

**Explanatory Memorandum to The Healthy Eating in Schools
(Nutritional Standards and Requirements) (Maintained Primary
Schools) (Wales) Regulations 2025**

This Explanatory Memorandum has been prepared by the Education Directorate and is laid before Senedd Cymru in conjunction with the above subordinate legislation and in accordance with Standing Order 27.1

Cabinet Secretary Declaration

In my view, this Explanatory Memorandum gives a fair and reasonable view of the expected impact of The Healthy Eating in Schools (Nutritional Standards and Requirements) (Maintained Primary Schools) (Wales) Regulations 2025. I am satisfied that the benefits justify the likely costs.

Lynne Neagle MS
Cabinet Secretary for Education
17 December 2025

PART 1

1. Description

- 1.1 The Healthy Eating in Schools (Nutritional Standards and Requirements) (Maintained Primary Schools) (Wales) Regulations 2025 (“the 2025 Regulations”) set out nutritional standards and requirements for food and drink provided to registered pupils on a school day by local authorities or governing bodies of maintained primary schools (including maintained nursery schools), whether the food and drink is provided on school premises or elsewhere.
- 1.2 The 2025 Regulations set out the types of food and drink that must and must not be provided and the frequency with which certain foods must or must not be provided. They also prescribe the energy and nutrient content of average school lunches.
- 1.3 The Statutory Guidance, to accompany the 2025 Regulations, will be finalised and published after laying of the Regulations (following the annulment period).

2. Matters of special interest to the Legislation, Justice and Constitution Committee

- 2.1 None.

3. Legislative background

- 3.1 The Healthy Eating in Schools (Wales) Measure 2009 (“the Measure”) makes provision (amongst other matters) about the promotion of healthy eating and drinking by pupils in maintained schools and provides Welsh Ministers with a regulation making power relating to food and drink provided on the premises of maintained schools or elsewhere to registered pupils at the school.
- 3.2 The Welsh Ministers make the 2025 Regulations in exercise of the powers conferred upon them by sections 4(1), (2) and (8) and 10(2) and (3) of the Measure.
- 3.3 As required by section 4(11) of the Measure, steps have been taken to ascertain the views of pupils and consult such other persons as Welsh Ministers consider appropriate, more detail on this is set out at paragraph 5.2.
- 3.4 Sections 4(1) of the Measure provides Welsh Ministers with a power to prescribe requirements that are to be complied with for food or drink provided on the premises of any maintained school or food or drink provided at a place other than school premises by a local authority or the governing

body of a maintained school to any registered pupil at the school. Section 4(2) provides that this includes power to specify nutritional standards or other nutritional requirements, food or drink that are not to be provided and maximum levels of fat, saturated fat, salt and sugar the food or drink can contain. The power does not apply to food or drink brought onto the premises of a maintained school by any person for their own consumption (section 4(3)). Section 4(8) provides that regulations may prescribe different requirements to different classes or descriptions of school, different requirements for food or drink provided by or to different classes or descriptions of person and requirements which apply during different periods of the day.

3.5 Sections 10(2) of the Measure provides that any power of the Welsh Ministers to make regulations includes a power to make provision generally or in relation to specific cases, make different provision for different cases and make such incidental, supplementary, saving or transitional provision as Welsh Ministers see fit. Section 10(3) provides that any power of the Welsh Ministers to make regulations or orders under the Measure may be exercised in relation to all those cases subject to exceptions or in relation to any particular case or class of case.

3.6 The 2025 Regulations are being made under the negative resolution procedure.

4. Purpose and intended effect of the legislation

4.1 The Healthy Eating in Schools (Nutritional Standards and Requirements) (Wales) Regulations 2013 (“the current regulations”) apply to local authorities and governing bodies of maintained schools (including maintained nursery schools) that provide food and drink to registered pupils, whether the food and drink is provided on school premises or elsewhere, and to other persons on school premises. The 2025 Regulations (other than regulation 6 and Schedule 6) apply solely to local authorities and governing bodies of maintained primary schools that provide food and drink to registered pupils at maintained primary schools, whether the food and drink is provided on school premises or elsewhere. For the purposes of the 2025 Regulations, “maintained primary school” means a maintained school that provides primary education (whether or not it also provides other kinds of education). “Maintained school” means a community, foundation or voluntary school, a community special school or a pupil referral unit in Wales or a maintained nursery school (as defined in regulation 2(1)).

4.2 Regulation 6 and Schedule 6 make consequential amendments to the current regulations so that they only apply to maintained secondary schools from the coming into force date of the 2025 Regulations. They also make other minor amendments to the current regulations to correct spelling and

technical drafting errors – this does not alter the policy but adds clarity.

4.3 If a school or PRU provides both primary and secondary education, the 2025 Regulations will apply only to food and drink provided to registered pupils in Year 6 and below. The current regulations, as amended, will continue to apply to food and drink provided to registered pupils in Year 7 and above and to anyone else on the school premises.

4.4 There have been long-standing concerns about the number of children who are overweight or obese in Wales¹, and the impact this has on health and well-being, especially in relation to reducing health inequalities. We know that around one in four (about 9,000) of our four- to five-year-olds start school each year living with obesity or overweight². Levels of childhood obesity are worse in our most deprived areas and severe obesity in children continues to rise. Poor diet is the major contributing factor.

4.5 It is also known that children who eat well learn better, feel better, and grow stronger. Our schools are vital places where children spend about 40% of their waking hours, helping shape lifelong eating habits and reducing health inequalities. This is especially important today when:

- Less healthy food is often cheaper and easier to find than healthy options.
- One in four reception-aged children start school living with obesity or overweight.
- Many children aren't getting the balanced nutrition they need to thrive.

4.6 Since the current regulations were introduced back in 2013, UK Government Dietary recommendations have been revised following publication of advice to the four UK Governments from the Scientific Advisory Committee on Nutrition (SACN). If no action is taken to amend the current regulations to reflect the latest scientific advice, Welsh Government will not be maximising the impact that the school food provision can have to reduce inequalities and support the development of lifelong good eating habits.

4.7 The aim of the 2025 Regulations, which are based on the latest UK government dietary recommendations, as mentioned above, is to enable nursery and primary school aged children in maintained schools to access healthy food during school hours, aiding the development of healthy eating habits.

