

Meeting of:	EDUCATION AND YOUTH SERVICES OVERVIEW AND SCRUTINY COMMITTEE
Date of Meeting:	2 JULY 2026
Report Title:	HEALTHY EATING IN SCHOOLS REGULATIONS AND EXPANSION OF ACCESS TO FREE SCHOOL MEALS IN SECONDARY SCHOOLS
Report Owner: Responsible Chief Officer / Cabinet Member	CABINET MEMBER EDUCATION AND YOUTH SERVICES CORPORATE DIRECTOR - EDUCATION, EARLY YEARS AND YOUNG PEOPLE
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Policy Framework and Procedure Rules:	There is no effect upon the Policy Framework and Procedure Rules.
Executive Summary:	This report updates the Education and Youth Services Overview and Scrutiny Committee on the implementation of The Healthy Eating in Schools (Nutritional Standards and Requirements) (Maintained Primary Schools) (Wales) Regulations 2025 and progress made towards the expansion of access to free school meals in secondary schools.

1. Purpose of Report

- 1.1. The purpose of the report is to update the Education and Youth Services Overview and Scrutiny Committee on the implementation of The Healthy Eating in Schools (Nutritional Standards and Requirements) (Maintained Primary Schools) (Wales) Regulations 2025 and progress made towards the implementation of universal secondary free school meals.
- 1.2. The report identifies the changes, which are being made to the primary school meal menu, and the support being provided to pupils, parents/carers, schools and governing bodies to implement and work towards the proposed changes.

2. Background

- 2.1. This report provides an analysis of the local authority's transition to the updated Welsh Government nutritional standards for primary schools. The Healthy Eating in Schools (Nutritional Standards and Requirements) (Maintained Primary Schools) (Wales) Regulations 2025 (the Regulations) were laid before the Senedd on 17 December 2025 and are scheduled to come into force on 31 October 2026. The Regulations represent the most significant update to the primary school meal offer in over a decade, aiming to reduce health and attainment inequalities by aligning school food with the latest UK scientific dietary guidelines. The food and drink provided in all maintained primary schools must meet the new regulations. The

regulations are based on the previous 'Appetite for Life' guidelines and form part of the wider Healthy Eating in Schools (Wales) Measure 2009 ('the Measure').

- 2.2. The regulations set out the nutritional standards for an average school lunch, as well as food and drink requirements throughout the school day. The nutritional standards specify minimum or maximum values for energy and thirteen nutrients, which apply to an average school lunch, calculated over each week of the menu cycle. The food and drink requirements describe the types of food and drink that must be provided, restricted and not permitted between breakfast and 6pm.
- 2.3. The Regulations place a duty on local authorities and school governing bodies to promote healthy eating and drinking by pupils.
- 2.4. To monitor compliance, school governing bodies are required to provide information in their annual report on the action taken to promote healthy eating and drinking by pupils at their schools.
- 2.5. Through inspections, Estyn is required to report to Welsh Ministers on the action taken by schools.
- 2.6. The Welsh Government document 'Statutory Guidance for Local Authorities and Governing Bodies', is a practical guide to implementing the above legislation. Local authorities and school governing bodies must take account of this, and if they decide to depart from it, have clear and justifiable reasons for doing so.

3. Current situation/proposal

- 3.1. The Regulations introduce profound changes to food and drink requirements, structured around the 'Eatwell Guide'.

Detailed food and drink category requirements

A. Vegetables

- Requirement: At least two portions of vegetables must be provided every day.
- Variety: Schools must offer at least six varieties of vegetables each week.
- Interpretation: This includes salad but excludes potatoes. Mixed vegetables served as a single portion count as one portion and one variety.
- Guidance: Vegetables should be promoted and encouraged. Canned vegetables should be in plain water, and baked beans should ideally be reduced sugar and salt varieties, provided no more than three days per week.

