



Department  
of Health &  
Social Care

# **Government response to the House of Lords Food, Diet and Obesity Committee's report 'Recipe for health: a plan to fix our broken food system'**

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Presented to Parliament  
by the Secretary of State for Health and Social Care  
by Command of His Majesty

January 2025



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# Introduction

This is the government's response to the recommendations made by the House of Lords Food, Diet and Obesity Committee in its report [Recipe for health: a plan to fix our broken food system](#), published on 24 October 2024.

The government welcomes the committee's report. We are grateful to everyone who contributed their time and expertise in providing evidence to the committee.

The report highlights an obesity crisis that is being caused by increasingly unhealthy changes in our food environment. This includes what food products are available to buy, their affordability and what they are made from. It also includes other factors, such as our exposure to marketing and promotions, the time available to buy and prepare food and whether we eat at home or out of the home.

Over more than 30 years, in relative terms, food and drink in the UK has become cheaper, more calorie dense, and higher in saturated fat, salt and sugar. Products high in fat, salt and sugar (HFSS) have become more available, more promoted and more advertised. These shifts in the food environment have had corresponding impacts on purchasing behaviours and food and nutrient intakes. The [National Diet and Nutrition Survey](#) finds that, on average, the UK population does not meet government recommendations for a well-balanced and healthy diet.

As a result, the 2022 [Health Survey for England \(HSE\)](#) found around 64% of adults in England are now living above a healthy weight. The [National Child Measurement Programme \(NCMP\), 2023 to 2024 school year](#) report found that by the time children finish primary school, 22.1% are living with obesity. HSE and NCMP also show that obesity prevalence increases with deprivation, and that inequalities in weight outcomes have gradually risen over time. Children aged 11 years living in the most deprived parts of England are over twice as likely to be living with obesity compared with the least deprived areas.

These are serious challenges to our health and wellbeing, to the NHS and to the economy. Obesity is one of the main causes of ill health, economic inactivity and premature mortality, as highlighted in the recently published [Get Britain Working white paper](#).

As part of this government's [Plan for Change](#), we are committed to achieving our [health mission to Build an NHS Fit for the Future](#). Reducing obesity rates will help make the country fairer, allow people to be healthier for longer and reduce early deaths from the biggest killers. But to do this will require reshaping the food environment that has caused the rise in obesity. This needs effective action across government including devolved governments and local authorities as well as across industry and all of society.

The committee has made several recommendations in 'Recipe for health', which we set out at the beginning of each chapter. We have responded to the recommendations below, in the same order and using the chapter titles and subheadings presented in the committee's summary of its conclusions and recommendations.

## **Chapter 1: diagnosing the problem**

### **The 'Hungry for change: fixing the failures in food' report**

"We endorse the recommendations of the 'Hungry for change' report and call on the Government to act on them, taking account of policy developments and trends in food, diet and obesity since it was published." (Paragraph 16)

The previous government provided a response to the July 2020 House of Lords Food, Poverty, Health and the Environment Committee's [Hungry for Change report](#). That report considered the links between inequality, public health and food sustainability. Relevant recommendations from it were considered by the House of Lords Food, Diet and Obesity Committee as part of its [Recipe for health: a plan to fix our broken food system](#) report.

As part of this government response, we will take into account the policies and developments relating to food and the food environment, diet and obesity prevalence since 2020.

### **Central recommendation**

"The Government must as a matter of urgency adopt a new, comprehensive and integrated food strategy to address the wide-ranging consequences of the food system failures identified in this report. Implementation of such a strategy will only be successful on the basis of strong and accountable leadership at the highest level of government." (Paragraph 36)

The government is committed to a mission-led approach to tackling obesity and improving the food environment. In the following responses to the committee's recommendations, we will provide details on the range of policies and opportunities that support this commitment.

The Department of Health and Social Care (DHSC) is leading on the health mission, which aims to:

- shorten the time people spend in ill health
- support independence

- reduce health inequalities
- drive economic growth

The mission will ensure the NHS is there when people need it, tackle the biggest killers and create a fairer Britain where everyone lives well for longer. The Secretary of State for Health and Social Care chairs a health mission board to oversee the health mission.

Through the health mission and 10 Year Health Plan, we will shift our NHS away from a model geared towards late diagnosis and treatment, to a model where the NHS focuses on prevention, with more services delivered in local communities. Our goals will only be achieved through stronger, more proactive action on prevention.

Food policy will be an important part of achieving the health mission's goals. It provides an opportunity for us to examine a wide range of evidence, design approaches and actions that can genuinely transform health outcomes.

In alignment with the health mission, the Department for Environment, Food and Rural Affairs (Defra) is developing an ambitious food strategy that will set the food system up for long-term success and will provide wide ranging improvements. The food strategy will help to improve our food system so it:

- provides healthier, more easily accessible food to tackle obesity and give children the best start in life, and help adults live longer healthier lives, building on the government's existing work to tackle obesity and improve health
- maintains food security by building resilience in the face of climate shocks and geopolitical changes, and protecting the supply chain which operates so effectively to keep us fed
- drives the investment, productivity and innovation that will ensure that the food and drink sector - our largest manufacturing sector - can realise its potential for economic growth
- reduces the impact of farming on nature and biodiversity, while supporting the sector through that transition

Both the health mission and the food strategy are major programmes of cross-government work. This work will take a co-ordinated and considered approach, informed by evidence and existing good practice, and achieved in partnership with devolved governments and local government. We are developing options and approaches over the coming months and will announce further information on both programmes soon.

