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Consultation – summary of response

The review of the Healthy Eating in Schools Regulations and Statutory Guidance

2 October 2025

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

Overview

This document provides a summary of responses to our consultation on healthy eating in schools, alongside the findings from a series of focus groups. This report was published on 2 October 2025.

Information on next steps has also been provided.

Action required

This document is for information only.

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

The Review of the Healthy Eating in Schools Regulations and Statutory Guidance (2025)

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Additional copies

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: [Healthy eating in schools | GOV.WALES](#)

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Glossary

ADHD

Attention Deficit Hyperactivity Disorder

ALN

Additional Learning Needs

ARFID

Avoidant/Restrictive Food Intake Disorder

COT

The Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment

CYP

Children and Young People

FSM

Free School Meals

Infants

Primary school learners in nursery to Year 2

Juniors

Primary school learners in Year 3 to Year 6

NHS

National Health Service

SACN

The Scientific Advisory Committee on Nutrition

UPFSM

Universal Primary Free School Meals

UPF

Ultra-processed foods

Introduction and background

Context and Rationale for Change

The Welsh Government is committed to improving health outcomes for learners in Wales and eradicating health inequalities for future generations. [Healthy Weight: Healthy Wales](#) sets out the ambition that by 2030 there will be revised school food regulations and improved dining environments, with learners directly involved in decisions about food and drink choices. This commitment is underpinned by the [Healthy Weight: Healthy Wales Delivery Plan 2022–2024](#), which confirmed the intention to review the regulations on school food nutrition and update these in line with the latest nutritional standards and guidelines.

The [Healthy Eating in Schools \(Nutritional Standards and Requirements\) \(Wales\) Regulations 2013](#) and associated [statutory guidance](#), published in 2014, have not been revised for over a decade. Since then, scientific and dietetic evidence has advanced in important ways, and learners' eating habits and school life have also evolved. The COVID-19 pandemic had a lasting impact on children and young people, whose health and wellbeing are still recovering. The rollout of [Universal Primary Free School Meals \(UPFSM\)](#) has further changed the school food landscape, creating both opportunities and challenges for delivery. As such, a comprehensive review of regulations and guidance is deemed both necessary and timely.

The policy intent is to ensure that children and young people have access to nutritionally balanced food and drink at school, and that healthy eating is promoted as a means of supporting healthy development, improving educational attainment, and reducing inequalities across Wales.

Research Questions

In this context, the Consultation on the review of the Healthy Eating in Schools Regulations and Statutory Guidance ran between 20 May and 29 July 2025. It was designed to gather views from a wide range of stakeholders, particularly learners and parents and carers, to help answer key questions about the future of school food policy. The central research questions were:

- Could the food served to learners provide greater nutrition to support learners to improve attainment, reduce obesity and tackle health inequalities?
- Which specific changes, if any, would be most effective in enabling learners and the wider school community to have a better understanding of why a healthy and balanced diet is important to health and well-being?
- Could the food served to learners provide a healthy and balanced school meal, including those with specific dietary requirements?

Evidence for Change

The case for revising the Healthy Eating in Schools (Nutritional Standards and Requirements) (Wales) Regulations 2013 and accompanying statutory guidance was supported by both evidence and stakeholder engagement. Pre-consultation testing of revised menus with local authority catering teams, alongside discussions with governors, local authorities and Estyn, highlighted the need for clearer standards and practical guidance on roles and responsibilities.

The benefits of healthy eating in schools are well documented. Nutritious meals improve physical health, reduce symptoms of anxiety and depression, support social and emotional development, and enhance concentration and attainment. However, the challenges are clear: one in three children starting primary school in Wales is overweight or obese, and projections suggest obesity-related conditions will cost the NHS in Wales £465 million a year by 2050.

While the rollout of Universal Primary Free School Meals has been welcomed as a means of reducing inequalities, the current 2013 standards require updating to reflect the latest scientific and dietetic evidence, changes in children's eating habits, and the lasting effects of the COVID-19 pandemic.

The consultation therefore sought views from a wide range of stakeholders to test proposals that aim to support healthy development, reduce inequalities, and raise awareness of the importance of a balanced diet, while ensuring that all learners can access nutritionally balanced meals at school.

Summary of proposals

The consultation was split into three key areas. Firstly, the Welsh Government was proposing updated food and drink standards for primary schools to improve learner health and wellbeing. These changes included increasing the availability of fruit, vegetables, and wholegrain carbohydrates, removal of fruit juice, and limiting pastry, fried foods, and sweetened desserts. Processed meats and alternatives would be restricted due to their high salt and fat content, while red meat would be safeguarded in moderation for its nutritional value. Portion sizes would also be tailored to age groups to reduce food waste.

Alongside changes to menus, the proposals outlined clearer guidance on promoting healthy eating across schools. This guidance more clearly defines the responsibilities of local authorities and governing bodies, alongside clarifying who is accountable in different school settings, and providing practical examples for implementation. The aim was to support a consistent, whole-school approach to creating healthier food environments and ensure schools can demonstrate compliance with legal requirements.

As part of this consultation, the Welsh Government integrated a call for evidence to better understand current food provision in secondary schools. Unlike primary schools, where most learners eat a plated meal together, secondary learners often choose from a wider range of options, including "grab and go" foods. More evidence is being sought to help shape policies that ensure a nutritionally balanced and appealing food offer that meets the needs and preferences of older learners.

This report presents the findings from all elements of the consultation and engagement process. This includes the 2,570 responses submitted to the consultation, 53 responses from the children and young people consultation questions, 44 Easy Read responses and 59 responses received directly to the Welsh Government through emails and letters. Also summarised is the engagement with parents, carers and young people that took place through a series of focus groups.

Report Structure

This report is structured around the various stages of the stakeholder engagement and consultation analysis process as follows:

- Consultation findings from the main consultation survey, structured by question
- Additional Correspondence – emails and letters
- Consultation findings from all forms of engagement with children and young people
- Easy Read consultation findings
- Focus Group findings from engagement with parents and carers
- Next steps
- The Annex contains the following research materials:
 - Consultation responses by respondent type
 - Methodology
 - Consultation Questions
 - Children and Young People Consultation Questions
 - Easy Read Consultation Questions
 - Focus Group Questions
 - List of organisations that responded
 - Focus Groups delivered

Consultation findings

Question 1 – Please select all that apply to you below.

Question 1 of the consultation invited respondents to indicate all applicable options from a list of 11 choices, as presented in Table 1 below.

These options were not exclusive, and respondents might have inhabited several demographic groups. Table 1 presents the number and percentage of responses received from respondents who self-selected they were part of the different groups. The highest number of responses were received from parents and carers (1,364; 53%), followed by primary school learners (499; 19.4%), secondary school learners (482; 18.7%) and the education workforce (352; 13.7%). Less than 100 responses were received from local authority stakeholders (81; 3.1%), catering providers (74; 2.9%) and healthcare practitioners (53; 2.1%). Less than 50 responses were received from farmers (38; 1.5%), suppliers (14; 0.5%) and local producers (6; 0.2%).

Table 1: Demographic Groups

Stakeholder Group	Number of responses	Percentage
Primary school learner	499	19.4%
Secondary school learner	482	18.7%
Education workforce	352	13.7%
Local authority	81	3.1%
Catering provider	74	2.9%
Healthcare practitioner	53	2.1%
Supplier	14	0.5%
Local producer	6	0.2%
Farmer	38	1.5%
Parent or carer	1364	53.0%
Other (please specify)	130	5.0%

Source: Consultation Responses n=3,093

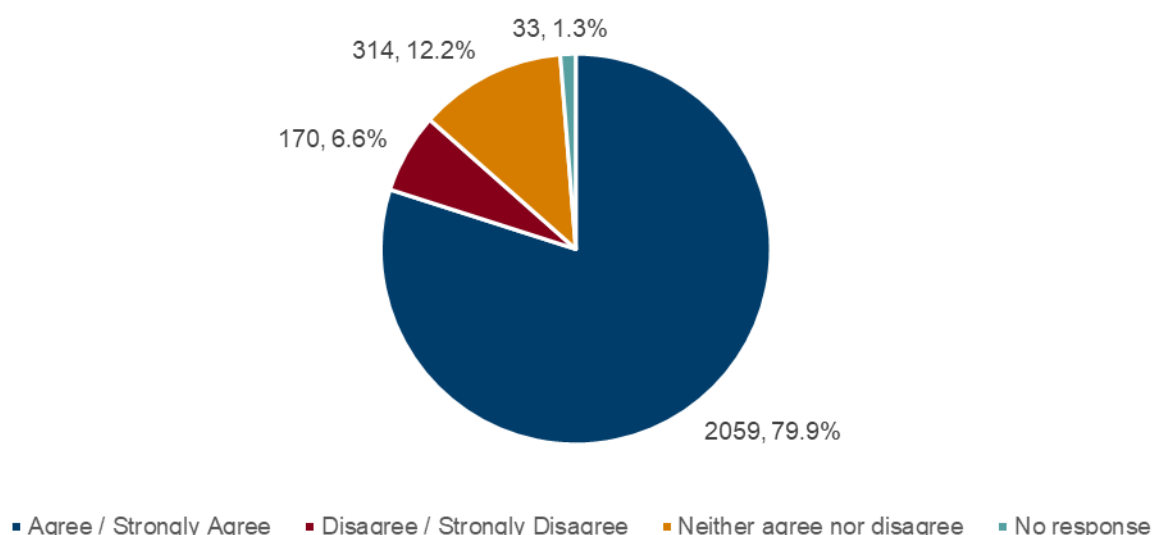
Additional responses were received from stakeholders through the Children and Young People's (CYP) consultation (53), the Easy Read consultation (44), and via direct correspondence to the Welsh Government through emails and letters (59). A total of 2,727 responses were received to this consultation. Direct engagement was also undertaken with learners, parents, and carers through focus groups. These findings are reported separately later in this document.

Question 2: To what extent do you agree or disagree with the proposals that relate to increasing the provision of fruit, vegetables and starchy carbohydrates?

Question 2 asked respondents to what extent they agreed or disagreed with the proposals that relate to increasing the provision of fruit, vegetables and starchy carbohydrates. This includes the requirement for schools to provide at least 2 portions of vegetables daily, at least 6 different vegetable varieties weekly. In addition, the daily one fruit portion requirement continues, with at least 4 different varieties provided weekly. The proposals also sought to include the requirement for a portion of starchy carbohydrates to be provided at least 3 times each week, and at least one portion of pasta, noodles or rice to be provided each week and must contain at least 50% wholegrain. The proposals also stated that bread must be at least 50% wholegrain.

As illustrated by Figure 1 (below), the question received a largely positive response, with 2,059 respondents (79.9%) who agreed or strongly agreed with the proposals. 314 respondents (12.2%) stated they neither agreed nor disagreed, with 170 (6.6%) who disagreed or strongly disagreed. There were 33 individuals (1.3%) who did not provide a response to this question. The stakeholder group most in favour were healthcare providers (90.6%, n=48) and the education workforce (87.8%, n=309), followed by parents and carers (85.9%, n=1,171). In total, 660 respondents provided a supporting comment to this question.

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



Source: Consultation Responses, n=2,543

For conciseness throughout the report, we have not referred to any themes that were referred to by 10 or fewer respondents.

Agree

Several respondents who supported the proposals to increase the provision of fruit, vegetables, and starchy carbohydrates offered additional comments and insights. This included sentiment such as “any increase in the amount of fruit and vegetables is a positive” (30), and generic support for the increased variety offered (33). The importance of these changes was noted by some respondents, as they recognised that some learners may not have access to fresh fruit and vegetables at home (22).

However, others felt that the proposals do not go far enough (33), calling for increasing the minimum number of portions of fruit and veg and offering greater variety on menus. In terms of proposals relating specifically to starchy carbohydrates, respondents were less likely to provide further comment on this, with 17 explicitly expressing their support, most commonly in relation to the provision surrounding 50% wholemeal.

Respondents who agreed identified several benefits that would result from the proposals. Several felt that it would support a nutritious and balanced diet (15) and would lead to healthier learners (26), whilst it was also seen as having the potential to improve their eating habits and choices (25). Others claimed the proposals would help improve the academic performance of learners in the classroom (10).

Neither agree nor disagree

Respondents frequently provided comments not directly related to the proposals surrounding fruit, vegetables and starchy carbohydrates but rather in relation to the provision of food in schools more generally. This included the need to improve the overall quality (26) and variety offered (56). Prioritising and improving the taste and presentation of school food was also emphasised (26), with specific calls for raw, fresh produce, and produce that is not overcooked and ‘mushy’ (12). Prioritising local and seasonal produce (16) was also raised. Finally, the need to increase the amount of protein (10) in school meals was called for, while others emphasised the need to minimise or remove all unprocessed, tinned or frozen produce on the menu (17).

Disagree

Respondents who disagreed with the proposals most commonly cited that learners are fussy eaters (51) and as such they would not end up increasing their uptake of fruit and vegetables. Additional impacts stemming from fussy eaters included an increase in food waste (29) and the fact that learners would end up ‘going hungry’ (31). This was a particular concern as several respondents highlighted that the school lunch would be the main meal of the day for many learners. 28 respondents expressed their opposition to the proposals relating to starchy carbohydrates, often claiming that learners do not like wholemeal bread or pasta.

Some highlighted the need to accommodate neurodivergent learners as part of the proposals (12), citing their sensitivity to any form of change such as the texture or presentation of food. Other respondents went further explicitly stating that the proposals would have a negative impact on neurodivergent learners and those with additional needs (14). These issues are explored in greater detail in later consultation questions.

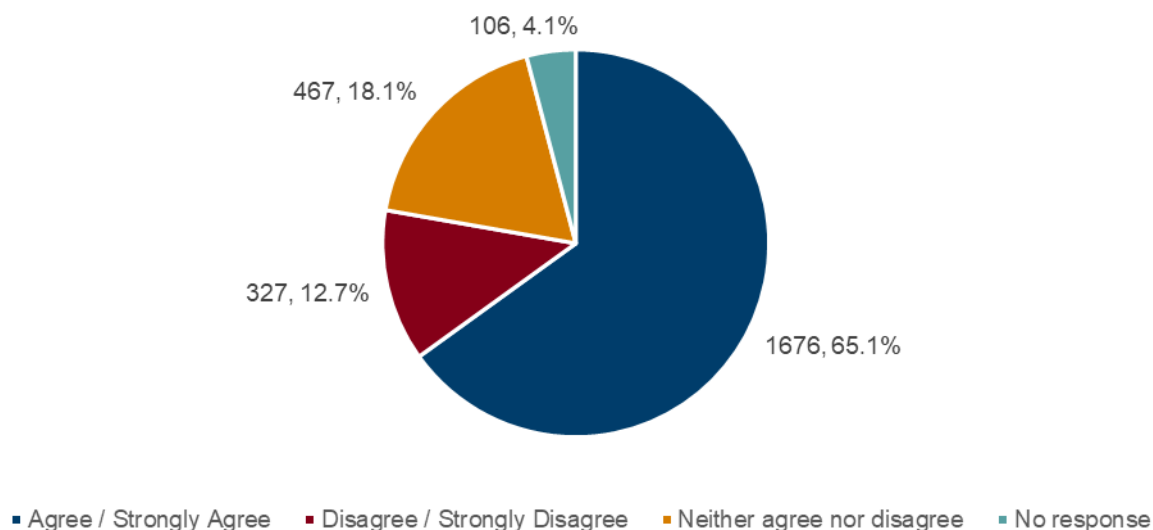
Among those who disagreed or strongly disagreed, only one respondent said the proposals do not go far enough. There were 32 respondents who felt this way who had different overall views: strongly agree (9), agree (20), and neither agree nor disagree (3). They recommended more variety of fruits and vegetables, increasing portions beyond two per day, greater use of pulses and legumes, and offering brown rice, wholewheat pasta and wholegrain bread. One respondent noted: “there are children who have little or no vegetables at home - two portions a day from school is inadequate to ensure health and wellbeing”.

Question 3: To what extent do you agree or disagree with the proposals that relate to meat, red meat and fish?

Question 3 of the consultation asked respondents to what extent they support the proposed changes, which include: providing at least one but no more than two portions of red meat per week; placing no limit on white meat; limiting processed meat to once a week; offering oily fish once every four weeks; and restricting meals where cheese is the main protein source to twice weekly. The rationale for limiting red and processed meats relates to the health risks associated with frequent consumption, whereas no comparable risks have been identified for white meat. The reduced frequency of oily fish is intended to balance nutritional exposure with the practical challenge that such meals often lead to lower uptake and higher levels of food waste.

As illustrated by Figure 2 (below), this question received a largely positive response, with 1,676 (65.1%) of respondents agreeing or strongly agreeing to the proposed changes. 327 (12.7%) of respondents disagreed or strongly disagreed with the proposals and 467 (18.1%) neither agreed nor disagreed. There were 106 individuals (4.1%) who did not provide a response to this question. The largest stakeholder group in favour of the proposals were healthcare practitioners (77.4%, n=44), the education workforce (69.9%, n=246) followed by parents and carers (66.4%, n=906).

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



Source: Consultation Responses, n=2,470

Of the 2,470 respondents who answered this question, 632 provided a supporting statement. Common themes included calls for greater limits on red meat consumption, a preference for locally sourced meat from Welsh suppliers, and suggestions that fish should be served more frequently than once every four weeks.

It should be noted that some respondents who expressed similar views in their written comments selected different response options. For example, 2 individuals

who both felt the proposals did not go far enough chose 'strongly agree' and 'strongly disagree' respectively. In addition, some respondents mistakenly believed that the proposed limitation on oily fish applied to all types of fish, which influenced how they answered.

Agree

A sizeable proportion of responses (93) expressed general support for the proposed changes without specifying particular aspects they liked. Among those who did provide detail, 51 respondents welcomed the reduction in red meat, citing health concerns, including 15 who specifically mentioned cancer. A further 38 respondents supported the decision not to restrict white meat, recognising its importance as a protein source for learners.

Others (23) supported limiting oily fish, largely due to personal dislike of fish and concerns about food waste, rather than health reasons. These views often reflected the belief that learners do not enjoy oily fish and therefore serving it has limited value. In addition, 25 respondents supported the changes on environmental grounds, considering them a positive step towards addressing climate concerns

Neither agree nor disagree

A considerable number of respondents (82) emphasised the importance of locally sourced produce and higher-quality meats, noting that these issues were not sufficiently addressed in the proposals. Many (74) identified the availability of processed meats as a greater concern than the proposed changes to meat, red meat, and fish.

Some respondents (37) shared personal preferences about eating meat and fish, such as whether they liked salmon, which were not directly relevant to the consultation. A smaller group (11) felt the proposals did not go far enough in restricting meat, red meat, and oily fish, while 17 respondents suggested that meat and fish should be removed from menus altogether, advocating a transition to plant-based meals for both health and environmental reasons.

Disagree

Most respondents who provided further comments opposed the proposed changes to meat, red meat, and fish. The strongest objections related to the provision of oily fish (122) and the restrictions on red meat (55), with many (30) arguing that these measures would reduce learner choice and dietary variety.

A notable proportion (55) believed that meat and fish should always be available for learners who wish to eat them. Twenty-four respondents expressed general opposition to the proposals without offering specific reasoning, while 11 raised concerns about their impact on learners with additional learning needs, sensory sensitivities, taste preferences, or complex allergies. Concerns that free school meals have led to reduced portions, inconsistent serving sizes and worsening food quality were raised by 5 respondents.

Of those who disagreed or strongly disagreed, 5 respondents felt the proposals do not go far enough. A further 6 respondents shared this view but either agreed (2) or neither agreed nor disagreed (4) overall. They suggested offering more choice and

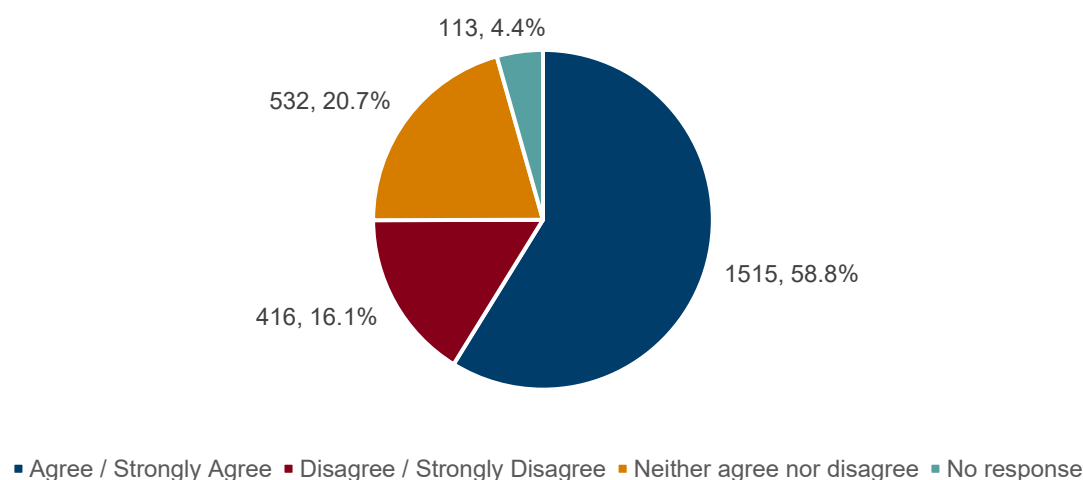
oily fish, while others recommended reducing reliance on meat and fish, removing red meat and providing “meals based with healthier sources of protein such as soya and beans”.

Question 4: To what extent do you agree or disagree with the proposals that relate to processed meat?

Question 4 asked respondents to what extent they agreed with the proposed changes on processed meats. The proposals sought to restrict processed meats or products containing meat to once per week and to reclassify ham, gammon, and bacon as processed meats in line with current UK dietary advice.

Overall, the proposals received majority support, as illustrated by Figure 3 (below), with 1,515 respondents who (58.8%) agreed or strongly agreed, 416 (16.1%) who disagreed or strongly disagreed, and 532 (20.7%) who neither agreed nor disagreed. There were 113 individuals (4.4%) who did not provide a response to this question. The education workforce was the most supportive stakeholder group (74.4%, n=262), followed by healthcare practitioners (73.6%, n=39) and parents and carers (64.7%, n=882).

Figure 3: To what extent do you agree or disagree with the proposals that relate to processed meat?