B. Fruit

- Requirement: At least one portion of fruit must be provided daily.
- Variety: At least four different varieties of fruit must be provided each week.
- Interpretation: Fruit juice is no longer permitted as a portion of fruit or as a permitted drink (except on school trips). Canned fruit must be in fruit juice only, not syrup.

C. Starchy carbohydrates

- Requirement: A portion of starchy carbohydrates must be provided every day.
- Wholegrain rule: At least one portion weekly must be pasta, rice, or noodles containing at least 50% wholegrain.
- Bread: All bread (excluding pizza bases, garlic bread, and naan) must be at least 50% wholegrain.
- Interpretation: Starchy carbohydrates do not include potatoes cooked in fat or oil. Supplementary bread must be available daily for hungry learners but is excluded from nutritional analysis calculations.

D. Beans, pulses, fish, and meat (proteins)

- Fish: A portion must be served at least once a week, with oily fish required at least once every four weeks. Combined fish products must contain at least 50% fish.
- Red meat: Restricted to at least once but no more than twice per week. This includes beef, lamb, pork, and venison but excludes white meat like poultry.
- Specified meat products: Items like bacon, ham, sausages, and burgers are limited to once per week. Ham and bacon are now newly classified as processed meat.
- Vegetarian main source: Beans or pulses must be provided as the main protein source in a non-meat/non-fish lunch at least once a week. This replaces the previous cap on cheese-based meals.
- Processed alternatives: Processed non-meat alternatives (for example, veggie burgers) are limited to twice per week.

E. Desserts and pastry

- Sweetened baked products: Limited to three portions per week. This includes cakes, biscuits, and sponge puddings but excludes ambient/chilled yoghurt.
- Fruit/veg accompaniment: All desserts must be accompanied by or contain a dessert portion of fruit or vegetables (minimum 20g for infant pupils, 40g for junior pupils).
- Pastry: Savoury or sweet pastry is restricted to once per week.

F. Drinks

- Permitted: Only plain water (still or carbonated), plain milk, and plain plant-based drinks are allowed.
- Milk: Nursery pupils must be served whole or semi-skimmed milk; others receive semi-skimmed, 1%, or skimmed.
- Plant-based: Must be calcium-fortified, unflavoured, and contain no free sugars (maximum threshold $\leq 0.5\text{g}$ total sugars/100ml).

Differentiated nutritional standards

3.2. For the first time, standards are split into two distinct age groups to reflect caloric and physiological needs:

- Infants (Nursery to Year 2): Target of 429 kcal per average lunch (range 365–493 kcal daily).
- Juniors (Year 3 to Year 6): Target of 528 kcal (range 449–607 kcal daily).

3.3. The regulations specify minimum/maximum limits for 13 nutrients calculated over a menu cycle:

Maximum limits (30% of daily need):

- Fat (Infants: 16.8g; Juniors: 20.5g);
- Saturated Fat (Infants: 5.3g; Juniors: 6.5g);
- Free Sugars (Infants: 5.7g; Juniors: 7g); and
- Sodium (Infants: 360mg; Juniors: 499mg).

Minimum limits (30–35% of daily need):

- Carbohydrate (Infants: 57.3g; Juniors: 70.4g);
- Fibre (Infants: 5.3g; Juniors: 6g);
- Protein (Infants: 5.91g; Juniors: 8.5g);
- Iron (Infants: 2.1mg; Juniors: 3mg);
- Zinc (Infants: 2.3mg; Juniors: 2.5mg) and
- Calcium (Infants: 157.5mg; Juniors: 193mg).

Specific nutrients

3.4. The standards are designed to provide steady energy to keep children alert and ready to learn with the focus on a range of nutrients and vitamins.

