

Brussels, 12/07/2022

SAFE'S reply to the consultation on the EU school fruit, vegetables, and milk scheme **Pathways to enabling fairer and healthier food environments for children**

About Safe Food Advocacy Europe – SAFE

SAFE – Safe Food Advocacy Europe was created with the aim of ensuring that consumer's health and concerns remain at the core of the EU's food legislation. SAFE is currently the only Brussels-based NGO specialised in the protection and representation of EU consumers in the food sector.

SAFE strives to ensure safer food standards for consumers by monitoring the EU food legislation process and cooperating with EU stakeholders to draft comprehensive food regulations. SAFE notably supports the development of policies and awareness-raising actions which jointly address health, environment, food safety and sustainability, all-the-while being involved in several projects aimed at fostering nutrition education and food literacy in children, such as the [Tackling Adolescent Obesity Project](#), [Sugar Project](#) and [Food4Inclusion](#) grant.

State of obesity in Europe

Obesity and overweight are a growing challenge for the European Union with more than one in three children obese or overweight. The prevalence of these food-related diseases has been dramatically increasing, with no Member State on track to reach the target of halting the rise of obesity by 2025¹. Nutrition has a primary impact on human health, with overconsumption of unhealthy foods considered a major factor in the development of non-communicable diseases (NCDs). While most European children are said to grow up in "obesogenic environments" where ultra-processed, high in fat, sugar, and salts (HFSS) foods are vastly promoted², this issue particularly affects disadvantaged children who have been identified as the main consumers of unhealthy foods due to their low price, accessibility and to the lack of nutrition education on the subject.

Feedback on the EU school scheme

The [EU School Scheme](#), launched in 2017, shows great potential in the fight against obesity and overweight to enable fairer and healthier food environments for children.

¹ WHO (2022), ["WHO Regional European Report on Obesity 2022"](#)

² ibid

The program, which supports the distribution of milk, fruit and vegetables and encourage educational measures for millions of children, could however be enhanced to optimise its implementation. Potential pathways notably concern:

- Its coverage. According to the Commission's 2019-2020 summary report, only 19 million children participate in the program as opposed to the 76 million pupils enrolled in schools in Europe
- Its distribution model. Redistribution frequency and models vary at the national scale (e.g., only 4 countries redistributing fruits and vegetables daily).
- A better ring-fencing of eligible products under the scheme. Currently some transformed products containing high sugar levels are left to national approval, which can to implementation disparities. Plant-based products inclusion is also currently absent from the scheme.
- A definition of the educational measures eligible under the program to improve nutrition education in European children, notably in terms of budget foreseen and content requirements.

As a committed contributor to the discussion on enabling food environments and a defender of children empowerment through nutrition education, SAFE is thankful to the European Commission for having the chance to comment on the revision of the EU school scheme. SAFE would notably like to point to 3 priorities which could help ensure the program's outreach and efficiency.

Priority 1 - Towards a better redistribution model to reduce food-related inequalities

Currently, 8.6% people cannot afford a proper meal in the EU (Eurostat, 2020) with food insecurity on the rise following the COVID-19 pandemic and war in Ukraine. Food security plays a fundamental role in children's health, with **access to food considered essential to a child's development**. While food access impacts children's behaviour and attention span, consumption of ultra-processed foods such as high in fat, sugar and salt (HFSS) foods are linked to a higher occurrence of diseases such as asthma, hypertension, myocardial infarction, strokes³. The question of UPFs and HFSS food exposure is particularly dire as it is deemed to be higher in disadvantaged areas - notably due to pricing, marketing, and unhealthy stores' strategic locations.⁴ Ensuring timely redistribution of healthy foods and building acceptance of this product via the EU School Scheme would be a first step to reduce food-related inequalities in the EU.

