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EUROPEAN SCHOOL FRUIT SCHEME FRESHFEL CONTRIBUTION TO THE EUROPEAN COMMISSION CONSULTATION

Freshfel Europe is pleased to submit its contribution in response to the Commission consultation on “Towards a possible European School Fruit Scheme”. Freshfel position could be summarised as in the table below:

Freshfel fully supports the philosophy behind option n°4 of the initial consultation document with the actions possibly reinforced by some of the elements of option n°2. To be successful, a large-scale school programme cannot rely on private financing but should be supported by EU and Member States' funding.

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A key objective of a school fruit and vegetable scheme should be to stimulate and increase the consumption of fruit and vegetables in a lasting manner. Today consumption can be demonstrated to have stagnated in most of the Member States at levels below the WHO/FAO recommendation of a minimum of 400 gr/day

While submitting its position, Freshfel feels obliged to make the following remark regarding anomalies in the consultation process:

Freshfel is concerned that in the course of the consultation the document for impact assessment has been modified on an important element affecting mainly option 4 and its financing. Such a revision is biasing the consultation process as indeed some stakeholders will provide or will have provided their views on the basis of the initial document and only some on the basis of the revised document. The modifications do not seem to be for the sake of “greater clarity” but fundamentally alter the terms of functioning of particularly option 4.

On such basis the outcome of this consultation might not be entirely accurate.

About Freshfel Europe

Freshfel Europe is the European Fresh Produce Association. It is the forum for the Fresh Produce Sector. The Freshfel Membership includes both Associations and Companies across Europe involved in the production, shipping, exportation, wholesale, importation, distribution and retail of fresh produce. Freshfel activities are further reinforced by the experience of a number of associated members both inside and outside the European Union, namely service providers to the sector (e.g. logistics).

The objective of Freshfel Europe is to secure a positive trading environment for the fresh produce sector by facilitating favourable market conditions for fresh produce, through harmonising requirements to improve efficiency within the sector, by addressing food safety and quality issues and by assisting the sector to build a receptive environment for the promotion and marketing of fresh produce and thereby improve the health of this business sector and the health of EU citizens. All these activities are undertaken by the association with the ultimate goal of increasing consumption of fresh produce across Europe.

The Association is based in Brussels and additional information is available on www.freshfel.org.

Background to the school fruit scheme

Consumption of fruit and vegetables is at best stagnating across Europe. In most of the cases consumption is at a level well below the WHO/FAO minimum recommendation. This level is today fixed by WHO/FAO at minimum 400 gr/day but many experts underline the need to consume at least 700 gr/day. Among the youngest citizens the level of consumption is even more worrying. The EU average is currently being mainly sustained by the eldest population members. Consequently, and despite the many health-giving and nutritional assets of fresh produce, fresh fruit and vegetables are not appealing to the youngest citizens and the consumption level urgently needs to be stimulated amongst children by developing taste acceptance and generating change to better and long-lasting eating habits. A large proportion of children, depending on country and social standing, eat no fruit and vegetables at all – ever!

The effect of the under consumption of fresh produce, combined with other factors such as an inadequate diet rich in sugar, salt and fats, as well as a lack of physical activity is leading today's society to face in the future a major health challenge with a growing part of the population being overweight or obese. The rise in childhood obesity is already reaching epidemic levels all across Europe. Nearly a quarter of overweight children are obese and medically at risk of several diseases. In the EU and according to data of the International Obesity Task Force, approx 22 million children are overweight and ca 5.1 million school children are obese. Every year, this figure increases by 300,000. The cost of obesity to the economies of the EU27 as calculated by the same body can now reach €150 billion plus per year. Evidence shows that children who are obese go on to have persistent weight problems as adults.

In the European Platform for Action on Diet, Physical Activity and Health, a balanced diet, rich in fruit and vegetables, combined with increased physical activity are the two recognised and undisputed steps to be taken to rectify obesity. A causal relationship between obesity and lack of fresh fruit and vegetables consumption has been established.

The setting up of an ambitious European fruit and vegetables school scheme is therefore highly relevant as well as urgent. Having the EU actively coordinating a school framework and engaging significant financial resources to secure a better awareness of the seriousness of the problem and availability of fresh produce at school, would be of great benefit to modify – with long-lasting effects – the diet of the youngest citizens and to rectify the obesity trends.

The momentum and urgency for action cannot be ignored. Freshfel therefore supports a strong EU initiative and has already welcomed the first steps taken by the Commission through its experts (September), stakeholders (November) and Member States (December) consultations as well as the launch of a public consultation for conducting an impact assessment. After this, it will be time for urgent and rapid action!

