

CZECH CONSUMER ASSOCIATION (SČS) — BACKGROUND PAPER, PART 2

SAFE — Food4Inclusion (ESF+ EaSI)

Situation Analysis: The New School Meal Regulation in the Czech Republic

Background paper for the SAFE Food4Inclusion online mutual-learning session on school catering

This paper sets out the principles and rationale behind the Czech Republic's newly regulated approach to school meals, and — because the reform's adoption was accompanied by substantial criticism that in large part remains unaddressed — recaps the substance of that criticism. It draws on 16 source documents made available to the Czech Consumer Association: 11 describing and supporting the new regulation, and 5 setting out critical positions on it, including the enacted legal text itself.

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A note on sources and method

The analysis is based on the enacted legal text — Decree No. 310/2025 Coll. — read alongside supporting and explanatory material from the Ministry of Education, Youth and Sports (MEYS) and the National Institute of Public Health (NIPH/SZÚ), together with documented critical positions from consumer, industry and school-catering practitioner organisations. Where earlier working drafts or presentations quoted figures that were later superseded by the enacted text, the enacted figure is used and the superseded figure is noted for context. A small number of claims — flagged where they occur — rest on a single, unverified media source rather than on documented or official evidence; these are presented explicitly as such.

PART A — Principles and Rationale for the New Regulation

A.1 Legal and institutional framework

School catering in the Czech Republic is governed by Act No. 561/2004 Coll. (the Education Act, in particular Section 35(2), Section 121 and Section 123(5)) and by its implementing Decree No. 107/2005 Coll. on school catering, issued by the Ministry of Education, Youth and Sports (MEYS) in agreement with the Ministry of Health. The decree has been repeatedly amended since its adoption:

Amendment	Effective from	Note
107/2008 Coll.	1 Apr 2008	
463/2011 Coll.	1 Jan 2012	the so-called “soup decree”
17/2015 Coll.	1 Feb 2015	
210/2017 Coll.	1 Sep 2017	
272/2021 Coll.	1 Sep 2021	
13/2023 Coll.	1 Feb 2023	in force until 31 Aug 2025 (nutrition norms could transitionally continue to apply until 31 Aug 2027)
310/2025 Coll.	27 Aug 2025 (promulgated) / 1 Sep 2025 (in force)	the current reform — see A.5 on the timeline; subsequently amended by Decree No. 64/2026 Coll.

Funding is mixed: the cost of food itself is covered in full by parents according to a financial norm set out in the decree (Annex 2, scaled by the child's age); staff costs are covered by MEYS, and operating costs (utilities, maintenance, equipment) by the establishing authority (municipality, region, or state). The average price of a lunch is around CZK 80, of which parents pay roughly a third.

The system is large and has grown steadily over time: in 2024, 8,839 school catering establishments served 2,013,533 diners daily, of which 1,579,602 were children and pupils — 86.1% of all children and young people in the Czech Republic (up from 25.4% in 1955). Oversight is carried out by the Czech School Inspectorate (typically every 3–4 years, or in response to complaints), the public health authority, the establishing authority, and veterinary inspection.

The current amendment is formally titled “Decree No. 310/2025 Coll., amending Decree No. 107/2005 Coll., on school catering, as amended”, and was subsequently amended in one respect by Decree No. 64/2026 Coll. (see A.4).

*Sources: Decree No. 310/2025 Coll. (consolidated text, *Zákony pro lidi*, as of 1 Jul 2026), MEYS overview of the school catering legal framework, “School Catering in the Czech Republic” (presentation, A. Strosserová, c. October 2024).*

A.2 Why reform — health and nutrition rationale

The central argument made by the reform's authors is the state of children's health, and a long-standing gap between what school canteens actually serve and current nutrition recommendations:

- Trends in childhood obesity in the Czech Republic: 3% (1991) → 10% obese plus 7% overweight (2016) → 16.4% (2021, the peak during the covid pandemic, per a study by the Czech Association of Paediatricians) → a modest decline back towards 2016 levels, but a rate still described as “persistently very high” (preliminary results, NIPH study, 2024/2025).
- Global context: according to UNICEF/WHO, 2025 was the first year in which the number of obese school-age children worldwide exceeded the number of underweight children (roughly 1 in 10 children obese); in

countries such as the UK, Australia, Canada and the US, ultra-processed foods and sugary drinks make up half or more of adolescents' daily energy intake.