## Chapter 2: government strategy

"The Government should introduce a new overarching legislative framework for a healthier food system." (Paragraph 63)

"This legislation should require that the Government publish a new, comprehensive and integrated long-term food strategy, setting out targets for the food system and the Government's plans to introduce, implement and enforce policy interventions to achieve those targets." (Paragraph 63)

"As part of this new legislative framework, the Food Standards Agency (FSA) should be given oversight of the food system. This oversight role should be transparent and independent of industry. It should include monitoring and reporting annually to Parliament against targets for sales of healthier and less healthy foods, on the overall healthiness of diets, on related national health outcomes, and on progress against Government strategy." (Paragraph 64)

"The Secretary of State for Health and Social Care should be accountable to Parliament for progress made against these objectives, at the apex of an effective cross-departmental governance structure (including a dedicated Cabinet Committee) on food policy, supported by a properly resourced Office for Health Improvement and Disparities." (Paragraph 65)

"The Prime Minister and the Chancellor of the Exchequer should play key leadership roles in enforcing and delivering this programme." (Paragraph 65)

"An obligation should be placed on the Secretary of State for Health and Social Care to lay before Parliament a Government response to Scientific Advisory Committee on Nutrition (SACN) recommendations within two months of their publication." (Paragraph 65)

The government is committed to creating a food environment that is healthier and supports people to live longer, healthier lives. These efforts will be enabled by our mission-led approach that ensures a whole government response to tackling the biggest issues facing our society. Food policy is a clear example of where co-ordination and collaboration are essential, given the interests, expertise and responsibilities that sit across a number of government departments.

Food policy will be an important part of achieving the health mission's goals. It provides an opportunity for us to examine a wide range of evidence, design approaches and actions that can genuinely transform health outcomes. The committee's report is a welcome contribution to the debate on this vital issue.



It is important that we take a considered approach to decide the actions we need to improve the food system. Defra will lead the development of the food strategy, but with close cross-government collaboration, including with DHSC and the Department for Education (DfE) and the Food Standards Agency (FSA).

The combined expertise and experience of DHSC, Defra and the FSA will allow for innovative approaches to help the enhancement, regulation and sustainability of the food system. This will drive efforts and collaboration across government to implement the health mission and develop an effective food strategy. We are working to build on strong partnerships with the sector to create a strategy that draws on shared expertise and collective commitments, backed by a clear vision and framework for change from government.

The Prime Minister will chair regular health mission stocktakes and will have oversight across all 5 missions (For more information see [Plan for Change: milestones for mission-led government](#)).

The recommendation for government to respond to SACN recommendations within 2 months of their publication is in line with the current process. Ministers are alerted to SACN publications for information before publication. Following any final SACN publications, ministers consider SACN recommendations and any proposed actions. The aim is to do this within 2 months of publication.

## **Chapter 3: the role of industry**

The government must:

"Now make a decisive shift away from voluntary measures to a system of mandatory regulation of the food industry." (Paragraph 126)

"Fundamentally reshape the incentives for the food industry through a coherent and integrated set of policy interventions to reduce the production and consumption of less healthy foods, and drive production and sales of healthier foods." (Paragraph 126)

"Exclude food businesses that derive more than a proportion of sales (to be defined by the Food Standards Agency) from less healthy products from any discussions on the formation of policy on food, diet and obesity prevention. This should also apply to the industry associations that represent these businesses." (Paragraph 128)

"Devise and publish by the end of 2025 a code of conduct on ministerial and officials' meetings (whether in-person or virtually) with food businesses, to be employed consistently across all government departments. The minutes of all such meetings should be published." (Paragraph 129)

As the providers of the food and drink we eat, the food industry has an important role in helping to improve the nation's diet and tackle obesity.

The food strategy will aim to ensure that the food system provides more easily accessible healthier food to reduce obesity, which will help give children the best start in life and help adults to live longer, healthier lives.

The government continues to review the balance between mandatory and voluntary measures to help improve poor diets, reduce obesity and improve the food system. We recognise that mandatory regulation can drive change and could be welcomed by parts of the food industry for setting a level playing field between companies who have already taken voluntary action and those who have yet to do so. Alongside mandatory measures, we think that there will always be a role for voluntary action, which can be implemented more quickly and provide space for innovation.

Approaches to reducing obesity must balance effective and enforceable mandatory policies that all companies must adhere to, while also exploring voluntary standards for best practice. This can help inform better regulation in the future and avoid creating undue costs for businesses and consumers.

Policy interventions must reduce the production and consumption of less healthy foods and encourage production and sales of healthier foods. We committed to implementing the advertising restrictions for less healthy food and drink on TV and online without further delay. On 3 December 2024, we laid the secondary legislation [The Advertising \(Less Healthy Food Definitions and Exemptions\) Regulations 2024](#) in Parliament to implement these restrictions. We also published the guidance [Restricting advertising of less healthy food or drink on TV and online: products in scope](#) to support industry's preparation for implementation. These restrictions will come into force across the UK on 1 October 2025. We expect them to remove up to 7.2 billion calories from UK children's diets each year and provide NHS savings of £50 million and social care savings of £40 million.

This policy is in addition to existing restrictions on the placement of less healthy products (HFSS) in prominent selling locations in store and online which came into force in England in October 2022. We made a further commitment to restrict the sale of high-caffeine energy drinks to children under the age of 16 (that is, children aged 15 years and under).

We remain committed to addressing the childhood obesity crisis and will carefully consider the evidence for taking further action where needed.