Important Milestones and Declarations about a school fruit programme

In recent years and at different public and private levels, the need to stimulate the consumption of fresh produce among young children has been recognised. Also in recent years, all the competent EU institutions have underlined the necessity to develop a pan-European framework for a school fruit programme. Among the many statements and commitments, the following can be underlined:

- Council and EU presidency: While discussing the CMO reform both under the Dutch presidency (2004) as well as under the German presidency (2007), conclusions were unambiguous and urged the Commission to draw the guidelines for such a scheme. The wording of the June 2007 Agriculture Council declaration when adopting the CMO reform in June 2007 was as follows with clear guidelines: *"In light of the dramatic increase in obesity amongst schoolchildren, which has been highlighted in the recently published Commission White Paper 'A Strategy for Europe on Nutrition, Overweight and Obesity related health issues', the Council invites the Commission to come forward with a proposal for a school fruit scheme as soon as possible based on an impact assessment of the benefits, practicability and administrative costs involved."*
- European Parliament: During the debate on the CMO reform in 2007, many references were made stressing the necessity of setting up a school programme.
- Social and Economic Committee: Within the debate about obesity, the necessity to change the diets of young children was highlighted on a number of occasions.
- World Health Organisation: The WHO in its action plan on obesity highlighted the merits of addressing the diet of young children to reverse the current obesity trends among the European WHO members. Furthermore, the Food Dudes school scheme, a programme co-funded by DG AGRI, as implemented in Ireland, was also recognised and awarded by WHO during its Istanbul Ministerial Conference on November 2006, as a good example of a project to counteract obesity.
- European Commission: Both DG AGRI CMO reform documents, as well as DG SANCO "Green Paper on Promoting Health and Physical activity", underlined the necessity of taking action at the school level.

Freshfel's support for the adoption of healthier dietary habits amongst children is not a new or opportunistic stance. When joining the DG SANCO Platform for Action on Diet, Physical Activity and Health in 2005, Freshfel prepared a "business plan". This document, forwarded to Commissioner Kyprianou and DG SANCO Director General Robert Madelin, already advocated a pan-European fruit & vegetables school scheme. Subsequently, Freshfel, in cooperation with its Irish Members and An Bord Bia incorporated as one of its voluntary commitments to the Platform, the Irish "Food Dudes Scheme" as a good example on how to move forward with a school programme. In 2006, in its answer to the "Green Paper on Promoting Health and Physical activity" Freshfel put forward the benefits of an EU fruit and vegetable scheme targeting school children. The Green (and subsequent White) Paper endorsed the concept and acknowledged that a school fruit scheme would be a step in the right direction. Finally, in 2007 on the eve of the scientific conference EGEA, Freshfel joined forces with a number of other sectors and health organisations (Aprifel, Areflh, European Heart Network) to call the EU institutions to take action.

In the various consultations and other conferences on the issue, scientific experts as well as health organisations widely supported the benefit of a fruit and vegetable school programme. The above shows an overwhelming support of stakeholders further supported by the scientific community for an ambitious school fruit and vegetable programme, and highlights the need for the Commission to come forward with a proposal for a school fruit scheme as soon as possible.

About the objective of a fruit school scheme according to the ISG

The Interservice Group identified a number of objectives for the fruit school scheme. Freshfel fully supports these objectives as corresponding to a true analysis of the current situation:

- Increase the long-term consumption of fruit and vegetables among children: The youngest are more exposed to junk food rich in salt, fats and sugar and influencing consumption habits for the better among schoolchildren would help correct this matter.
- Foster healthy eating habits among school children: By getting the youngest repeatedly to taste the flavour of different fruit and vegetables, it will give them the opportunity to become acquainted with new flavours and lead them to new consumption habits away from heavily branded and marketed convenient junk food.
- Facilitate access to initiatives promoting the consumption of fruit and vegetables by schoolchildren in poorer regions and among disadvantaged sections: Funding availability in the sector is limited and besides these actions are more accurately classified as “public health actions” under the responsibility of public authorities. It is often noted that schoolchildren in poorer regions and those in the most disadvantaged segments are those where such actions would be most successful, and this is supported by data from the above mentioned Food Dude Scheme where the poorest fruit and vegetable eaters repeatedly showed the greatest improvement in beneficial dietary change.
- Bring Europe closer to its citizens: Obesity is one of the major health challenges of this century and directly affects European citizens in their daily life. A pan-European school fruit scheme would bring what many consider remote, irrelevant European Institutions closer to all its citizens in their daily lives by promoting healthy daily actions for the benefit of all.

Which is the preferred option?

- **General comments on the options**

The Commission consultation document for impact assessment outlines 4 different options for the implementation of a European Fruit scheme. Freshfel carefully reviewed these options and clearly supports option 4 as being the one responding to the Council recommendation. The implementation of option 4 could however become even more efficient if some elements of option 2 could also be retained or incorporated into the final scheme proposed by the Commission.