Source: Consultation Responses, n=2,463

Of the 2,576 who submitted an answer for this question, 551 respondents provided additional information to support their choice. Common themes included concerns about the link between processed meats and cancer, the view that schools should not serve processed meats at all and suggestions for healthier ways of preparing and serving these products.

It should be noted that some respondents who expressed the same opinion in their written comments selected different response options. For example, several respondents stated that processed meats should not be served in schools but chose different positions when answering the question itself.

Agree

The largest group of respondents who provided additional comments (170) viewed the proposed limitations were a positive change. Many respondents (31) highlighted links between processed food and health risks such as cancer, diabetes, and obesity. A further 16 respondents went further, calling for a complete ban on ultra-

processed foods (UPFs), stating that they have no place in schools. Quorn and other meat alternatives were criticised as ultra-processed, unappealing or less healthy than meat by 4 respondents.

Neither agree nor disagree

A total of 144 respondents argued that processed foods should not appear on school menus at all, citing their high sodium and saturated fat content and low overall nutritional value. Thirteen respondents felt that the proposals should restrict processed meats even further, while still allowing some provision. Others (12) said that they needed more information to make an informed decision, for example, whether breaded 100% chicken breast would be classified as processed meat.

Additionally, 23 respondents expressed personal preferences on processed meat that did not provide meaningful insights.

Disagree

Some respondents (22) suggested that processed meats could be served more healthily by using whole cuts, such as 100% chicken breast, and limiting additives. Eleven respondents supported an “everything in moderation” approach, believing it could provide balance for those who enjoy processed meats. Another 21 felt processed meat remains popular with learners and preferred that learners eat something rather than nothing. Ten respondents went further, arguing the proposals would unduly restrict learner choice and therefore should not be introduced.

A number of respondents (21) expressed concern that the proposals could disproportionately disadvantage impact learners with additional learning needs (ALN), preferring instead a more flexible approach with a wider range of options. Finally, 10 respondents suggested the changes may have been motivated by cost-cutting, which they argued would be problematic if true.

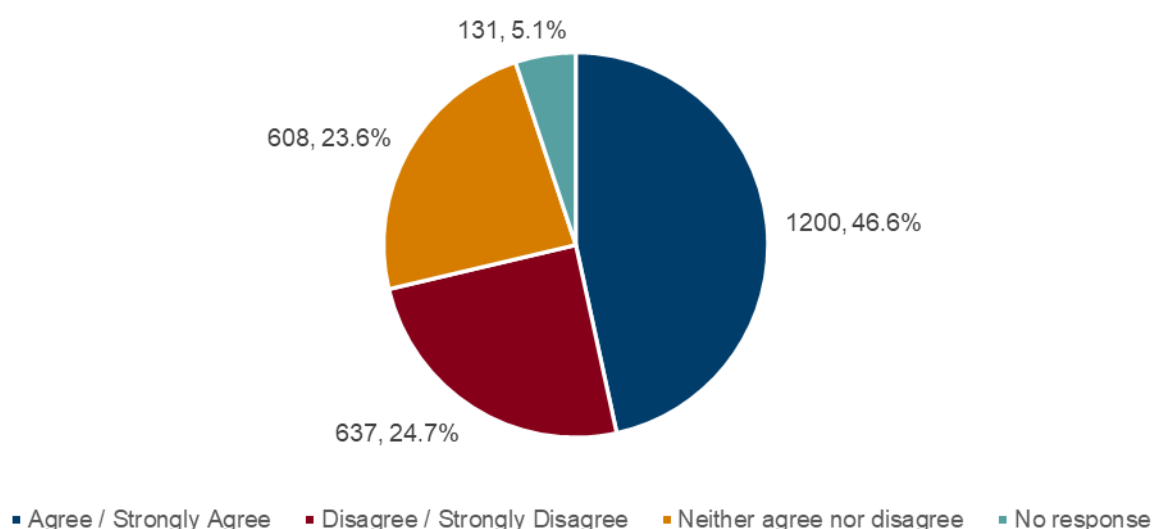
There were 61 respondents who disagreed or strongly disagreed and said processed meat should not be offered at all. A further 83 respondents expressed the same view but selected strongly agree (49), agree (22), neither agree nor disagree (9) or gave no response (3). Separately, 13 respondents suggested that processed meat should be further limited.

Question 5: 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)?

Question 5 asked respondents to what extent they agreed with the proposals to restrict cheese-based dishes to no more than twice a week, and to limit processed meat and fish alternatives to the same frequency. The aim of these proposals was to ensure a varied, healthy and balanced diet for vegetarians and those choosing non-meat dishes, by encouraging greater use of high fibre, low fat protein alternatives such as beans, pulses and eggs.

This question received a mixed response, as illustrated by Figure 4 (below), with 1,200 respondents (46.6%) agreeing or strongly agreeing, whilst 608 (23.6%) neither agreed nor disagreed and 637 (24.7%) disagreed or strongly disagreed. There were 131 individuals (5.1%) who did not provide a response to this question. The stakeholder group most supportive of the proposals were healthcare practitioners (64.2%, n=34). Of the primary school learners who responded, 215 (43.3%) were in favour.

Figure 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)?



Source: Consultation Responses, n=2,445

As part of the question, respondents were also given an opportunity to provide a supporting comment. Of the 2,445 who answered, 594 gave further information. The most common themes that emerged were that cheese should still be readily available and that cheese is a good source of calcium and other nutrients. Respondents also highlighted their desire for children to have less processed food. These are explored in further detail below.

Agree

Many respondents (101) who supported the proposals felt that learners should be encouraged to eat less processed food. Several (68) specifically noted that processed meat and fish alternatives, as well as cheese-based dishes, could be replaced with more nutritious non-meat protein sources such as beans and lentils.

Within this group, 50 respondents emphasised the need to reduce processed non-meat alternatives, while 35 highlighted the importance of restricting cheese-based dishes.

Neither agree nor disagree

A number of respondents (134) emphasised the principle of “everything in moderation”, suggesting that cheese-based dishes and processed non-meat alternatives should not necessarily be restricted, provided the overall weekly menu remains balanced. Many respondents felt other priorities were more important, such as offering choice and variety (87), making food appetising for learners (30), using quality ingredients (34) and preparing food from fresh with healthy cooking methods (26). Seventy-two respondents expressed a specific food preference for themselves or their children, while 26 requested further clarity to the proposals, noting that some alternatives, such as tofu and soy mince, are healthy and should not be categorised as processed non-meat alternatives.

Some respondents (23) argued that all learners should be able to choose vegetarian and vegan options, not just learners with dietary requirements. Others used this question to comment more broadly on school food provision: 34 respondents advocated for more plant-based meals, 11 suggested that meat alternatives are preferable to meat, while 29 expressed a desire for meat or fish option to remain consistently available. Additionally, 16 respondents recommended that sustainability and climate impacts should be considered.

Disagree

Respondents who disagreed with the proposals most commonly supported keeping cheese readily available (137), with 119 highlighting its value as a source of calcium and other nutrients. Some (44) felt the proposals would overly restrict vegetarian and vegan options, making it more difficult to cater for dietary requirements (53). Related to this, 43 respondents raised concerns that limiting vegetarian options could disadvantage learners with specific dietary requirements or preferences, stressing that these dishes should be carefully planned. Fifty-two respondents noted that cheese-based or processed alternatives are often “safe foods” for fussy eaters, warning that restrictions could leave some learners hungry (31). Several (23) also pointed out that cheese dishes are a popular choice among learners.

Conversely, a smaller group disagreed because they felt the proposals did not go far enough. Eighteen respondents argued for stronger restrictions, while 52 believed that processed non-meat alternatives should not be served in schools at all.

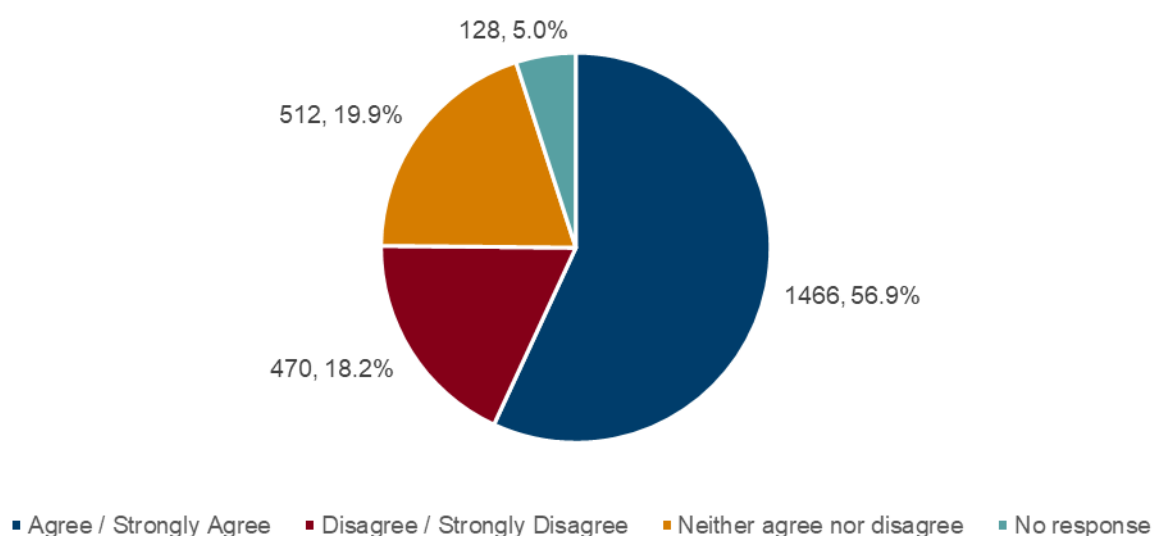
Among those who disagreed or strongly disagreed, 7 respondents made a general comment that the proposals do not go far enough. In total, 18 respondents made this comment. A separate 18 respondents who disagreed or strongly disagreed made a specific comment that processed meat and fish alternatives should not be served at all. In total, 53 respondents raised this point. These respondents suggested further limiting processed foods and cheese, reducing reliance on meat and fish and increasing vegan options and plant-based protein sources such as lentils and beans. One respondent summarised “under this proposal, 4 out of 5 vegetarian options could be cheese-based and processed meat alternatives, which doesn’t provide enough variety and healthy options for pupils. Additionally, there are no guidelines for inclusion of nutrient-rich plant-based foods such as legumes and nuts”.

Question 6: 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?

Question 6 asked respondents to what extent they agreed with the proposals relating to potatoes cooked in oil, fried foods, sweetened baked goods and desserts, and pastry. The proposals state that 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. Additionally, a deep fried or flash fried food or where coating or breadcrumb contains oil must not be provided more than once each week. In relation to pastry, products containing pastry (whether sweet or savoury) must not be provided more than once a week. Finally, sweetened baked products and desserts must not be provided more than three times a week (excluding milk-based desserts) and all sweetened baked products, desserts and cheese provided at the end of a school lunch must contain or be accompanied by a dessert portion of fruit or vegetables.

As illustrated in Figure 5 (below), a majority of respondents (56.9%, n=1,466) agreed or strongly agreed with the proposals, while 512 respondents (19.9%) neither agreed nor disagreed and 470 respondents (18.2%) disagreed or strongly disagreed. There were 128 individuals (5.0%) who did not provide a response to this question. The stakeholder group most in favour were healthcare practitioners (66%, n=35), followed by the education workforce (63.4%, n=223) and local authority stakeholders (61.7%, n=50). Least in favour were secondary school learners (50.2% in favour, n=242) followed by primary school learners (50.7%, n=253).

Figure 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?



Source: Consultation Responses, n=2,448

As part of the question, respondents were also given an opportunity to provide a supporting comment. Of the 2,448 who answered, 603 gave further information. The most common themes which emerged were the need for moderation and overall balance, with many people agreeing to the changes to fried foods in particular.

However, some respondents felt the proposals do not go far enough and could be made healthier. These are explored in further detail below.

Agree

Several respondents (54) felt that desserts should continue to be served, while 47 suggested that the options should be healthier than those currently provided, and 61 expressed explicit support for the dessert-related proposals. Fifty respondents also emphasised the importance of reducing learners' sugar intake.

In relation to fried foods, 77 respondents supported the proposed changes, with 14 noting that many schools already serve these items infrequently. Additionally, 28 respondents highlighted that promoting a healthy diet should go alongside encouraging increased physical activity in schools.

Neither agree nor disagree

The most common theme which emerged was the need for moderation. Respondents suggested that desserts and fried foods can be enjoyed as part of a balanced diet (155). Others felt that the priority should be in ensuring that food is tasty and enjoyable (40), that learners are given variety and options (51), and that the food is good quality and freshly prepared (45). Many respondents (43) commented specifically on the types of oils that should be used and avoided, with respondents suggesting that seed oils should be replaced with olive oil and coconut oil.

Some respondents (43) highlighted their desire for processed and ultra processed foods (UPFs) to be restricted, rather than focusing on restricting specific foods, with one respondent sharing that "of greater importance to me is that the food is not processed". Others (21) felt that there should be a larger focus on food education and supporting learners to make healthier choices. A further 16 respondents suggested that the guidelines should be more detailed, such as whether the restrictions apply to roast potatoes or if there are restrictions on the type of oil used.

Disagree

Those who disagreed with the proposals were either against changes being made or felt the proposals could go further. The former group worried that some learners might not eat the new options (49), particularly the desserts containing or served with a portion of fruit or vegetables, and that could lead to some learners being hungry (36). 30 respondents suggested that fried foods, potatoes cooked in oil and pastry should be readily available. Others (21) felt that because some learners might not have access to desserts and 'sweet treats' at home, it is important for schools to provide one every day to ensure those learners are not missing out. Some respondents (24) also felt as though these changes could have the potential to 'demonise' food groups and create negative relationships with food for learners. A further 11 respondents requested that learners with additional learning needs (ALN) or sensory issues are considered. School meal portions being too small, leaving some children hungry, and calls for larger, more flexible serving sizes were voiced by 8 respondents.

Conversely, 97 respondents felt as though the proposals do not go far enough and instead fried foods and chips should be cut out completely (70) and that dessert

should either not be served at all or should consist of fruit and unsweetened yoghurt only (46).

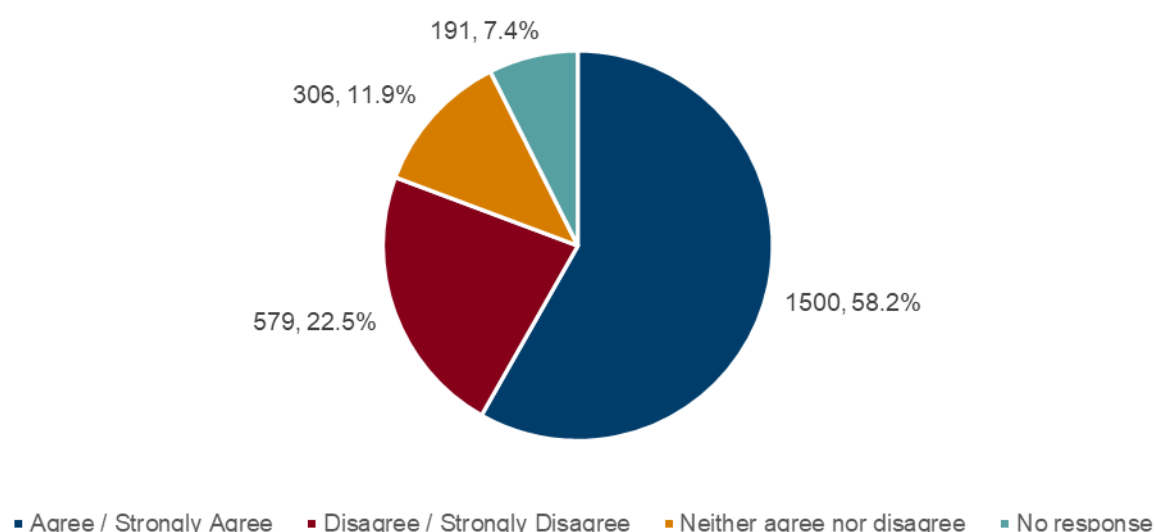
Of the respondents who disagreed or strongly disagreed, 37 commented that the proposals do not go far enough. In total, 98 respondents made this comment. They suggested using only olive oil is used, further limiting these items or removing them entirely. Several respondents felt there was no need to serve these foods in schools and recommended focusing on improving the main course instead.

Question 7: 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?

Question 7 asked about proposed changes to drinks. Under current guidance, a range of drinks, including water, milk, fruit or vegetable juice, plant-based drinks, and combination or blended drinks are permitted. In an effort to reduce learner's sugar intake, the new proposals recommend learners avoid sugary drinks completely, such as fruit juice. The new proposal permits only plain water, plain milk and plain plant-based drinks being provided in primary schools.

As illustrated in Figure 6 (below), this question received a positive response, with 1,500 (58.2%) agreeing or strongly agreeing with the proposals. 306 (11.9%) neither agreed nor disagreed and 579 (22.5%) disagreed or strongly disagreed. There were 191 individuals (7.4%) who did not provide a response to this question. The stakeholder group most in favour were healthcare practitioners (75.5%, n=54). Those least in favour were secondary school learners (45.2% in favour, n=218), farmers (52.6%, n=20) and primary school learners (56.3%, n=281).

Figure 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?



Source: Consultation Responses, n=2,385

As part of the question, respondents were also given an opportunity to provide a supporting comment. Of the 2,385 who answered this question, 658 gave further information. The most common response was supportive of the changes. However, other common themes included the worry that not all children like water and that squash or a sugar free alternative could be provided instead. These are explored in further detail below.

Agree

The most common supporting comment cited support for the changes (174), with 23 respondents specifically stating that fizzy drinks should not be provided and 30

respondents expressing their support for the provision of plain plant-based drinks. Several respondents (35) felt that these changes are in line with dental health recommendations.

Neither agree nor disagree

Some respondents (44) highlighted the need for quality, including high quality milk and cold water to make drinks more appealing to learners. 39 respondents wondered whether the proposals would also apply to drinks brought in from home. Additionally, medical requirements were raised by respondents (44) who both agreed and disagreed with the proposals, with some respondents in favour of proposals for their provision for learners with milk allergies, whilst others felt the proposals do not account for, for example, learners with diabetes and learners with additional learning needs (ALN).

Disagree

Respondents in disagreement with the proposals were concerned that not all learners like water (135) and not all learners drink milk (74), potentially leading to dehydration and in that case, would prefer children to drink something rather than nothing (120). 158 respondents suggested that squash should be available, and 106 respondents suggested a sugar free alternative, such as sugar free squash or flavoured water, could be offered. Some respondents (64) felt that learners should be provided with a larger selection of drinks than the proposals offer. Several respondents (95) felt that fruit juice should be offered to learners, with 79 respondents suggesting that it is acceptable to offer fruit juice or squash in moderation and 30 respondents highlighting that fruit juice contains important nutrients that some learners might not get in their diets if they do not like eating fruit.

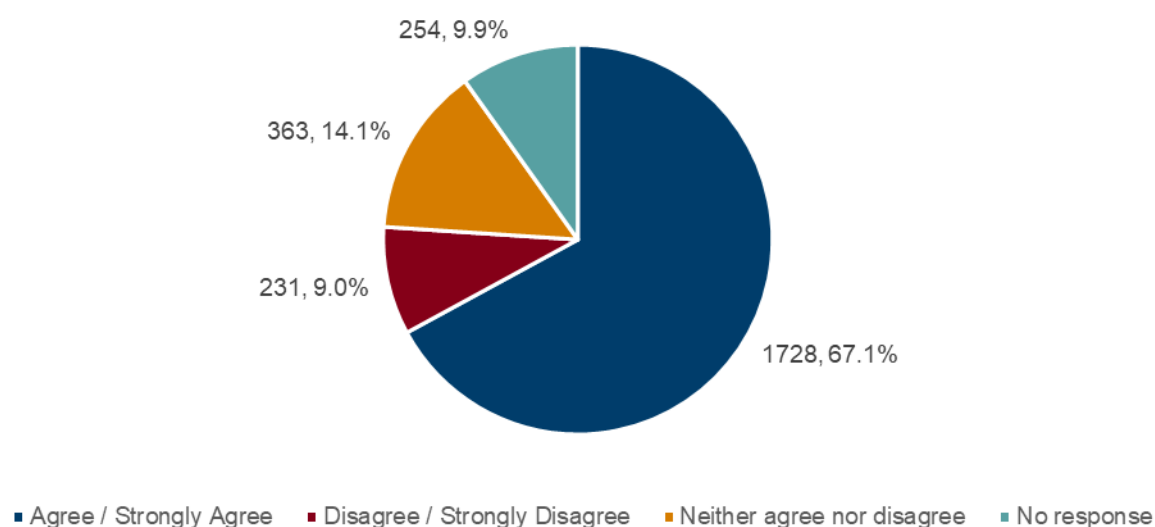
There was some concern (44) about plant-based drinks not having good nutritional value and being overly processed, with requests that these drinks should have no added sugar. Some respondents (29) used this question to express their criticism of plant-based diets, whilst others (15) requested that milk be removed entirely due to environmental and health concerns. 18 respondents expressed their desire for only whole milk to be offered to learners, rather than semi-skimmed or skimmed milk, citing that whole milk is important of learners' development.

Question 8: 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?

Question 8 of the consultation aimed to explore the level of support for proposals to differentiate the portion sizes of primary school learners between those in nursery to Year 2 and those in Year 3 to Year 6 (referred to as Infants and Juniors respectively). The rationale behind these proposals included introducing portion sizes that are more 'age appropriate' and tailored, which could reduce food waste as a result.

As illustrated in Figure 7 (below), the question received a largely positive response, and 1,728 respondents (67.1%) agreed or strongly agreed with the proposals. 363 respondents (14.1%) stated they neither agreed nor disagreed, with 231 (9.0%) who disagreed or strongly disagreed. There were 254 individuals (9.9%) who did not provide a response to this question. The stakeholder group most in favour were healthcare practitioners (81.1%, n=43), followed by the education workforce (75%, n=264). Of the primary school learners who responded to the consultation, 329 (65.9%) were in favour.

Figure 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?



Source: Consultation Responses, n=2,322

As part of the question, respondents were also given an opportunity to provide a supporting comment. Of the 2,322 who answered, 712 gave further information. Common themes which emerged included that current portion sizes were not big enough, that appetites can vary between children of the same age and the need to factor in other factors, such as height, size, and the extent to which the child is active. These are explored in further detail below.