The government engages with a wide range of food industry stakeholders which is vital to understand changes and risks in the food supply chain. A good example of the value of this engagement was during the COVID-19 pandemic when there were significant disruptions to food availability. Engagement to understand how policy can impact different parts of the food system is an important part of the process to inform effective policy development and an essential step towards future goals.

There is a distinction between engaging on the feasibility of implementation and engaging directly on policy design. We seek intelligence and views from the food industry, who are one of the many stakeholders the government engages with, because all stakeholders need to be part of the solution. The government ultimately retains overall leadership in designing, implementing and monitoring the impact of policies.

We have no plans to exclude food businesses or industry representatives based on the percentage of sales a business derives from less healthy products. Such an approach would prevent effective engagement with many of the companies where change is most needed. This approach would also favour large companies which may sell more tonnes of HFSS products than other companies, but where HFSS sales are only a small percentage of their overall sales due to selling many other types of products.

In creating the food strategy, we are working to build strong partnerships with the sector to draw on shared expertise and collective commitments, backed by a clear vision and framework for change from government.

We are committed to greater transparency across government to let our stakeholders hold politicians and public bodies to account. Summaries of industry meetings are already published, for example for the [Food Data Transparency Partnership](#) health and eco working group meetings, as well as for the [Food and Drink Sector Council](#).

## **Chapter 4: ultra-processed foods (UPFs)**

### **Overview/research on UPFs**

"We welcome the commitment of the scientific community in the UK and beyond to undertake further research into the links between UPFs and poor diet and health. Working with bodies such as UK Research and Innovation (UKRI) and the National Institute for Health and Care Research (NIHR), the Government must commission further research independent of industry into these links, and in particular to explore:

Potential mechanisms of causation linking UPFs and poor health outcomes;

The health benefits of consumption of products with no or minimal processing on both overall dietary patterns and on health outcomes;

The impact of the hyperpalatability and energy density of foods on dietary consumption;

The long-term health effects of consumption of specific additives and combinations of additives; and

The cost-effectiveness of interventions that can reduce consumption of less healthy, often highly processed foods, and increase the availability and affordability of healthier foods.

The Government and SACN must monitor and respond urgently to any emerging evidence." (Paragraphs 251 to 253)

SACN has been considering the evidence published since its 2023 [statement on processed foods and health](#). A paper was discussed at SACN's horizon scan meeting in October 2024 and at its committee meeting in November 2024. SACN is aiming to publish an update to this statement early in 2025.

SACN has agreed for the topic of processed foods and health to remain on an active watching brief and to reconsider any new, high quality evidence in November 2025. Also relevant to processed foods, SACN is considering the World Health Organization guideline on non-sugar sweeteners, with the aim of publishing a position statement early in 2025.

Other research to address the evidence gaps is also already underway. NIHR (which is funded by DHSC) and UKRI (which is funded by the Department of Science, Innovation and Technology) are working with charity research funders to ensure the full range of evidence gaps on UPFs are addressed.

NIHR is also investing in a range of research on UPFs. This includes commissioning new research on the health and health inequality impacts of interventions that affect UPF consumption, and research on the cost implications of reducing these foods in the UK diet.

UKRI has commissioned research to understand the public's views on UPFs, to help inform future research and policy.

## **Action on UPFs**

"The need for further research into ultra-processed foods must not be an excuse for inaction:

The food industry must be held to account now for the rise in unhealthy diets and obesity. The Government has already taken some steps to regulate HFSS products, many of which are also UPFs. It must now go much further." (Paragraph 254)

"Furthermore, the Government should commit as part of its new comprehensive food strategy to tackling the over-consumption of such less healthy foods, and increasing consumption of healthier, largely unprocessed and minimally processed foods, ensuring a healthy and affordable diet for all." (Paragraph 255)

"This will not be easy. Since less healthy, highly processed foods often represent the affordable and convenient option at present, they can crowd out healthier options from the diet, particularly for those facing food insecurity. Given that many households have neither the time, skills nor facilities to prepare meals from scratch, it is important that the products they are offered by the food industry are healthier. The Government should therefore take action to make healthier, largely unprocessed and minimally processed foods more accessible and affordable. It should also explore how best to enable the preparation of meals and snacks at home from scratch as often as personal circumstances allow." (Paragraph 256)

"In addition, the Government must within two months publish a detailed response to the July 2023 SACN statement on processed foods and health, and any subsequent findings published by SACN. This should set out the Government's current position on UPFs, and in particular: whether and how national dietary guidelines should reflect the need for caution about eating a diet containing a high proportion of UPFs; and the current evidence on their impact on public health. Any guidance on consumption of UPFs should be accompanied by an operational definition for individual foods that is robust and easily useable both by consumers and by the food industry." (Paragraph 257)

"The Eatwell Guide published in 2016 should be reviewed to ensure it reflects updated evidence and advice, and further reviewed as required in the future if further evidence on the public health impact of UPFs emerges. The Government should review and implement the most cost-effective ways of making the Eatwell Guide useful and accessible to consumers (for instance via interactive digital platforms)." (Paragraph 258)

"The Government must implement the 2018 Nutrient Profiling Model without further delay. Going forward, the NPM must also be regularly reviewed to ensure it reflects emerging scientific evidence and dietary guidelines,

including any emerging research evidence on the potential harms of UPFs or their properties, and used to identify both healthier and less healthy foods for the purposes of regulation." (Paragraph 259)

Actions to improve unhealthy diets will be considered under the health mission and the food strategy, with further details available in chapters 2 and 3.

We recognise there is more we can do to improve diets and the food environment by working collaboratively across government, informed by evidence and good practice.