¹ Page 10 - Public Health Wales obesity report estimates a quarter of children in Wales are overweight or obese [Obesity in Wales](#)

² [Eliminating weight stigma - guidelines for BDA communications - British Dietetic Association \(BDA\)](#)

- 4.8 Revising the current regulations helps ensure primary school aged learners in maintained schools have access to more nutritious school food which could help to reduce the risk of diet-related health problems such as obesity, cancer, coronary heart disease and type 2 diabetes.
- 4.9 The 2025 Regulations will apply to maintained primary schools nationally, ensuring that school food providers across all local authority areas will:
- offer more fruit and vegetables to help Welsh children get their five-a-day;
 - include starchy carbohydrates (like wholegrains) because evidence suggests Welsh children aren't getting enough fibre;
 - limit pastry, sweetened baked goods and desserts, and fried foods based on the latest dietary advice;
 - reduce processed meat and limit processed alternatives to fish and meat which can be high in salt and saturated fat;
 - retain red meat in moderation to ensure children benefit from the nutrients it provides without overconsumption; and
 - prohibit sugary drinks, which are linked to obesity and tooth decay.
- 4.10 While many factors influence children's health outcomes, evidence shows that strong food requirements and nutritional standards, implemented as part of a whole-school approach, can significantly improve dietary habits. Strengthening these standards is a vital step toward ensuring school food shapes lifelong healthy eating behaviours and improves health and education outcomes.
- 4.11 Separately, updating the current regulations would fulfil the Welsh Government's commitment made in the [Healthy Weight: Healthy Wales Strategy](#) to bring forward the '*implementation of revised school food regulations*' which are in line with the latest requirements and guidelines. This is part of a national priority to enable our education settings to be places where physical and mental health remains a priority to '*reduce the impact of poor health and inequality.*'
- 4.12 The Wales Centre for Public Policy published a report on the 'Effects of Universal Free School Meals'³ in October 2024 which stated (page 30) that the nutritional content of school lunches is crucial because outcomes associated with health, weight, and attainment are likely to be enhanced if school lunches meet good nutritional standards.
- 4.13 Furthermore, considering and aligning provision with the latest health recommendations for child nutrition contributes toward Welsh Government's Programme for Government commitment to meet the [Well-being of Future](#)

³ [Report-The-effects-of-Universal-Free-School-Meals.pdf](#)

[Generations \(Wales\) Act](#) goal of a ‘*Healthier Wales*’ and a ‘*society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood*’.

5. Consultation

- 5.1 The Welsh Government has undertaken several phases of engagement and consultation to help develop its policies in relation to school food.
- 5.2 Between 20 May 2025 and 29 July 2025, we sought views on a draft of the 2025 Regulations and accompanying guidance. As part of this process the Welsh Government engaged with key stakeholders including young people, parents and guardians, caterers, teachers, school food suppliers and local producers.
- 5.3 In total, the process captured 2,570 responses to the consultation, including almost 1,000 from learners. Respondents could select multiple demographic groups within the main consultation, and the highest number of responses were received from parents and carers (53%), followed by primary school learners (19.4%), secondary school learners (18.7%) and the education workforce (13.7%). Fewer responses came from local authorities, catering providers and healthcare professionals (2-3%), with smaller proportions from farmers, suppliers, and local producers.
- 5.4 A children and young people’s version and an easy read version of the consultation document were also made available. 53 responses were received for the children and young people’s version, 44 responses were received for the easy read version. The consultation surveys were supplemented by engagement through a series of 16 focus groups (6 with parents/carers and 10 with learners from schools across Wales) and a self-completion toolkit, ensuring feedback from a wider sample of learners.

Children and young people response

- 5.5 Overall, children and young people were supportive of the proposals relating to fruit, vegetables and starchy carbohydrates, as well as changes for meat, red meat and fish. Whilst slightly lower, there was still a sizeable amount of support for changes relating to processed meat, non-meat options and potatoes cooked in oil, fried foods, sweetened baked goods and desserts, and pastry. Whilst many were supportive, some expressed concerns around the proposals for drinks, preferring soft drinks and squash to plain water and plant-based drinks. Many welcomed the differentiation in portion sizes, with several commenting that the portion sizes are currently not big enough in schools, and as a result they are often hungry. Support for changes to breakfast provision was mixed across those who engaged with

the consultation. When asked about the guidance, children and young people frequently stated they were unsure or did not know.

- 5.6 Access and inclusion were key concerns, particularly for children with dietary restrictions or additional learning needs. Only 44% of respondents found the guidance on special diets clear, and there were calls for more flexibility and better support for neurodivergent learners. Broader equity issues were raised, including food insecurity, limited portion sizes, and the risk of some groups—such as children in poverty or with disabilities—being disproportionately affected. Further information on the impact can be found within the Children Rights Impact Assessment and Equality Impact Assessment.
- 5.7 Impacts will be mitigated through providing clarity in the Guidance on how schools and local authorities should work with learners and their families to develop inclusive menus and consider any further support or adjustments in relation to accessing the school food provision.

Overall response

- 5.8 When asked about increasing the provision of fruit, vegetables and for starchy carbohydrates to be at least 50% wholegrain, the response was largely positive, with 79.9% agreeing.
- 5.9 The proposals that relate to meat, red meat and fish and restricting processed meats, received majority support, with 65.1% agreeing with the proposals relating to meat, red meat and fish, and 58.8% agreeing with limiting processed meat.
- 5.10 The questions asking respondents about restricting cheese-based dishes, limiting processed meat and fish alternatives and restricting fried foods, sweetened baked goods and desserts received a mixed response. 46.6% of respondents agreed with restricting cheese-based dishes and limiting processed meat and fish alternatives, however only 24.7% disagreed, with 23.6% not sure, with higher numbers of respondents (56.9%) in support of limiting fried foods, sweetened baked goods, and desserts.
- 5.11 The response to restricting drinks to plain water, plain milk and plain plant-based drinks to reduce sugar intake by removing options such as fruit juice was positive, with 58.2% agreeing, particularly healthcare practitioners, whilst learners were less supportive. Those neutral or who opposed raised concerns that not all learners like water or milk, warning that this could risk dehydration, and many suggested allowing squash or sugar free alternatives in moderation. Some emphasised that fruit juice contains important nutrients that could otherwise be missed.