- School meals as a public-health lever: in kindergartens, school catering can account for up to 60% of a child's daily food intake; across the system as a whole it covers 35–60% of daily energy intake and reaches 1.6 million children every day (including staff and outside diners, nearly one fifth of the Czech population). School closures during covid — with irregular eating, unrestricted access to food at home, stress and less physical activity — are cited as one contributing factor in the rise in obesity during that period.
- NIPH study 2019 (Ruprich et al.) on lunch quality: 57% of canteens fell short of EFSA fat recommendations, 61% fell short of recommended energy content for lunch, and 43% of canteens exceeded WHO salt guidance by more than double (average salt content of 3.43 g NaCl per lunch, i.e. 69% of the maximum recommended daily sodium intake).
- Prague Public Health Authority (HSHMP) measurements (2025, 42 canteens): 33% of sweetened drinks served exceeded the recommended limit of 2 g sugar per 100 ml; the worst measured value was 13.7 g per 100 ml (almost 7 times the limit — flavoured milk with gingerbread flavouring).
- Methodological weaknesses in the existing nutrition-calculation system (“spotřební koš”): flawed conversion coefficients, illogical food-group classifications (e.g. aubergine counted as fruit, buckwheat as a vegetable, tofu as a dairy product), and insufficient sensitivity to sugar content in flavoured dairy products and drinks (juices/concentrates were until now counted simply as “fruit”).

Sources: “International School Meals Day”, “How Much Sugar Do Children Drink” (HSHMP, 2 Mar 2026), “Reportpilot” (NIPH/MEYS/SYRI).

A.3 Institutional preparation process

- 2023 — at the initiative of the Minister of Health, an inter-ministerial working group on institutional catering is established.
- The National Institute of Public Health (NIPH) launches the project “We Have It On Our Plate and We Care”, structured around six thematic pillars: staff, equipment and premises, operations, food and gastronomy, suppliers, and customer care.
- August 2024 — practical piloting of the proposed revision to Annex 1 (the nutrition-calculation system): 33 canteens across different operating types and regions were approached; 2 declined to take part; 31 drew up a four-week menu under the new rules; evaluation failed for 5 due to software issues — 26 canteens were quantitatively evaluated, and 17 provided qualitative feedback.
- September 2024 — a discussion panel at NIPH on “rebuilding the nutrition-calculation system”, involving nutrition therapists, MEYS, the Ministry of Health, the Union of Towns and Municipalities, school head teachers, the “Really Healthy School” initiative, the Nesehnutí association and others — a SWOT analysis found the weaknesses of the previous system outweighed its strengths.
- On the basis of the pilot, limits and quantities were recalibrated (see A.4), and the resulting proposal was passed to the Expert Group on School Catering and the inter-ministerial working group for approval.

Sources: “Reportpilot”, “School Catering in the Czech Republic” (presentation).

A.4 Key substantive changes

Two structural changes form the backbone of the reform:

- Dietary catering changes from something a canteen “could” previously offer into something an operator now “must” offer.

- The nutrition-calculation system is recalculated from “as purchased” quantities (which included cleaning/preparation waste) to “net edible weight” — in practice, canteens now need to purchase more raw ingredients to yield the same amount of food actually served.

Further specific rules under the enacted text (see the note on the timeline in A.5):

- Right to bring one's own food — an operator must allow pupils to eat food they have brought from home on the premises, free of charge (new Section 2a and Section 5(4)).
- A new “Annex 1a” (flexible nutrition norms) replaces the former lacto-ovo-vegetarian option; it may be adopted where a majority of legal guardians or adult diners express interest.
- Free sugars: permitted fulfilment ranges from 0–100% of the norm (it may be omitted entirely, but not exceeded); non-alcoholic drinks without milk containing free sugars may not be offered; flavoured milk drinks are limited (roughly 1–2 times a month with lunch, depending on the catering arrangement).
- Sweet items: at most one sweet dish per day across all meals; sweet mid-morning/afternoon snacks at most twice a week; a sweet dish as the main lunch course at most once every two weeks; reduced frequency of pastries.
- A ban on dehydrated soup/sauce mixes and flavourings containing more than 10% salt; a ban on table sweeteners and products containing artificial sweeteners.
- Fats: a minimum ratio of 2:1 plant-based to animal fats; a ban on unblended palm, palm-kernel and coconut oil for free use.
- A minimum share of organic products (per EU Regulation 2018/848) of 2%, later 5%, of food weight — applying to establishments serving more than 180 diners; a minimum 10% share of seasonal fruit, vegetables or potatoes by weight.
- A non-choice weekly menu: one day of white meat, one day of white or red meat, one day of a fish dish (fish at least twice a month), two meat-free days; red meat offered at most once a week within any given choice.
- A new stand-alone food group, “whole grains and pseudocereals”, and increased quantities of legumes.