Achieving significant dietary improvements at a national level will require whole system intervention across a range of areas, from school meal provision and government food procurement, through to advertising. A cross-governmental approach with devolved governments and local government working in partnership, will be fundamental to address all the issues raised in the House of Lords Food, Diet and Obesity Committee's report.

[The Eatwell Guide](#) is a pictorial representation of current government dietary recommendations. The guide already emphasises that our diets should include plenty of fruit and vegetables and wholegrain or higher fibre foods. It also shows that many foods that would be classified as UPFs are outside of the main Eatwell image, as they are high in calories, saturated fat, salt and/or sugar.

DHSC will consider conducting consumer research to assess user needs and understanding of the Eatwell Guide. This will support DHSC's longer term aim to improve the accessibility of the guidance which is needed to help all population groups put the government dietary guidelines into practice.

As mentioned in responses in earlier chapters, the government will consider SACN publications in line with usual process. Following publication of SACN's update on processed foods and health in 2025, ministers will consider the recommendations and policy options. The aim is to do this within 2 months of publication.

SACN continues to monitor the evidence on UPFs, and this was a topic of discussion at last year's SACN meetings as mentioned above.

Maintaining the integrity of government dietary recommendations will require further research. Once there is sufficient evidence, an independent full dietary risk assessment of the scientific evidence by SACN would be needed to draw firm conclusions about the extent to which food processing itself is an issue. We would need this before considering any significant updates to the Eatwell Guide and government dietary recommendations.

We recognise that to support the practical application of the Eatwell Guide, we need a food environment that helps the healthier choice to be the easier choice for everyone.

Reformulation of the everyday food and drink that we all buy will help make a healthier diet more accessible. There are a range of legislated and voluntary measures that have either already led to businesses reformulating food and drink products to reduce levels of sugar, saturated fat, calories and salt, or are expected to do so. This includes:

- advertising and promotions restrictions for less healthy food or drink
- the Soft Drinks Industry Levy (SDIL)
- the voluntary reformulation programme
- front of pack nutrition labelling

We are working together as a mission-led government to look at the incentives for reformulation and consider the balance of mandatory and voluntary measures that we need in future to make further change.

A review of the current UK Nutrient Profiling Model (NPM) 2004 to 2005 was commissioned in 2016 to bring it in line with the latest dietary guidelines. In particular, the recommendations for free sugars and fibre made in the 2015 SACN [Carbohydrates and Health Report](#). The updated NPM was consulted on in 2018. Any further updates to the NPM will be in response to any new dietary recommendations made by SACN.

## **Chapter 5: making food environments healthier**

### **Holding the food industry to account**

"Large food businesses must be held to account for selling unhealthy food and drink. The Government must ask the Food Data Transparency Partnership Health Working Group to finish its work no later than the end of September 2025. Following this, the Government should legislate to make reporting on healthiness of food sales (defined by the Nutrient Profiling Model) mandatory for all businesses with more than 250 employees, in a programme overseen by the Food Standards Agency. The Government should bring in targets to achieve healthier food sales and should review progress before the end of this Parliament and regularly thereafter, introducing penalties for non-compliance if progress is insufficient. The Government should determine how such reporting could be made practicable for smaller businesses, and deliver what support, if any, those businesses would need." (Paragraph 275)

The Food Data Transparency Partnership (FDTP) is a shared programme of work across DHSC, Defra and FSA, set up to improve the transparency of food data. The aim of the health workstream of FDTP, led by DHSC, is for businesses with more than 250 employees across retail, manufacturing and the out of home (OOH) sector to report on the healthiness of their sales.

Since July 2023, the health workstream made good progress on resolving questions about how business-level reporting on healthier sales could work. However, there are several outstanding technical challenges, including data availability and quality, as well as the appropriate scope for reporting, including own-brand compared to branded goods and foods sold in franchises. Products that are out of scope for reporting would also need defining. These challenges need to be resolved before we can move to further questions about how reporting:

- can be quality assured
- can be made feasible for different businesses
- should be published and presented

FSA has had a leading role in data discussions in the health workstream.

There is no current expectation for small or medium sized businesses to be within scope of FDTP reporting on the healthiness of sales. This is due to practicality and burden and is in line with similar regulations.

Work on the health workstream of FDTP paused for the general election. We are reviewing FDTP alongside other policy areas.

## **Reformulation, taxes and subsidies**

"The Government should:

"Legislate as soon as possible to make targets with dates for reduction of salt, sugar and calories mandatory for large businesses and require those businesses to report on progress. Progress should be monitored by the Food Standards Agency and reported to Parliament. Fines for failure to comply should be introduced by the end of the Parliament." (Paragraph 285)

"Announce as soon as possible that it intends to uprate the Soft Drinks Industry Levy (SDIL) to keep pace with consumer price inflation since it was introduced and review the rate of the SDIL annually from now on. The Government should also reduce the current thresholds for the levy from 5g



and 8g per 100ml to 4g and 7g per 100ml and bring sugary milk-based drinks into scope. The changes should be applied by April 2026 at the latest." (Paragraph 288)

"Announce an intention to introduce a salt and sugar reformulation tax and apply it as soon as possible, and within two years at most." (Paragraph 294)

"Introduce measures to make healthier food more affordable. To this end, the Government should urgently commission a comprehensive review of the evidence on the most cost-effective interventions to drive businesses to produce and market healthier, often unprocessed or minimally processed fruits and vegetables, legumes, nuts, seeds and whole grains and to drive up consumption of those foods. This should include consideration both of universal subsidies and of targeted measures to support people on low incomes." (Paragraph 300)

There are a range of measures that we are taking forward, both legislated and voluntary, that have already led to businesses reformulating food and drink products, and which are detailed throughout this response. DHSC, Defra and FSA will continue to look at the evidence, opportunities and incentives for cross-government work through the health mission and the food strategy.