- 5.12 The response to providing more appropriate portion sizes by differentiating between those in nursery to Year 2, and Year 3 to Year 6, was largely positive, with 67.1% agreeing overall, and 75% of the education workforce agreeing.
- 5.13 When asked about the proposals relating to breakfast provision, 55.8% of respondents agreed although several respondents opposed the proposal to remove fruit juice, instead claiming that it should remain part of the breakfast offer.
- 5.14 Following the consultation feedback, several amendments have been made to the proposed 2025 Regulations. These include the proposal relating to 'cheese-based meals' being replaced with a 'beans and pulses' provision, the introduction of a clearer definition for processed meat (now referred to as 'specified meat product') and the removal of the provision for all fish to be sustainability-caught.

Financial Impact

- 5.15 The Welsh Government's consultation on updating the Healthy Eating in Schools Regulations highlighted concerns from some respondents about the potential financial impact of the proposed changes. Some local authorities and schools anticipated that the inclusion of more fresh produce will increase food procurement costs. These stakeholders emphasised that their budgets are already under considerable strain, and current funding levels are not seen as sufficient to meet the anticipated costs of healthier, wholegrain foods. Additional cost pressures were also expected, some of which were not directly attributable to the introduction of new Regulations. These included rising food prices, the need for staff training, potential upgrades to kitchen infrastructure and provision for special diets as a result of Universal Primary Free School Meals (UPFSM). There were also concerns about the financial impact of potential food waste if meals offered are not suitable for learners.
- 5.16 The analysis also notes that some parents' have concerns that they may face increased costs if their children opt out of the free school meal provision if they do not like the new offering and require packed lunches instead.
- 5.17 To help manage costs, several strategies were suggested. These include reducing the use of expensive meats, cutting costs linked to outsourcing food provision to private contractors or off-site suppliers, and increasing the use of cheaper plant-based foods. Other respondents proposed that cost savings could be achieved by reducing the number of desserts offered and by tackling food waste more effectively.
- 5.18 Overall there was uncertainty about the cost impact. Several respondents felt that while some elements of the proposals could increase costs, others might reduce them, making the net effect difficult to anticipate.

A minority of respondents expect costs to reduce due to increased use of plant-based foods and fewer ultra-processed foods, as well as smaller portion sizes for infants. Some also believe that, although costs may rise in the short term, there could be long-term savings, particularly for the NHS, because of improved health and learning outcomes for children.

- 5.19 Some local authority respondents called for more detailed cost modelling, consistent funding uplifts, and investment in infrastructure and training. Many respondents stressed that the costs associated with these changes should be viewed as a long-term public health investment, rather than a financial burden or barrier to stronger standards.
- 5.20 In summary, the consultation analysis reveals uncertainty about the cost implications, with some responses citing potential increases and others identifying savings. Where concerns were noted, it was felt that further, ongoing work would inform a longer term understanding of the implications of updating the regulations.
- 5.21 The consultation documents and a summary of the responses are available at: [Healthy eating in schools | GOV.WALES](#).

PART 2 – REGULATORY IMPACT ASSESSMENT

6. Options

6.1 This RIA considers two options to achieve our policy ambitions as set out in the Explanatory Memorandum. It was not considered to be a realistic minimum option to only introduce statutory guidance to achieve these ambitions. Statutory guidance alone could create inconsistencies across Wales, leading to potential health inequalities amongst learners. The two options therefore identified are:

Option 1: Keep the existing 2013 Healthy Eating in Schools Regulations i.e. business as usual

Option 2: Update the current Regulations and Statutory Guidance in primary schools to consider the latest UK Government dietary recommendations.

6.2 Stakeholders have been extensively engaged in the review and development of the proposals for the 2025 Regulations for primary schools (Option 2). A pre-consultation testing and reflection phase has also allowed for trialling of approaches and further refinement of proposals prior to wider testing through public consultation.

6.3 In relation to the amendments concerning secondary schools in the 2025 Regulations, these address spelling and technical amendments and do not alter the underlying policy, which will remain in place until such time as it is formally reviewed and updated. As such, they have not been considered within the options outlined below which apply only to primary schools.

Option 1 – Keep the existing 2013 Healthy Eating in Schools Regulations i.e. business as usual

Description

6.4 The food in schools offer in Wales is underpinned by the [Healthy Eating in Schools \(Nutritional Standards and Requirements \(Wales\) Regulations\) 2013](#) (“the 2013 Regulations”). These set out the types of food and drink that must and must not be provided during the school day and define the nutrient content of an average school lunch. All food provided by local authorities and governing bodies in local authority-maintained schools must adhere to these Regulations (subject to limited exceptions set out in

the 2013 Regulations). This option would mean these Regulations remain unchanged.

Benefits

6.5 The 2013 Regulations set out the minimum nutritional requirements which must be met. They provide local authorities and governing bodies with discretion to design menus which can go further, incorporating many of the revised UK Government dietary recommendations into their provision without requiring changes to the existing Regulations.

6.6 Our consultation highlights that many local authorities are already implementing practices that exceed the current statutory requirements. Therefore, retaining the 2013 Regulations may be viewed positively by avoiding the risks associated with Option 2. This could alleviate potential pressures on local catering teams by not introducing new national requirements which could be beyond some local authorities' existing operational capacity. This however needs to be balanced against the potential risks of not updating the regulations listed below.

Risks

Welsh Government

6.7 Since the introduction of the 2013 Regulations, the UK Government's dietary recommendations have been revised following updated advice from the Scientific Advisory Committee on Nutrition (SACN) to the four UK Governments. Without action to consider this advice, Wales risks missing key opportunities to contribute further toward improved health outcomes through our school food offer and falling behind other nations that have already updated their food requirements to reflect the latest SACN guidance (Scotland).

6.8 There is an additional reputational risk for the Welsh Government if the 2013 Regulations are not updated. Delivering revised school food Regulations that align with the latest nutritional requirements and guidelines was a clear commitment made in our [Healthy Weight: Healthy Wales Strategy](#) as part of our approach to realising the 'Well-being of Future Generations (Wales) Act' goal of a 'Healthier Wales'.

Health

6.9 Retaining the 2013 Regulations presents a longer-term risk. It would represent a missed opportunity to help reverse increasing numbers of overweight or obese children, which, alongside other lifestyle and environmental factors, could result in greater costs to the NHS in Wales due to diet-related conditions such as diabetes and heart disease (see paragraph 6.25). These interconnected risks underline the importance of regularly revisiting school food requirements as part of a broader strategy to safeguard both the health of all learners and the sustainability of the NHS across all Health Boards.

Learners

6.10 As set out in paragraph 6.6, some school caterers are already implementing practices that exceed the current statutory requirements. However, retaining the 2013 Regulations means that there are inconsistencies in the nutritional content of meals offered across local authorities which can lead to inequalities for some learners.