It is important to note that for this question, some respondents provided a supporting comment which contradicted their previous answer. For instance, they selected strongly agree and then proceeded to make a negative statement as a supporting comment. Finally, for the sake of conciseness we have not reported on any themes which were referred to by respondents 5 times or less.

Agree

Many respondents who provided further information expressed their support for the proposals. Several (20) expressed shock that tailoring portion sizes in primary schools based on age was not already in place within the existing guidelines. Respondents identified benefits that they felt would accompany these changes, including a reduction in children overeating and food waste (40).

The issue that was raised most overwhelmingly by respondents was that the portion sizes within primary schools currently are not big enough, and as a result children are coming home 'starving' (222). As such, a notable proportion welcomed the prospect of increasing the portions for juniors. However, there were some respondents who also expressed concern that infants' portion sizes would remain the same or even decrease as a result of the proposed changes.

Neither agree nor disagree

Some respondents indicated that they were supportive of introducing different portion sizes for infants and juniors in principle, but that there should also be a degree of flexibility when implemented (10). The option of offering 'seconds' (as long as it was healthy) to learners who were still hungry after the initial serving was touted (39). Others who supported differentiating between primary learners generally felt that there was need to sub-categorise further, introducing different portion sizes between those in year 3 and those in year 6 (8), both of whom would get the same portion under the proposed guidance.

Disagree

Those who were explicitly opposed to the proposals relating to portion sizes mostly cited the inappropriateness of age as a measure to determine how much a child should eat, given the appetites of children the same age can vary to a large degree (117). Alternative factors to determine portion sizes cited by respondents included height (8), body size / weight (8) and the amount of physical activity a child has (35), with respondents highlighting the rate at which calories are burned as key to how much they can and should eat. Several respondents also emphasised that the levels of nutrition in a meal should be the primary concern when children eat at school, not the portion size (24).

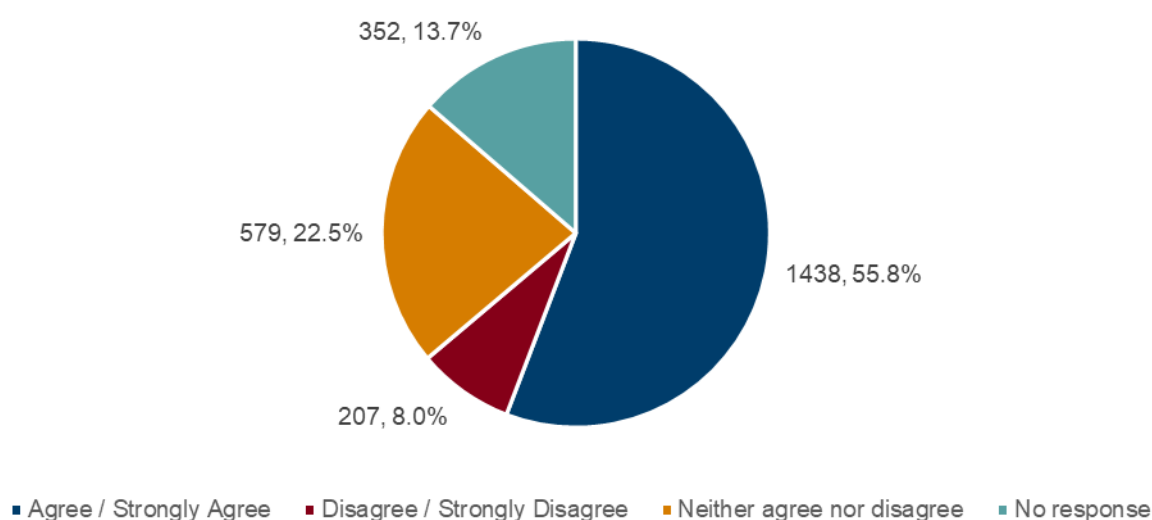
In terms of where responsibility should exist when it comes to determining portion size, the importance of learners being able to choose the amount they eat themselves was referenced (12), whilst others claimed that schools, and specifically, kitchen staff should be able to use their own discretion (8).

Question 9: To what extent do you agree or disagree with the proposals relating to breakfast provision?

Question 9 of the consultation asked respondents whether they agreed or disagreed with the proposals relating to breakfast provision. The proposals are to no longer include fruit juice in the fruit definition due to its free sugar content, for all bread to be 50% wholemeal and to have separate portion sizes for infants and juniors provided in statutory guidance.

As illustrated in Figure 8 (below), the question received a positive response, with 1,438 respondents (55.8%) who agreed or strongly agreed with the proposals. 579 respondents (22.5%) stated they neither agreed nor disagreed, with 207 (8.0%) who disagreed or strongly disagreed. There were 352 individuals (13.7%) who did not provide a response to this question. The stakeholder group most in favour were healthcare practitioners (69.8%, n=37) followed by local authority respondents (66.7%, n=54).

Figure 8: To what extent do you agree or disagree with the proposals relating to breakfast provision?



Source: Consultation Responses, n=2,224

Respondents were given the opportunity to provide additional comments to support their answer.

Agree

Respondents who agreed who provided further comment often expressed support for specific elements relating to the proposals surrounding breakfast provision. This included the exclusion of white bread (29) and the removal of fruit juice (27) which were considered unhealthy and unnecessary. More generally, the minimising or removal of sugary items (41) was supported by respondents.

Neither agree nor disagree

Many respondents provided more mixed or neutral responses relating to breakfast provision in schools more widely. This includes the importance of learners having a

good breakfast (41) and the need to ensure breakfast is nutritious and balanced (87). A small number of respondents (12) claimed that their school did not provide breakfast at all. The need to increase the number of options available at breakfast was also referenced frequently (50), as was improving the quality of the food that is supplied, avoiding cheap produce that is processed or high in chemicals (51). Similar to previous consultation questions, the need to consider learner's likes and dislikes, including those who are neurodivergent or have allergies, was raised (37). Other comments included ensuring that fruit is on the menu (18), that breakfast provision is available to all (21) and that it is free for low-income households (12). The profile of respondents who referenced portion sizes (43) largely reflected the feedback provided in Question 8 of the consultation: whilst some supported the differentiation between infants and juniors, others expressed concern that age was not an appropriate metric to determine portion size.

Disagree

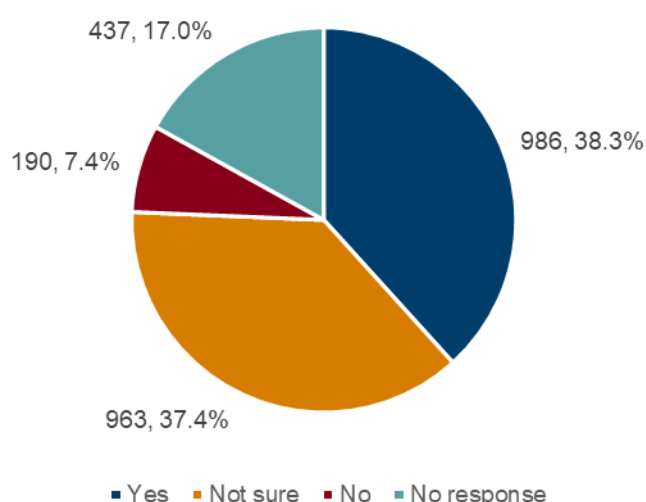
Respondents who were explicitly critical of the proposals for breakfast provision highlighted a range of issues. Some felt that it should not be the school's responsibility at all (17) while the cost implications for the school (14) and parents (10) respectively was raised in a concern. In contrast to those who agreed, several respondents opposed the proposal to remove fruit juice, instead claiming that it should remain part of the breakfast offer (48). 11 respondents stated that choices relating to breakfast provision should not be removed at all.

Question 10: Is the draft statutory guidance supporting primary school food caterers to implement the draft regulations sufficiently clear?

Question 10 asked respondents whether the draft statutory guidance supporting primary school food caterers to implement the draft regulations was sufficiently clear. The Welsh Government have made the guidance simpler with clear definitions and straightforward terminology. This includes providing specific portion sizes for infants and juniors, one portion size for both age groups where pre-prepared products cannot be divided, recommendations for exceeding the standards, and encouragement to be aspirational and continuously improve.

As illustrated in Figure 9 (below), there were slightly more respondents who agreed than were not sure, with 986 respondents (38.3%) who felt that the draft statutory guidance was sufficiently clear. However, there were also 963 respondents (37.4%) who were not sure. A further 190 respondents (7.4%) felt that the draft statutory guidance was not sufficiently clear. There were 437 individuals (17.0%) who did not provide a response to this question. There was a large proportion of every stakeholder group who were not sure when answering this question.

Figure 9: Is the draft statutory guidance supporting primary school food caterers to implement the draft regulations sufficiently clear?



Source: Consultation Responses, n=2,139

As part of the question, respondents were also given an opportunity to provide a supporting comment. Of the 2,139 who answered, 245 gave further information, the majority of which was related to additional information that would be useful to be included within the draft statutory guidance. Common themes which emerged included the need for practical implementation tools, monitoring, evaluation and accountability, and alignment to sustainability and public health. Also mentioned were equity and inclusion and that clear information is needed. These are explored in further detail below.

The need for practical implementation tools was mentioned by 28 respondents, who listed examples such as a best practice document, dedicated training sessions, meal plans and recipe sessions to ensure consistency in how the regulations are applied across different schools and childcare settings. A further 28 respondents mentioned the need for adequate monitoring, evaluation and accountability to ensure the guidance is implemented correctly as well as education to ensure schools move beyond minimum compliance. Also mentioned was the need for the guidance to better align with broader sustainability and public health goals (28). This included suggestions to have daily plant-based options, further restrictions on processed meats (11), stronger sourcing standards, and collaboration with local producers.

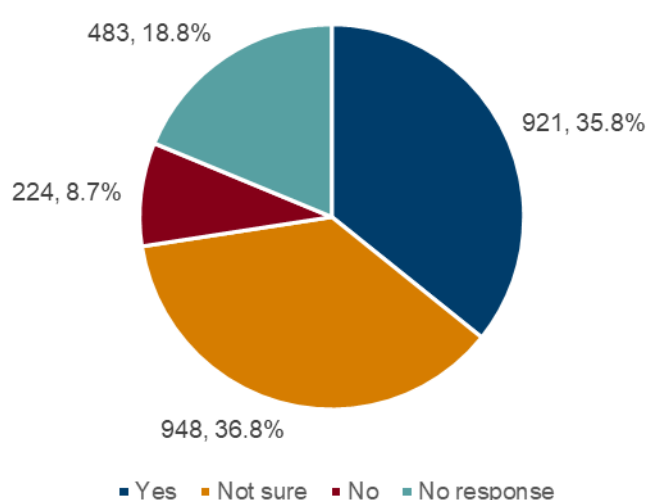
Additional consideration of equity and inclusion within the draft statutory guidance was mentioned by 26 respondents, who mentioned examples of more explicit consideration of vulnerable and disadvantaged learners. Another theme was the need for clearer information for different audiences to be included (26) including parents (20). This links to the need for this guidance to be implemented as part of a whole school food environment (11) as well as to focus on training and capacity building (15). Finally cost concerns were communicated by 11 respondents, with some mentioning that they believed that the universal free school meals (UPFSM) roll out for primary learners has impacted in important ways the options offered, the quality of produce and the portion size.

Question 11: Is the draft statutory guidance on the provision of medically prescribed dietary requirements and other dietary requirements sufficiently clear?

Question 11 asks respondents whether they believe the draft statutory guidance on medically prescribed dietary requirements and other dietary needs is sufficiently clear. The guidance provides clarification on which foods served during the school day must comply with regulations, outlines exemptions for medical diets and school trips, and seeks to address inconsistent practices in relation to medically prescribed diets, as well as the confusion surrounding support for learners with non-prescribed dietary needs.

As illustrated in Figure 10 (below), a greater proportion of respondents were unsure in their response to this question compared with those who agreed. Specifically, 948 respondents (36.8%) indicated they were unsure whether the draft statutory guidance on specific dietary requirements was sufficiently clear, 921 respondents (35.8%) considered it to be sufficiently clear, and 224 respondents (8.7%) felt it was not sufficiently clear. There were 483 individuals (18.8%) who did not provide a response to this question.

Figure 10: Is the draft statutory guidance on the provision of medically prescribed dietary requirements and other dietary requirements sufficiently clear?



Source: Consultation Responses, n=2,093

There were 223 qualitative comments provided in response to this question. Of these, the highest number of responses were those who had no comment or were not sure (48). Specific themes mentioned included the need to ensure that this includes neurodivergent/ALN learners in this category, that there should be more detail included, and accommodations for vegetarian/vegan diets within this guidance.

Many respondents raised concerns that the draft statutory guidance does not adequately account for the dietary needs of neurodivergent learners (34), including those with autism, sensory sensitivities, or Avoidant/Restrictive Food Intake Disorder

(ARFID), who may require safe or “beige” foods and flexible approaches not reliant on medical prescriptions. While the guidance was praised for addressing medical, cultural, and religious diets, stakeholders emphasise the need for clearer recognition of non-medically prescribed but essential dietary adjustments, stronger alignment with equality legislation, and practical support for schools to ensure inclusive, consistent, and equitable provision.

Nineteen respondents called for the guidance to provide greater detail, including clear definitions and specific examples of how it should be applied to a range of medically prescribed diets, to support consistent interpretation of reasonable adjustments. Seventeen respondents highlighted the need for explicit accommodation of vegetarian and vegan diets, while 14 expressed concerns that the guidance excludes undiagnosed children or those with dietary needs not formally categorised as medically prescribed. A further 13 respondents emphasised that learners with medical conditions or dietary requirements should be provided with equally healthy and safe options, rather than being offered vouchers.

To support implementation, 13 respondents called for targeted training on medically prescribed diets, noting concerns that current guidance is not always followed and that cross-contamination has previously been an issue. Additional attention was also requested for learners with allergies, intolerances, and medical conditions (13). Finally, 11 respondents stressed the importance of balancing rigorous nutritional standards with compassionate flexibility to ensure individual needs are appropriately met.

Question 12: What challenges, if any, do you feel should be further recognised within the draft regulatory impact assessment?

This question asks respondents what challenges they feel should be further recognised in the draft regulatory impact assessment.

Of those who answered to this question, the most common response was that they did not know or were unsure what challenges to identify (111). Among those who did provide a substantive response, 96 highlighted the difficulty of ensuring learners eat and drink enough during the school day. Related to this, 71 respondents expressed concern that children might not like the new options, with the risk that uptake of school meals could fall. Cost was also identified as a challenge (80), with respondents citing the financial pressures facing schools, caterers and families.

Seventy respondents argued that provision for those with dietary requirements was too limited, while 65 pointed specifically to the challenges faced by learners with ALN, sensory difficulties or eating disorders. Attitudes were also seen as a barrier, with 60 respondents emphasising that parental and learner resistance could undermine the policy. Education was mentioned by 57 respondents, with calls for stronger teaching and awareness-raising around food.

Ensuring variety and choice appeared in 53 responses, while 49 highlighted concerns about processed food. Forty-seven respondents stressed the importance of maintaining quality and consistency, while 40 drew attention to practical barriers such as limited time and the challenges of food preparation. Other issues referenced included food waste (38), the importance of meals being tasty and appealing (33), the challenge of catering for fussy eaters (33), the need for staff training (32), and the feasibility of sourcing food locally and seasonally (30).

Concerns about small portion sizes across ages, inconsistent servings and the need for larger, more flexible portions were raised by 26 respondents. Some respondents emphasised the need to bring more cooking on-site (24), and challenges faced by low-income families, specifically (24). A group of 23 respondents commented on the need to consider environmental impacts. Additional themes mentioned were compliance with regulations (21), ensuring overall nutritional balance (19), and comments around unhealthy relationships with food (18).

There were 23 respondents questioned whether the new menu is healthy enough, calling for less ultra-processed food, red meat, cheese, desserts and chips, and more fruit, vegetables and plant-based options. They also recommended introducing guidelines for packed lunches, considering learners with ALN and climate change impacts, and basing the guidelines on more up-to-date nutritional information.

Question 13: What positive effects, if any, do you feel should be further recognised within the draft regulatory impact assessment?

This question asks respondents what positive effects they feel should be further recognised within the draft regulatory impact assessment.

Respondents most commonly stated that they had nothing to add or provided a negative comment (152). Thirty-three respondents indicated that they did not know. Of the respondents who did identify positive impacts, healthier children (95) were the most frequently cited. Seventy-one respondents welcomed the changes as delivering better or healthier food than before, while 66 noted that the reforms would help normalise healthy eating habits and embed positive behaviours early in life. A further 64 respondents offered additional suggestions for change, ranging from calls for fresher, tastier food and greater menu flexibility, to stronger links with food education, local sourcing and involving learners and parents more directly in decisions.

Twenty-seven respondents highlighted the benefits of improved mental health and wellbeing of learners, while another 27 identified longer-term benefits, such as improved life chances or healthier adult populations. Twenty-six respondents linked the reforms to improvements in the quality and freshness of school food, while 25 pointed to the role of food education, 25 to better educational outcomes and behaviour, and 25 to simply feeding learners adequately. Portion sizes were also mentioned by 22 respondents, particularly the benefits of more age-appropriate measures, while 21 said the reforms would help widen learners' tastes.

Equity and social benefits were raised as well, with 20 respondents suggesting the changes could reduce inequalities, 18 supporting the emphasis on locally sourced produce, 16 referring to greater choice and variety, and 16 to sustainability benefits. Fourteen respondents thought food waste could be reduced, while 11 emphasised that school meals provide healthy food that some parents may not be able to provide at home. Less commonly mentioned, but still notable, were positive effects relating to inclusion for learners with ALN (10).

Question 14: What comments, if any, do you have on the draft impact assessments, particularly the impact of the draft regulations on children, families living in socio-economic disadvantage and people with protected characteristics (including evidence you feel should be considered)?

Question 14 asked respondents to comment on the draft impact assessment of potential impacts of the proposals on children and families living in socio-economic disadvantage, as well as individuals with protected characteristics. Respondents were also invited to suggest evidence which could be considered in regard to assessing any potential impacts.

Respondents cited several potential expected impacts of the proposals on families and children living in socio-economic disadvantage, both positive and negative. Sentiment largely depended on whether respondents felt that children would continue to receive school meals or 'opt out', instead choosing packed lunches which may not meet the same health standards and may lead to higher costs for families. Concerns were commonly raised about the impact of proposals on individuals with protected characteristics, and enabling sufficient accommodation for learners with disabilities, neurodiversity and ALN, as well as those from different religious and cultural backgrounds. Respondents were apprehensive about learners not receiving sufficient nutrition and the potential impact that this would have on the health of learners, as well as on educational and behavioural outcomes.

Negative impacts

Overall, 109 respondents raised equity concerns regarding the impacts of the proposals on children and families living in socio-economic disadvantage, as well as people with protected characteristics. The main concerns stemmed from the variety of options available under the proposals (52). Due to the issues outlined below, 12 respondents indicated that the impacts of the proposals on these groups should be monitored.

Some respondents felt that the perceived lack of food options under the new proposals may negatively affect learners as there would be an increase in those 'opting out' of school provision and an uptake in packed lunches (37), resulting in additional costs and a failure to meet the nutritional standards set out in the proposals. Additionally, there was concern that children will only eat certain foods (24), and as such, may go hungry as a result of the proposals (35), either due to a lack of uptake of school meals, or as a result of a change in portion sizes (16). Furthermore, 41 respondents emphasised the importance of ensuring sufficient choice and portion sizes of school lunches given they are often the main meal of the day for many children, particularly those from poorer socio-economic backgrounds.

In terms of the groups of learners who would be most negatively affected by the issues outlined above and why, respondents identified the following:

- Neurodivergent learners or learners with disabilities or health conditions: concerns regarding the perceptions of limited food choices for learners with sensitivities and health requirements around food (49).

- Children from poorer socio-economic backgrounds: for whom the proposals may be a bigger adjustment to a more limited range of foods at home and whose parents would be disproportionately negatively impacted by the costs associated with their child or children choosing to opt out of FSM provision (13), particularly given the reliance of a number of families on FSM provision (20) and recent increases in the cost of living (9).
- Learners who require cultural and religious accommodations: there were mixed views expressed regarding the potential effect of the proposals on the ability to meet the different cultural and religious requirements of learners. A small minority of respondents indicated concern regarding the 'welfare' of animals slaughtered in accordance with halal / kosher requirements (7).
- Small portion sizes were specifically mentioned as an issue by 4 respondents.

Positive impacts

In contrast to negative feedback, a smaller number of respondents highlighted potential positive impacts on health and learning outcomes for learners (43), including supporting them to build healthy eating habits via increased access to new, healthy foods that learners may have had limited experience/exposure to at home. Similarly, 13 respondents felt that improving the diversity of food offered would enable greater opportunities for children to try new food in a safe, non-judgemental environment and support positive engagement around healthy eating with learners and their families.

Wider comments

Finally, a number of respondents provided wider comments on aspects of the proposal and the provision of school meals in general that was beyond the scope of this question. These comments included the following:

- The general quality of school meal provision needs to improve (36).
- The need for a wider education / campaign around the proposed changes to support the adoption of healthy eating habits (29).
- That all meals offered in schools (including secondary schools) should be provided free of charge.

Question 15: What comments, if any, do you have on how costs would be impacted on (including evidence you feel should be considered)?

Question 15 asked respondents to consider how the proposals might affect costs and to provide any evidence of this impact. Responses varied, with some focusing on the potential costs for parents and carers, and others highlighting the wider financial pressures these changes could place on schools and their budgets.

Increased costs for parents

Overall, 22 respondents suggested that the parents of learners who choose to opt out of the FSM provision under the proposals would face an increase in costs associated with purchasing food for packed lunches. Additionally, a smaller number of respondents suggesting that those who cannot or will not take up FSM provision should be provided with a voucher to cover the costs of packed lunches.

Increased costs for schools

A large number (95) of respondents suggested that the inclusion of more fresh produce and better-quality meat under the proposals would lead to an increase in food procurement costs. A further 48 stressed that any additional costs should be carefully monitored to ensure adequate funding and avoid placing extra strain on already limited school budgets. Another 43 raised concerns about the financial impact of potential food waste if meals offered were not suitable for learners. Cost pressures linked to shrinking portion sizes, with meals described as being too small and lacking variety, were highlighted by 8 respondents.

