standard important?

Zinc is essential for children's growth, tissue repair, wound healing, and supporting a healthy immune system.

This standard ensures school lunches make an important contribution to children's zinc intake, supporting children's growth, immune function, and overall health.

Sources of zinc include:

Red meat, offal (especially liver and kidney), eggs, fish, milk and other dairy products, cereals, soya products, red kidney beans, lentils, chickpeas and nuts*.

**Be aware of nut allergies.*

Practical advice

- Regularly include a variety of zinc-rich foods in vegetarian dishes, such as wholegrain cereals, kidney beans, milk, and eggs.

- Add zinc-rich ingredients to popular meals—for example: cottage pie, roast pork or beef, lentil bake, brown rice, vegetarian bolognese with soya mince, and crumble toppings with pumpkin seeds.

Calcium

7.19 An average school lunch must contain no less than 35 per cent of the total recommended dietary intake of calcium:

Nutrient	Percentage of daily requirement	7-10	4-6	Minimum or Maximum
Calcium (mg)	35%	193	157.5	Min

Why is the calcium nutritional standard important?

- Calcium is essential for strong bones, as well as healthy muscle and nerve function, making it especially important for school-aged children who are growing.
- A lack of calcium can lead to stunted growth during childhood and increase the risk of osteoporosis later in life, so it's vital to include calcium-rich foods in school meals to support children's development.

This standard ensures school lunches make an important contribution to children's calcium intake, supporting their growth, bone development and long-term health.

Sources of calcium

- Dairy products such as milk, cheese and yoghurt
- Canned fish with bones (e.g. salmon and pilchards)
- Broccoli and cabbage
- Dried fruits
- Tofu
- Red kidney beans, chickpeas and soya beans.
- White bread is fortified with calcium.
- Fortified plant-based milk drinks

Practical advice

- Low-fat dairy products provide the same amount of calcium as the full-fat versions, making them a healthier choice.
- Ensure plant-based dairy alternatives are fortified with calcium to meet nutritional needs.
- Add calcium-rich foods to meals, such as cheese and potato pie, salmon quiche, salmon fishcakes, red kidney beans and chickpeas into stews, soups, casseroles and curries, and custard made with milk.

Vitamin A

7.20 An average school lunch must contain no less than 35 per cent of the total recommended dietary intake of Vitamin A:

Nutrient	Percentage of daily requirement	7-10	4-6	Minimum or Maximum
Vitamin A (µg)	35%	175	140	Min

Why is the Vitamin A nutritional standard important?

- Vitamin A is essential for healthy vision, especially in dim light, supports the immune system, and plays a key role in maintaining healthy skin and tissue.

This standard ensures school lunches provide a valuable contribution to children's vitamin A intake as part of a healthy, balanced diet supporting their vision, skin health and overall wellbeing.

Sources of Vitamin A include:

- Oily fish, eggs, liver
- Cheese, milk and yoghurt
- Yellow, orange and red coloured fruits and vegetables such as: carrots, peppers, apricots, oranges, papaya, mango, butternut squash, sweet potato and tomatoes.
- Dark green leafy vegetables.

Practical advice

- Incorporate foods high in vitamin A into dishes, e.g. salmon fish cakes, baked sweet potato wedges, red pepper and tomato omelette, carrot and coriander soup and fruit salad.

Vitamin C

7.21 An average school lunch must contain no less than 35 per cent of the total recommended dietary intake of Vitamin C:

Nutrient	Percentage of daily requirement	7-10	4-6	Minimum or Maximum
Vitamin C (mg)	35%	10.5	10.5	Min

Why is the Vitamin C nutritional standard important?

- Vitamin C is essential for wound healing, protects cells and helps maintain healthy blood vessels, skin, bones and cartilage.
- It also acts as an antioxidant, protecting children from infections and disease, and helps the body absorb iron more effectively.
- Not enough vitamin C can lead to health issues such as scurvy.

This standard ensures school lunches provide a valuable contribution to children's vitamin C intake, as part of a healthy balanced diet, supporting their overall health and wellbeing.

Sources of Vitamin C include:

- Fruits – especially citrus fruits (oranges, lemons, limes, grapefruit), berries and kiwi fruits.
- Vegetables – especially broccoli, green and red peppers, potatoes and sweet potatoes.

Practical advice

- Make raw (uncooked) fruit and vegetables available each day as they contain the most vitamin C.
- Prepare and cook food containing vitamin C as close to lunchtime as possible to preserve their nutritional value, as vitamin C is water-soluble and can be lost during cooking.
- Steam vegetables or cook them with minimal water to retain more vitamin C.
- Incorporate foods high in vitamin C into dishes, e.g. jacket potato with salad, fruit salad, mixed vegetable hotpot, casserole and stews.