6.11 There is emerging evidence⁴ that some children continue to feel hungry following their school lunch. This concern has been particularly noted among older pupils. Retaining the 2013 Regulations would miss an opportunity for the Welsh Government to introduce revised requirements, via the 2025 Regulations, that could help ensure that meals are both nutritionally balanced and sufficiently satiating.

6.12 Furthermore, failure to update the 2013 Regulations risks perpetuating the cycle of child poverty, hunger, and widening health and educational inequalities. Children from socio-economically disadvantaged backgrounds are disproportionately affected by poor nutrition⁵, which is linked to poorer health, lower academic attainment and behavioural challenges. We know that school meals can constitute up to a third of a child's weekday food intake, making them a critical lever for intervention. Without strengthened regulations, the current standards may fail to reflect updated scientific guidance and miss opportunities to embed healthy eating habits early in life and tackle inequality.

Costs

⁴ [Only a fifth of children answering survey are full after school dinner - Children's Commissioner for Wales](#)

⁵ [Child health inequalities driven by child poverty in the UK - position statement | RCPCH](#)

Welsh Government, local authorities and health services

6.13 There would be no direct additional cost associated with maintaining the 2013 Regulations for the Welsh Government, local authorities or school governing bodies. However, while this option avoids immediate budgetary implications, it may carry longer-term reputational and strategic risks for the Welsh Government (see paragraph 6.7 and 6.8) and could limit opportunities for improved national nutritional standards in schools. It may also include longer term financial risks through lost opportunities to minimise health inequalities; the cost of which may be felt in the future by the NHS and local authority services (paragraph 6.25).

Learners

6.14 While the wider social impacts set out in paragraph 6.13 cannot be precisely calculated and are therefore unquantifiable, maintaining the current outdated food requirements could impact negatively on our efforts to tackle child hunger and reduce inequalities. These in turn could impact on the future health and earning potential of learners.

Option 2: Update the Healthy Eating in Schools Regulations and Statutory Guidance in primary schools to consider the latest UK Government dietary recommendations by making the 2025 Regulations.

Description

6.15 The Welsh Government considers that updating the 2013 Regulations to more closely align with current UK Government Dietary recommendations, is the most effective way to deliver consistency on the policy intent of helping primary school children access the food and drink they need to have a healthy diet and reach their potential. The aim is to enhance the nutritional standards of school meals by improving the minimum food requirements served to pupils. The key changes include:

- Offering more fruit and vegetables to help Welsh children get their five-a-day.
- Providing more wholegrains because evidence suggests Welsh children aren't getting enough fibre.
- Limiting pastry, sweetened baked goods and desserts, and fried foods based on the latest dietary advice.
- Two distinct nutritional standards for infants (nursery-year 2) and juniors (year 3-year 6).

- Reducing processed meat and limiting processed alternatives to fish and meat which can be high in salt and saturated fat.
- Retaining red meat in moderation to ensure children enjoy its nutritional benefits without overconsumption.
- Limiting sugary drinks, which are linked to obesity and tooth decay.

Benefits

Welsh Government

6.16 Evidence provided from the WLGA on primary school lunch menus across all 22 local authorities found that in 75% of the weekly menu cycles examined, schools were already offering at least six different vegetables, meeting the proposed requirement for variety, in addition to providing two portions of vegetables daily, often including salad as a second option. Many also use wholegrain or 50/50 varieties of pasta, rice and bread, and offer fish products weekly. Further, most local authorities already comply with the proposed drinks standard, with plain water universally available and fruit juice rarely offered.

6.17 The 2025 Regulations would therefore formalise and standardise good practice, ensuring consistency and alignment across all local authority areas with the latest UK Government dietary recommendations across primary school meal provision as far as is reasonably practicable, and eliminate the risks set out in **Option 1**. It also supports our ambition as set out in the Healthy Weight: Healthy Wales strategy to provide a long-term, whole-system approach to prevent and reduce obesity across Wales. The supporting Statutory Guidance, which will be published after the laying of the 2025 Regulations, will set out recommendations for those that are already reaching the minimum standards to exceed those if they so wish.

6.18 Updating the Regulations also aligns with our Future Generation aspirations by providing an opportunity for all primary age children to share and enjoy a healthy, nutritionally balanced meal together. This seeks to maximise the benefits of our investment in children's health and wellbeing, learning, and in their social skills.

Learners

6.19 Our school lunch provision is designed to meet approximately 30% of the average daily nutritional requirements for children aged 4–10. Where

learners also access the school breakfast provision, this can contribute an approximate additional 20% towards their daily intake. The balance of the school meals aims to ensure that children's health needs are met during the school day, for example through an increase in fibre and a reduction in free sugars. These improvements are intended to instil healthier eating habits, supporting learners to make more nutritious choices beyond the school environment, and contribute to efforts to reduce obesity. However, the impact of the 2025 Regulations on obesity levels remains uncertain and unquantifiable due to learners receiving the remainder of their nutrition outside of the school setting, and variations in take-up of the school offer. However, the amended regulations and guidance are designed to have a positive influence both within and beyond the school day.

6.20 Evidence indicates that when meals are backed up by nutritional requirements, this has been beneficial to educational outcomes.⁶ Evidence also indicates the benefits of nutritional requirements in school food on health outcomes. Ensuring that the food provided in schools contributes towards improved outcomes for learners represents better value for money to the public purse.

6.21 Many local authorities are already adopting practices that go beyond the current statutory requirements, potentially resulting in improved outcomes for learners. However, the WLGA reported that the benefits are difficult to measure in the context of different local approaches, and that benefits would be more consistently realised if underpinned by strengthened policy and guidance.

6.22 **Evidence** shows that children living in areas of higher socio-economic disadvantage face higher rates of weight issues. Updating the Regulations, accompanied by strengthened statutory guidance, therefore represents an effective method for helping equitable access to healthier food as well as supporting the development of healthy eating behaviours and food choices that can contribute toward improved outcomes and quality of life for children and young people living in Wales.

6.23 Furthermore, the revised statutory guidance, to be published following the laying of the Regulations, will reinforce expectations on how local authorities and schools should meaningfully engage with learners in the design and delivery of the school lunch offer. This includes ensuring that the offer better reflects the diverse needs of learners and sub-groups

⁶ Anderson, M.L., Gallagher, J. and Ritchie, E.R. (2018) School meal quality and academic performance. *Journal of Public Economics*, 168, pp.81-93.

