Update to Northern Ireland Nutritional Standards for School Food: The Vegan Society Consultation Response

1 Introduction

1.1 Fruit and Vegetables

1.1.1 Proposed Update 1: Increase the daily availability of vegetables to no fewer than 2 portions as well as 1 portion of fruit, per child throughout the lunch service.

• Do you agree with the change(s) proposed above aimed at increasing the availability of fruit and vegetables? Neither Agree or Disagree

This is a small step in the right direction. However, children and young people will only benefit by eating the fruit and vegetables. All the main course options should include the equivalent of two or more portions of vegetables as part of the central dish e.g. as a lowsalt soya mince and vegetable sauce, or as a lentil and vegetable cottage pie. All the dessert options should include fruit e.g. mixed fruit crumble. Additional fruit and vegetables can then also be available as accompaniments.

1.2 Fibre

1.2.1 Proposed Update 2: New standards that rice and pasta should be wholegrain or a higher fibre version, and 50% of bread and sandwiches available should be wholegrain or higher fibre versions. New information in the standards to increase the availability of beans, pulses and other proteins

• Do you agree with the change(s) proposed above aimed at increasing the availability of fibre? Neither Agree or Disagree Generally positive. Children and young people should be given support to try and get used to wholegrain versions of rice, pasta, bread etc. so the proportion can be increased.

Legumes (beans, peas, chickpeas and lentils) should be promoted as good sources of protein for everyone, not just for people who don't eat meat and fish. This is in line with the Eatwell Guide's recommendation to "Eat more beans and pulses".

1.3 Fat

1.3.1 Proposed Update 3: New standards for 'Oils and Spreads' to use only unsaturated cooking oils and fat spreads. Reduced frequency of fried and other high fat foods offered, from two days to one day per week, in a primary school. Increased number of days without any processed or fried and other high fat foods available in a primary school, from two days to three days per week. Reduction of processed red meats e.g. bacon, cooked ham, gammon etc. to be reduced to once per week in a primary school, and twice per week in a post primary school. Processed, fried and other high fat food items restricted to lunchtime, to encourage healthier morning break services.

• Do you agree with the change(s) proposed above aimed at reducing the availability of saturated fat? Disagree

Processed red meats should be removed from the menu entirely. Full fat animal milk dairy products should also be removed entirely, as they are also a significant source of saturate fat. These should be steps toward removing all animal-derived fats and foods from the menu.

We would like to see school food standards highlight that healthy dairy replacement is important for vegan children, and can be useful and suitable for all children. They should be provided with plain fortified plant milk (non-rice varieties for under-fives) in order to promote equal nutritional care.

1.4 Sugar

1.4.1 Proposed Update 4: Cakes, biscuits and pudding desserts are limited to twice per week, and should meet Public Health England sugar reduction targets. (Fruit and a dairy-based dessert must be available every day to continue to adhere to the fruit and vegetables and dairy standards, and ensure there are still opportunities for pupils to avail of fruit and calcium and Vitamin D-rich foods). Reduce portion size of unsweetened fruit juices and smoothies to max 150ml. Change to no added-sugar flavoured milk with new portion size of max 200ml. Removal of table sugar, jam, honey and marmalade available to add to food. Reduced frequency of condiments (eg ketchup and other sauces) available to twice a week and with a maximum portion size of 10g/ml. Pancakes and scones available at all food services throughout the day meet the following criteria for sugar content and portion size: Max 10g sugar per 100g; Made using unsaturated fat and low-fat dairy;

Max portion size 50g primary/60g post primary.

• Do you agree with the change(s) proposed above aimed at reducing the availability of sugar? Disagree

We would like to see school food standards highlight that healthy dairy replacement is important for vegan children, and can be suitable and useful for all children. They should be provided with plain fortified plant milk (non-rice varieties for under-fives) in order to promote equal nutritional care. Plain fortified plant milk can also be used in cooking, usually as a direct replacement for dairy. Children do not need lactose milk sugar in their diets.

1.5 Salt

1.5.1 Proposed Update 5: Removal of salt to add to food after preparation, at any stage throughout the day. Reduced frequency of condiments (eg ketchup and other sauces) available to 2 days a week, with a maximum portion size of 10g/ml. Reduced frequency of processed red meats will contribute to salt reduction (see next proposal).

• Do you agree with the change(s) proposed above aimed at reducing the availability of salt? Disagree

Processed red meats should be removed from the menu entirely. This should be part of a transition to a truly sustainable plant-based menu.

1.6 Processed Red Meat

1.6.1 Proposed Update 6: That the availability of processed red meats, eg. bacon, cooked ham, gammon etc be reduced to once per week in a primary school and twice per week in a post primary school and that processed red meats and meat or chicken products are only made available at lunch times.

• Do you agree with the change(s) proposed above aimed at reducing the availability of processed red meat? Disagree

Processed red meats should be removed from the menu entirely. This should be part of a transition to a truly sustainable plant-based menu.

1.7 Mandatory Nutritional Standards for other Food and Drinks in Schools in all grantaided schools

1.7.1 Proposal 7: It is proposed that the Nutritional Standards for Other Food and Drinks should become mandatory in all grant-aided schools and apply equally to all food provided in the school setting.

 Do you agree the Nutritional Standards for Other Food and Drinks should become mandatory in all grant-aided schools and apply equally to all food provided in the school setting? Neither Agree or Disagree We need to collaborate with parents and guardians, children and young people, caterers, funders and where appropriate, registered dietitians, to ensure that suitable vegan-friendly options are available on all menus. This will ensure that vegan children and young people can enjoy the benefit of highly nutritious food in school environments. This will also benefit anyone for whom veganfriendly food is suitable for their particular health-based, religious, philosophical dietary needs. For example, vegan children should be provided with plain fortified plant milk (non-rice varieties for underfives) in order to promote equal nutritional care. Legumes (beans, peas, chickpeas and lentils) should be promoted as good sources of protein for everyone, not just for people who don't eat meat and fish. This is in line with the Eatwell Guide's recommendation to "Eat more beans and pulses".

The Nutritional Standards for Other Food and Drinks should explicitly offer plant-based vegan-friendly alternatives. This is required to avoid a risk of exclusion for vegan children and young people, and other people with belief-based dietary needs, in educational settings.

1.8 Independent Monitoring of Implementation of the Nutritional Standards

1.8.1 Proposal 8: It is proposed that monitoring and evaluation and support arrangements independent of schools and school caterers are established to provide support and advice to ensure the updated Nutritional Standards are being implemented equally in all grant-aided schools, to highlight examples of good practice as well as barriers to implementation and to ensure that all children and young people who avail of food and drinks in school benefit from the opportunity to eat a healthy balanced diet.

 Do you agree that independent monitoring and evaluation arrangements should be established to ensure the updated Nutritional Standards are being implemented in all grant aided schools? Agree

Experts on plant-based nutrition must be included, and vegan experts consulted, to ensure that the right to appropriate and sustainable nutrition is respected for all children and young people. The Vegan Society has a vegan Registered Dietitian on Staff, and works with the British Dietetic Association, so is ideally placed to provide such expertise.

The Vegan Society note that the document mentions both tofu and bean curd, which are the same class of product. We advise that other soya products should be explicitly mentioned, such as soya mince with no added salt, and unsweetened soya yoghurt.

1.9 Potential increase in the cost of a school meal

 In the absence of funding, do you think it would be reasonable to increase the cost of a school meal for paying pupils by around 5 to 7 pence a meal to ensure a September 2020 implementation? Neither Agree or Disagree

No child, young person nor family should ever be denied an appropriate meal for any reason, including both belief-based and financial reasons.