Strategies for reducing costs

Some respondents cited potential strategies to manage potential increases in costs associated with the proposals, such as reducing the use of expensive meats (20) and cutting costs linked to outsourcing food provision to private contractors or off-site suppliers (18).

No Impact / Not sure

A total of 113 respondents felt there would either be no cost impact or were unsure. Seven noted that some elements of the proposals could increase costs, while others could reduce them, making the overall impact difficult to judge.

Lower costs

Furthermore, a small group (20) expected the proposals to reduce costs, citing increased use of plant-based foods (18) and inclusion of fewer UPFs (7). Additionally, 41 respondents suggested that while costs associated with the proposals may increase in the short term, long-term savings could result from improve health and learning outcomes (35). A further 21 respondents suggested that costs associated with food provision should not be a factor when it comes to feeding children. Additionally, 20 respondents suggested that the proposals offer a real opportunity to support Welsh farming and more local produce and 13 respondents suggesting that the proposals may be associated with reduced environmental costs.

Some respondents used this question to raise broader issues. A minority (45) criticised the Welsh Government's approach to universal FSM provision, with some

saying that they would prefer to pay, or have FSM means-tested to enable better quality food provision overall. A smaller number of respondents expressed support for current FSM provision (12). Respondents suggested that school meal provision should focus on increasing quality of current provision (34) and offering sufficient choice and providing education to support healthier eating habits (12).

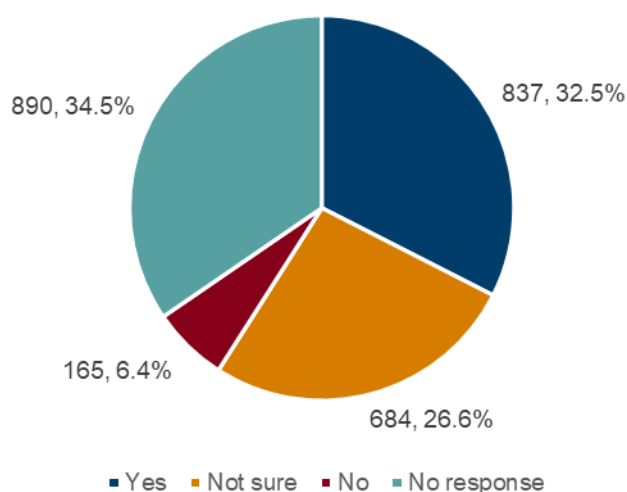
Question 16: Is the draft statutory guidance, aimed at supporting local authorities and governing bodies to deliver their duties to promote healthy eating and drinking, sufficiently clear?

Feel free to provide examples of anything you think is missing.

Question 16 asked respondents whether they felt that the draft statutory guidance, aimed at supporting local authorities to deliver their duties to promote healthy eating and drinking, was sufficiently clear. The guidance covers a range of responsibilities, including promoting healthy eating and drinking in schools, reporting on this in annual governing body reports, ensuring free drinking water is available on school premises, encouraging learners to take up school meals and milk, guaranteeing that eligible learners receive their free school meals and milk, and protecting the identity of those who are eligible.

As illustrated in Figure 11 (below), there were 1,686 responses to this question, representing 65.5% of all respondents to the consultation. Of these responses, 32.5% (837) thought that the draft statutory guidance was sufficiently clear. 6.4% (165) said that it was not sufficiently clear. A further 26.6% (684) were not sure. Of the stakeholder groups, 39.5% of the education workforce (n=139) felt that it was sufficiently clear.

Figure 11: 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?



Source: Consultation Responses, n=1,686

In total, 224 respondents provided a supporting comment, a lower response rate compared to previous consultation questions.

Yes

Despite nearly half of respondents stating that the draft statutory guidance aimed at supporting local authorities and governing bodies was sufficiently clear, the majority of supporting comments were either unrelated to the question or highlighted areas

for improvement. Positive references included how the guidance reflects the wider policy context, including the Well-being of Future Generations (Wales) Act 2015 and how it helps to foster a whole-school approach to food that is aligned with public health priorities and the promotion of equitable nutrition.

Not sure

Forty-eight respondents provided comments that were not specific to the draft statutory guidance. This included themes which had been raised previously under other questions, ranging from the need to remove UPFs in schools, the proposals around drinks provision and the role of vending machines. Some respondents stated that the proposals as a whole were symptomatic of government overreach.

Others stressed the importance of monitoring and regulation (18) across a variety of contexts. For instance, to determine the effectiveness of the draft guidance and proposals, as well as supporting continuous improvement. Suggestions included metrics of what learners are eating and conducting interviews with learners themselves. The need to review the amount of food waste after each sitting was referenced, as was clearer outcomes relating to learners' mental health and behaviour.

No

While many respondents stated that they welcomed the guidance and saw it as a positive step forward, some also felt it could be made clearer through greater use of case studies and examples as a means of providing practical support and real-world context (22). For instance, there were calls for case studies to be included in the guidance that demonstrated how schools have successfully promoted healthy eating, as a way to help local authorities understand how to apply the guidance in different contexts. Other requests included providing greater clarity around any minimum requirements relating to the quality of produce such as bread, yoghurts and cereals, questioning whether preservatives, emulsifiers and processed food would be allowed or not. Including a best practice menu over a 3-week cycle was also suggested.

Some respondents highlighted the need for the draft guidance to be clearer in respect to who has responsibility for implementation (23). This included differentiating between schools under local authority control and those that are not, due to the variation in who runs their own catering service. The need to differentiate between schools themselves and school caterers was also mentioned. These respondents generally criticised the guidance for being too open to interpretation with calls for clarity on which actions are statutory and which are advisory. Similarly, respondents stated the need for greater consistency in terms of the language used in the guidance (20), with the classification of 'good' and 'bad' food deemed to be oversimplified and counterproductive. The importance of training to accompany the guidance was also emphasised by some respondents (13). Portion sizes being too small or needing closer monitoring to ensure adequate serving sizes were noted by 6 respondents.

More widely, the need to ensure equity and inclusion within the draft guidance was noted (26), especially in relation to factoring in learners with ALN and special dietary requirements. Collaboration was identified as essential (17) with respondents

stressing the necessity of engaging and integrating parents, despite the guidance being targeted at governing bodies and local authorities.

Question 17: How can we achieve a nutritionally balanced and appealing food offer in secondary schools?

Feel free to provide examples of good practice or evidence that supports your response.

Question 17 explored respondents' views on secondary school food, with the aim of informing meaningful updates to the regulations. This question was intended to complement ongoing data collection on consumption patterns to help identify where revised regulations could have the greatest impact for secondary schools and their learners.

Respondents identified 21 themes that each received more than 10 mentions. The most frequently raised themes, each cited by over 100 respondents, were the need to provide learners with more information, the importance of offering balanced meals, and the value of listening to and trusting learners' perspectives on their food choices. Additional themes, each highlighted by more than 50 respondents, included expanding menu choice, ensuring fresh food is prepared on site, improving meal quality, addressing the impact of the dining environment, removing unhealthy options, increasing the availability of healthy "grab and go" items, and considering cost and free school meal provision.

Learner engagement and behaviours

The need to provide more information for learners so they can make informed food choices was the most frequently mentioned theme (148 respondents). Many felt that at secondary school age, the ability to make healthier choices independently is an important life skill.

Respondents suggested several ways to present this information, including displaying the benefits of healthy food in canteen settings and ensuring prices are clearly shown, as these are often missing. Learners themselves reported wanting to see more healthy options, with prices visible on packaging. Other learners proposed using visual tools such as the 'Eatwell plate', with nutritional details on each of the food groups present to help them to make healthier choices.

There were also strong calls to incorporate learner voice and trust learners' choices (111 respondents). One respondent noted: "young people are more likely to eat school meals if they feel their preferences are considered. Involving them in menu planning, tasting sessions, or food councils increases engagement and reduces waste."

A further 39 respondents highlighted the importance of building on learned behaviours. They suggested a whole-school approach and continuing the healthy habits introduced in primary schools. Suggestions included integrating these standards whilst also adapting them into modern and appealing dishes for older learners. Some parents and carers expressed surprise at the contrast in the amount of healthy food on offer between primary and secondary school food provision. Learners also suggested initiatives such as a points system for eating healthy foods, linked to house points, to encourage positive behaviours.

Finally, 12 respondents recommended using social media and influencers to promote healthy eating. They argued that tapping into trends, without explicitly labelling foods as “healthy”, would make them more appealing. Examples included influencer-led videos showcasing what they eat to train or perform well, which learners might aspire to copy. Respondents felt schools could involve learners by allowing them to vote on their favourite meal options for the following week. They say this would give ownership to the food they are eating and boost engagement around mealtimes.

Food quality and nutrition

The need for balanced meals to create a nutritious yet appealing food offer in secondary schools was highlighted by 144 respondents. They stressed that learner engagement with school meals depends on striking the right balance between health and taste. Examples included offering a variety of wraps with grilled meats or other protein and allowing condiments like mayonnaise or BBQ sauce in moderation.

Several respondents also suggested that enhancing meals with lentils, plant proteins or vegetables would increase the nutritional value of the meals on offer but also prioritising serving meals that are tasty, filling and inexpensive. A common theme from parents/carers was the importance of ensuring learners eat something, even if it is not “perfectly healthy” as they would rather they ate something, than nothing at all. Healthier versions of popular foods, such as pizza, were seen as a practical compromise.

A further 88 respondents emphasised the importance of having fresh food cooked on site and in improving overall quality. One education workforce stakeholder noted that learners “constantly complain about the lack of quality and I don’t think I have ever seen a healthy meal or even a vegetable served”. Respondents felt that “home-cooked” meals would be more appealing, with some suggesting that fewer, higher-quality options, such as those offered in France, would be preferable to a wide range of lower-quality foods. Concerns were also raised about contracts awarded to the “lowest bidder”, with respondents feeling that some contractors prioritise profit over fresh, seasonal ingredients. Many criticised frozen, off-site food as tasteless and frequently wasted. In addition, 64 respondents supported removing unhealthy options altogether, arguing that schools should only provide healthy choices. One stakeholder commented that schools should “stop pandering to children’s addiction to junk food”.

To better match learners’ needs, 63 respondents suggested increasing the availability of healthy “grab and go” options as they recognise that many secondary learners have limited time for sit down meals. Popular suggestions included having options such as sandwiches, wraps, pasta salads, and rice bowls.

Finally, 24 respondents commented on portion sizes, arguing they should be increased to reflect the needs of growing adolescents as many lead active lifestyles. Others proposed that all meals should automatically include a free portion of fruit or vegetables to encourage healthier eating.

Choice and provision

Whilst 98 respondents felt that learners should be offered more choice, 24 believed that reducing choice would be more beneficial. Those in favour of more choice often linked it to variety, with learners also wishing that there were options which did not focus as much on nutritional value. One learner noted that “forcing children to eat food they dislike constantly just because of its nutritional value will not benefit them”. Other learners asked for more vegetable-based dishes, a wider variety of fruits beyond apples and bananas, more culturally diverse meals, and options that cater to picky eaters. The respondents who supported having less choice argued that a streamlined menu would be easier to manage. One education workforce respondent said fewer options would help reduce queues since schools are only responsible for “five meals per week”. A parent/carer added that simplifying the menu could make it easier to focus on providing meals children know and enjoy.

Thirty-one respondents supported the introduction of meal deals or street food-style offerings. They felt this approach could encourage balance, for example, by offering a cookie only as part of a set meal that also includes items such as a chicken salad wrap, fruit, and flavoured water. Others suggested that this format would allow learners to personalise their meals with colourful, appealing components, while also reflecting current trends. Suggested options included themed or culturally diverse meals such as a Mexican bowl containing rice, beans, chicken, sweetcorn, cucumber, cheese, and roasted sweet potato, but not focusing on the health benefits solely.

Sixteen respondents felt that schools should move away from “grab and go” formats and instead promote sit down meals. They argued that protected eating times would help learners rest and enjoy their food in a calmer environment. Some also felt that being led by learners in this area, such as their feeling that they need more time to eat and would prefer for it to be less hectic at lunchtimes would improve the dining experience. Another 16 respondents raised concerns about learners going off-site at lunchtime. Some felt this could not be controlled, as “the children will go elsewhere” regardless, while others noted that limited or unappealing school options drive learners towards less healthy alternatives and listed fast food chains including McDonald’s, KFC and Subway.

Learner Environment and Whole-School Approach

Seventy-seven respondents highlighted that the dining environment affects learners’ food choices at lunchtime. They noted that the timing and length of breaks vary across schools, with shorter lunch periods leaving little time to sit down and eat. They say that this pushes learners towards quick “grab and go” options and feel that these are often less healthy. Respondents suggested that national guidelines should be introduced to ensure consistent and appropriate gaps between breakfast, break, and lunch, and to prevent lunch being served too late in the day. One respondent mentioned that their child’s lunch break can sometimes be as late as 1.30pm which they feel is unacceptable. Respondents emphasised the importance of longer and staggered lunch breaks and having sufficient seating and cutlery. They also mentioned their ambition for dining areas to be pleasant, well-supervised, and not overly crowded or stressful.

Many commented that outdated dining facilities and long queues in smaller canteens reduce both the time available for eating and the range of food on offer, with some advocating for national level funding to modernise dining spaces and make them more welcoming. Suggestions for improvement included empowering trained catering teams to trial new menus. They also suggested being able to provide clear menus in advance to help learners make informed choices, and encouraging healthy decisions through positive messaging, food that looks appealing, and as previously mentioned, healthier “grab and go” options.

Sixteen respondents highlighted issues with food waste or litter, including the need to monitor food waste, particularly whether healthier options are being discarded more often than less healthy ones. They also raised concerns about plastic use, suggesting schools encourage reusable water bottles instead of selling bottled water in meal deals. Adequate provision of tap water was also noted. Some felt that the current levels of high food waste reflect inadequate food options and recommended involving learners in menu design to improve uptake. Whilst “grab and go” meals were seen as popular with learners, though respondents acknowledged the added cost and disposable waste associated with these options.

Respondents also called for better supervision in dining halls, with incentives for staff to be present and engaged with learners. This links to the suggestion of a whole-school system approach by 14 respondents. These respondents wished that secondary schools would go beyond lunchtime and instead embed food and nutrition across the curriculum and throughout the school day.

Innovative examples

Eighty respondents provided innovative examples of how school food could be improved. Suggestions included exploring new models of delivering lunches, such as large wok-style stations where learners could choose a starch, a protein, vegetables, and a sauce, with food cooked fresh to order. Respondents noted that this approach mirrors how catering is managed at festivals and could be adapted for schools. Other education practitioners described engaging directly with learners to ask what they would like to see on menus. They would also like to see that choices are balanced across the day, and food is served that considers factors such as food miles.

Respondents also emphasised the value of hands-on learning and food education. Ideas included inviting chefs or food experts to introduce new cuisines, creating opportunities for learners to prepare food for themselves and others. There was also the suggestion of developing school allotments where learners could grow fruit and vegetables to be used in lessons and canteens. Cooking classes where learners are actively involved in preparing and choosing dishes were seen as a way to develop skills and healthy routines. Respondents felt that involving learners in cooking school meals could give them a stronger sense of ownership and understanding of the food they eat. Other suggestions included offering a daily balanced meal at a reduced price with at least two portions of vegetables and wholegrains, employing professional chefs, and partnering with local businesses to provide healthy “pop up” food stalls.

Community and local sourcing were highlighted as important opportunities within secondary schools. Respondents suggested building partnerships with local

organisations and supermarkets to use surplus or near “best before” products, as well as making greater use of Welsh and UK produce. Parents with experience in the food industry could also be invited to share their expertise and support schools.

Several respondents cited countries such as Denmark, Norway, the Netherlands, France, Spain, Italy, Japan, South Korea, and China as examples of best practice in school food provision. Within Wales, schools including Stanwell School and Cowbridge Comprehensive School (Vale of Glamorgan), St Alban's Roman Catholic High School (Torfaen), and Olchfa School (Swansea) were mentioned, along with organisations such as Chefs in Schools and Cegin y Bobl.

Food labelling and information were also proposed as tools to encourage healthier choices. Ideas included using a “traffic light” rating system to highlight how healthy different foods are and displaying simple information sheets alongside items to show nutritional content, such as sugar levels. Some parents/carers noted that while not all learners would pay attention to this information, others would think twice before choosing a cookie or muffin if they could see the percentage of their daily sugar allowance it contained.

Standards, guidance and compliance

Twenty-six respondents suggested that all regulations introduced in primary schools should also apply to secondary schools. They felt that improvements to secondary school meals should be treated with the same urgency as in primary schools, as older learners are equally in need of healthy food to support their learning and wellbeing. Respondents proposed offering a similar structure to primary provision, such as two hot meal options alongside pasta, sandwiches and jacket potatoes, but with a more varied menu to suit older learners. They also acknowledged that changing the long-established eating habits of teenagers would be a challenge but expected it would become easier over time as younger learners grow accustomed to healthier standards in primary school and carry these habits into secondary school.

Eleven respondents called for stronger rules, clearer guidance, and financial support. They wanted to see regular monitoring tools, such as surveys with secondary school learners, audits on plate waste, and compliance checks. They highlighted that monitoring should be strengthened to match the level already in place for primary schools.

Cost and equity

Fifty-six respondents mentioned either FSM or cost. Of these, some respondents stressed that FSM allowances should be reviewed to ensure they cover the whole school day, including breakfast and breaktime options. They called for inclusive pricing that makes healthier foods the most affordable choice, particularly for low-income learners, and for expanding free or low-cost breakfast clubs with culturally appropriate, balanced options.

Concerns were also raised about affordability more broadly, with many describing meals and drinks as overpriced for their quality and portion size. Learners reported going hungry because their allowances were not enough to buy a full meal within their FSM allowance as well as something for break time.

Question 18: What, in your opinion, would be the likely effects of the legislation on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

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

Question 18 asks respondents to consider what effects the legislation might have on the Welsh language, particularly whether it creates opportunities to use the language and whether there is any risk of treating Welsh less favourably than English.

The most common responses were dismissive of any link between the legislation and the Welsh language. A total of 141 respondents felt the legislation would have 'no effect,' while 118 regarded the question as 'irrelevant.'

However, others saw opportunities for a positive impact. Providing bilingual information was mentioned by 117 respondents, who highlighted the importance of ensuring menus, materials and guidance are consistently available in both languages. A further 59 encouraged schools and catering staff to use Welsh as much as possible in daily practice. Forty-one respondents were less certain, stating they were 'not sure' of the likely effects, while another 41 gave explicitly negative comments about the role of Welsh in this context. Thirty-six mentioned that the use of Welsh should be about choice and not imposed in a mandatory way.

Thirty-eight respondents felt there should be more focus on the Welsh language in general, suggesting that the legislation could go further in embedding language considerations into food education and mealtimes. Smaller but still notable numbers of respondents (28) pointed to the local, cultural connections between farming, food production, and language, while 22 suggested that specific training for catering staff would be needed to make greater use of Welsh feasible in practice.

The dominant response to this question was scepticism, with many believing that the legislation is not directly relevant to the Welsh language. The 141 respondents who felt the changes would have no effect, and the 118 who called the question irrelevant, together represented a clear majority. However, a substantial group still identified ways in which the legislation could contribute to the Welsh Government's wider ambition to strengthen the use of the Welsh language.

The call for bilingual information (117) reflected the view that providing menus, signage and communications in both languages is important for ensuring fairness and visibility. The 59 respondents who advocated for using Welsh as much as possible in daily interactions, suggesting that this could help normalise the language, particularly in communal settings such as at mealtimes. This theme was reinforced by 28 respondents who linked food and language through culture, noting that food education connected to local customs could be an opportunity to strengthen Welsh identity.

Question 19: In your opinion, could the legislation be formulated or changed so as to: have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

The question asks whether the legislation could be formulated or changed in ways that would strengthen its positive effects on the Welsh language or help mitigate any negative impacts. The Welsh Government has a duty to ensure that all legislation treats Welsh no less favourably than English, and so this question explores whether the new food regulations could actively contribute to promoting the language within schools.

The majority of respondents did not see clear opportunities in this area. The largest single group stated they were either 'not sure' or 'didn't know' (323), while 289 felt that no changes were needed. A further 148 described the question as irrelevant, suggesting they did not view the legislation as connected to language issues.

Among those who did identify opportunities, 72 respondents gave a positive "yes", indicating that changes could be made to enhance Welsh language use. Bilingual menus were the most specific proposal, supported by 45 respondents. Another 41 suggested encouraging Welsh use more broadly, particularly outside of the classroom. Thirty-six emphasised the importance of equal treatment between Welsh and English, while 33 highlighted the value of teaching learners and catering staff the Welsh terms for food as a practical way to embed the language in everyday situations.

Smaller numbers of respondents gave further suggestions. Twenty-seven supported a stronger focus on local food. Thirteen called for more education and resources to support the Welsh language. Some respondents wanted more funding for Welsh training (7), greater use of Welsh at mealtimes (6), or for Welsh to be adopted as the primary language (5).

Question 20: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

The final consultation question allowed people to summarise their final comments/issues that were not captured in the scope of earlier questions.

Of the 575 respondents who opted to provide an answer to this question, views were wide-ranging. The majority of respondents used this question to raise specific issues relating to the proposals (561), with a small number expressing general agreement with the proposed changes (14).

The largest group (78) felt that the proposals did not go far enough. Within this group, 35 called for stricter rules on the cooking methods used by schools to ensure healthier preparation. These respondents were made up of parents or carers (29), primary school learners (5), education workforce (3), other (3), 1 catering provider, 1 supplier, 1 farmer, 1 local authority and 1 secondary school learner. Seventeen respondents made general comments that menus should be made healthier without offering specific suggestions. These 17 respondents were made up of parents or carers (12), education workforce (4), secondary school learners (2) and 1 primary school learner. A further 26 wanted more produce sourced locally from Wales. Many respondents (54) highlighted the need to better consider learners with ALN, (21), allergies or intolerances (21). Some respondents (12) expressed a general request for the proposals to include plain food for learners.

Some respondents (22) felt the changes should also apply to secondary and further education, while 20 argued that the entire lunchtime system needs reform, noting that meals are rushed and learners lack the time to properly.

A number of respondents (38) stressed the importance of embedding food education alongside the changes, so pupils understand the reasons for the new standards. Sixteen respondents also wanted learners themselves to be more involved in shaping changes.