- Iron - essential for muscle development and carrying oxygen; deficiency leads to fatigue.
- Zinc - vital for growth, tissue repair, and immune health.
- Calcium - critical for strong bones and nerve function during childhood growth spurts.
- Vitamin A - important for vision in dim light, healthy skin, and immune function.
- Vitamin C - aids wound healing and iron absorption; lost easily in water, so steaming is recommended.
- Folate - necessary for red blood cell formation; deficiency causes weakness and appetite loss

Nutritional analysis and software procurement

3.5. On behalf of Welsh Government, the Welsh Local Government Association (WLGA) has provided to local authorities, guidance on the software required to be purchased to plan and nutritionally analyse each primary school menu.

3.6. Among other detailed technically specific requirements, the software must include the following core capabilities. The software must:

- track 13 specific nutrients using official UK food databases;
- calculate data for infants and junior pupil meals separately; and it must
- measure nutrition based on the actual portion sizes served to pupils.

3.7. To meet these requirements, the local authority has procured specialist software (that is, 'Saffron Menu and Wellbeing').

Implementation

- 3.8. The local authority will launch its new primary menu in-line with the WG deadline of 26 October 2026. Final national guidance is expected to be circulated to local authorities on 1 July 2026.

Implementation challenges

- 3.9. The local authority envisages the following key implementation challenges:

Marginal uptake

Universal primary free school meals (UPFSM) uptake increased by 8% (£81,820 in claimed grant value) from 2024-2025 to 2025-2026. It is important to note that an additional 20p per meal was received from September 2025 backdated to April 2025.

Procurement cost spikes

There have been significant increases in the wholesale cost of food, consumables and transportation due to international conflict in affecting fuel prices, with weekly haulage fuel costs in particular rising by 50% (April 2026).

Product availability

Sourcing products that meet the 50% wholegrain standard (for example, pasta and rolls) will impact food cost and margins, Bridgend primary schools are already compliant on wholemeal bread. Current analysis shows a 30% increase when considering the need for wholemeal pasta in the new menu required by the Regulations.

Increased food waste

There may be higher levels of waste, particularly with the mandated two-portion daily vegetable requirement, necessitating additional waste collection bins and services.

Implementation of Universal Secondary Free School Meals (USFSM)

- 3.10. Following the recent Senedd elections, Welsh Government has committed to removing the current income threshold of £7,400 per year for secondary school pupils on Universal Credit. Starting from September 2026, all secondary pupils (Years 7 to 11) whose families receive Universal Credit, will be entitled to free school meals, regardless of their household earnings.
- 3.11. While the impact of this decision is yet to be fully understood both nationally and locally, the local authority is currently working with the WLGA, other local authorities and the Local Authority Catering Association (LACA) on the following challenges in working towards implementation:

Implementation timeframe

- 3.12. With projected start date of September 2026, this leaves a short window for implementation. The majority of Catering Service senior and operational staff are contracted to work term-time only. This is also further compounded by the

upcoming regulatory deadline for the roll out of Healthy Eating in Schools (Nutritional Standards and Requirements) (Maintained Primary Schools) (Wales) Regulations 2025 in primary schools.

Lack of empirical data in respect of USFSM eligibility

- 3.13. Due to a current lack of data on eligible pupils, we are currently unable to identify or predict the additional numbers of pupils who may take up the USFSM, which would be challenging for operational teams in kitchens.

Reconciliation

- 3.14. There is currently no process to correctly record who has eligibility when pupils attempt to purchase food items. This would need addressing urgently with schools and our cashless catering technology partner.

Food offering

- 3.15. There is currently uncertainty around the food offering for USFSM. In particular, whether this would only constitute the provision of a hot meal, or if other options would be available, such as more 'grab and go' food such as salads and filled baguettes.

Recruitment

- 3.16. The local authority currently has a comprehensive school Catering Service staff vacancy shortfall of 19%, which could add more pressure on the service.

Equipment

- 3.17. Following our recent kitchen audits requested by Welsh Government, £1.4 million was calculated as required to bring all nine Bridgend secondary school kitchens to standard and capacity to meet the needs of a full roll-out of USFSM.