(including those with protected characteristics), particularly in relation to special dietary requirements and cultural preferences.

6.24 Finally, there are reports that some children are reporting as hungry following their school lunch (paragraph 6.11). Updated Regulations will ensure there is no upper limit on the food we want to encourage, such as fruit, vegetables and bread which is at least 50% wholegrain, whilst limiting foods which contain sugar and saturated fat which increase the risk of diet-related health problems. These changes have the potential to further help address the issue of hunger in schools and improve concentration in the classroom.⁷

NHS

6.25 The 2025 Regulations will potentially strengthen our ability to tackle childhood obesity in Wales. As noted in paragraph 6.9, failing to act risks perpetuating diet-related conditions such as type 2 diabetes and heart disease - both of which carry long-term implications for the NHS in Wales. While school food provision is not the sole determinant of children's health, it is a powerful lever for shaping lifelong eating habits. By modernising the Regulations, and strengthening statutory guidance, we can seize a critical opportunity to embed healthier behaviours early on⁸, reduce future strain on the health system, and contribute to lowering the UK-wide annual NHS spend on obesity-related diseases, currently estimated at £6.5b⁹. The same report estimates that the social cost of obesity in Wales alone is £3b each year, this figure includes NHS costs, broader economic costs from reduced productivity and costs to the individual from a reduction in quality of life (measured using quality adjusted life years – QALYS).

Local authorities and Governing Bodies

6.26 The 2025 Regulations will continue to support local flexibility in menu design, ensuring that school food caterers can adapt menus to reflect local/regional preferences, local produce and operational realities. In meeting the new requirements, it is not anticipated that school food caterers will need to diverge significantly from existing business-as-usual processes

⁷ UNESCO 2023. Ready to learn and thrive. School health and nutrition around the world. Available from [Ready to learn and thrive: School health and nutrition around the world - 2023 | World Food Programme](#)

⁸ Lundborg P, Rooth DO, Alex-Petersen J. Long-Term Effects of Childhood Nutrition: Evidence from a School Lunch Reform. *Rev Econ Stud* [Internet]. 2022. 1;89(2):876–908. Available from: <https://doi.org/10.1093/restud/rdab028>

⁹ ⁹ [Estimating the full costs of obesity - Frontier Economics](#)

with some already implementing standards that align with the revised requirements (paragraph 6.16).

6.27 In addition, the 2025 Regulations and subsequent Statutory Guidance creates an opportunity for greater promotion of healthy eating and drinking in schools, linking with the new curriculum, strengthening knowledge and awareness, and contributing to positive lifelong healthy eating behaviours. At the same time, better nutrition could support improved behaviour and attainment within schools.¹⁰

Wider Benefits

6.28 Food holds fundamental importance in Wales, delivering a wide range of benefits that extend beyond nutrition. It strengthens the foundational economy by supporting local jobs and driving growth, enhances the security of food supply, and is essential to the health and wellbeing of communities.

6.29 The increase in fruit and vegetables within the 2025 Regulations for primary schools presents an opportunity to increase local production and enhance the impact of existing Welsh Government-funded initiatives. This includes the 'Welsh Veg in Schools' project which focuses on producing and supplying sustainably grown local vegetables into schools. This would also support new product development focused on dishes with Welsh produce by Castell Howell and Larder Cymru, who are actively collaborating with local authorities to review menus and increase the volume of locally sourced produce. These benefits must also be balanced against the associated risk of the 2025 Regulations on school food suppliers and is considered in paragraph 6.36.

6.30 This approach is supported through local authorities' continued adoption of Welsh Government's guidance: '[Harnessing the Purchasing Power of the Public Plate for a Healthier, Wealthier Wales – a Legal Guide to Embedding Sustainability into Food Procurement](#)' for all food contracts/framework agreements delivering school food in the context of revised regulations.

6.31 While the full extent of these impacts is unquantifiable at this stage, continued engagement with the agriculture sector and school food suppliers

¹⁰ [Report-The-effects-of-Universal-Free-School-Meals.pdf](#)

in Wales remains crucial, offering mutual benefits and helping to unlock further opportunities to strengthen local supply chains.

Risks

Local authorities

6.32 To help understand the potential risk to local authorities regarding the impact on deliverability, affordability and take-up of the offer, Welsh Government undertook a range of activities with delivery partners. This has included via a Task and Finish group approach (which included local authority representation) the co-development of the draft proposals consulted upon. In addition, time was built in ahead of the consultation (from September 2024- May 2025) for optional pre-consultation testing by local authorities, with Welsh Government providing workshops to support partners to understand key changes and gather reflections.

6.33 Through this collaborative approach, and their responses to the consultation, local authorities reported several potential risks in delivering the 2025 Regulations. These include financial pressures due to perceived increased costs for wholegrain and fresh foods, potential food waste while learners adapt to new menus, as well as operational challenges such as supply chain limitations, infrastructure upgrades, and the need for staff training.

6.34 In recognition of the risks, several changes were made to the 2025 Regulations, including:

- amending the definition of processed meat (now referred to in the Regulations as 'specified meat product') to provide greater clarity for delivery partners.
- removing the provision to limit cheese-based meals to provide greater clarity for delivery partners.
- narrowing the definition of non-meat and non-fish alternatives to ensure that a broader range of ingredients were available to local authorities and schools when planning menus.

6.35 An analysis of the consultation responses shows that a large number (95) of respondents considered that the inclusion of more fresh produce and better-quality meat under the proposals would lead to an increase in food procurement costs. However, 113 respondents felt there would either be no cost impact or were unsure, highlighting that the challenges and associated costs are difficult to quantify. As set out in

paragraph 6.5, school caterers retain their ability to flexibly design menus to meet their needs. Further, differences in cost accounting, catering structures, and procurement across local authorities lead to high variability, while factors such as changes to inflation and supply chain operations further complicate reliable estimations. In conclusion, respondents noted that more detailed cost modelling was necessary to fully understand these impacts over time. During both the pre-consultation and consultation, several local authorities reportedly began implementing the 2025 Regulations where possible (see paragraph 6.32). There is therefore reassurance the 2025 Regulations are deliverable, with potential for learning to be shared and adopted more widely.