³ Khandpur, N. et al (2020), « Ultra-processed food consumption among the pediatric population: an overview and call to action from the European Childhood Obesity Group », *Ann Nutr Metab*, vol 76, pp 109-113

⁴ Magalhaes, V. et al (2015), "Associated factors to the consumption of ultra-processed foods and its relation with dietary sources in Portugal", *Journal of Nutritional Science*

1.1. Problems associated with the current redistribution model

The current EU school scheme finances the distribution of fruit, vegetables, milk, and certain milk products to schoolchildren outside school meals, with redistribution occurring in an intermittent manner. Indeed, only 4 countries currently redistribute fruits and vegetables on a daily basis. With access to healthy food at the root of many socio-economic inequalities, fostering healthy diets is paramount to preserve a child's health, learning ability and inclusion (e.g., sustaining self-confidence by helping maintain a healthy body weight).

1.2. Suggestions for a more fit-for-purpose redistribution model

A more frequent redistribution model targeting school lunches and breakfast could therefore be an efficient way of combating food insecurity while ensuring proper learning conditions for disadvantaged children.

Indeed, regularly including these healthy foods as an addition to school lunches can help shape children's dietary habits by building acceptance of these products. Additionally, encouraging public procurements such as free provision of breakfast in schools appears as paramount, with this specific meal considered highly beneficial for children's cognition. Currently, the [WHO foresees](#) that roughly 20 to 40% of European kids go to school without eating breakfast, while going to school an empty stomach is said to hamper a kid's ability to focus and learn properly, thus putting them at risk of social inclusion⁵.

Priority 2 - Towards a clearer definition of the scheme's product range: including healthier and more sustainable alternatives

Building acceptance and habitual use from a young age is key to defining a child's food choices. Another priority should be to better define, as well as enlarge, the scope of products eligible under the EU School Scheme, and to raise awareness on the importance of these products amongst children. The revision of the EU School Scheme should therefore include healthier and more sustainable alternatives, notably promoting seasonality, local redistribution channels, plant-based products such as drinks and nuts. The authorisation of **added sugar salt, and fat in certain products** (e.g., dairy products and juices) should be revised as it appears as intrinsically inconsistent with the objectives pursued by the scheme.

⁵ Nyaradi, A. et al (2013), "The role of nutrition in children's neurocognitive development, from pregnancy through childhood", *Front Hum Neurosci*, vol 7, no 97

2.1. Diversifying criteria for product selection

The current scheme encourages the distribution of organic and local products. However, further attention should be brought to stress factors such as **seasonality** of products and **local distribution** channels as to reduce the environmental impact of food and foster reasoned eating patterns in children. Focus should also be put on the question of minimum packaging given the environmental impact and toxicity of the latter.

2.2. Promoting plant-based products within the EU School Scheme

Production of dairy products drastically contributes to greenhouse gas emissions in the EU. It is assessed to account for over one-quarter of the carbon footprint in EU diets. From a health stance, it is important to recall that protein and calcium are obtainable from plant-based sources and can easily be found in products such as nuts or legumes⁶. Provision of the latter is also important for all children to optimally benefit from the scheme, given how lactose intolerance⁷ is currently on the rise in the EU.

The different proteins distributed to children should be harmonized, in order to balance animal and plant proteins as to **encourage responsible consumption patterns in children and accelerate the transition to healthy and sustainable food systems**. The revision of the EU school scheme should therefore include plant-based products, be they plant-based drinks, whole grains, or nuts.

2.3. Phasing out products containing added sugar salt, and fat from the scheme

Within the current EU school scheme, added sugar, salt, fat, sweeteners and artificial flavouring is generally not allowed. However, **health and nutrition authorities in EU countries may allow, as an exception, limited quantities of added salt, fat and - for milk products - sugar**. This means that after being approved by the Member States authorities, various transformed products such as juices, soups, yoghurts and cheese can be distributed to school to promote a varied and healthy diet. These categories, which are left to national discretion, can lead to implementation disparities and inconsistencies as to the goal pursued by the scheme. **This authorisation should be revised in order to avoid as much as possible products with added sugar, salt and fat given that the current sugar daily intake for children is equal to 20 teaspoons (80 grams), far exceeding the WHO recommendations of 6 teaspoons (25 grams)**⁸.

This ban should be mainstreamed across the entirety of the future scheme's product range, notably encompassing plant-based drinks and products.

⁶ WHO European Office for the Prevention and Control of Noncommunicable Diseases (2021), "[Plant-based diets and their impact on health, sustainability and the environment](#)."