Specific quantities changed repeatedly during preparation on the basis of the pilot testing. The figures below are the quantities enacted in the final text of Decree No. 310/2025 Coll. (Annex 1, Table 1) and supersede earlier working figures from the preparatory phase (for example, an October 2024 presentation gave “56 g of meat” for a 7–10 year-old's lunch — an earlier proposal now superseded; the enacted figure is 46 g). Lunch quantities by age group (grams, net edible weight per diner per day):

Age group — lunch	Meat	Fish/shellfish	Dairy/milk	Free fats	Free sugars	Veg/fruit	Potatoes	Grains*	Legumes
2–3 yrs	26	6	44	7	6	94	53	11	7
4–6 yrs	39	9	67	10	8	140	79	14	9
7–10 yrs	46	11	78	12	10	162	92	17	11
11–14 yrs	52	13	89	13	11	187	106	20	13
15+ yrs	65	16	111	17	14	233	132	25	15

* Whole grains and pseudocereals. The decree also sets a permitted tolerance range for fulfilment (Annex, Table 3): meat and dairy 75–125% of the stated value, free fats 75–100%, free sugars 0–100% (may be omitted entirely); for vegetables/fruit, potatoes, whole grains and legumes only a lower bound of 75% is set (no upper limit).

Alongside this main (mandatory) set of norms, the amendment also introduces an optional “Annex 1a — Flexible Nutrition Norms”, with its own, slightly different set of quantities (including the option of substituting dairy in full with plant-based alternatives); a school canteen may elect to follow the flexible norms instead of the standard Annex 1. Decree No. 64/2026 Coll. subsequently amended only the organic-food share in Annex 1 (from 2% to 5%, see above) — the nutrition quantities themselves were not affected by that later amendment.

Important: under the transitional provision and Article III of the decree (see A.5), this specific annex — the nutrition-calculation quantities — does not come into force until 1 September 2028. The figures in the table above are therefore already legally adopted and binding for the future, but may not yet be in day-to-day use in canteens at the time of this presentation.

*Sources: Decree No. 310/2025 Coll. (consolidated text, *Zákony pro lidi*, as of 1 Jul 2026), “Reportpilot”, “School Catering in the Czech Republic” (presentation).*

A.5 Timeline for entry into force

The timeline is set out directly in the text of Decree No. 310/2025 Coll. (Article III, Entry into Force) and in its transitional provision:

- General entry into force of the decree: 1 September 2025 — from this date, among other things, the right to eat one's own food in the canteen and the new financial norm (Annex 2) apply.
- Exception — Article I, item 6 (the entire new Annex 1, i.e. the nutrition-calculation quantities, and the new Annex 1a): does not enter into force until 1 September 2028.
- Transitional provision: a school catering establishment may continue to operate under the previous Decree No. 107/2005 Coll., as it stood before this amendment, until 31 August 2027 — with the exception of the right to bring one's own food (Section 4(10)) and the new financial norm (Annex 2), both of which have applied since 1 September 2025.

Two earlier sources among the supporting documents — a 26 June 2025 article describing a choice between starting in September 2025 or September 2026, and a 23 June 2026 announcement referring to a postponement to 1 September 2027 — describe discussions from a stage before the timeline was enacted in its current form. These reports illustrate how long, and how much, the timeline was debated in public before the legal text was finalised; the analysis here relies on the enacted dates (2025 and 2028, with the transitional window to 2027) as the authoritative reference.

*Sources: Decree No. 310/2025 Coll. (consolidated text, *Zákony pro lidi*, as of 1 Jul 2026, incl. Article III and the transitional provision), “State Sought to Silence Criticism of the New Decree” (*Aktuálně.cz*, 26 Jun 2025), “Public Reaction — School Canteens” (*MEYS/Society for Nutrition*, 23 Jun 2026).*

A.6 Accompanying measures

The reform is accompanied by commitments of methodological support: recommended recipes for meat-free, legume-based, fish and mixed dishes, staff training for canteens, guidance on economic streamlining of operations, an updated calculation tool for the nutrition-calculation system, and a communication campaign aimed at parents, children and teachers. The programme extends beyond the nutrition tables themselves — the “We Have It On Our Plate” project also addresses staffing, kitchen equipment, food-waste prevention (“zero waste”), and relationships with suppliers.