6.36 Separately, the Welsh Government has evidenced its commitment to the delivery of nutritious food in primary schools, including through the latest uplift to the unit rate paid per meal under the universal primary free school meal commitment. This rate increased from £3.20 to £3.40 per meal from September 2025 and is the highest in the UK. It is also the second time Welsh Government has uplifted the unit rate paid per meal since the policy commenced. This increase is intended to reflect known inflationary pressures on food, staffing, and operational costs and aims to support the ongoing sustainability and improve the quality of school meal provision.

6.37 Finally, to further mitigate the aforementioned risks, the proposed 2025 Regulations will be followed by subsequent revised statutory guidance for local authorities and schools and existing mechanisms will support Welsh Government to continue monitoring take-up of school food and delivery of school meals. Through liaison with the Welsh Local Government Association, Public Health Wales and local Welsh Network of Health and Wellbeing Promoting Schools leads, Welsh Government will continue to assess what support is needed, what has already been developed and can be shared, and where existing good practice can be adopted more widely. This will wrap around existing Welsh Government policies which are established to support local authorities and schools - such as routine capital maintenance and procurement cycles (referenced in paragraph 6.55).

Learners

6.38 Take-up of the offer was a consideration for Welsh Government in designing the 2025 Regulations, and through the pre-consultation period and consultation (paragraph 6.32 refers) learner insight was captured. The updated 2025 Regulations limit the availability of what we know to be popular food choices such as processed meat and sweetened desserts. These changes could potentially increase child hunger if children do not

choose to eat what is offered in the future and could, at least initially, result in some additional food waste. Health inequalities could potentially widen if learners, or their families, opt to provide packed lunches in place of nutritionally balanced school meals, particularly if these packed lunches are of lower nutritional value. The provision of packed lunches would also represent a financial burden for learners' families. Collectively, these impacts could be disproportionately felt by children living in socio-economic disadvantage, who are also more likely to be from some ethnic minorities and from families with disabled people, as these children may be more reliant on the meal in school.

6.39 These impacts will be mitigated through existing practice, where caterers design menus with the needs and preferences of primary learners and local communities in mind. At a national level Welsh Government will strengthen Statutory Guidance on the promotion of healthy eating and drinking, further clarifying roles and responsibilities, and offering practical advice for those with a duty to take action. This will include emphasising the importance of engaging learners, parents and carers to familiarise them with the school food offer and encourage uptake. Separately, Public Health Wales is supporting Welsh Government in identifying optimum communication methods to reach target audiences, including learners, as to promote the benefits of the 2025 Regulations. This work will be in collaboration with Welsh Network of Health Promoting Schools leads, to facilitate disseminating information and to ensure consistency in messaging. In the longer term, there is also the potential to consider and understand the behavioural science of school food choices.

6.40 Finally, through the Universal Primary Free School Meal grant, Welsh Government will continue to monitor take-up of the food in school offer as to consider what if any further changes may be needed.

Suppliers

6.41 Our consultation highlighted concerns from some that school food caterers may be required to source cheaper produce to manage budgets, potentially reducing demand for Welsh products including meat, dairy, and fresh produce. This could have a detrimental impact on local farming communities and the rural economy. The consultation also highlighted that the availability and cost of 50% wholegrain products such as bread, pasta, noodles may present additional challenges for local suppliers.

6.42 Responses from suppliers were, though, relatively limited and therefore our understanding of the full impact of the updated Regulations to this group is difficult to quantify. However, of those that engaged with the

consultation, some highlighted potential risks to agricultural and food supply businesses, particularly noting that any reduction in the frequency of red and processed meat may impact Welsh businesses (where these items are currently being supplied to and served in primary schools). In addition, some reported that limiting fruit juice on school menus could potentially impact some Welsh businesses and locally employed rural communities. It was noted, however, that this impact would namely be felt if fruit juice were to be limited in secondary schools (which is not within scope of the proposed amendments to the 2025 Regulations). Additionally, it was suggested that bespoke manufacturing of provisions that need reformulating to meet the new requirements could increase costs to suppliers and be passed to caterers. Suppliers also noted that sourcing and meeting new requirements may require upstream investment and collaboration with producers, posing challenges for smaller or rural supply chains. As set out in paragraph 6.26, school food caterers have flexibility to develop menus to meet their operational realities and regional preferences and so the exact impact on suppliers here is unknown. However, we intend to mitigate these risks as far as reasonably practicable through supply chain liaison via the Welsh Government's Food Division.

Costs

Local authorities

6.43 While the implementation of the 2025 Regulations will introduce new requirements for school food provision, there are credible pathways to achieving compliance in a cost-neutral manner.

6.44 The funding provided to local authority catering services for both Universal Primary Free School Meals (UPFSM) and eligible Free School Meals (eFSM) supports the core components of meal delivery. This includes staffing, food procurement, menu redesign, staff training, and updates to product sourcing.

6.45 The flexibility embedded in the regulations continues to enable local authorities to design menus which make cost-effective substitutions where necessary. Local authorities will retain the autonomy to determine how best to meet the revised requirements, allowing for efficient, locally tailored menu planning that supports a wide range of choices and continues to meet the needs of their communities.

6.46 Based on a sample primary school menu, the WLGA has estimated an average increase of £0.15 per school lunch for food items. The most

significant cost rise is attributed to desserts (+£0.13), primarily due to the inclusion of fruit or vegetable portions with all desserts and the substitution of sweetened baked goods with yoghurt.

6.47 The potential for cost increases was also identified in some local authorities consultation returns which raised concerns regarding the cost of providing fruit and/or vegetables with every dessert, whilst others were concerned around the feasibility of ‘serving’ fruit or vegetables on the plate with all desserts, rather than ‘offering’ them on the counter.

6.48 Using the WLGA estimate, the Welsh Government projects that the total additional annual cost could be approximately £6 million, assuming an average annual take-up rate of 86%¹¹. However, it is important to note that historical take-up rates for Free School Meals¹² have typically been lower and therefore this represents the upper cost estimate. Further, while desserts are popular, there is no mandatory requirement to offer a dessert under the new Regulations, only an upper limit on how often sweetened baked products or desserts can be served during the week.

6.49 However, due to the factors already articulated regarding different practices across local authorities, it is difficult to reliably use this data to draw conclusions. The cost modelling presented in the WLGA response is based on an example menu informed by procurement data from a broad sample of local authorities. Some elements trialled within the WLGA menu were based on draft regulations shared as part of a pre-consultation testing phase with local authorities – this included milk-based desserts and cheese-based dishes. These requirements specifically have since been amended, allowing greater flexibility in menu planning and enabling each authority to tailor menus to predict uptake and customer preferences. In addition, the WLGA’s consultation response indicates these costs are based on 100% take up of all elements of the school lunch. In practice however, some learners do not take up all elements of the offer and local authorities will analyse these patterns and use historic uptake data to plan food preparation. This approach helps manage waste and ensures costs remain aligned with targeted food budgets.