Smaller groups raised specific concerns: 18 about the climate impact of meat and fish, 23 about potential increases in food waste, 26 about changes to portion sizes, 26 about the use of UPF, and 22 about limited variety and reduced choice. Finally, 23 respondents criticised the consultation process as overly complex, and 16 felt it was a waste of money.

Additional Correspondence – emails and letters

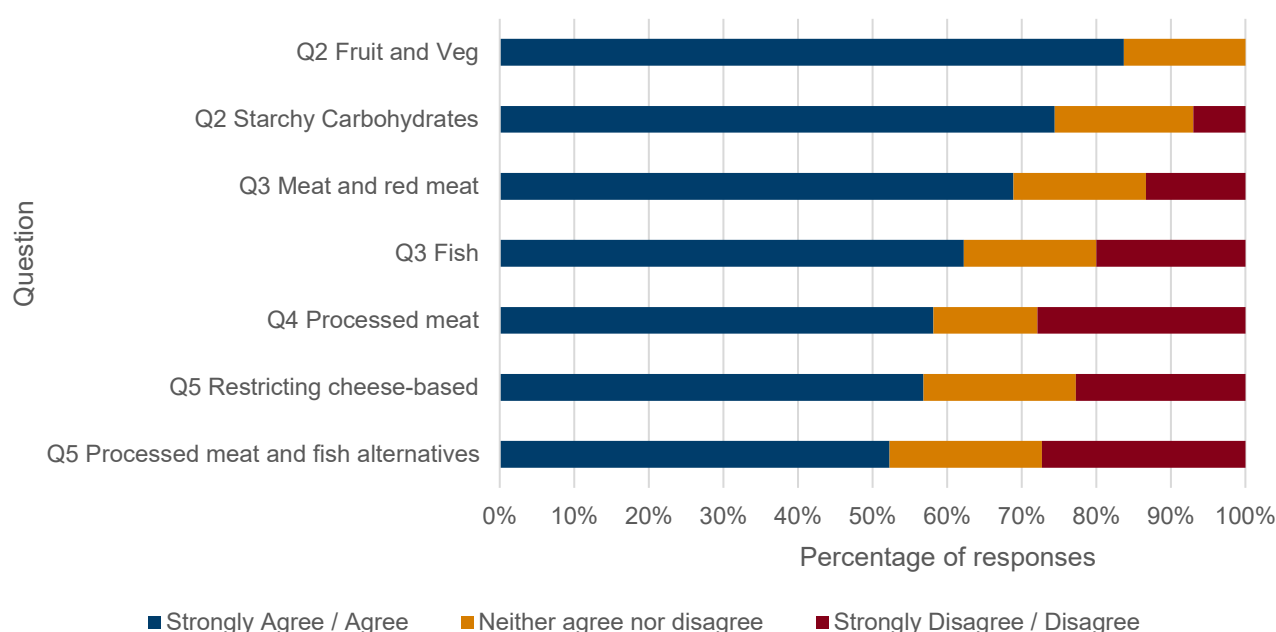
A total of 59 responses were submitted directly to the Welsh Government via email or letter, the breakdown of which is shown in Table 2. The largest share of responses came from those who selected 'Other,' which included campaigning organisations, charities, and professional representative bodies. A full list of organisations, excluding those who requested anonymity, is provided in Annex G.

Table 2: Stakeholder Responses received through additional correspondence

Stakeholder	Number of responses	Percentage of responses
Other (please specify)	40	67.8%
Local Authority	12	20.3%
Catering Provider	10	16.9%
Healthcare Practitioner	10	16.9%
Education Workforce	3	5.1%
Parent or carer	2	3.4%
Supplier	1	1.7%

Source: Mailbox responses, n=59

Figure 12: Mailbox responses to Questions 2-5



Source: Mailbox responses, Q2 & Q4, n=43; Q3, n=45; Q5, n=44

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

Of the 43 quantitative responses submitted to this question, some respondents expressed different views on the proposals relating to fruit and vegetables compared

with those on starchy carbohydrates. For this reason, the results are presented separately for each part of the question.

As fewer than 50 quantitative responses were received via the consultation mailbox, the findings are reported as numbers rather than percentages. Thirty-six respondents either strongly agreed or agreed with the proposals to increase the provision of fruit and vegetables, with none disagreeing and 7 selecting “neither agree nor disagree”.

Respondents, including health boards and public health organisations, generally welcomed the proposals as an important step towards improving the diets of learners and in tackling health inequalities, highlighting evidence that eating at least five portions of fruit and vegetables daily reduces the risk of long-term health conditions such as heart disease, stroke, and cancer. Many respondents also valued the focus on variety, with calls for greater inclusion of frozen and tinned produce to improve choice, affordability, and seasonality.

However, several challenges were raised. A common concern was that learners often refuse, or do not eat, fruit and vegetables currently provided, leading to high levels of food waste. Respondents emphasised the need for schools to adopt strategies to encourage learners to try healthier foods, such as improving presentation, offering wider variety, and integrating food education into the curriculum to avoid a “beige plate” scenario. Equity was also a key theme, with respondents noting that learners in more deprived areas are least likely to consume fruit and vegetables, making school meals vital to tackling health inequalities. Some also pointed out that charging for fruit at break times can create barriers for low-income families.

Implementation and monitoring were identified as areas requiring further work. Some respondents argued that the proposals largely reflect what “responsible” caterers already provide. These respondents questioned how compliance would be assured to prevent inconsistency across schools and local authorities, whilst minimising any additional administrative and financial burden on local authorities. Suggestions also included having a broader alignment with sustainability objectives, including sourcing more local and seasonal items and supporting food system resilience in line with climate and nature targets.

In relation to starchy carbohydrates, 32 respondents either strongly agreed or agreed with the proposals, 3 disagreed or strongly disagreed, and 8 selected “neither agree nor disagree.”

Respondents welcomed exemptions for products such as naan, pizza bases, and crumpets. However, some concerns were raised that the proposals are not ambitious enough, with some calling for clearer wording around providing “three different types of carbohydrate” and wishing for stronger alignment with dietary guidance, and higher standards generally. One health board stakeholder who opposed the proposals instead recommended daily provision of starchy carbohydrates with greater emphasis on wholegrain to improve fibre intake.

Implementation challenges included the higher cost and limited availability of wholegrain products, with calls for procurement support and phased progression milestones. Respondents also noted that younger children and fussy eaters may find high-fibre options unpalatable and supported the use of 50% wholegrain products as a transitional measure. To support implementation, stakeholders recommended investment in product innovation and reformulation, citing Food Standards Scotland's "Reformulation for Health" programme as a successful example.

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

Of the 45 quantitative responses submitted to this question, some respondents expressed different views on the proposals relating to meat and red meat compared with those on fish. For this reason, the results are presented separately for each part of the question.

Thirty-one respondents either strongly agreed or agreed with the proposals relating to meat and red meat. There were 6 respondents who disagreed or strongly disagreed, and 8 selecting "neither agree nor disagree."

Many respondents support the proposals that relate to meat and red meat as they see this as evidence based and aligned with UK dietary guidance. Several welcomed the flexibility to continue serving white meat as they feel that white meat is popular with learners and helps with menu planning. Others highlighted that sourcing Welsh meat supports local farming and sustainability goals, though it may require additional funding. Some supported a "less but better" approach, using smaller amounts of higher quality meat combined with beans or pulses.

However, some respondents feel that the proposals go too far in restricting red meat, given its nutritional contribution which they reference as being important in learner diets. Others believed the proposals do not go far enough, advocating for tighter limits on both red and white meat due to health and environmental concerns. Some respondents referenced deforestation, pollution and animal welfare issues from intensive poultry farming as reasons why white meat should not be unlimited. A few stakeholders also questioned whether the requirement to serve at least one portion of red meat per week reflects the interests of the red meat sector rather than public health, and some called for mandatory meat-free days or daily plant-based options.

In relation to fish, 28 respondents either strongly agreed or agreed with the proposals, 9 disagreed or strongly disagreed, and 8 selected "neither agree nor disagree."

Those who supported the proposals relating to fish agreed with maintaining a weekly fish requirement and ensuring all fish is sustainably sourced. Those who supported the proposals relating to oily fish viewed it as more realistic given low uptake and concerns about food waste. Some noted the importance of tuna salmon and breaded fish products for acceptability and affordability, while welcoming flexibility around product definitions.

However, many stakeholders, including healthcare professionals and local authorities criticised the reduction in the frequency of oily fish, as they saw it as a

“step backwards” from national dietary guidance. They argued the proposals risk reducing exposure to nutrient-rich foods that support brain and heart health and widening inequalities relating to diet. Instead of lowering standards, they suggested schools need more support with recipe development and education to improve uptake. Others raised concerns about cost and supply challenges linked to sustainable sourcing requirements and felt that the proposals risk creating confusion and wished to see clearer definitions.

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

Of the 43 quantitative responses submitted to this question, 25 selected strongly agree or agree. A further 12 disagreed or strongly disagreed with the proposals that relate to processed meat and 6 selected “neither agree nor disagree”.

Many respondents supported proposals that relate to processed meat, citing health evidence that processed meat is a carcinogen with no safe levels of consumption. Several healthcare stakeholders argued the proposals are not ambitious enough and called for a phased plan to eliminate processed meat entirely from primary school menus. However, others wished that improving the quality of products should be the focus, such as using higher meat content and lower salt options, rather than imposing stricter limits that could discourage meal uptake.

A recurring theme was the need for much clearer definitions and examples. Respondents raised concerns about the ambiguous “product containing meat” category, which could de-regulate items like burgers, meatballs, and breaded chicken, while inconsistencies also emerged around portion sizes and trip exemptions for ham, with one stakeholder wishing to avoid the Scotland “ham-gate” scenario. Stakeholders noted that the popularity of processed options like ham sandwiches should not be underestimated.

Respondents emphasised the need for support with procurement, phased implementation and additional funding. They also wished for robust monitoring to prevent “tick box” compliance. Many also advocated for broader changes, such as supplementing meat with pulses, expanding plant-based protein options, and ensuring meals that are vegan are available daily for all learners, to support inclusion, and sustainability. Finally, some stressed the importance of a whole-school approach, applying standards across school meals, events, and fundraising to create a consistent health-promoting food environment.

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)?

Of the 44 quantitative responses submitted to this question, some respondents expressed different views on the proposals relating to restricting cheese-based dishes compared with those on processed meat and fish alternatives. For this reason, the results are presented separately for each part of the question.

In relation to cheese-based dishes, 25 respondents either strongly agreed or agreed with the proposals, 10 disagreed or strongly disagreed, and 9 selected “neither agree nor disagree.”

Many respondents who support the proposals relating to restricting cheese-based dishes cited concerns over high saturated fat and salt content, over-reliance on cheese for vegetarian options, and the need to promote more varied and healthier proteins. Several suggested pairing cheese dishes with pulses or vegetables to improve nutritional value or replacing them more often with meals centred around pulses. In terms of stakeholders, Healthcare practitioners in particular supported restrictions. Others opposed the restriction, arguing cheese remains a key protein source for vegetarians, that cheese is popular with learners, and helps maintain school meal uptake. Concerns included limited availability of appealing alternatives, potential for reduced choice and increased waste. Also raised was the need for clarity around the inclusion of cheese with jacket potatoes or in sandwiches. Some suggested that the cheese-based restrictions risk reducing flexibility in menu planning or may create unanticipated impacts by increasing reliance on less desirable substitutes.

Twenty-three respondents either strongly agreed or agreed with the proposals relating to processed meat and fish alternatives. There were 12 respondents who disagreed or strongly disagreed, and 9 selecting “neither agree nor disagree.”

Respondents in support of the proposed restrictions of processed meat and fish alternatives stressed that these products are often ultra-processed, are high in salt and fat, and are of limited nutritional value. Many saw the restriction as a chance to shift menus towards healthier, less processed proteins like beans, lentils, and tofu. Public health organisations suggested going further with a dedicated “pulses standard” to ensure regular use of minimally processed plant-based options.

Those against the proposals argued that this unfairly restricts vegetarian and vegan learners, reducing variety and risking lower meal uptake. They noted that not all processed alternatives are unhealthy, referencing specific branded items. Some suggested criteria should focus on nutritional quality rather than whether foods are “industrially processed.” Concerns were also raised about portion size limits making meals appear too small, and about inconsistencies (such as how soy mince is excluded but similar products are restricted).

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?

Of the 43 quantitative responses submitted to this question, some respondents expressed different views on the proposals relating to potatoes cooked in oil and fried foods compared with those on sweetened baked goods and desserts, and pastry. As such, the results are presented separately for each part of the question.

Thirty-three respondents either strongly agreed or agreed with the proposals relating to potatoes cooked in oil and fried foods. There were 3 respondents who disagreed or strongly disagreed, and 7 selecting “neither agree nor disagree.”

Most respondents supported limiting potatoes cooked in oil and fried foods. Many welcomed moves to phase out deep-fat fryers entirely, citing benefits for learner health. Some suggested going further by reducing fried food to once a week in total

or eliminating it altogether and also wished to promote oven baked potatoes and fried foods and healthier cooking oils. Local authorities noted that many schools already comply, with chips often only served once a week.

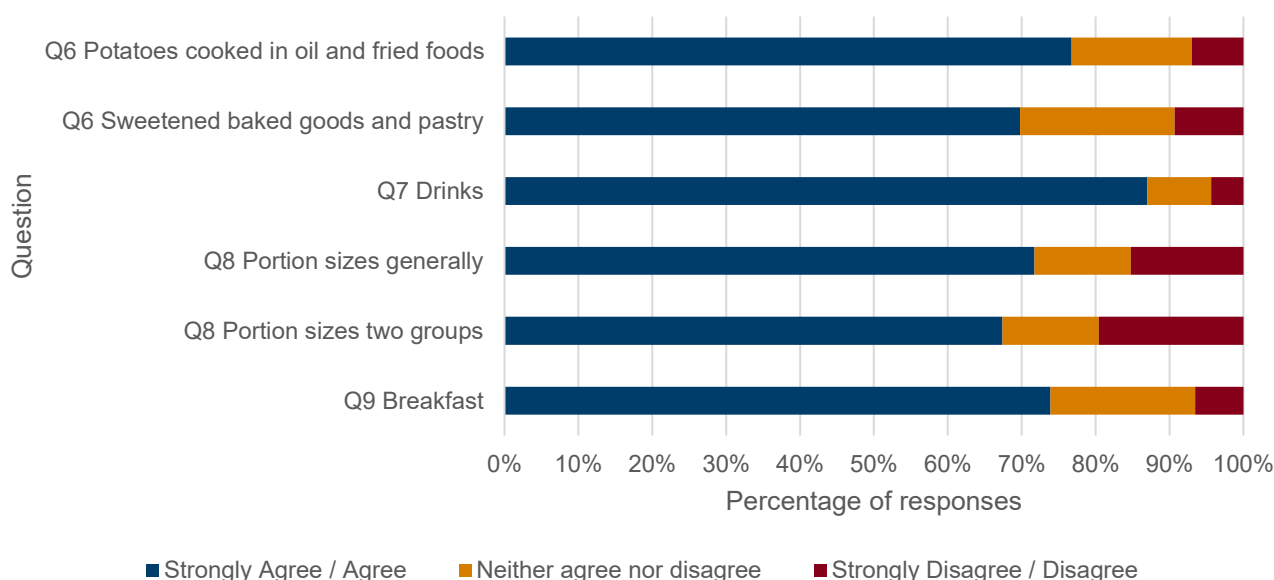
A minority disagreed with tightening restrictions further, warning that removing fried foods altogether could affect uptake of school meals. Others stressed that oven-baked potatoes sprayed with oil should still count as compliant. Some felt more clarity was needed on what counts as “flash fried” or “coated” foods, such as fish fingers or chicken goujons.

In relation to sweetened baked goods and desserts, and pastry, 30 respondents either strongly agreed or agreed with the proposals, 4 disagreed or strongly disagreed, and 9 selected “neither agree nor disagree.”

There was strong support for the proposals relating to sweetened baked goods and desserts, and pastry. Many argued the changes should go further, phasing these foods out or replacing them with fruit, yogurt, or healthier wholegrain-based desserts. Respondents highlighted links between sugar intake, obesity, and poor oral health, recommending that desserts be treated as occasional treats rather than provided every day. Some emphasised sustainability, calling for use of local products, Fairtrade ingredients, and less reliance on highly processed items.

Concerns included reduced learner choice, popularity of sweet desserts, and risks of lower school meal uptake if these options are restricted too far. Several local authorities highlighted higher costs and more food waste when offering fruit, yogurt, or cheese as alternatives. Others opposed pastry limits if items are freshly prepared, arguing that not all pastry-based foods (such as quiche) are unhealthy. Some also criticised excluding milk-based desserts from restrictions, warning this could lead to providing sweetened puddings like custard or rice pudding almost daily.

Figure 13: Mailbox responses to Questions 6-9



Source: Mailbox Responses, n=46; Q6, n=43

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?

Of the 46 quantitative responses submitted to this question, 40 selected strongly agree or agree. A further 2 disagreed or strongly disagreed with the proposals that relate to providing only plain water, plain milk and plain plant-based drinks in primary schools and 4 selected “neither agree nor disagree”.

Respondents shared a strong consensus that water is the healthiest option, sharing how in many schools, water is already only provided at lunchtime, and some local authorities have extended this to breakfast clubs. Respondents noted the evidence-based benefits of drinking water, such as how it improves concentration and reduces the risk of obesity and dental decay. However, some raised concerns that restricting drinks to water may reduce hydration if learners refuse to drink water, preferring juice. A few respondents felt that without more appealing options, learners might waste drinks or bring in sugary alternatives from home.

Milk was widely supported as a valuable source of calcium and nutrients. Respondents said it complements meals, aligns with health guidance, and helps establish healthy routines. Some suggested offering organic milk for environmental benefits. Concerns raised by respondents included the amount of milk that is wasted at mealtimes, younger learners being given too much (some noting that a 125ml portion is seen as excessive), and milk being too filling, so that food is wasted. Some felt that skimmed or semi-skimmed milk should be offered, while others noted environmental concerns with dairy milk and suggested a shift toward plant-based alternatives for all.

Many welcomed the inclusion of plain plant-based drinks, especially for learners with allergies, those who are lactose intolerant, vegan, or don’t drink dairy milk for ethical/environmental preferences. Respondents cited evidence that fortified plant-based drinks are safe alternatives to dairy milk, with some urging for mandatory fortified options. The change was also seen as promoting equality, inclusivity, and sustainability. Concerns centred on inconsistent fortification, limited availability of suitable products, and the need for clear definitions of “plain.” Some cautioned that without proper guidance, plant-based drinks may not provide adequate nutrition, while others worried about operational challenges in sourcing compliant options.

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?

Of the 46 quantitative responses submitted to this question, some respondents expressed different views on the proposals relating specifically to providing more appropriate portion sizes in primary schools, compared with the proposed split between those in nursery to Year 2 and Year 3 to Year 6. For this reason, the results are presented separately for each part of the question.

In relation to the principles of providing more appropriate portion sizes in primary schools, 33 respondents either strongly agreed or agreed with the proposals, 7 disagreed or strongly disagreed, and 6 selected “neither agree nor disagree.”

Those who supported adjusting portion sizes overall highlighted that younger children are often given portions which are too big and then go to waste, while older children go hungry. Those in support also noted that this could align with health guidance and promote healthier eating habits if backed by clear training for catering staff which contains visual aids. Some argued that portion sizes should be left to the discretion of catering staff since appetite varies by individual, not just age. They felt mandatory changes could create unnecessary administrative burdens, confuse families, and risk leaving children hungry if applied too rigidly.

Thirty-one respondents either strongly agreed or agreed with the part of the question about the split between those in nursery to Year 2 and Year 3 to Year 6. There were 9 respondents who disagreed or strongly disagreed, and 6 selecting “neither agree nor disagree.”

Those who agreed with having two portion groups mentioned how this was a practical improvement that better reflects differing nutritional needs. Some stakeholders, including health board respondents, supported clear standards with minimums for healthy foods and maximums for foods to limit, noting it could reduce waste and improve learners feeling full. Some suggested that this does not go far enough, advocating for three age bands as they felt this would be more accurate.

Those who disagreed with having two portion groups felt this distinction was impractical and burdensome, especially in relation to pre-portioned products and considering already stretched catering resources. Some representative bodies and local authorities warned it could increase costs as well as creating a confusing and complicated service. Some argued that having a single set of nutritional standards with flexible guidance would be simpler and more effective.

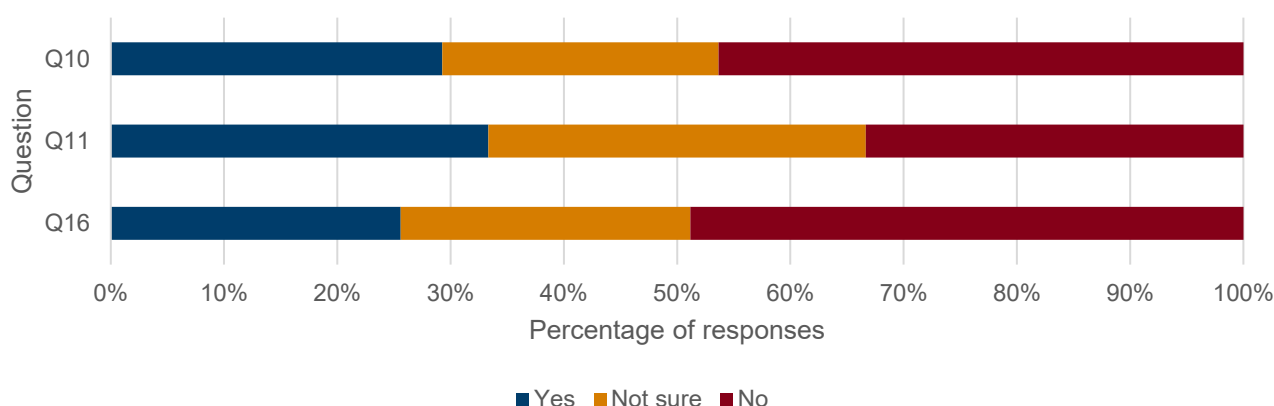
To what extent do you agree or disagree with the proposals relating to breakfast provision?

Of the 46 quantitative responses submitted to this question, 34 selected strongly agree or agree. A further 3 disagreed or strongly disagreed with the proposals that relate to breakfast provision and 9 selected “neither agree nor disagree”.