We have published a number of reports showing progress by all sectors of business towards meeting the targets set for the voluntary reformulation programme. These are available in the [sugar, salt and calorie reduction and reformulation](#) collection. These reports show that the programme has been successful in reducing levels of sugar, salt and calories in some product categories, although it is clear that industry needs to do more.

We continue to review the implications of mandatory reduction and reformulation targets. Setting enforceable mandatory targets on salt, sugar and calories would require businesses to already be reporting on their reduction and reformulation. As outlined in 'Holding the food industry to account' above, a number of reporting challenges for both government and businesses would need to be resolved before reporting can be implemented effectively.

We also continue to keep all taxes under review. Decisions about the future development of taxes are made by the Chancellor of the Exchequer, in line with the government's tax policy-making framework.

We acknowledge the success of SDIL as a way to encourage reformulation. As announced in the Autumn Budget 2024, we are taking steps to ensure the SDIL remains effective and fit for purpose. To maintain incentives for soft drinks manufacturers to reduce

their sugar content and protect the real-term value of the levy, we will ensure that SDIL increases to reflect:

- the 27% consumer price inflation (CPI) between 2018 and 2024, which will be spread evenly across the next 5 years
- future yearly CPI increases

The first annual uprating will take place on 1 April 2025. To accommodate smaller rate increases, future SDIL rates will be expressed in terms of 10 litres rather than litres. We will also review the SDIL's operation and structures, with a view to further reduce the sugar content in soft drinks. Within its scope, the review will consider:

- the sugar content thresholds at which the SDIL applies
- whether to remove the current exemptions for milk-based and milk substitute drinks

We continue to review incentives for reformulation, and will consider the balance of mandatory and voluntary measures that we need in future to make further change.

We note the committee's recommendations on access to healthier affordable foods. We will consider access to healthier affordable foods in the health mission, as part of the food strategy and through the [child poverty taskforce](#).

## **Advertising of unhealthy food**

"The Government should:

"Legislate to ban the advertising of HFSS food and drink across all physical and digital media, as well as advertising by businesses that fail to reach mandatory health targets. This should be initiated no later than October 2026, culminating in a total ban by the end of this Parliament. As part of this, the Government should ban the sponsorship of sports events by and celebrity endorsements of large food businesses that fail to reach mandatory health targets." (Paragraph 311)

"Develop a toolkit to support and accelerate local authority efforts to restrict outdoor HFSS advertising and encourage the spreading of good practice in advance of the comprehensive ban on advertising of HFSS food and drink coming into effect." (Paragraph 321)

We have committed to restrict advertisements of less healthy food or drink products before 9pm on television, and all paid-for advertising of these products online across the UK from

1 October 2025. On 3 December 2024, we laid the secondary legislation 'The Advertising (Less Healthy Food Definitions and Exemptions) Regulations 2024' in Parliament to implement these restrictions. We also published the guidance 'Restricting advertising of less healthy food or drink on TV and online: products in scope' to support industry's preparation for implementation.

We estimate that these restrictions will remove up to 7.2 billion calories from UK children's diets per year and reduce the number of children living with obesity by 20,000.

The Advertising Standards Authority's [UK code of non-broadcast advertising and direct and promotional marketing](#) (CAP code) already bans advertisements for less healthy food or drink products where children under 16 years (that is, aged 15 or under) make up more than 25% of the media's audience, and bans the targeting of these advertisements to children, for example the use of licensed characters. The code also bans outdoor advertisements of less healthy food or drink near schools or in areas with a high concentration of children.

Nine mayors have recently announced they will support local level action to ban junk food marketing across the public transport networks and public spaces under local control.

We will continue to review evidence of the impacts on children of advertising for less healthy food and drink products and will consider whether further action is needed.

## **Healthier high streets**

"The Government must:

"Swiftly introduce measures to give local authorities more planning and licensing powers to protect public health and reduce the proliferation of businesses that rely on sales of less healthy food." (Paragraph 330)

"Bring forward the planned review of restrictions on retail location promotions, ensuring loopholes are closed and local authorities are adequately resourced to enforce the ban by the end of 2025." (Paragraph 337)

"Implement the ban on HFSS volume price promotions no later than 1 October 2025 and restrict other forms of HFSS price promotion in retail settings, including 'meal deals'." (Paragraph 342)

"Ban location and price promotions of HFSS food and drink by out-of-home businesses with more than 50 employees, and for smaller out-of-home businesses and franchise premises if practicable." (Paragraph 347)

"Ban location and price promotions of HFSS food and drink across online delivery platforms and aggregators, including digital messages and promotional notifications." (Paragraph 347)

"Act swiftly to ban the use of brand and licensed characters, cartoons and nutrition and health claims on the packaging of HFSS food and drink. The Government should also ban these forms of promotion of HFSS products in retail and the out-of-home sectors as soon as possible." (Paragraph 354)

"Legislate as soon as possible to implement its promised ban on the sale of energy drinks to children, ensuring the ban is comprehensive and providing adequate resources for it to be enforced." (Paragraph 351)

We agree that there is more to do to make the food environment healthier and work is underway to achieve that aim.

On 12 December 2024, the government published the revised [National Planning Policy Framework](#) for local government. As part of this, local authorities were given the stronger, clearer powers they have told us they need to block new fast food outlets near schools. These changes to national planning policy will support local authorities to promote healthy communities and tackle childhood obesity.