Capital infrastructure

- 3.18. The majority of our comprehensive schools are older buildings, and any capital work will potentially have significant physical, structural and regulatory challenges beyond the required kitchen upgrades.

UPFSM

- 3.19. Since the completion of the roll-out of UPFSM, the average daily uptake across Bridgend primary schools is now 47%.
- 3.20. In 2025-2026, Welsh Government announced the increase in the meal claim price from £3.20 to £3.40 to support the additional financial challenges that UPFSM has brought. This was widely welcomed by local authorities.
- 3.21. In 2025-2026, there was an underspend of £598k in Catering Services. The underspend is based on the full implementation of UPFSM and the accompanying grant funding to support the initiative from Welsh Government. The Medium-Term Financial Strategy approved by Council for 2026-27 includes a £300k budget reduction for efficiencies in the Catering Services budget.

Current and emerging challenges

- 3.22. The initial roll-out of UPFSM was compounded by lack of heavy equipment, with up to a one-year wait for some equipment, due to all local authorities utilising the same small group of specialist equipment suppliers.
- 3.23. Recruitment has been a significant challenge, with a staffing shortfall of 30% in our primary schools.
- 3.24. A long-term financial challenge will be the depreciation of the equipment and assets purchased through Welsh Government capital grant money. With a potential operating life span of 10 to 15 years, significant investment will be needed to replace and maintain the larger kitchen assets beyond 2034.
- 3.25. Some schools still do not have the infrastructure requirements to have certain equipment installed to support the service, for example, dishwashers and electric ovens, due to the limited utility capacity in their geographical location.

4. Equality implications (including Socio-economic Duty and Welsh Language)

- 4.1. The protected characteristics identified within the Equality Act, Socio-economic Duty and the impact on the use of the Welsh Language have been considered in the preparation of this report. As a public body in Wales, the local authority must consider the impact of strategic decisions, such as the development or the review of policies, strategies, services and functions.
- 4.2. It is considered that there will be no significant or unacceptable equality impact, as a result of this report.
- 4.3. Under the Equality Act 2010, the local authority has a statutory duty to make reasonable adjustments for disabled or neurodivergent learners. The Healthy Eating Regulations must be followed unless they conflict with a specific reasonable adjustment required for a disabled learner.
- 4.4. The local authority currently manages approximately 254 individual medically prescribed menus. These cover complex conditions such as diabetes, dysphagia, Coeliac Disease, and sensory development needs.
- 4.5. Socio-economic duty - by providing high-quality free school meals, the local authority supports pupils and their families with the cost-of-living.

5. Well-being of Future Generations implications and connection to Corporate Well-being Objectives

- 5.1 The well-being goals and principles prescribed for within the Well-being of Future Generations (Wales) Act 2015 connect directly to the approach to supporting children, young people and their families. The approach is consistent with the five ways of working as defined within the sustainable development principle and more specifically as follows:

Long term

The Regulation priorities intergenerational health outcomes over short-term financial or operational ease. By mandating nutrient-dense school menus, it helps children

develop healthy eating habits that last into adulthood, giving young learners a healthy foundation protects their long-term cognitive development and future economic potential.

Prevention

The Regulation act as a critical intervention to tackle root causes of preventable illnesses like childhood obesity, type 2 diabetes, and coronary heart disease. Using school food to prevent malnutrition and obesity protects vulnerable children from experiencing health inequalities later in life.

Integration

The Regulation integrates school food policies into wider public goals, including child poverty reduction, educational achievement, and environmental sustainability. It merges education, health, and local authority catering services into a single, cohesive delivery system.

Collaboration

The implementation of The Regulation relies on shared responsibility across regional governments, local authorities, and expert groups. It reflects Bridgend County Borough Council's goal of 'One Council', working well together and with partners. Our procurement and catering teams collaborate with regional supply chains to source the diverse fruit and vegetables required by the new regulations.