Those who agreed with the proposals relating to breakfast provision felt that this would align breakfast with lunch standards and support learners’ overall health and learning outcomes, especially among vulnerable groups.

However, concerns were raised about cost, food waste and operational challenges. Some called for flexibility in portion sizes, clearer guidance on spreads and cereals, and inclusion of items like plain yoghurt. There were also differing views on plant-based milks, with calls for unsweetened, fortified options, and caution against UPFs. Funding pressures, staffing capacity, and the dual role of breakfast clubs as a childcare option were highlighted as practical barriers, and several stakeholders recommended the need for additional resources, training, and clear communication with families to ensure successful implementation.

Figure 14: Mailbox Responses to Questions 10, 11 and 16



Source: Mailbox Responses, Q10, n=41; Q11, n=39; Q16 n=43

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

Forty-one respondents answered this question. Of these, 12 respondents felt that the draft statutory guidance supporting primary school food caterers to implement the draft regulations was sufficiently clear. A further 19 respondents felt that this was not clear, and 10 were not sure.

Those who provided further information on how they felt the draft statutory guidance was not sufficiently clear but raised concerns about clarity, accessibility, and enforcement. Many noted that the language is overly technical, inconsistent, or repetitive, and called for simplified, plain English versions with visual aids, exemplar menus, recipe guides, and training, so that there is no room for interpretation across local authorities and schools.

A recurring concern was the continued allowance of exemptions for events and rewards, which were seen as undermining a whole-school approach to healthy eating and gives mixed messages. Respondents called for stronger accountability, clearer monitoring of compliance, and alignment between school-provided meals and food brought from home. Cultural diversity, ALN, and ethical dietary needs (e.g. vegan provision) were highlighted as requiring more explicit guidance and inclusion by specific stakeholders.

There was also emphasis on resource and operational pressures: the need for dietetic training, support for cooking from scratch, consistent portion sizes, and clarity around menu cycles, red/processed meat reductions, and management of allergens. Some respondents called for mandatory daily plant-based options and more explicit links to children's rights, sustainability, and health outcomes.

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

Of the 39 quantitative responses submitted to this question, 13 felt that the draft statutory guidance on the provision of medically prescribed dietary requirements and other dietary requirements was sufficiently clear. A further 13 felt it was not clear, and 13 also selected "not sure".

Respondents welcomed the inclusion of a dedicated section on special diets in the draft statutory guidance, noting that it provides important legal clarity by distinguishing between the duty to make reasonable adjustments for disabled learners and broader statutory alignment. Those who did not feel that the draft statutory guidance was sufficiently clear highlighted gaps in clarity, consistency, and practicality. This included further detail required on who holds responsibility for ensuring compliance (schools, caterers, or local authorities), and inconsistent definitions of special diets. Also mentioned was a lack of clear national processes for managing requests, particularly where medical evidence is unavailable or costly to obtain.

Many called for clearer guidance, plain language, consistent terminology, and practical tools such as case studies, flowcharts, and examples of reasonable adjustments. Specific issues included the treatment of neurodivergent learners who have sensitivities around mealtimes and the need to accommodate cultural and religious diets. Respondents also stressed the financial and operational pressures caused by increasing demand for bespoke menus, higher ingredient costs, training needs, and limited access to dietetic expertise. There was broad support for additional funding, national guidance, and recruitment of in-house dietitians or nutritionists to ensure equity, safety, and consistency across Wales. Many opposed cash or voucher alternatives, warning this would undermine the aims of UPFSM.

What challenges, if any, do you feel should be further recognised within the draft regulatory impact assessment?

Respondents highlighted a wide range of challenges that they feel should be further recognised in the draft regulatory impact assessment. Key concerns included financial pressures, supply chain limitations, and the availability of products such as wholegrain breads and pasta, alongside the costs of new equipment, infrastructure, and staffing. Many raised the risk of reduced meal uptake if foods are unfamiliar or unappealing, which could worsen health inequalities, particularly for disadvantaged learners. Cultural and medical dietary needs, allergies, and protected beliefs (such as veganism) were also highlighted as complex issues requiring clearer definitions, resources, and legal guidance.

Operational barriers were frequently noted, including short and hectic lunch breaks, inadequate dining spaces, lack of trained staff, and insufficient monitoring and compliance systems. Respondents stressed the importance of a whole-school approach, involving parents, learners, and staff to embed positive food cultures and avoid reliance solely on caterers.

Environmental concerns such as food waste, excess packaging, and sustainable sourcing were also raised, with calls for stronger links to climate goals and local procurement. Respondents felt that the challenges reflect the need for greater funding and robust accountability mechanisms. They asked for further support to ensure the regulations are practical, equitable, and sustainable.

What positive effects, if any, do you feel should be further recognised within the draft regulatory impact assessment?

Respondents highlighted a wide range of positive effects that they feel should be further recognised in the draft regulatory impact assessment. These included

improvements to children's health, diet and learning outcomes, reduced health inequalities through UPFSM and long-term benefits, such as lower risks of obesity, diabetes and heart disease. Many noted that aligning school food with the EAT-Lancet planetary health diet and plant-based provision could also deliver environmental gains, support climate goals, and strengthen links between health, sustainability and education.

Additional positive effects included having stronger local economies through procurement with local Welsh suppliers, opportunities for workforce training and upskilling, reduced food waste via portion control, and curriculum links that embed food education within a whole-school approach. Respondents stressed that collaboration across the school food system is essential, and that behaviourally informed communications and learner engagement will be key to ensuring uptake and avoiding families opting out. Respondents felt that the proposals are a key opportunity to improve health, equity, sustainability and community resilience, if delivered in a joined-up way.

What comments, if any, do you have on the draft impact assessments, particularly the impact of the draft regulations on children, families living in socio-economic disadvantage and people with protected characteristics (including evidence you feel should be considered)?

Many respondents agreed the draft regulations could reduce health inequalities by ensuring all learners, particularly those from socio-economically disadvantaged backgrounds, have access to nutritious school meals. School meals were seen as a vital safety net, with UPFSM helping families in Wales manage food insecurity and an increase in the cost of living.

However, concerns were raised about uptake. It was felt that if menus are unappealing, inflexible, or unfamiliar, children may opt out, risking hunger and widening inequalities. Stronger guidance and monitoring were called for to ensure inclusivity for learners with cultural, religious, medical, or those with vegan diets. Respondents also highlighted the need for phased implementation, staff training, clear compliance mechanisms, and engagement with families and learners. While the proposals were welcomed, it was felt that their success will depend on careful delivery, sufficient funding, and a whole-school approach that makes healthy food appealing, inclusive, and accessible.

What comments, if any, do you have on how costs would be impacted on (including evidence you feel should be considered)?

Respondents highlighted serious concerns that the true costs of implementing revised nutritional standards for UPFSM are not yet fully understood. While healthier, wholegrain, and sustainably sourced foods are more expensive, local authority stakeholders stressed that budgets are already stretched and their funding allocations from Welsh Government are inadequate.

Respondents communicated that rising food prices, staff training, kitchen infrastructure, special diets, and sustainable procurement all add cost pressures, with estimates ranging from a few pence to over £1 extra per meal. Some suggested cost savings could be achieved through reducing desserts, waste, or meat use, and

evidence was cited that plant-based diets can be cheaper and deliver long-term savings to the NHS.

Respondents called for more detailed cost modelling, consistent funding uplifts, and investment in infrastructure and training, stressing that costs should be viewed as a long-term public health investment rather than a barrier to stronger standards.

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? (Feel free to provide examples of anything you think is missing.)

Forty-three respondents answered this question. Of these, 11 respondents felt that the draft statutory guidance aimed at supporting local authorities and governing bodies to deliver their duties to promote healthy eating and drinking was sufficiently clear. A further 21 respondents felt that this was not clear, and 11 were not sure.

Many respondents felt the draft statutory guidance is clearer than before, but still lacks consistency, accountability, and practical detail. Concerns were raised about unclear roles and responsibilities between local authorities, schools, governors, caterers, and Estyn, as well as the absence of robust monitoring and enforcement mechanisms.

Several highlighted that terms like “should” and “could” weaken expectations, and therefore the guidance risks being inconsistently applied between different local authorities and schools. There were also calls for stronger emphasis on whole-school approaches, locally sourced food and better support for governors through training, templates, and best practice examples. Stakeholders stressed that clearer accountability, stronger compliance mechanisms, and more practical tools are needed to ensure the guidance delivers meaningful and consistent improvements in healthy eating and drinking across schools in Wales.

How can we achieve a nutritionally balanced and appealing food offer in secondary schools? (Feel free to provide examples of good practice or evidence that supports your response.)

Similar to the main consultation responses to this question, respondents highlighted that achieving a nutritionally balanced and appealing food offer in secondary schools is complex. They listed factors such as time, space, financial pressures, and an emphasis on learner autonomy. Many called for minimum lunch break standards, better dining facilities, and affordable, attractive healthy options to compete with fast food outlets and reduce reliance on unhealthy “grab and go” foods. FSM meal allowances were seen as inadequate, with suggestions to expand coverage across the school day and ensure meal deals remain both appealing and balanced whilst also being affordable for those who receive FSM.

A whole-school approach was widely supported, embedding food into school culture, curriculum, and leadership. Also mentioned was the need for stronger compliance monitoring. Stakeholders stressed the importance of engaging learners in menu planning, tasting sessions, and food education to build lifelong healthy habits. Best practice examples included creative “street food” style menus, healthier grab and go options, school allotments, and partnerships with local suppliers. Calls were also

made for clearer nutritional standards, support for plant-based and culturally inclusive meals, and funding to modernise kitchens and dining spaces.

Overall, respondents emphasised that a nutritionally balanced and appealing food offer cannot rely on caterers alone. Respondents felt that coordinated action across schools, government, and communities is required, backed by investment and flexibility. By aligning standards with convenience and affordability, cited as the main needs for secondary learners, while promoting education and engagement, secondary schools can offer food that is both nutritionally sound and appealing, helping to sustain healthy behaviours established in primary school.

What, in your opinion, would be the likely effects of the legislation on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

Most respondents who provided an answer to this question felt the proposed legislation would have little or no impact on the Welsh language, as bilingual menus and communications are already common practice in their experience. However, opportunities to strengthen the Welsh language were mentioned, such as mandating bilingual menus, signage, and resources, ensuring Welsh is given prominence, and linking food education with Welsh culture and local produce.

In your opinion, could the legislation be formulated or changed so as to: have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

The respondents that did provide an answer to this question provided similar responses to the previous question. Additional suggestions included using Welsh food terms, staff training, and respondents further emphasised the importance of linking food education with culture and local procurement. While some felt the legislation would have little impact, others argued that making bilingualism explicit in the regulations would reinforce government policy and create more opportunities for learners to use Welsh in daily life.

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Several respondents utilised this answer to explain the overall purpose or objectives of their organisation or provided further details to the answers already given to the earlier consultation questions. Those who did provide related issues that were not specifically addressed earlier in the consultation raised points which are outlined below.

Some respondents further emphasised the importance of a whole school approach that goes beyond meals to include food education, growing projects, cooking, budgeting skills, and making stronger links with families and communities, governing bodies, and catering staff. Concerns were raised about the risk of mixed or harmful

messaging around food (e.g. “good/bad” foods) and the need to protect children’s mental health, particularly regarding eating disorders. Physical activity and mental health were also raised as essential complements to food policy.

Respondents highlighted opportunities for the Welsh Government to promote “grown in Wales” produce within the guidance, supporting local farmers and reducing reliance on imported goods with poor welfare or environmental standards.

Many noted inconsistencies in monitoring and compliance. A single national software was suggested. Respondents highlighted the technical and administrative burden of nutritional analysis, and the need for national dietician support. Calls were also made for clearer guidance on packed lunches, themed food days, and the role of Estyn in monitoring.

Several highlighted the need for more plant-based meals for both health and environmental sustainability. Vegan groups and rights-based organisations stressed that daily vegan-suitable meals are necessary to respect philosophical convictions and avoid implicit bias toward animal-based diets. Others criticised the lack of ambition in promoting plant-based diets, saying opportunities to move away from red meat and dairy were missed.

Some representative bodies and healthcare practitioners pointed to high levels of obesity and diet-related ill health in Wales, calling for schools to lead by example and for wider government action on retail environments, advertising, and planning rules around takeaways near schools. Calls were made for more discretion to reflect local demographics, choice for children, and sensitivity to practical challenges in catering.

Findings from children and young people

This summary includes all findings from the consultation activities with children and young people. This includes findings from primary and secondary school learners from the main consultation survey, the children and young people (CYP) consultation survey, Easy Read survey responses received from CYP, and findings from the focus groups with CYP.

Do you agree with increasing the amount of fruit, vegetables and starchy carbohydrates?

Primary and secondary school learners responding to the main consultation were mostly supportive of the proposed changes relating to fruit, vegetables and starchy carbohydrates. Out of the learner responses, 696 (70.9%) strongly agreed or agreed, 194 (19.8%) neither agreed nor disagreed and 75 (7.6%) disagreed or strongly disagreed. Sixteen respondents (1.6%) did not select an answer. Supporting comments from learners included how the proposals would improve healthy eating habits and choices amongst learners. Primary learners were particularly supportive of increasing fruit, while some were less likely to want more vegetables.

The children and young people (CYP) who responded to the CYP consultation were also largely in favour of these changes, with 45 (84.9%) who agreed or strongly agreed, 5 (9.4%) who neither agreed or disagreed and 3 (5.7%) who disagreed or strongly disagreed. Of the 53 CYP respondents to this question, 11 left a supporting comment. Some respondents (4) highlighted that these changes would contribute to healthier diets and children, whilst others (2) expressed their support for giving learners more choice. However, one respondent felt that they have enough fruit and salad already and another suggested that children might have mixed opinions about wholegrain carbohydrates.

CYP respondents of the 'Easy Read' Consultation were even more in favour of these changes, with 29 out of 34 who agreed or strongly agreed, 2 not sure and 3 respondents leaving it blank. No CYP respondents to the easy read consultation disagreed with the proposals.

In terms of CYP feedback from the focus groups, the majority of learners across all primary schools agreed with increasing the fruits and vegetables offered. The majority also agreed with changes to starchy carbohydrates, with learners from St David's Catholic Primary School in Swansea commenting that potatoes were "the biggest waste" in their school meals. Junior learners from Cadoxton Primary School noted that wholegrain starchy carbohydrates were already part of their school menu, with most of the group happy with the wholegrain bread that was offered (although some noted that white bread was "more tasty").

Support for the proposals was also replicated in focus group feedback from secondary schools. Feedback included the need to offer a greater variety of fruit, instead of "just apples and oranges", alongside the welcoming of 50% wholegrain foods.

Do you agree with these changes for meat, red meat and fish?

Of the primary and secondary school learners who responded to this question in the main consultation, 622 (63.4%) either agreed or strongly agreed. 213 (21.7%) neither agreed nor disagreed, while 115 (11.7%) disagreed or strongly disagreed. 31 (3.2%) did not select an answer. Of the learners who provided a supporting comment, responses included general support for the proposals and the request that high quality and locally sourced meat, red meat and fish should be available.

This question received a mostly positive response from respondents to the CYP Consultation, with 31 (58.5%) CYP who strongly agreed or agreed, 13 (24.5%) neither agreed or disagreed and 8 (15.1%) strongly disagreed or disagreed. One (1.9%) did not select an answer. There were no common themes in the 11 supporting comments, with 3 respondents suggesting that there should be more red meat.

Twenty-five of the 34 CYP respondents to the Easy Read Consultation agreed or strongly agreed with the changes, whilst 4 were not sure and 2 disagreed or strongly disagreed. 27 provided a supporting comment. Three did not provide a response to this question.

Primary school learners who participated in focus groups were more divided when asked whether they agree with the changes relating to meat and fish, with nearly half of learners from Clwyd Primary School disagreeing, compared to the majority of learners from Ysgol Gynradd Gymraeg Rhosafan agreeing. In this context, learners were often vocal about different preferences for eating meat, noting different textures and tastes. Focus group participants from secondary schools felt that fish could be increased on the menu, in recognition of the fact that existing options were often breaded fish. Secondary learners from Lliswerry High School were aware of health problems linked to red meats (such as cancer and heart disease).

Do you agree with these changes for processed meat?

In response to the main consultation, 470 (47.9%) primary and secondary learners agreed or strongly agreed with the proposal relating to processed meat. 175 (17.8%) disagreed or strongly disagreed, while 298 (30.4%) neither agreed nor disagreed. 38 (3.9%) did not select an answer. Of the primary learners who provided a supporting comment, 13 stated that limiting the amount of processed meat on school menus was a good thing. Other comments by both primary and secondary school learners who agreed included the importance of cooking fresh 'home-cooked' meals in school every day and that the quality of processed meat is very poor and "disgusting".

Thirty-three respondents (62.3%) to the CYP Consultation strongly agreed or agreed with this question, whilst 15 (28.3%) neither agreed nor disagreed and 3 (5.7%) strongly disagreed or disagreed. Two respondents (3.8%) did not select an answer. Of the 6 respondents who left a supporting comment, two highlighted that processed meat is a popular choice amongst learners.

Of the 34 CYP respondents to the Easy Read Consultation, 25 respondents agreed or strongly agreed, 7 were not sure and 2 respondents did not select an answer. No CYP respondents chose disagree or strongly disagree.

Learners who participated in focus groups were aware of the health risks associated with processed meats but acknowledged that many learners like and are even 'excited' by fried and processed foods, such as chicken nuggets, which is often why they choose to eat school meals in the first place.

Do you agree with these changes for non-meat options?

Of the primary and secondary school learners who responded to this question in the main consultation, 431 (43.9%) agreed or strongly agreed, 235 (24%) disagreed or strongly disagreed and 278 (28.3%) neither agreed nor disagreed. 37 (3.8%) did not select an answer. Those who agreed and provided further comment expressed the need to ensure sufficient choice and variety when providing non-meat options. Some of the learners who disagreed and provided further comment suggested that cheese should still be made readily available for learners who want it.

Of the respondents to the CYP Consultation, 26 (49.1%) strongly agreed or agreed, 19 (35.8%) neither agreed nor disagreed and 5 (9.4%) strongly disagreed or disagreed to this question. There were 6 supporting comments made which included thoughts on how the changes would give vegetarians and vegans more options, as well as a suggestion to provide non-meat options to meat eaters once a week. Another respondent requested that a meat option is still always available for meat eaters.

This question received a mixed response amongst CYP responding to the Easy Read Consultation, with 13 respondents who agreed or strongly agreed, 12 respondents who were not sure and 7 respondents who disagreed or strongly disagreed. Two respondents did not select an answer.

Proposed changes for non-meat were met with varied support from learners across all primary schools engaged as part of the focus groups. Secondary learners from Lliswerry High School were supportive of non-meat options, as well as alternatives in general, showing awareness of allergies and varied dietary needs.

Do you agree with these changes for potatoes cooked in oil, fried foods, sweetened baked goods and desserts, and pastry?

Overall, 495 (50.5%) primary and secondary learners agreed or strongly agreed with the proposals relating to potatoes cooked in oil, fried foods, sweetened baked goods and desserts, and pastry. 198 (20.2%) learners disagreed or strongly disagreed, while 254 (25.9%) neither agreed nor disagreed. 34 (3.5%) did not select an answer. Some primary school learners who agreed and provided further comment, expressed that desserts, fried foods, potatoes and pastries should still be offered but in moderation as part of a balanced diet.

Amongst CYP respondents, 28 (52.8%) strongly agreed or agreed, 5 (9.4%) neither agreed nor disagreed and 19 (35.8%) strongly disagreed or disagreed. One respondent did not select an answer. Of the 17 who left a supporting comment, several respondents (6) expressed that they would not enjoy vegetables being served with dessert and instead dessert should only be served with fruit. Others (3) supported the changes due to their health benefits, whilst 2 respondents highlighted that fried foods are popular choices amongst learners. Another respondent suggested that the changes do not go far enough and instead, sweetened baked

goods and dessert could be served once a week, with fruit and yoghurt offered on the other days.

The Easy Read Consultation also received a largely positive response to this question, with 27 CYP respondents who agreed or strongly agreed and 2 who were not sure. Three respondents selected multiple options, such as agree and not sure, agree and disagree and strongly agree, agree and not sure. Two respondents did not select an answer.

Focus group participants from primary schools were mixed on proposals relating specifically to potatoes cooked in oil. Conversely, primary school learners were much more likely to support the changes to pastry. Once again, proposed changes relating to sweetened baked goods and desserts received a mixed reception, with learners from Ysgol Gynradd Gymraeg Rhosafan and Clwyd Primary School highly in favour, whereas learners from schools such as Awel y Mor were much more opposed, instead suggesting that more fruit could be offered without reducing or changing dessert options.

Secondary learners from Lliswerry High School were aware of health problems linked to too much oil in the context of fried foods, generally agreeing with proposals specific to pastries and desserts. Learners from Cwm Rhondda were generally opposed to proposed changes relating to food cooked in oil and fats.

Do you agree with these changes for giving learners only plain water, plain milk and plain plant-based drinks in primary schools?

Over half (499; 50.9%) of all primary and secondary learners who responded to the main consultation, agreed or strongly agreed with proposals relating to drinks. 207 (21.1%) disagreed or strongly disagreed, with 195 (19.9%) who neither agreed nor disagreed. 80 (8.2%) did not select an answer. Primary school learners in favour who provided a supporting comment made statements such as “I love this idea”, “totally agree” and “great for teeth”. Conversely, the most common criticism from learners who disagreed was that many children do not like water and not all children drink milk.

This question received a mixed response in the CYP consultation, with 22 (41.5%) CYP respondents who strongly agreed or agreed, 14 (26.4%) who neither agreed nor disagreed and 16 (30.2%) who strongly disagreed or disagreed. One respondent did not provide an answer. Of the 13 who left a supporting comment, several respondents (7) expressed that juice should be available, with 3 suggesting that a low or no sugar alternative could be provided. Others (4) felt that juice could be offered in moderation, and 2 respondents shared that some learners might not like the remaining options.

Of the 34 CYP who responded to this question in the Easy Read Consultation, 18 respondents agreed or strongly agreed with the changes, 9 respondents were not sure and 4 disagreed. Two respondents selected both not sure and disagree, while 1 provided no answer.