DHSC is also committed to a package of regulatory measures designed to create a healthier food and drink environment and support consumers to make healthier choices. This includes restricting the promotion of less healthy food and drink products in certain store locations, such as checkouts, store entrances, aisle ends, and their online equivalents. These regulations came into force in England in 2022. We expect this to reduce children's calorie consumption and accrue health benefits of over £57 billion and provide NHS savings of over £4 billion, over the next 25 years.

The government provides annual funding to local authorities to enforce these restrictions. We will conduct a post-implementation review within 5 years of implementation for which we have started to commission evidence.

This represents a bold and ambitious programme of work to address the advertising and promotion of less healthy food in retail settings and on TV and online. We will continue to assess the impact of this work programme and consider the evidence and case for change for going further where needed.

We have also committed to banning the sale of high-caffeine energy drinks to children under the age of 16 (that is, children aged 15 years and under).

## Food labelling

"While our focus is system-wide change, effective nutrition labelling can help consumers make healthier choices and stimulate reformulation. The Government should:

"Introduce mandatory front-of-pack nutrition labelling that clearly distinguishes healthier and less healthy products, in a form determined by independent, publicly funded research with UK consumers in real-world situations. A variety of labelling systems with evidence of success in other countries should be trialled. Labels must be prominent and of a clearly readable size." (Paragraph 364)

"Make prominent nutrition labelling mandatory for all businesses in the out-of-home sector by the end of this Parliament, in a comparable form to labelling in the in-home sector. To help smaller businesses comply, the Government should make available a tool to help businesses assess the nutritional content of their products." (Paragraph 367)

Front of pack nutrition labelling aims to support healthier choices by communicating complex nutritional information to consumers in a way that is easy and quick to understand. The UK's voluntary multiple traffic light scheme has been in use since 2013 and highlights whether a product is 'high' (red), 'medium' (amber) or 'low' (green) in total fat, saturated fat, total sugars and salt.

In 2020, the UK government and devolved governments at the time held an evidence-gathering consultation on front of pack nutrition labelling. This considered whether improvements were needed to the UK's front of pack nutrition labelling scheme and invited views on international examples of labelling, including using warning labels. Alongside this, publicly funded research was conducted in a nationally representative sample of consumers to test how the UK's existing scheme performed compared to some of those used in other countries. Both the UK's scheme and Nutri-Score (used in France) performed better than warning labels (used in Chile) or a generic 'positive tick' logo.

We will continue to review the evidence on front of pack nutrition labelling and will consider with devolved governments whether further action is needed in the future.

Legislation came into force in April 2022 requiring large OOH businesses in England with 250 or more employees, including restaurants, cafes and takeaways, to display the calorie information of non-prepacked food and soft drink items they sell. It aims to help consumers to make healthier choices for themselves and their families when eating out or getting a takeaway. It may also encourage businesses to reformulate and offer lower calorie options.

We will continue to evaluate the impact of OOH calorie labelling across the population and will conduct a post-implementation review within 5 years of implementation.

## Chapter 6: infants, children and young people

### Pregnancy, infancy and early years

"The Government must:

"Set goals for improving maternal and infant nutrition to prevent childhood obesity, develop a comprehensive and integrated strategy by the end of 2025 to meet those goals drawing on evidence from existing initiatives, and report on progress to Parliament annually thereafter." (Paragraph 380)

"Act immediately to strengthen regulation on the composition and marketing of follow-on, toddler and growing up milks, banning the promotion of such products." (Paragraph 385)

"Legislate by the end of 2025 to set strong mandatory compositional and marketing standards for commercial infant foods. The policy must be determined independent of industry input." (Paragraph 395)

"Immediately review food standards for early years settings, making them mandatory, supporting early years settings to meet them and establishing a performance framework." (Paragraph 400)

Maternal and infant nutrition is an important part of our strategy to prevent childhood obesity.

The National Institute for Health and Care Excellence (NICE) published the update to its [guidance on maternal and child nutrition](#) in January 2025. SACN is also considering nutrition and maternal health and is aiming to publish its report in 2025. The guidance and report are based on a comprehensive consideration of the evidence and are expected to make recommendations on maternal weight and nutrition more generally. NICE and SACN are ensuring that their conclusions and recommendations are complementary. Future actions and goals will be informed by these important publications.

Based on the SACN report [Feeding in the first year of life](#), which provides advice for infants, work is already planned through NHS England's [Three year delivery plan for maternity and neonatal services](#). The plan was launched in 2023 and sets responsibilities for NHS organisations at trust, integrated care system, regional and national levels to make maternity and neonatal care safer, more personalised, and more equitable for

women, babies and families. This plan includes setting standards for infant feeding and encouraging the use of interventions on improving maternal healthy weight.

[Better Health - Start for Life](#) is a trusted NHS service, with over 14 million parents visiting the website last year. It provides advice and practical guidance to parents on topics such as:

- pregnancy
- feeding babies and young children
- child development
- school readiness

Families can also access support at any time of the day, every day, through an expansion of the National Breastfeeding Helpline and the launch of a 12-month pilot night service. Family Hubs, set up in funded areas of need, can offer parents holistic and person-centred care to help them understand the links between breastfeeding and perinatal mental health.

The government acknowledges the committee's concern on follow-on, toddler and growing up milks. In 2023, the SACN report [Feeding young children aged 1 to 5 years](#) showed findings from national dietary surveys indicating that free sugar intakes for children aged 18 to 60 months were above the current recommendations. In addition, formula milks (mainly follow-on formula and toddler and growing-up milks) were consumed by 36% of children aged 1 to 1.5 years and contributed 50% of free sugar intakes in consumers.