PART B — Recap of Critical Objections

The preparation and consultation process for the new regulation drew a substantial number of critical positions. According to the documents reviewed, the great majority of substantive objections to the content of the nutrition-calculation system were left without a visible response; the only documented concession by the state was a repeated postponement of the timeline (see A.5).

B.1 Who is raising the criticism

- The Czech Consumer Association (SČS) and the Cabinet for Standardisation, o.p.s. — Libor Dupal and Irena Michalová.
- The Czech Federation of the Food and Drink Industries — through the formal consultation process; represented in the media by spokesperson Marek Zemánek.
- The Czech Chamber of Commerce (via the Cabinet for Standardisation as a member organisation of its Quality Section) — separate formal comments on the regulatory impact assessment.
- Practitioners from school canteens: Renata Černá (head of a school canteen in Dobřany, a pilot participant), Yvone Malinková (head of another canteen); and Adam Kilberger on behalf of the Association of Communal Catering (ASPOS).

B.2 Substantive objections

- No legally anchored tables of recommended daily nutrient intakes exist for the relevant age groups — both SČS and the Czech Federation of the Food and Drink Industries independently describe the decree's authors as “starting from a blank slate”.
- A significant reduction in the amount of meat in the nutrition-calculation system (a 25–39% reduction, depending on age group, according to the SČS/Cabinet comments) — raising concerns about adequate protein, calcium and iron intake, and questions about whether paediatricians were involved in the process.
- A low frequency of milk and dairy drinks (roughly twice a month) described as unacceptable; the Czech Federation of the Food and Drink Industries cites clinical research from the Society for Nutrition documenting already-inadequate calcium and vitamin D intake among children.
- A risk of excessive fibre intake from mandatory whole grains and pseudocereals in young children — possible digestive problems, food refusal, and increased food waste.
- A doubling of the recommended consumption of legumes relative to current national annual consumption (3.7 kg per person per year) questioned as disproportionately aggressive.
- Soy, as an allergen and a highly processed food, considered an unsuitable substitute for milk/meat within the flexible nutrition option.
- Insufficient domestic supply of organic produce to meet the required share (2%, later 5%) — a risk of dependence on imports and of disadvantaging Czech suppliers.
- The requirement for “zero” added salt described by the Czech Federation of the Food and Drink Industries as biologically unrealistic, since salt is defined (EU Regulation No. 1169/2011) as 2.5 times the sodium content that is naturally present in all food ingredients.
- No account taken of the specific requirements for food for children under 3 (infant and toddler nutrition is subject to separate, stricter EU rules) — a comment from the Cabinet for Standardisation/Czech Chamber of Commerce.

- A risk of iron deficiency (anaemia, particularly among girls) if the flexible/vegetarian option is more widely adopted — medical guidance recommends beef, liver, eggs, or plant-based iron sources always combined with vitamin C.
- A challenge to the explanatory report's claim that the amendment has no impact on the state budget or the business environment — the Cabinet for Standardisation notes that “this has not held true in past practice”.
- A historical parallel with the so-called “snack decree” of 2018, which had to be relaxed after proving operationally and sensorially unworkable — cited as a cautionary precedent.

B.3 Process and legitimacy objections

- The August 2024 pilot was, according to the testimony of one participant (Renata Černá), methodologically inadequate — clear terms of reference were lacking, requirements were added incrementally, and a key indicator (the volume of food waste) was not tracked at all.
- According to the spokesperson for the Czech Federation of the Food and Drink Industries, the draft attracted an “unprecedentedly high number of comments”; these were addressed only in writing, with no opportunity for oral discussion with the drafters.
- According to one of the decree's authors, quoted second-hand and anonymously in a media report, a remark was made during the pilot about political pressure to approve the decree quickly: “there is political will to push this through right now — if it doesn't happen now, a new government won't do it” — an unverified, second-hand quotation.