⁷ Stony Brook University (2020), "[Study reveals lactose tolerance happened quickly in Europe](#)."

⁸WHO (2020), "[Healthy Diets – key facts](#)."

Lastly, enhanced monitoring of national implementation and sustained recommendations could help pave the way towards a more fit-for-purpose deployment of the scheme regarding the elements mentioned above.

Priority 3 - Towards an increase/mainstreaming of food literacy activities in order to combat food-related NCDs

NCDs and food insecurity constitute pressing socio-economic issues. Nutrition has a direct impact on health, with over-consumption of ultra-processed foods such as high-fat, sugar and salt (HFSS) products assessed to be particularly alarming according to one's socio-economic background. **Children from disadvantaged families are the first consumers of these foods due to their low price and lack of knowledge on the topic, which increases socio-health inequalities in the EU.** Additionally, various studies have shown a link between eating habits, socio-economic environment, and the level of nutritional knowledge of people. Indeed, living in rural areas or having a low level of school education are factors linked to a low nutritional awareness and unhealthy eating habits.

As underlined by the European strategy on the rights of the child, basic information on food, nutrition, obesity prevention, physical activity should be accessible to children. Nutritional education is a way to bridge this knowledge gap and to efficiently help target the current NCD and climate crises happening in Europe.

While educational measures are included in the EU school scheme, there currently is no percentage of the budget dedicated to them. In addition, the recommendations only refer to potential formats for activities, but **do not set requirements as to the content.**

Only the implementation of strong nutrition educational measures can help children develop healthy and sustainable eating patterns throughout their lives. For SAFE, attention should be brought to the following transversal topics:

- Food labelling (i.e., teach children how to read food labels)
- Food additives, maximum daily intakes, and their subsequent health effects (e.g., sugar overconsumption):
- The environmental impact of food. It is fundamental for children to know where their food comes from, and to know the link between agriculture, environment and eating patterns. Through these measures, the consumption of fruits and vegetables should be encouraged, so that children can learn to adopt a more sustainable, plant-based diet.
- Tools to tackle food waste. Indeed, less than half of people understand the meaning of "best before" labelling and only four out of ten people correctly understand the meaning of expiration dates on food products (Eurobarometer, 2015).

Encouraging quality educational curricula by turning to best practices

According to articles 165 and 166 of the Treaty of the Functioning of the European Union, the EU should support and contribute to the development of quality education and complement the actions of Member States, without substituting their competences. In the context of the EU school scheme, such practices could translate into the provision of a framework for national authorities and European stakeholders to cooperate to improve their policies, **notably via a sharing of best practices**. Identified best practices include:

- *National best practices*. Some Member States have adopted specific policies: some have introduced healthy diets and menus with reduced meat, or vegetarian diets in canteens. Other Member States, such as Sweden, Portugal or France, have introduced nutrition education courses. The EU School scheme should support these national measures and complement them at European level.
- *Non-governmental best practices carried out at the local or European levels*: Actions carried out by SAFE, such as the "[Tackling Adolescent Obesity \(TAO\)](#)" project, the "[Sugar Project](#)" have strived to improve the nutritional knowledge of children living in disadvantaged areas and to raise awareness of obesity-related problems among adolescents and their families. These programmes' structures aim to provide children with basic knowledge on food additives, food labelling, and daily nutritional intakes for them to make informed dietary choices. Since 2016, these workshops have helped foster food literacy in close to 2000 students. Additionally, these field activities have made it possible to identify other problems influencing children's consumption of HFSS foods which need addressing. These include the presence of vending machines on school premises and the lack of harmonisation and recommendations on the topic.

Conclusions

Improving children's understanding of nutrition, promoting healthier diets, and developing better access to food information are essential drivers of sustainable and healthy eating patterns among consumers from an early age. **The EU school scheme shows the potential of having a longstanding impact in the fight against obesity assuming that its redistribution model, scope and educational activities be optimised.** Providing unequivocal recommendations, pooling best practices, and reinforcing monitoring of the allocated funds would enable a more fit-for-purpose implementation of the scheme at the local level. Only this can help pave the way for better social integration, reduced health care needs and a reduction in the direct effects of poverty for disadvantaged populations.