¹¹The 86% rate was provided through the UPFSM grant as a conservative high-end estimate to ensure sufficient funding is allocated. It was derived from internal analysis and used to calculate grant allocations to local authorities.

¹² PLASC 2019 data indicates that, on census day, the take-up rate for Free School Meals (eFSM) was 75%. More recent take-up data has not been used due to data quality issues following the implementation of the transitional protection policy.

6.50 Caterers retain the flexibility to design menus that respond to local supply chains, learner preferences and operational realities. Such flexibility enables local authorities to substitute higher-cost items with more affordable, locally available alternatives, optimise recipes for cost-efficiency, and adjust menus seasonally to take advantage of lower-cost produce. As a result, actual costs may vary significantly depending on local context, uptake of elements within the school lunch offer, and implementation choices.

6.51 The consultation also highlighted a range of existing practices deployed by local authorities to achieve cost savings within the delivery of school meals. These include leveraging bulk purchasing arrangements, adopting flexible menu planning that incorporates seasonal produce, and working with local supply chains to optimise procurement. However, due to operational variances across settings—including differences in supplier access, kitchen infrastructure, and learner preferences—it is not possible to quantify the extent of these efficiencies at a national level at this time. In addition, the introduction of differentiated portion sizes for infants and juniors is a practical and effective strategy to align food provision with age-specific nutritional needs and leads to lower food waste and reduced food costs.

6.52 While specific figures for kitchen upgrades and training are difficult to quantify, the potential need for capital investment and increased training budgets to deliver the revised regulations was reported through the consultation by some respondents.

6.53 Whilst there is no requirement in the 2025 Regulations to remove deep-fat fryers, it will be included as an aspiration within the subsequent Statutory Guidance. The Welsh Government acknowledges the operational and financial challenges associated with transitioning to healthier cooking methods in school kitchens. While many local authorities are committed to this shift, the replacement of deep-fat fryers with combi-ovens and associated kitchen upgrades could require capital investment in the future. The scale of that investment and whether there are any additional ongoing financial implications associated with the change are unknown at this stage. According to WLGA's consultation response, 42% of primary schools still use deep-fat fryers weekly, and although five local authorities have already completed the phase-out, most others are progressing gradually, typically when equipment reaches end-of-life.

6.54 The Welsh Government noted that some local authorities have removed deep-fat fryers and installed programmable combination ovens

and are going as far as to also install solar panels and replace gas cooking equipment with electric, enabling the use of renewable energy to further reduce costs.

6.55 The Welsh Government recognises that accelerating the transition away from deep-fat fryers and ensuring consistent implementation across Wales will require careful planning and investment. While no specific funding is included for local authorities, the Welsh Government's approach is to encourage local authorities to replace deep-fat fryers at natural points of renewal, such as when equipment reaches the end of its operational life. This phased strategy supports gradual infrastructure improvement without imposing immediate financial burdens whilst still being compliant with the revised Regulations (which do not prohibit deep fat fryer use, only reduce the frequency that deep-fried food can be provided). We consider that the associated costs—such as upgrading to combi-ovens—can be accommodated within existing budget frameworks i.e. where local authorities integrate these changes into routine capital maintenance and procurement cycles over time. This approach balances ambition with practicality, enabling progress toward healthier cooking practices while respecting current financial constraints.

6.56 The 2025 Regulations will be followed by subsequent Statutory Guidance which could be argued as bringing a familiarisation cost for local authorities and school catering staff who will need to take time to review and understand the new requirements. However, this is expected to be cost neutral, as catering staff already regularly review and update menus and have regular training sessions as part of their usual responsibilities. The familiarisation process could be incorporated into their existing workflow, without requiring additional resources or staffing. If, however, training was required beyond these arrangements, the total cost for 3 hours of training for all catering staff across 1,199 primary schools, assuming 5 staff per school paid £14/hour is estimated at around £250,000¹³.

6.57 As set out, these potential costs will be mitigated as part of a business-as-usual approach to training and professional development locally, and can be accommodated as part of locally planned approaches to implementation prior to the 2025 Regulations coming into force. Partners have a 9-month lead-in time to familiarise themselves with new requirements, in addition to the time that has passed since new, draft regulatory proposals and guidance were first published in May 2025.

¹³ Estimated using Wales School Census Results 2025, Annual Survey of Hours and Earnings 2024 and feedback from the WLGA.

Suppliers

6.58 An analysis of the consultation responses from suppliers highlighted that bespoke manufacturing may be required for items that contain 50% wholegrain starchy carbohydrates which may not be widely available. This could lead to local authorities sourcing provisions from outside of Wales to reduce costs. Suppliers noted that reformulating products to meet new standards may require investment in new product development, impacting pricing. To help local authorities continue to 'choose Welsh' the Welsh Government's Food Division have the expertise available to support businesses adapt and reformulate where possible and will continue to engage suppliers on matters relating to this policy. In addition, reformulation of products to meet Welsh school food standards may also impact businesses who supply schools in other parts of the UK – increasing the number of lines available and potentially increasing costs of production/manufacturing. As a counterpoint though, there is also the potential for increased demand for these same products in other parts of the UK in the future, should other administrations amend regulations in a similar way and in response to UK dietary advice.

6.59 Increased diversity of ingredients (e.g. more fruit and veg varieties) may lead to higher management costs for ordering, storage, and stock control, though feedback from local authorities indicates many are already adopting these standards in practice. Further, the 2025 Regulations could also potentially negatively impact agriculture and food businesses who supply provisions we want to limit in school meals. However, the new Regulations could also benefit rural communities by providing opportunities to encourage more local, sustainable produce to be sourced, linking with the Community Food Strategy and utilising the local supply chain from farm to fork.

6.60 Local Food Partnerships, now established in every local authority in Wales, can also provide strategic co-ordination of local food projects and create new supply opportunities by connecting local food stakeholders. Joining farmers with wider organisations along the supply chain will complement the objectives of the [Sustainable Farming Scheme](#). For example, the increase in fruit and vegetables provides an opportunity to increase local production. Continuing to work with the agriculture sector in Wales to develop new opportunities to increase local supply is crucial.