Current recommendations from SACN are that these products are not required by children aged 1 to 5 years and that milk or water, in addition to breast milk, should constitute the majority of drinks given to children aged 1 to 5 years.

NHS advice is that there is no evidence to suggest that toddler or growing-up milks provide extra nutritional benefits for young children.

The Competition and Markets Authority's (CMA) [Infant formula and follow-on formula market study interim report](#) into competition in the infant formula market was published in November 2024. We will now carefully consider its options and work with the CMA as it develops its final recommendations for government early next year. This includes considering the concerns from the CMA about the cross-promotion of follow-on formula and infant formula and its impact on influencing the feeding choices of parents and carers. We will continue to review the evidence in this area for going further if needed.

In addition, with regards to foods consumed by babies and infants, the government agrees it is vital that we maintain the highest standards for these foods, which is why we have

comprehensive regulations in place that set nutritional and compositional standards for commercial baby food. The regulations also set labelling and marketing standards to ensure consumers have clear and accurate information about the products they buy. We continue to keep these regulations under review to ensure they reflect the latest scientific and dietary guidelines.

The government recently introduced reforms to the enforcement procedure for the regulation of nutrition and health claims in England. We did this by introducing an improvement notices regime that will create a faster, cheaper and more proportionate method for ensuring compliance and will be consistent with other legislation enforcement processes.

Children's early years provide an important foundation for their future health. The [Early Years Foundation Stage \(EYFS\) statutory framework](#) that all registered early years providers are required to follow states:

"Where children are provided with meals, snacks, and drinks, these must be healthy, balanced and nutritious."

The EYFS framework also signposts to [example menus for early years settings in England](#). We are working with DfE to review this guidance and to ensure it aligns with current government advice and recommendations on feeding infants and young children, including both nutritional and food safety aspects. To further support providers to meet the EYFS requirements, DfE has published [nutrition guidance](#) on its 'Help for early years providers' website.

## **Healthy meals for school-aged children**

"The Government should:

"Immediately review and update the school food standards: bringing them into line with SACN's advice on dietary intakes of free sugars and fibre; setting out that schools should always make drinking water freely available and should offer no drinks except water and milk; and providing guidance on how the standards apply to school breakfasts as they are rolled out."

(Paragraph 414)

"Introduce a system by the end of 2025 for monitoring compliance with the school food standards. The results of compliance checks should be published online. Compliance checks should be introduced for early years settings by the end of this Parliament." (Paragraph 432)



"Immediately take forward reforms to the Government Buying Standards for Food and Catering Services to ensure that schools as well as other public sector organisations must procure healthier food. In the meantime, the Government should introduce guidance on best practice for procuring healthy catering services for schools and local authorities." (Paragraph 425)

It is important that children eat nutritious food at school and the government encourages schools to look at encouraging healthy eating throughout all aspects of the school including its policies, curriculum, culture and more. The [school food standards](#) restrict HFSS foods, as well as low quality reformed or reconstituted foods. These ensure that pupils always have healthy options for their school lunch. The standards also state that pupils should always have easy access to free, fresh drinking water.

The government is working to deliver its manifesto commitments, including setting up breakfast clubs in every state-funded school with primary aged pupils. DfE has published [Breakfast clubs early adopter guidance](#) to provide support to schools on how to implement or adapt breakfast clubs. This includes detailing what our minimum requirements and expectations are, as well as providing practical guidance on how schools can start breakfast clubs, including how they could expand their offer further.

DfE will keep its approach to school food under continued review.

Compliance with the school food standards is mandatory for maintained schools, academies, and free schools. School governors have a responsibility to ensure compliance and should appropriately challenge the headteacher and the senior leadership team to ensure the school is meeting its obligations. To support governors, in partnership with the National Governance Association, DfE has recently launched an [online training course on a whole school approach to food](#). This training programme is designed to provide governors and trustees with the skills and expertise to understand their responsibilities, and to develop and champion their own whole school approach to food. Through this training, DfE wants to improve understanding of the school food standards and give governing boards the confidence to hold their school leaders to account.

DfE and FSA, along with support from DHSC, ran a [school food standards compliance pilot](#) with 18 local authorities during the 2022 to 2023 academic year. This pilot aimed to find out if food safety officers were able to assure the compliance of school food standards when carrying out routine food hygiene inspections in schools. It was designed to test the feasibility of additional questions and observation in food hygiene inspections, across a variety of types and sizes of local authority, to provide assurance of compliance.

The pilot's results showed that food safety officers could conduct checks of the school food standards alongside food hygiene inspections, although officers reported some pressures on their workload. When following up with potentially non-compliant schools, the

pilot found that this process was successful when school staff were supportive and engaged, or when local authorities had the capacity and capability to provide substantial support. But this was not always the case. DfE is continuing to work with FSA on next steps.

Ofsted and childminder agencies assess how providers meet and deliver the EYFS framework and report on the quality and standards of provision. If providers fail to meet the EYFS requirements, they may issue actions and a 'welfare requirements notice', which sets out the actions a provider must take by a certain date to comply with the requirements. It is an offence for a childcare provider not to comply with a welfare requirements notice.

We note the committee's recommendations for Government Buying Standards (GBS) for food and catering services. Defra's food procurement officials are currently exploring options for updating and expanding the scope of the GBS for food and catering services in the public sector. We are committed to using the purchasing power of the procurement supply chain to achieve our wider ambitions on sustainability, animal welfare, economic growth and nutrition and health.