The idea of giving learners only plain water, plain milk and plain plant-based drinks was fairly divisive across the primary schools engaged as part of the focus groups,

with learners tending to be either highly in favour, or strongly opposed. For instance, learners from St David's were curious and enthusiastic about other drinks that could be offered which were felt to be more enjoyable, such as flavoured milks and lemon tea, but many learners felt that fruit juices should be included.

Changes to the drinks offered was the most controversial issue, with learners from Ysgol Gyfun Cwm Rhondda largely in favour, whereas those from Lliswerry High School shared concerns that reducing options could make peers more likely to be dehydrated. Replacing fizzy drinks with no added-sugar fruit juice (either fresh or from a machine) was suggested instead. Learners from Lliswerry High School also stated the need for greater education and explanation around what constitutes 'plant-based drinks.'

Do you agree with these changes for portion sizes?

There were 593 (60.4%) primary and secondary learners who responded to the main consultation who agreed or strongly agreed with the proposals relating to portion sizes, compared to 83 (8.5%) who disagreed or strongly disagreed. 196 (20%) learners neither agreed nor disagreed. 109 (11.1%) did not select an answer. The most common supporting comment provided by learners who agreed was that the portion sizes are currently not big enough in schools, and as a result they are often hungry.

Respondents to the CYP consultation were largely in favour of these changes, with 38 (71.7%) who strongly agreed or agreed, 7 (13.2%) who neither agreed nor disagreed and 7 (13.2%) who strongly disagreed or disagreed. One respondent did not provide an answer. Of the 15 who left a supporting comment, some respondents (5) were supportive of the proposals as they felt currently that Juniors can sometimes be hungry after their lunch and this change will ensure they eat enough. Others (2) suggested that there could be flexibility, where learners are able to choose their portion size depending on their individual needs. Two respondents felt that the changes would reduce the food waste currently produced by Infants.

Of the 34 CYP respondents to the Easy Read Consultation, 19 strongly agreed or agreed with proposals relating to portion sizes, 10 were not sure and 2 disagreed. One respondent provided no answer, one selected both strongly agree and strongly disagree and one selected agree and not sure.

The majority of learners across all primary schools engaged as part of the focus groups were supportive of the changes for portion sizes, with only a small minority opposed. The male learners from Cadoxton Primary School, for instance, were particularly excited about the prospect of bigger meals for older learners.

The proposals relating to portion sizes were also supported by secondary learners from both schools, with comments that this will result in less food waste.

Do you agree with these changes for breakfast?

Of the primary and secondary learners who responded to the main consultation, 494 (50.4%) agreed or strongly agreed with the proposals relating to breakfast provision. 103 (10.5%) strongly disagreed or disagreed and 247 (25.2%) neither agreed nor

disagreed. 137 (14%) did not select an answer. Of those who provided a supporting comment, several felt there should be more options available on the breakfast menu.

This question received a mixed response amongst the CYP consultation respondents, with 20 (37.7%) who strongly agreed or agreed and 20 (37.7%) who strongly disagreed or disagreed. 12 (22.6%) neither agreed nor disagreed. One respondent did not provide an answer. Of the 18 who left a supporting comment, several respondents (9) felt that juice should still be offered at breakfast, with 5 respondents suggesting moderation, such as offering it less often or offering juice with a lower sugar content. Two respondents felt that juice should be offered because it is healthy and they understand it to contribute towards their 5 a day. A further 3 respondents suggested that learners should be offered a choice between wholemeal and white bread as some children do not like wholemeal bread.

Of the 34 CYP who responded to the Easy Read Consultation, 18 agreed or strongly agreed, 10 were not sure and 2 disagreed or strongly disagreed. Four respondents left this question blank.

Support for changes to breakfast provision was mixed across both primary and secondary school learners who were engaged as part of the focus groups. Secondary learners agreed with the introduction of wholemeal as a means of introducing fibre into your diet, but disagreed with the exclusion of fruit juice, citing it as an important source of vitamins and an effective way to increase the likelihood of learners eating more fruit in the future.

Is the Guidance clear?

Of the primary and secondary learners who responded to this question in the main consultation, 294 (30%) selected “Yes”, 455 (46.4%) selected “Not sure” and 65 (6.6%) selected “No”. 167 (17%) did not select an answer.

Question 9 received a largely positive response, with 37 (69.8%) respondents to the CYP Consultation who selected “Yes”, 12 (22.6%) selected “Not sure” and 3 (5.7%) selected “No”. One respondent did not provide an answer.

Of the 34 CYP respondents to the Easy Read Consultation, 27 selected “Yes”, 3 said “Not sure”, and 2 selecting “No”. 2 respondents left this question blank.

Most focus group participants across both primary and secondary schools agreed that the guidelines are clear.

Is this Guidance about special diets clear?

Of the primary and secondary school learners who responded to this question in the main consultation, 330 (33.6%) selected “Yes”, 391 (39.9%) selected “Not sure”, 73 (7.4%) selected “No” and 187 (19.1%) provided no answer.

Most respondents to the CYP Consultation selected “Yes” for Question 9.1 (38; 71.7%), whilst 11 (20.8%) selected “Not sure” and 3 (5.7%) selected “No”. One respondent did not provide an answer. Of the CYP respondents to Questions 9 and 9.1, only 5 left a supporting comment. Three respondents highlighted the importance of catering for learners with allergies and dietary requirements.

When asked in the Easy Read Consultation, “Will the guidance help children with special or medical diets?”, 16 out of 34 CYP respondents selected “Yes”, 14 selected “Not sure” and 2 selected “No”. Two respondents did not provide an answer.

When asked about whether the guidelines on special diets are sufficiently clear, most primary and secondary learners who participated in focus groups agreed.

What challenges do you think this guidance will have?

When primary and secondary learners responding to the main consultation were asked “What challenges, if any, do you feel should be further recognised within the draft regulatory impact assessment?”, 303 provided an answer. The most common response was “I don’t know” or “not sure”.

In the CYP Consultation, 40 respondents answered this question. Some respondents (6) did not identify any challenges, whilst others (2) suggested that making these changes might cost more money. Several respondents (10) predicted that some learners would not like the new options, with some (8) suggesting it would take time for learners to get used to the new menu and eating healthier. Two respondents worried that if learners do not like the new food, then this could lead to more food waste.

Both primary and school learners who participated in the focus groups identified costs as a challenge. Other challenges identified were ensuring sufficient consideration of individuals with allergies or digestive issues, such as lactose intolerance.

What positive effects do you think this will have?

In the main consultation, 263 primary and secondary school learners provided a response to the question “What positive effects, if any, do you feel should be further recognised within the draft regulatory impact assessment?” 32 stated they “don’t know”, 7 felt there would be improved mental health and wellbeing, while 5 thought there would be less food waste.

Forty-two respondents to the CYP Consultation answered this question. Most respondents (29) highlighted that the changes will mean that learners have a healthier diet, with two respondents recognising that this could have long-term health benefits. A further two respondents suggested that portion size changes will reduce food waste and ensure older learners are eating enough. Three respondents expressed that they were not sure what the positive effects will be.

In terms of feedback from the focus groups, primary school learners felt the positive effects from the guidelines included healthier eating and greater choice. Secondary school learners noted several benefits, including physical and mental health benefits, with learners experiencing improved concentration and increased energy, as well as healthier eating habits.

How do you think this will affect families on low income?

In the main consultation, 230 primary and secondary school learners provided a response to the question “What comments, if any, do you have on the draft impact

assessments, particularly the impact of the draft regulations on children, families living in socio-economic disadvantage and people with protected characteristics (including evidence you feel should be considered)?" Once again, "don't know" was the most common response provided (74). Fifteen respondents raised the issue of "equity", while 5 felt it will help those families build healthy eating habits.

Thirty-nine CYP respondents answered this question. Of these, 17 respondents highlighted that the changes will be helpful for low-income families because school dinners are free and they will be able to save money. A further 3 respondents highlighted that the changes would ensure learners are eating a healthy meal, which is important if healthy food is not financially accessible at home. Three other respondents were not sure, whilst 4 respondents thought the changes will have no effect on low-income families, mainly because school dinners are already free.

Several primary and secondary school learners who participated in focus groups noted that "it will be better" for families in low income. One learner suggested allowing learners to take food that is going to waste in school back home.

Changes like this can take time and money. How do you think this will affect costs?

In the main consultation, 221 primary and secondary school learners provided a response to the question "What comments, if any, do you have on how costs would be impacted on (including evidence you feel should be considered)?" 27 CYP believed that the proposals would cost more, but 8 mentioned that they felt that this would be money well spent. There were also who 8 felt there would be increased costs as a result of higher food waste.

Thirty-six CYP respondents answered this question. Several respondents (20) predicted that the changes would increase costs, due to healthier food costing more and increased preparation time. However, 7 respondents felt that the increased cost is worth it to provide learners with healthier food in schools. A further 2 respondents thought that the changes will cost less because of the smaller portion sizes for Infants and through the removal of some food and drink items. Others (3) were not sure, and 2 respondents did not think the changes would affect costs to a great degree.

Easy Read respondents were not asked a question relating to their views on the costs of the proposals.

Do you think these changes will affect the Welsh language?

In the main consultation, 202 primary and secondary school learners provided a response to the question "What, in your opinion, would be the likely effects of the legislation on the Welsh language?" 62 stated they were "not sure" and 20 said there would be "no effect". A further 21 felt that providing menu information bilingually would promote the use of the Welsh Language and 11 already use the Welsh language as much as they can.

Question 14 received a largely negative response, with 34 CYP respondents to the CYP consultation selecting "No", whilst 15 selected "Not sure" and one selected "Yes". 12 of the 50 respondents left a supporting comment. 5 respondents suggested

that the changes will not affect the Welsh language, whilst others (7) did not understand the connection between the Welsh language and school dinners. 2 respondents highlighted that many of the kitchen staff at their schools do not speak Welsh.

Twenty-seven CYP Easy Read respondents supplied an answer for this question. The most common response to this question was that respondents were not sure or provided answers which were not relevant to this question. Some learners also mentioned how they are encouraged to speak Welsh, for example by saying 'please' and 'thank you' in Welsh when receiving their school dinner.

Finally, a strong majority of learners from the focus groups disagreed with the idea that the proposed changes would affect the Welsh language.

Do you think this will help local authorities and schools promote healthy eating?

Of the primary and secondary learners who responded to this question in the main consultation, 270 (27.5%) selected "Yes", 297 (30.3%) selected "Not sure", 56 (5.7%) selected "No" and 358 (36.5%) provided no answer. There were 29 CYP who provided a meaningful supporting comment, and of these, there were 4 who mentioned consulting with learners and 3 recognised a need to support learners with allergies.

This question received a largely positive response with CYP consultation respondents, with 39 (73.6%) who selected "Yes", 10 (18.9%) selected "Not sure" and one (1.9%) selected "No". One respondent did not provide an answer. There were 12 respondents to the CYP consultation who left a supporting comment. Most respondents' (10) supporting comment reiterated their belief that the changes will help local authorities and schools to promote healthy eating.

This question received a mostly positive response from CYP Easy Read respondents, with 22 selected "Yes", 8 selected "Not sure" and 2 selected "No". For Easy Read respondents, this question did not provide the opportunity to submit a supporting comment.

Is there anything else you'd like to say about these changes?

Of the CYP who provided an answer to this question within the main consultation, 11 had comments on how they feel that the portion sizes are currently too small. There were 9 learners raised comments relating to allergies/intolerances, including the difficulty of matching free from provision for all dietary needs. A further 8 had comments on the school dinner environment, including how they would like the long queues improved, how they would like to see more variety/choice, more time to eat, and water fountains with cold water on offer. Seven raised further comments on food in secondary schools, including how they think the food is better quality in primary school than in secondary.

Twenty-three respondents to the CYP consultation answered this question. Several respondents (16) did not want to add anything to their previous answers. Two respondents suggested that more focus should be placed on making children less fussy, whilst another respondent requested that schools serve more Welsh dishes.

Further comments included the desire for juice to be served (1), support for the changes (4) and the suggestion that the menu should be sampled by learners before it is introduced (1).

Thirteen CYP respondents to the Easy Read survey provided additional comments. This included 7 who wished to share information they had learned on deforestation or Fairtrade within their class with others, support for making school dinners healthier (3), and the desire for food waste to be reduced (2).

Do you have any ideas about how we can help learners have healthy, balanced food in secondary schools?

There were 133 primary school learners and 185 secondary school learners who provided an answer to this question within the main consultation. Of these responses, there were 51 who highlighted their desire for balanced meals, such as more vegetables and a salad bar. A further 39 suggested that learners are given more information, to support them in making informed choices. 34 learners wished for more choice, including “more healthy options so children are more likely to choose them”. There were also 26 learners who wanted to have a voice in the process, such as asking them what they want to eat.

Eighteen CYP respondents answered this question. Several respondents (5) did not have any ideas about how to help learners have healthy, balanced food in secondary schools. Others (2) suggested involving secondary learners in the development of menus, whilst 2 respondents recommended improved food education and 4 respondents suggested making school dinners free or more affordable in secondary schools.

There were 26 CYP respondents who provided an answer to the Easy Read version of this question. Many respondents (11) also proposed that the food offering in secondary schools should be made healthier and others (2) felt that FSM should apply to all secondary school learners, as well as primary school learners. Some respondents (7) also highlighted that secondary school learners could be provided with a wider range of options.

Suggestions from secondary school learners in focus groups included introducing a greater variety of fruits on the menu, ensuring healthy options are cheaper and increasing education around the benefits of healthy eating.

Easy Read consultation findings

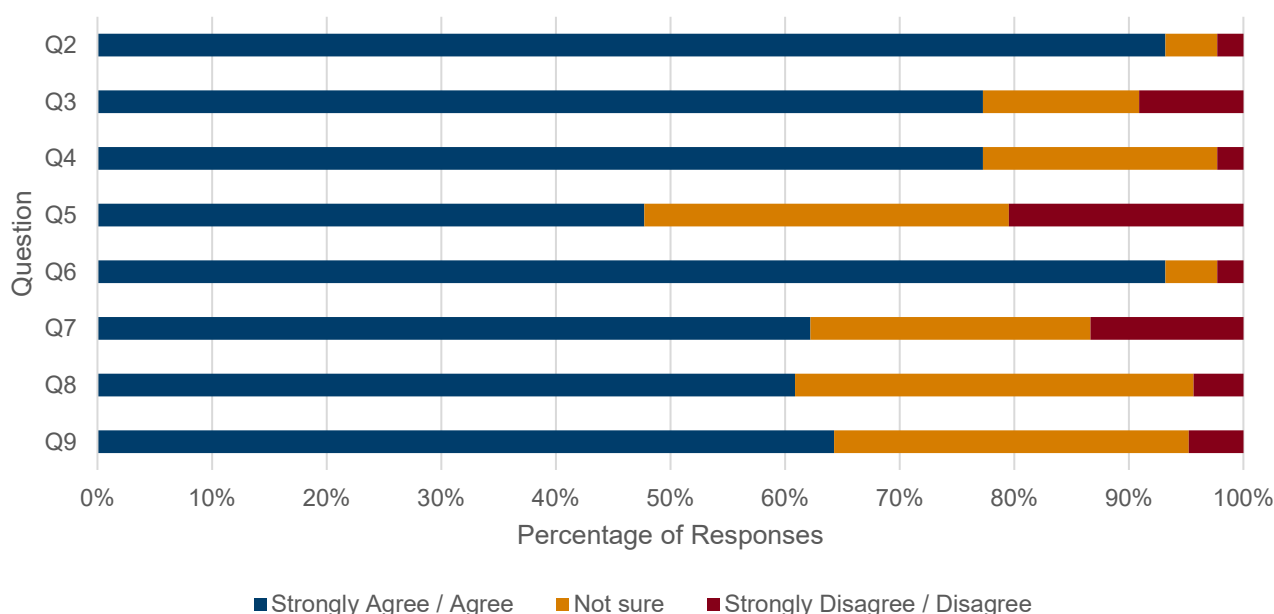
A total of 48 Easy Read responses were submitted. The breakdown of these responses is shown in Table 3. The largest share came from primary school learners.

Table 3: Demographic Groups of Easy Read responses

Stakeholder Group	Number of responses	Percentage of responses
Primary school learner	34	70.8%
Other	5	10.4%
Parent or carer	5	10.4%
Work in education	2	4.2%
Work for a council	2	4.2%
Work in catering	2	4.2%
Food supplier	1	2.1%
Local food producer	1	2.1%
Farmer	1	2.1%

Source: Easy Read responses, n=48

Figure 15: Easy Read consultation responses to Questions 2-9



Source: Easy Read Responses n=44 (Q7, n=45; Q8, n=46; Q9, n=42)

What do you think about our changes to fruit, vegetables and starchy carbohydrates?

Easy Read respondents were largely in favour of these changes, with 41 who agreed or strongly agreed, 2 who were not sure and 1 who disagreed.

Of the 44 Easy Read respondents, 24 provided a supporting comment. Several respondents expressed their support for the proposals, citing that fruit and vegetables are healthy (8) and that they in favour of a wider range of options (5). Further, 7 respondents requested that the bread provided in schools is sustainably made and without palm oil.

What do you think about our changes to meat and fish?

Of the 44 Easy Read respondents, 34 respondents agreed or strongly agreed with the changes, whilst 6 were not sure and 4 disagreed or strongly disagreed. 27 provided a supporting comment.

Respondents (6) highlighted the health benefits of protein and a further 4 respondents requested that meat and fish be locally sourced and Welsh. Some respondents (5) also highlighted their wish for meat to be sourced from a supplier that does not use soy or palm oil in their animal feed.

What do you think about our changes to processed meat?

Of the 44 Easy Read respondents, 34 respondents agreed or strongly agreed, 9 were not sure and 1 respondent strongly disagreed. 21 provided a supporting comment.

Several respondents (7) agreed with the changes, highlighting that processed meat is unhealthy and should be restricted in schools, whilst 2 respondents suggested processed meat should be restricted even further. Others (2) suggested that good quality food is important and that a “freshly prepared butchers’ sausage or handmade burger is worlds apart from supermarket or catering packs of frozen products”. 7 respondents requested that animal feed was soy or palm oil free.

What do you think about our changes to non-meat options and cheese?

This question received a mixed response, with 21 respondents who agreed or strongly agreed, 14 respondents who were not sure and 9 respondents who disagreed or strongly disagreed.

Of the 44 Easy Read respondents, 25 provided a supporting comment. Respondents who disagreed with the proposals highlighted that cheese is a popular choice amongst learners (4) and that cheese is healthy due to its protein content and nutrients such as calcium (6). 7 respondents also highlighted the importance of providing options for people with dietary requirements and allergies. Others, however, agreed with the proposals, suggesting that too much cheese is unhealthy and therefore should be restricted (2). 4 respondents proposed that a variety of options should be served in schools.

What do you think about our changes to cooking in fats and oils and desserts and pastries?

This question received a largely positive response, with 41 respondents who agreed or strongly agreed, 2 who were not sure and 1 disagreed.

Of the 44 Easy Read respondents, 25 provided a supporting comment. Many respondents (13) expressed their support of the proposals, such as the inclusion of fruit with desserts and sugar reduction. Similarly to the consultation findings, some

respondents (5) suggested that only certain types of oil should be used, such as olive oil.

What do you think about our changes to drinks?

Of the 45 Easy Read respondents to this question, 28 respondents agreed or strongly agreed with the changes, 11 respondents were not sure and 6 disagreed. 24 provided a supporting comment.

Respondents (10) expressed that they wish for schools to offer fruit juice or a sugar free alternative. Some respondents (4) felt that juice should be offered in moderation, whereas others (4) were in support of the changes, citing that water and milk are healthy choices.

What do you think about our changes to portion sizes?

Of the 46 Easy Read respondents to this question, 28 respondents strongly agreed or agreed, 16 were not sure and 2 disagreed. 24 provided a supporting comment.

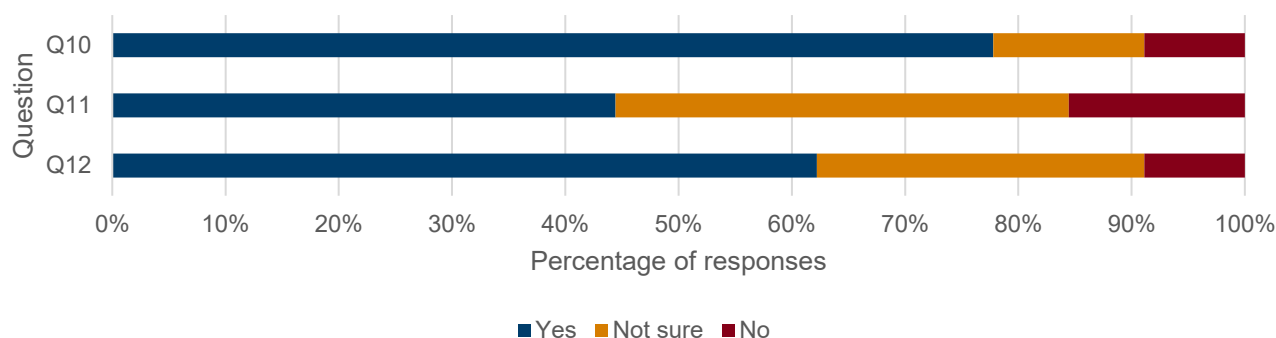
Several respondents (12) approved of the proposals, particularly the proposal to give a larger portion size to Juniors to ensure these learners are eating enough and are not hungry. Others (12) felt that a more flexible approach would be more appropriate, such as offering second helpings, suggesting this would reduce food waste, account for different appetite sizes between learners of the same age and ensure learners who do not have access to sufficient food at home can eat a larger meal at school, regardless of their age.

What do you think about our changes to primary school breakfast?

Twenty-seven respondents agreed or strongly agreed, 13 were not sure and 2 disagreed or strongly disagreed. Of the 42 Easy Read respondents to this question, 24 provided a supporting comment.

Some respondents (6) shared that they were not sure because breakfast is not offered in their school. Some respondents (2) suggested that a variety of breakfast options should be offered, such as eggs, beans, yoghurt and porridge, rather than a reliance on cereal and bread. 4 respondents proposed that the cereal offered should be palm oil and soy free, whilst 4 respondents expressed their desire for Fairtrade food to be offered. Others (2) restated their view from Question 7 that fruit juice should be available.