A note on this claim: One of the documents reviewed for this analysis — a 26 June 2025 article in *Aktuálně.cz* (journalist Jan Malina) — reports that school canteen manager Renata Černá said she was contacted by the National Institute of Public Health's legal department after speaking publicly about her critical experience of the pilot, and was warned of possible legal consequences if her comments “damaged the decree's issuance”. This account rests on a single individual's statement in one media report: no written record has been produced, no individual from the legal department is named, and the Ministry of Health did not respond to the outlet's request for comment. It is included here not as an established fact, but because it illustrates how sensitive this topic became during the consultation process, and the kind of public and media reaction the reform provoked.

- Aktuálně.cz asked the Ministry of Health for its position on the handling of the consultation process as a whole, and on the claim above; according to the article, the ministry did not respond even after a follow-up request.

B.4 The state's response and the degree to which criticism was addressed

The documents reviewed do not evidence any concrete adjustment to substantive nutritional parameters (amounts of meat, dairy, fibre, the organic-food share) in response to the objections raised. The only documented concession by the state relates to process and timing:

- First postponement: canteens were given the option of starting under the new decree in September 2025 or waiting until September 2026 (as reported as of June 2025).
- Second postponement: the main nutrition norms, due to take effect on 1 September 2026, were pushed back a further year to 1 September 2027 (announced by MEYS in June 2026), accompanied by commitments of methodological support, training and an updated calculation tool.

The fact that the postponement happened twice in succession suggests that even the first additional year was not enough to resolve the practical problems raised. Note: the precise legal form of these two, separately

reported postponements was ultimately consolidated into a single date in the enacted text (1 September 2028), plus the transitional window to 31 August 2027 — see A.5.

A balancing note: what the pilot also showed

To avoid a one-sidedly critical picture, it is worth noting that the August 2024 pilot also demonstrated that the proposed changes were, in principle, workable for most of the canteens involved: of the 33 canteens approached, 31 (94%) agreed to take part and did draw up a four-week menu under the new rules in practice; 26 canteens were successfully evaluated quantitatively, and 17 provided qualitative feedback. This suggests that the change to recipes and menu composition itself is manageable for the great majority of operators — the criticism from pilot participants (see B.3) is directed more at how the pilot was run and communicated than at whether the goal itself was achievable.

B.5 Summary of the underlying tension

Across the documents reviewed, there is a clear tension between the state's legitimate ambition to modernise a nearly twenty-year-old decree on the basis of health data (rising childhood obesity, insufficient adherence to nutrition guidance, excessive sugar and salt) and criticism that the process was rushed, insufficiently grounded in the state's own legal standards (missing recommended daily intake tables), and handled without transparency (an “unprecedented” number of comments addressed only in writing, with no oral discussion, and no ministerial response to media enquiries). While the state did respond to process and timing pressure (repeated postponement of entry into force), the substantive, expert and industry objections to the parameters of the nutrition-calculation system remain, according to the available documents, largely without a visible response.

Conclusion

This case offers a strong and internationally relatable narrative, and it connects well with the headline finding from Part 1 of this session (the European survey): even where a regulation is built on solid health data and good intentions, implementation remains the key challenge — the gap between the rules on paper and everyday practice, and between the drafters of a regulation and those who must put it into practice. The Czech case illustrates this wider European experience through a concrete, well-documented example.

Appendix — source documents

Group 1 — principles and rationale for the new regulation

- Informational overview of public-law obligations
- How Much Sugar Do Children Drink (HSHMP, 2 Mar 2026)
- We Have It On Our Plate and We Care (NIPH project presentation)
- International School Meals Day
- Amendment to the school catering decree (full legislative text, working version)
- MEYS overview of the school catering legal framework
- Reportpilot — findings from the pilot testing of the revised Annex 1 (NIPH/MEYS/SYRI)
- Brief summary of the proposal's content
- School Catering in the Czech Republic (presentation, A. Strosserová, c. October 2024)
- Examples of changes under the new regulation
- Decree No. 310/2025 Coll., amending Decree No. 107/2005 Coll., on school catering (consolidated text, *Zákony pro lidi*, as of 1 Jul 2026) — primary/authoritative legal source

Group 2 — critical positions

- Critical Perspective — School Catering 2024 (SČS / Cabinet for Standardisation, Dec 2024)
- Comments from the Czech Federation of the Food and Drink Industries
- Comments from the Cabinet for Standardisation / Czech Chamber of Commerce
- State Sought to Silence Criticism of the New Decree (*Aktuálně.cz*, Jan Malina, 26 Jun 2025)
- Public Reaction — School Canteens (MEYS / Society for Nutrition, 23 Jun 2026)