DfE guidance [Buying for schools: get free help from procurement specialists](#) service is made up of various resources to help schools buy goods and services efficiently and compliantly. This is a free advice and guidance service for state schools and there is no cost to access it.

## **Chapter 7: making healthy food affordable and accessible**

### **The cost of a healthy diet**

"The Government should immediately commence publication of quarterly estimates of the costs of a weekly healthy food basket. Findings should be reported to Parliament alongside progress towards targets on population nutrition and public health." (Paragraph 445)

A healthy food basket is a way of measuring the cost of food people could buy that would meet recommendations for a healthy diet.

We have responded in part to this recommendation in Chapter 5 on the recommendation to introduce reporting and targets for the food industry.

In addition, we will explore the implications and challenges of regularly reporting healthy food basket costs and how reporting may reflect the true cost for households. For

example, differences in access to food where greater distances or less ability to travel may increase the cost of a healthy food basket. This also extends to food preparation and time where limited time may lead consumers to fast food options that may be less healthy or more expensive. We need more evidence on the changes in food-related costs to understand how the cost of a healthy food basket changes for different demographic groups.

## Healthy Start

"The Government should:

"Immediately review the costs and benefits to nutrition and public health of increasing the value of Healthy Start payments to reflect increases in the prices of fruit, vegetables and milk." (Paragraph 454)

"Enable auto-enrolment for Healthy Start over the course of this Parliament and in the meantime review evidence on and implement effective ways of encouraging eligible households to take up the scheme." (Paragraph 457)

"Immediately review the costs and benefits to public health of extending eligibility for the Healthy Start scheme to all families earning under £20,000 per year." (Paragraph 460)

The [Healthy Start scheme](#) was introduced in 2006 to encourage a healthy diet for pregnant women, babies and young children aged under 4 (that is, aged 3 and under) from very low-income households, currently supporting over 353,000 people. We will continue to keep the scheme under review and an evaluation by the NIHR is underway.

The NHS Business Services Authority (NHSBSA) operates the Healthy Start scheme on behalf of DHSC. All applicants to the Healthy Start scheme, where they meet the eligibility criteria, must accept the terms and conditions of the prepaid card when they apply. As the prepaid card is a financial product and cannot be issued without the applicant accepting these terms, the NHSBSA is not able to automatically provide eligible families with a prepaid card.

The NHSBSA promotes the scheme directly to potentially eligible pregnant women and parents through:

- social media advertising campaigns
- parenting websites
- apps

- publications to reach expectant and new parents who may be eligible

In April 2021, the value of Healthy Start rose from £3.10 to £4.25 per week, providing additional support to pregnant women and families on lower incomes to make healthy food choices. Children aged under 1 now each receive £8.50 in total per week, a rise from £6.20 a week. This was an increase of 37%.

We are exploring all viable routes to improve uptake of the Healthy Start scheme, including its value and eligibility.

## **Affordable school meals**

"The Government should:

"Immediately review the costs and benefits to public health of increasing the per-meal free school meals funding rate to account for food price inflation since 2014-15." (Paragraph 465)

"Immediately review the costs and benefits to public health of extending free or subsidised school meal provision, including extending eligibility for free school meals to children in all families with an income of £20,000 per year or less." (Paragraph 471)

"Remove technical barriers to auto-enrolment for free school meals over the course of this Parliament. In the meantime, the Government should disseminate good practice on auto-enrolment for local authorities." (Paragraph 475)

"Ensure that families eligible for free school meals receive holiday food support at no less than the value of free school meals following the end of the current funding settlement for the Holiday Activities and Food programme." (Paragraph 480)

The government's mission is to break down barriers to opportunity and reduce child poverty, which is why we are working to deliver free breakfast clubs in every state-funded primary school, so children start the day ready to learn. For more information, see [Breakfast clubs early adopter guidance for schools and trusts in England](#).

The continued provision of free school meals to disadvantaged children also plays an important role in this mission. In total, the government spends around £1.5 billion each year on free lunches for millions of pupils.

Under current programmes, 2.1 million of the most disadvantaged school pupils are registered to receive benefits-related free school meals, and a further 90,000 students in further education receive free lunches on the basis of low family income. Also, around 1.3 million infant pupils in reception, year 1 and year 2 receive free lunches as part of the universal infant free school meals (UIFSM) policy.

Schools are funded for benefits-related free school meals at £490 per eligible pupil per year. This funding is allocated to schools through their core budgets. In 2024 to 2025, the total spend on benefits-related free school meals is £917 million.

UIFSM and free meals in further education are funded through a direct grant to schools and colleges. The meal rate for both these programmes has been increased from £2.53 to £2.58 and backdated to the start of the 2024 to 2025 academic year. DfE recognises the vital role played by free school meals and encourages all eligible families to take up their entitlement. To make it as easy as possible to receive free school meals, DfE provides the Eligibility Checking System. This is a website that enables local authorities to assess whether households meet the eligibility criteria to receive free meals and awards them on this basis.

We are aware of a range of activity aimed at maximising uptake of free school meals. This includes a number of approaches being trialled by local authorities to support families who may be eligible for free meals, but are not claiming them. DfE welcomes local authorities taking action to ensure that government support reaches families, as long as these activities meet legal and data protection requirements.

As with all government programmes, we will keep our approach under continual review, including eligibility for free school meals.

Now that DfE has been given its overall budget for 2025 to 2026, it is working to confirm the exact funding available to support children and young people eligible for free school meals and their families during the school holidays.

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