Figure 16: Easy Read consultation responses to Questions 10-12



Source: Easy Read consultation responses, n=45

Is the guidance clear for the people who make and serve food in primary schools?

Question 10 received a largely positive response from Easy Read respondents, with 35 who selected “Yes”, 6 selected “Not sure” and 4 selected “No”. For Easy Read respondents, this question did not provide the opportunity to submit a supporting comment.

Will the guidance help children with special or medical diets?

In response to Question 11, 20 Easy Read respondents agreed, 18 were not sure and 7 disagreed. For Easy Read respondents, this question did not provide the opportunity to submit a supporting comment.

Is the promoting healthy eating guidance clear for councils and school leaders?

Question 12 received a mostly positive response from Easy Read respondents, with 28 who selected “Yes”, 13 selected “Not sure” and 4 selected “No”. For Easy Read respondents, this question did not provide the opportunity to submit a supporting comment.

How can we help secondary schools give children good healthy food they enjoy?

Thirty-five Easy Read respondents supplied an answer for this question. Several respondents (10) responded by suggesting that secondary school learners should be involved in the process, by surveying them, asking them what food they would like on offer and involving them in growing and cooking food to improve food education.

Many respondents (18) also proposed that the food offering in secondary schools should be made healthier and others (2) felt that FSM should apply to all secondary school learners, as well as primary school learners. Some respondents (4) also highlighted that secondary school learners could be provided with a wider range of options.

Do you think this guide will affect the Welsh language? And is there anything we can do differently to help the Welsh language?

Thirty-five Easy Read respondents supplied an answer for this question. The most common response to this question was that respondents were not sure and did not see how the Welsh language was relevant to the guidelines (15). Some respondents suggested that bilingual menus and signs could be provided (4) and that learners are already encouraged to speak Welsh, for example by saying ‘please’ and ‘thank you’ in Welsh when receiving their school dinner (8).

Additional comments

Twenty-five Easy Read respondents provided additional comments. This included support for making school dinners healthier (4), the desire for food waste to be reduced (2) and the view that healthy school dinners are worth the investment (2). A further 3 respondents proposed that schools should serve Fairtrade food and one respondent suggested that the guidance should consider those with neurodiversity or ARFID.

Focus Groups

This chapter outlines the findings of the focus groups held in June and July 2025 targeted at parents and carers of learners. The findings from the 10 focus groups held with primary and secondary learners are captured in the previous chapter. In total, 6 groups were held with parents and carers. The full breakdown of the focus groups held as part of this consultation are outlined in Annex G.

Engagement with parents and carers

Parents from low-income families

Parents from low-income families were generally supportive of the proposed changes when presented with them in full, recognising the importance of offering a greater variety of new, healthy food options in schools to enable children to try new things. One parent noted that it was “silly they are only introducing this now”, with others categorising many of the changes as “common sense”. However, participants also expressed concerns that there may not be enough choice for their children under the new guidance, as some of them are fussy eaters. This was particularly relevant to the proposals surrounding fruit, vegetables and starchy carbohydrates, with several parents stating their child would not eat “overtly healthy food”, including certain vegetables and “brown pasta”, which would contribute to increased food waste. As an alternative, they called for a backup “cheese or ham sandwich” option, along with plain pasta.

In terms of additional proposals presented as part of the consultation, parents from this group agreed with suggested changes relating to meat, fish and processed meat, but were not supportive of those relating to non-meat options and cheese. This was largely because cheese was viewed as a good alternative for learners who are fussy eaters and a “go-to” to make other healthy foods more appealing. Parents agreed with the proposals focusing on changing the cooking in fats and oils and desserts and pastries, with one participant saying they were shocked that any elements of school meals were deep-fried at all as part of the current offering. Some parents suggested introducing air fryers into school kitchens to “take the pressure off the limited menu”.

In response to the drinks-based proposals, parents supported the removal of fizzy drinks but were keen that squash should still be included, providing it is sugar free. There was also support for keeping fruit juices as part of the drinks offering, as they feel it is still important and see it as one of the recommended five-a-day portions.

Parents of neurodivergent children

Parents of neurodivergent children were supportive of the proposed changes in theory, with the feeling that it is a step in the right direction for the wider population of learners. The proposals surrounding fruit and vegetable provision was especially welcomed, as it was felt that an increase in portions and variety was positive.

However, several participants expressed concerns that there was insufficient consideration on the impact of the changes on neurodivergent learners. Specifically, there was worry that their children would not eat the healthier alternatives proposed, due to reasons of taste and texture. The introduction of 50%

wholegrain into starchy carbohydrates was a particular source of concern. In these instances, similar to the views expressed by parents from low-income families, it was felt that a limited offering of slightly more unhealthy options would be appropriate, as it was deemed better for their child to eat something, as opposed to nothing at all. Despite this, parents also recognised the challenges in providing a tailored offering to neurodivergent learners due to resourcing constraints within schools.

Parents from varied cultural and religious backgrounds

Parents from varied cultural and religious backgrounds were strongly supportive of the proposed changes. The group was particularly positive about the prospect of more diversity in meal offerings, meaning that children are eating a wider range of fruits and vegetables, on the condition that the overall protein content of meals would still be balanced. There was, however, a perception amongst some that a reduction in carbohydrates (in favour of vegetables) could lead to learners leaving more of their meals and an increase in food waste.

When asked about the proposals relating to processed meats, parents were supportive as they felt that that quality was more important than quantity. They were also welcoming of the changes to reduce fried foods, and some in this group were surprised fried products were still available as part of the school meal offering. Most parents in the group agreed that the removal of fruit juices is preferable where these are concentrated products and have a high sugar content, however there was support for the option of sugar free diluted squashes to ensure learners are drinking enough overall. The group perceived the dessert guidance to 'contradict' the overall emphasis on reducing sugar in the menu and expressed support for the provision of desserts and pastries being offered just once during a school week as a 'treat'.

Welsh speaking parents of primary school learners

A central focus of the discussion with Welsh speaking parents of primary school learners was around the proposals relating to meat and dairy respectively, and its impact on local farming and the rural economy, potentially reflecting the fact that most participants were situated in rural areas. Several of the parents strongly opposed a full day without meat, citing cultural and economic ties to farming communities and personal dietary preferences.

There were associated concerns that cheaper menu options might bypass local producers in favour of long-distance imports; locally sourced produce was valued for both quality and environmental reasons. Parents felt learners should always have the option to choose meat, even when plant-based alternatives are available. They expressed worries that rising costs could lead to lower-quality meat, fish, fruit, and vegetables being served. Some parents disliked plant-based products that imitate meat, preferring to serve actual vegetables or pulses rather than processed substitutes. There was also repeated concern about waste, particularly if children do not like or recognise certain foods.

Participants from this group emphasised the importance of learners and parents understanding where food comes from and how it is produced.

Welsh speaking parents of secondary school learners

Welsh speaking parents of secondary school learners were generally positive about the proposed changes but emphasised the importance of maintaining choice for learners. The group welcomed the idea of offering more fruit in schools. However, parents raised concerns about the difficulty of tracking what their children eat throughout the day, particularly in secondary schools where multiple daily food options and snacks are available. Participants noted key differences between primary and secondary school provision, such as primary menus being fixed, while secondary schools offer varied daily choices, thus making it harder to ensure healthy selections.

There was agreement within the group that unhealthy food at break (e.g., bacon sandwiches) followed by lunch (e.g., pizza or pasta) is problematic, with parents feeling they are effectively paying for two meals. Participants stressed that forcing specific foods in the school setting could lead to refusal and increased consumption of unhealthy food at home. Instead, they favoured early education on healthy eating from primary school onwards. Concerns were also raised about high prices and food waste, with examples such as learners eating only the toppings from pizza and discarding the rest.

Some participants expressed interest in incorporating lessons on food origins, food miles, and environmental impacts into school learning. This group of parents/carers felt overall that the changes for primary schools would encourage more vegetable options and variety, not just cold dishes, which would improve health outcomes in theory.

Parents of children who bring packed lunches

Parents of children who bring packed lunches were encouraging of the changes set out in the consultation, but participants also acknowledged it would be challenging to cater for all tastes and preferences.

They were supportive of increasing the variety in the provision of fruits and vegetables, noting that it would help children to try new foods. The switch to wholegrain and guidance around starchy carbohydrates was also welcomed. Participants agreed with changes to meat but emphasised there should be more of a focus on quality and more distinction between meat and processed meats, with one participant indicating that the poor quality of meat in school meals had put their child off eating it at home.

Reductions to cooking in fats and oils were described as 'sensible' and parents further suggested that sweet goods could be reduced to once per week. Views were more mixed in relation to proposed changes to drinks, with support for the removal of fizzy drinks and squash, but some suggestions that offering fruit juices (in small quantities without added sugars) should be allowed. Offering different portion sizes was also encouraged, though it was suggested there could be some room for choice here (given the variation in appetites between children in a single year group alone).

Next steps

The Welsh Government will carefully consider all responses received during the consultation process. Where appropriate, the Welsh Government will make any necessary amendments to the draft legislation and accompanying guidance to reflect the feedback and improve clarity, effectiveness, or fairness. These revisions will be made prior to the legislation being formally laid before the Senedd.

The Welsh Government will also review all the evidence submitted on how secondary school learners can access a nutritionally balanced and appealing food offer. These insights will help shape future policy and will be considered to inform any proposed changes to the legislation as it applies to secondary schools.

Annexes

Annex A – Methodology

The engagement and consultation analysis followed a mixed–method sequential approach to capture as comprehensive a picture as possible on the key areas of interest, to answer the following research questions:

1. Could the food served to learners provide greater nutrition to support learners to improve attainment, reduce obesity and tackle health inequalities?
2. Which specific changes, if any, would be most effective in enabling learners and the wider school community to have a better understanding of why a healthy and balanced diet is important to health and well-being?
3. Could the food served to learners provide a healthy and balanced school meal, including those with specific dietary requirements

The approach was divided into four phases. This included an inception and scoping phase, qualitative engagement phase, analysis phase, and reporting phase.

Inception and Scoping

A series of 10 scoping interviews took place online with key stakeholders to develop a holistic understanding of the context surrounding the consultation, including the rationale, key areas of exploration and to obtain insight into the key themes that emerged from pre-consultation activity.

Qualitative Engagement

Altogether 16 focus groups were conducted in line with the sampling framework. Recruitment for the parent focus groups was undertaken by our partner, DJS Research. The recruitment of the learner groups was undertaken by Children in Wales, with support from Welsh Government.

Six focus groups were conducted with parents/carers. Ten focus groups with learners took place from schools across Wales. The list of these is available in Annex H.

Focus groups with parents/carers were facilitated online for consistency and inclusivity and began with an explanation of the proposals.

This direct engagement with learners was supplemented by a self–completion toolkit produced by Children in Wales, designed to capture feedback on the consultation issues from learners from a wider sample of schools. Focus groups with learners were facilitated in the summer term 2025 in person by a researcher from Children in Wales or Miller Research in schools.

Consultation Analysis

An initial research framework and database was developed in order to ensure careful and efficient management of the analysis process. A mid-point summary was produced during the consultation period and shared with Welsh Government. This allowed tracking of the response rate and associated narrative as the consultation progressed. The key themes for each consultation question were highlighted in the

early stages, with subsequent responses reinforcing, expanding upon, and broadening out these themes.

A sample of responses received within the first month of the consultation informed key word analysis and thematic breaks for the wider analysis activity and enabled the analysis team to sense check the themes identified in the initial quantitative analysis. Duplicate, or campaign, responses were treated as a single response in the analysis. Where duplicates were identified the full response was removed in every instance after the first. Given the nature of the closed questions many responses only differed in the open text response. Where the open text response questions were not answered duplicates were removed where the time of submission made it clear that a response had been submitted twice (possibly through technical error).

All categorical questions (e.g.: agree/disagree) were analysed using Microsoft Excel Pivot Tables. Qualitative responses to each question were then manually coded and analysed by researchers to produce a summary of responses. The focus groups, interviews and additional responses (emails and letters) were analysed using Miro, an online mind–mapping software, enabling an iterative cycle of structured analysis and tracking of identified themes. Analysis was undertaken on a question–by–question basis and according to engagement type in the first instance, with secondary analysis undertaken on a thematic basis. This complemented better understanding of any areas of contention. Irregular responses, including those received by email and letter, which did not explicitly address the consultation questions but were still relevant, were analysed and attributed to the most relevant question.

Reporting Phase

A slide deck of emerging findings was shared and presented to the Welsh Government, prior to this report being submitted. This report is supplemented by a searchable tabular summary of consultation responses.

Annex B – Consultation Questions

Demographics

1. Please select all that apply to you below.
 - Primary school learner
 - Secondary school learner
 - Education workforce
 - Local authority
 - Catering provider
 - Healthcare practitioner
 - Supplier
 - Local producer
 - Farmer
 - Parent or carer
 - Other (please specify)

Lunch in primary schools

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

3. To what extent do you agree or disagree with the proposals that relate to meat, red meat and fish?
4. To what extent do you agree or disagree with the proposals that relate to processed meat?
5. 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)?
6. 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?

Drinks in primary schools

7. 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?

Portion sizes in primary schools

8. 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?

Breakfast in primary schools

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

The primary regulations guidance

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

Special diets

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

Regulatory and wider impact assessment

12. What challenges, if any, do you feel should be further recognised within the draft regulatory impact assessment?
13. What positive effects, if any, do you feel should be further recognised within the draft regulatory impact assessment?
14. What comments, if any, do you have on the draft impact assessments, particularly the impact of the draft regulations on children, families living in socio-economic disadvantage and people with protected characteristics (including evidence you feel should be considered)?
15. What comments, if any, do you have on how costs would be impacted on (including evidence you feel should be considered)?

Promoting healthy eating statutory guidance: primary and secondary schools

16. 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? (Feel free to provide examples of anything you think is missing.)

Call for evidence: secondary schools

17. How can we achieve a nutritionally balanced and appealing food offer in secondary schools? (Feel free to provide examples of good practice or evidence that supports your response.)

Mandatory questions

18. What, in your opinion, would be the likely effects of the legislation on the Welsh language? We are particularly interested in any likely effects on

opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

- Do you think that there are opportunities to promote any positive effects?
 - Do you think that there are opportunities to mitigate any adverse effects?
19. In your opinion, could the legislation be formulated or changed so as to:
- have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or
 - mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?
20. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Annex C – Children and Young People Consultation Questions

1. Do you agree with increasing the amount of fruit, vegetables and starchy carbohydrates?
2. Do you agree with these changes for meat, red meat and fish?
3. Do you agree with these changes for processed meat?
4. Do you agree with these changes for non-meat options?
5. Do you agree with these changes for potatoes cooked in oil, fried foods, sweetened baked goods and desserts, and pastry?
6. Do you agree with these changes for giving learners only plain water, plain milk and plain plant-based drinks in primary schools?
7. Do you agree with these changes for portion sizes?
8. Do you agree with these changes for breakfast?
9. Is the Guidance clear?
10. Is this Guidance about special diets clear?
11. What challenges do you think this guidance will have?
12. What positive effects do you think this will have?
13. How do you think this will affect families on low income?
14. Changes like this can take time and money. How do you think this will affect costs?
15. Do you think these changes will affect the Welsh language?
16. Do you think this will help local authorities and schools promote healthy eating?
17. Is there anything else you'd like to say about these changes?
18. Do you have any ideas about how we can help learners have healthy, balanced food in secondary schools?

Annex D – Easy Read Consultation Questions

1. What do you think about our changes to fruit, vegetables and starchy carbohydrates?
2. What do you think about our changes to meat and fish?
3. What do you think about our changes to processed meat?
4. What do you think about our changes to non-meat options and cheese?
5. What do you think about our changes to cooking in fats and oils and desserts and pastries?
6. What do you think about our changes to drinks?

7. What do you think about our changes to portion sizes?
8. What do you think about our changes to primary school breakfast?
9. Is the guidance clear for the people who make and serve food in primary schools?
10. Will the guidance help children with special or medical diets?
11. Is the promoting healthy eating guidance clear for councils and school leaders?
12. How can we help secondary schools give children good healthy food they enjoy?
13. Do you think this guide will affect the Welsh language? And is there anything we can do differently to help the Welsh language?
14. Additional comments

Annex E – Focus Group Questions

Questions developed as part of the Consultation Toolkit for Children and Young People, produced by Children in Wales

1. Do you agree with increasing the amount of fruit, vegetables and starchy carbohydrates?
2. Do you agree with these changes for meat, red meat and fish?
3. Do you agree with these changes for non-meat options?
4. Do you agree with these changes for potatoes cooked in oil, fried foods, sweetened baked goods and desserts, and pastry?
5. Do you agree with these changes for giving learners only plain water, plain milk and plain plant-based drinks in primary schools?
6. Do you agree with these changes for portion sizes?
7. Do you agree with these changes for breakfast?
8. What challenges do you think this guidance will have?
9. What positive effects do you think this will have?
10. Changes like this can take time and money. How do you think this will affect costs?
11. How do you think this will affect families on low incomes?
12. Is this Guidance clear?
13. Is this Guidance about special diets clear?
14. Do you think these changes will affect the Welsh language?
15. Do you think this will help local authorities and schools promote healthy eating?
16. Do you have any ideas about how we can help learners have healthy, balanced food in secondary schools?
17. Is there anything else you'd like to say about these changes?

Questions for Parents and Carers

1. What do you think overall to these proposed changes? (rate out of 5)
2. Do you think the proposed changes represent a positive step forward or step backward?
3. What do you think about the proposed changes to fruit, vegetables and starchy carbohydrates?
4. Do you welcome the increase in portions / variety of fruit and veg?
5. Do you welcome the introduction of guidance around starchy carbohydrates, especially the minimum 50% wholegrain requirement?

6. What do you think about proposed changes to meat and fish, including processed meat?
7. What are your thoughts about the changes to non-meat options and cheeses?
8. Is it appropriate to limit processed alternatives to meat?
9. What do you think about the changes to cooking in fats and oils and desserts and pastries?
10. What do you think about the changes to drinks?
11. What do you think about the changes to portion sizes?
12. What do you think about the changes to primary school breakfasts?
13. Do you think there is any risk that your child (or other children) would not want to eat the meals under the new menu?
14. Do you think there is the right balance between healthy, nutritious food and food which children will want to eat?
15. Can you think of any negative effects that could come as a result of these changes to primary school meals?
16. Do you think the food served under the new regulations will effectively be able to meet the needs of children with specific dietary requirements?
17. [For parents from varied cultural and religious backgrounds] Are you confident that the food served under the new regulations will sufficiently account for and provide culturally appropriate options? If no, what actions need to be taken?
18. [For parents of neurodiverse children] Do you think the proposed changes sufficiently account for neurodiverse children or those with additional needs?
19. Can you foresee any issues for these children in relation to how the food is presented / its texture / the overall meal experience, as a result of these changes? If yes, do you have any thoughts on how these could be addressed?
20. [For Welsh-speaking parents] Do you think the proposed changes will have any impact on the Welsh language, either positively or negatively?
21. [All] Have the proposed changes made you more or less inclined for your child to engage with primary school meals?
22. What do you anticipate will be the overall impact of the proposed changes?
23. Do you think the proposed menu changes will help children in terms of educational performance, as well as reduce health issues, such as obesity?
24. [For parents of secondary-school learners] Do you think the proposed menu changes could be suitably applied to secondary schools as well as primaries?
25. What do you anticipate would be the main obstacles or enablers?
26. Can you tell us more about your child(ren)'s experiences with school lunches?
27. What barriers are there for secondary school learners to make healthy choices?
28. What enablers are there for secondary school learners to make healthy choices?
29. Can you think of any activities to encourage the take up of school meals that a local authority and/or governing body could encourage or support?
30. What kinds of things could schools be doing to help promote healthy eating? Have you any examples of how this happens in your child's school?
31. [For secondary school parents] Is there anything else that is related to secondary school meals which would be helpful to mention when considering how to achieve a nutritionally balanced, appealing food offer in secondary schools?

32. Following this evening's discussion, would you say your views on the topics discussed have largely changed, or remained the same?
33. Do you have any final thoughts or comments based on what we have discussed here today?

Annex F – List of organisations that responded

The following organisations were happy for their organisation name to be attributed to a consultation response rather than being kept anonymous. The consultation online form did not allow individuals to submit a response without selecting the 'keep my response anonymous' option until very late in the consultation process. As a result, this list is disproportionately short and a further 262 respondents disclosed the organisation they were from, whilst remaining anonymous.

- Aneurin Bevan University Health Board
- Betsi Cadwaladr University Health Board
- Big Fresh Catering Limited
- British Dietetic Association
- British Egg Industry Council
- British Nutrition Foundation
- Cardiff and Vale University Health Board
- Cardiff Good Food and Movement Leadership and
- Children's Commissioner for Wales
- Coeliac UK
- Countryside Alliance
- Enabling Change Group
- Estyn
- Faculty of Public Health
- Food Sense Wales
- Harlech Foodservice
- Hywel Dda University Health Board
- Merthyr Tydfil County Borough Council
- Monmouthshire County Council
- OATLY
- Powys Teaching Health Board
- Public Health Dietitians in Wales
- Public Health Wales
- Royal College of Nursing Wales
- Size of Wales / Maint Cymru
- Soil Association Cymru
- Sustain UK
- Swansea Bay University Health Board
- Swansea Council
- The Food Foundation
- The Vegan Society
- UCAC
- Vegan Rights Consulting

- Wales Dietetic Leadership Advisory Group

Annex G – Focus groups delivered

Six focus groups were held with parents/carers from the following groups:

- Parents from low-income families
- Parents of neurodivergent children
- Parents from varied cultural and religious backgrounds
- Welsh speaking parents of primary school students
- Welsh speaking parents of secondary school students
- Parents of children who bring packed lunches

Ten focus groups with learners were held with 152 learners in total from the following schools:

- Secondary Schools
 - Ysgol Gyfun Cwm Rhondda, Rhondda Cynon Taf
 - Lliswerry High School, Newport
- Primary Schools
 - St. Mary's Catholic School, Wrexham
 - St. David's Catholic School, Swansea
 - Ysgol Llanfihangel y Creuddyn, Ceredigion
 - Awel y Mor Primary School, Port Talbot
 - Clwyd Primary School, Swansea
 - Ysgol Gynradd Gymraeg Rhosafan, Port Talbot
 - Cadoxton Primary School, Vale of Glamorgan