Folate

7.22 An average school lunch must contain no less than 35 per cent of the total recommended dietary intake of folate:

Nutrient	Percentage of daily requirement	7-10	4-6	Minimum or Maximum
Folate (µg)	35%	53	35	Min

Why is the folate nutritional standard important?

- Folic acid is essential for making red blood cells and supporting growth and healthy cell division. In food, it naturally occurs as 'folate'.
- Folic acid deficiency can lead to tiredness, weakness, loss of appetite, weight loss, and digestive issues.
- Including folate-rich foods in school meals is important to help children stay healthy and energised throughout the day.

This standard ensures school lunches provide a valuable contribution to children's folate intake, as part of a healthy balanced diet, supporting their overall health and wellbeing.

Sources of folate

- Oranges, green leafy vegetables, green beans, beetroot, broccoli, peas
- Wheat bran and other wholegrain foods including brown rice
- Fortified breakfast cereals
- Eggs
- Poultry, pork, shellfish and liver
- Yeast and beef extracts,

Practical advice

As a water-soluble vitamin, folate can be lost during cooking—especially when boiling vegetables. To help preserve it, try steaming or microwaving instead, and avoid overcooking. These small changes can help keep more of the vitamin in the food you serve.

- Prepare and cook food containing folate as close to lunchtime as possible as folate may be lost during the cooking process.
- Steam or cook vegetables with minimal water to preserve folate content.
- Include folate-rich foods in meals, such as leafy greens and lentils in stews, curries, casseroles.

Annex 1 – Definitions

- **Fruit** does not include fruit juice
- **Sustainably sourced fish** includes wild caught fish and fish products certified by the Marine Stewardship Council and farmed fish and fish products certified by the Aquaculture Stewardship Council;
- **Oily fish** includes anchovies, herring, kipper, mackerel, pilchards, salmon, sardines, trout and whitebait
- **Meat** means the skeletal muscles of mammalian and bird species recognised as fit for human consumption with naturally included or adherent tissue but does not include mechanically separated meat.
- **Red meat** is meat of mammalian species (excluding rabbit) including beef, lamb, mutton, pork, veal, venison and goat meat, and that is not processed meat
- **Processed meat** means meat, offal and meat by-products such as blood, that has been preserved through salting, curing, smoking or adding preservative including sausages, bacon, ham, gammon, salami and pate;
- **Product containing meat** means a food that contains one of the following as an ingredient whether or not the food also contains any other ingredient -
 - mechanically separated meat;
 - the heart, the tongue, the muscles of the head (other than masseters), the carpus, the tarsus, or the tail of any mammalian or bird species recognised as fit for human consumption
- **Processed alternatives to meat and fish** means industrially produced processed non-meat and fish food products that attempt to mimic meat or fish products, such as mycoprotein products and plant based sausages and burgers but not including soy mince
- **Starchy carbs** includes bread, potatoes, rice, pasta, noodles and cous-cous
- **Wholegrain** includes wholemeal
- **Sweetened baked products and desserts** includes sweet (but not savoury) pastry and pastry products containing pastry
- **Milk-based desserts** includes yoghurt, custard and rice pudding

- **Plain plant-based drinks** mean plain soya, oat or other plant-based drinks (but not including plain rice drinks), which are unsweetened and fortified with calcium

Annex 2 – Guidelines

- **Beans and pulses** – Beans and pulses are an important, low-fat source of protein and fibre and the inclusion of more beans and pulses can improve satiety. These count towards 1 portion of the vegetable standard but should be promoted in general and used in a range of dishes throughout the school menu. For example, adding to stew, curries, wraps, soups, sides and salads, and using lentils to thicken sauces in dishes such as casseroles.
- **Dried fruit** –Although dried fruit counts as one of your 5 A Day, it is a high, concentrated source, of sugar which can impact dental health. It is therefore recommended to consume as part of meals only and a max portion size has been suggested.
- **Meat with additional ingredients** such as egg, breadcrumbs, flour, seasoning (including small amounts of salt) and spices -These products include: Cooked British Beef Slice 50g Red Tractor (Cooked beef silverside with added water and pea protein); Red Tractor Raw Chicken Breast Fillet Portion (Raw UK Red Tractor certificated chicken breast fillets, portion controlled for consistency with added water for succulence)

Poultry used in composite recipes, may be slightly less than the recommended portion size. If using a meat cut, consider how the portion will look presented on the plate (plate coverage).

Annex 3 - Special diets diagram