6.61 Any cost increase incurred by suppliers has the potential to be passed on to local authorities (at least in part) in the form of higher prices

and may therefore already be reflected in the discussion in the section above.

Families

6.62 The potential financial impact of the proposals on families remains uncertain at this stage. Some parents responding to the consultation expressed concern that their child may opt out of the free school meal provision, or elements within it, due to dislike of the revised offering, resulting in additional costs for packed lunches. Conversely, the introduction of improved nutritional standards may encourage other parents to allow their child to take up school meals more frequently, thereby reducing household food costs and supporting healthier eating habits. Ultimately, implementation approaches designed and delivered by local authorities and schools are key to engaging with learners and their families, developing and familiarising them with new menus, and promoting the school meal offer effectively to help ensure levels of uptake. Effective implementation planning and support can contribute to this agenda, offering resources alongside strengthened guidance that further supports local authorities and governing bodies to understand and fulfil their existing duties, including to promote healthy eating and drinking and encourage take up of school meals. On-going engagement with the WLGA and local authorities will help to understand if further support is needed in the future.

Conclusion

6.63 To help pave the way for the introduction of new regulations Welsh Government has undertaken a range of activity with delivery partners. This has included the co-development of draft proposals with stakeholders, pre-consultation testing and reflection, and workshops to support partners to understand key changes as part of public consultation. These efforts have helped support some local authorities to begin delivering what is intended under the 2025 Regulations.

6.64 At this stage however, the full cost implications of implementing the 2025 Regulations remain unquantifiable. Differences in cost accounting, catering structures, and procurement across local authorities lead to high variability, while factors such as changes to inflation and supply chain operations further complicate reliable estimations. However ahead of the 2025 Regulations, the Welsh Government uplifted the rate paid to local authorities per meal from £3.20 to £3.40 per meal from September 2025 – highlighting our commitment to school food and its potential for securing improved outcomes for Welsh learners.

6.65 The Welsh Government will continue to monitor delivery of the 2025 Regulations and consider this alongside any future review of the Universal Primary Free School Meal unit rate, to ensure that funding remains aligned with delivery realities. Any unknowns should not prevent action being taken, particularly given the cost of not acting. Any costs incurred over time by updating the Regulations represent a preventative, long-term public health investment, rather than a barrier to stronger standards.

6.66 To support implementation, Welsh Government is strengthening Statutory Guidance for caterers to support their interpretation and application of new requirements and, separately, strengthening Statutory Guidance on the promotion of healthy eating and drinking, clarifying roles and responsibilities within the food in school system. However, ultimately, implementation approaches designed and delivered by local authorities and schools are key to engaging with learners and their families, developing menus with them in mind and familiarising them with new offerings, and promoting the school meal offer effectively to help ensure levels of uptake.

Summary of the preferred option

6.67 **Option 1** proposes no change to the 2013 Regulations. These were made over 10 years ago and no longer reflect current UK Government dietary recommendations. Providing school meals that do not align with dietary recommendations will limit the positive impact of the universal primary free school meal provision and wider free school meal offer and would represent a missed opportunity for school food to maximise its contribution to improving the health, well-being, and attainment of primary aged learners at school.

6.68 **Option 2** allows an opportunity to align with the latest UK Government dietary recommendations and evidence indicates revised food/nutritional requirements, delivered in the context of a whole school approach to food, are an effective long-term strategy to improving nutrition and healthy eating behaviours.

6.69 It is not considered that a business-as-usual approach would outweigh the benefits of revising the 2013 Regulations to closer align with UK Government dietary recommendations. Making the 2025 regulations under **Option 2** creates the opportunity to build on the strengths of the existing Regulations and refine them further to ensure that food and drink in schools provides essential nutrients, and that saturated fat, sugar and salt

are restricted. While the additional costs associated with the proposed changes are currently uncertain, there remain opportunities for cost-savings and greater efficiencies in operational practice. Additionally, the potential for increased costs should be set against the preventative, long term agenda and the potential for the policy to contribute towards a reduction in the ongoing cost of obesity in Wales. Pursuing **Option 2** is viewed as a long-term public health investment.

6.70 Therefore, **Option 2** is the preferred option.

7. Competition Assessment

7.1 The proposed amendments to the 2013 Regulations have the potential to impact competition within the school food supply market. Consultation responses highlighted that reformulating products to meet new standards may require investment in new product development, which could favour larger suppliers with greater capacity for innovation and compliance. Most Welsh food businesses are smaller or local suppliers which may face challenges in meeting new requirements, particularly where bespoke manufacturing or bulk purchasing is required.

7.2 The increased diversity of ingredients and higher standards for nutritional quality may also affect supplier pricing and menu planning.

7.3 However, the Welsh Government's approach seeks to balance ambition with practicality by encouraging local authorities to leverage local supply chains and adopt flexible menu planning. Carefully planned approaches to implementation and continued engagement are intended to mitigate risks and promote fair competition. Finally, a long lead-in time is allowed before new regulations come into force in October 2026, supporting opportunities for reflection, collaboration and planning.

8. Post implementation review

8.1 The Welsh Government is committed to reviewing the impact of these proposed Regulations. Well established networks with schools, local authorities, suppliers and wholesalers will offer strengthened opportunities to discuss and review implementation approaches, both in anticipation of the proposed October coming into force date and beyond it. This will provide a policy feedback loop supporting adjustments to planned or future approaches to implementation. Ongoing communication with delivery

partners will ensure implementation progress is fed back to Welsh Government officials, including consideration of the risks and benefits identified above.

8.2. The Year 1 evaluation report of the Universal Primary Free School Meals (UPFSM) programme, scheduled for publication in early 2026, will provide valuable early insights into the school food system in Wales before the 2025 Regulations take effect. Data collected so far includes qualitative information on dietary behaviours, wellbeing, and perceptions of school food environments, gathered from children, families, school staff, and other stakeholders.

8.3. Conducting the initial phases of the UPFSM evaluation in this pre-regulation context will enable Welsh Government to explore the potential impact of the 2025 Regulations. Future phases of the evaluation will continue to monitor these impacts, supporting evidence-based policy development and implementation.

8.3 Further, methods of monitoring and evaluation will be considered as part of efforts to measure and quantify the impact of this new policy. A range of opportunities may already exist that can be used to support monitoring and evaluation of any changes. These include existing education and health data-sets and indicators which can be compared over time.