Involvement

The regulations focus on the lived experience of children and school communities. Schools use the curriculum to link the food served on plates with hands-on nutrition education, ensuring pupils actively understand their food options. It also drives the objective of prosperous places with thriving communities. Engaging with local food partnerships, parents, and pupils, ensures menus are inclusive, culturally diverse, and well-received.

6. Climate change and nature implications

Lower emissions

Shifting menus toward whole grains, fruits, and vegetables, while restricting processed meats, directly lowers the carbon footprint of school meals.

Less food waste

Setting precise, age-specific statutory portions may reduce school plate waste, preventing methane emissions from landfills. However, there is also a risk of the Standards increasing waste due to the potential impact of more restricted menu choices for pupils.

Shorter supply chains

Sourcing more fresh produce encourages localised procurement, cutting down 'farm-to-fork' transport emissions.

Marine protection

The Regulations mandate that all fish served must be sustainably sourced to prevent overfishing and protect aquatic life.

Deforestation reduction

Cutting back on ultra-processed foods lowers the demand for global agricultural commodities like palm oil, which drive habitat loss.

Eco-friendly farming

High demand for diverse vegetables supports local Welsh farmers using the Sustainable Farming Scheme, boosting soil health and regional biodiversity

7. Safeguarding and corporate parent implications

Combating dietary neglect

The availability of UPFSM together with mandatory nutrient standards protect vulnerable children from hidden hunger and physiological neglect by ensuring stable daily nutrition.

Eliminating stigma

The availability of UPFSM protects pupils from bullying or social exclusion.

Managing allergen risks

The local authority ensures that controls are in place to safeguard children with medical dietary needs by developing bespoke menus for each pupil.

Levelling health inequalities

As a corporate parent, the local authority uses these high-quality menus to help reverse early-life health disadvantages for care-experienced children.

Boosting classroom focus

Good nutrition directly improves concentration, behaviour, and learning outcomes for children in the care system.

Teaching independence

Linking school plates to nutrition education helps looked-after children build vital lifelong healthy habits for independent living.

8. Financial implications

- 8.1 The Regulations, which require full compliance by 31 October 2026, introduce substantial financial pressures for the local authority as follows:

Rising per-meal cost scenarios

Transitioning to raw ingredient scratch cooking and sourcing a mandatory minimum

of six different weekly vegetables and 50% whole-grain varieties significantly raises bulk procurement costs over cheaper, ultra-processed items.

Welsh Government subsidy adjustments

To absorb these specific market pressures, Welsh Government expanded the central UPFSM funding allocation by raising the per-meal rate paid to local councils from £3.20 to £3.40 from September 2025.

Local authority subsidies

Historically, the local authority has had to financially bridge localised funding shortfalls where the actual cost of kitchen meal provision outpaced standard national grant rates.

Replacement of nutritional databases

Welsh Government has ended central financial funding for the standard 'Saffron' school nutritional planning database. Local authorities must absorb new internal recurring licensing or procurement costs to secure compliant menu-tracking software. The current annual cost is currently approximately £6k.

Kitchen infrastructure expansion

Delivering fresh, raw menu options on a mass scale requires significant ongoing capital investments to ensure school kitchens are fit for purpose. This goes beyond the one-off capital investment provided by Welsh Government for the implementation of UPFSM.

Dedicated allergen and compliance staff

Shifting away from processed foods to complex raw ingredients creates a critical need for specialised local authority catering posts, including a dedicated allergen management role.

Workforce retraining demands

School kitchen staff require funded operational hours to undergo intensive retraining on portion tools, statutory free-sugar restrictions, and safe scratch-cooking methodologies.

9. Recommendations

9.1 It is recommended that the Education and Youth Services Overview and Scrutiny Committee:

- considers the contents of the report;
- provides feedback on the implementation of the Regulations; and
- provides feedback on the updates on the proposed expansion of free school meals in secondary schools.

Background documents

None