Freshfel’s comments on the four options are as follows:

- Option 1: Status Quo. Scientific experts, politicians, industry experts, NGOs have all called for the setting up in the European context of a school fruit and vegetable programme. To do “nothing” would contradict the worrying warning about the rising level of obesity among the youngest citizens. With urgency a framework allowing large-scale actions should be coordinated under the European umbrella. Public authorities have responsibilities to take regarding public health and it could be seen as a negligent approach to adopt a status quo given the alarming data about obesity across Europe and the world in general. The spread of the epidemic across the Continent demonstrates that EU action is very necessary. While recognizing that several Member States did not wait for a European scheme to act, these laudable efforts and initiatives need to be further stimulated and reinforced. Without a Central European support system some of these good initiatives could see their survival questioned by the scarcity of resources. Besides, and budget wise, the cost of non action will be horrendous as studies now indicate that, on a yearly basis, the cost to the European nations due to the lack of consumption of fresh produce across Europe has reached 150 billion € (compared to the existing fruit and vegetable support budget under the CAP at EU level of less than 1.5 billion €).
- Option 2: Networking. While circumstances and expectations might vary from one Member State to another, it would be useful to set up some kind of networking system at the EU level to share best practice

about school programme implementation. Such an exchange of experience is already taking place namely through the support of organisations like Freshfel, IFAVA, EGEEA, etc, but some kind of formalised framework would enhance and extend the sharing of knowledge and hopefully improve the good functioning of existing schemes or stimulate new initiatives. Such a system could only be worthwhile if it was in support of a strong pan-European school fruit and vegetable programme.

- Option 3: Supporting Initiatives. The CMO already reinforced the need for promotional campaigns targeting the youngest children through its own projects. A number of promotional programmes are already targeting children and new rules set up under the revised CMO are already providing an incentive to address communication to children. Given the restricted promotional budget available, these funds should be kept for communication purposes and priority promotion activities to stimulate consumption as a whole (including to children). In recent years, a number of school programmes, namely the Irish Food Dudes scheme, have already been run in a co-funded manner under the EU promotion budget. Experiences clearly demonstrate the extreme difficulties for this kind of programme to gather resources from the industry. To run any new programme under the provisions of the existing promotion scheme would just lead to a situation where the fruit school scheme would just not happen given the complexity of the scheme and financial rules with regards to the co-financing by three different parties. It should also be noted that in the case of a school programme, the proposing organisation, as applicable for co-funded promotion programmes, might not play the same role in the case of school programmes.

- Option 4: Driving Initiatives. Looking at the obesity epidemic level and the huge and costly resultant health implications, the urgent and frequent calls to set-up an ambitious programme and the necessity to reach the broadest number of children of school age, a specific, dedicated school programme should be set up. The objective should remain to improve the availability of fruit and vegetables in the school environment to allow primary school children to become acquainted with the taste of a variety of fresh produce. The programme should facilitate the distribution of fruit and vegetables, excluding all processed produce with a high density energy or added sugars, and or salt. In this context, the financing of the scheme should be made by EU funding further supported by Member States resources. Experiences clearly demonstrate the extreme difficulties to gather resources from the industry for programmes of general interest. Such an action would benefit the overall health of the youngest and therefore the financing of the school scheme should not be subject to private funding.

- **What are the necessary conditions for a successful scheme for children that can promote a sustainable increase in the consumption of fruit and vegetables by young people and have a lasting influence on their behaviour?**

- The scheme should recognise the diversity of school environments across Europe and adapt to each region and local situation.

- The scheme must guarantee the availability to children of a wide-range of quality fresh fruit and vegetables that are easily pre-prepared (where necessary) and eaten. Diversity of fresh fruit and vegetables is an essential element to the success of the scheme. Children need to be introduced to a wide-variety of fruit and vegetables, they need to experience the taste and they need motivation to consume.

- The objective of the scheme is to secure consistent and reliable supply of fresh fruit and vegetables in schools and increase the volume already available. The debate regarding organic versus conventional produce is not relevant, as conventional produce is safe as it adheres to the strict safety regulations set by the EU. The debate regarding the supply of local produce is also inappropriate as it could significantly limit the range of produce. As indicated before, diversity of fruit and vegetables is an essential element of the success of a campaign.

- The school should be the central part of the programme, but a successful implementation should involve the necessary cooperation of parents, public and private stakeholders, including local authorities and more importantly wholesalers who have the logistics expertise and availability of a wide range of fresh fruit and

vegetables. The involvement of fresh produce operators as well as the school administration will also be key to the success. Other parties such as major retailers and health insurance companies should also be taken into account and support the scheme.

- The scheme should aim at creating new links and should not favour the setting-up of parallel distribution networks to those already existing. The system should not distort competition among operators and the beneficiaries should be the schools and their children.
- Some kind of accompanying measures would reinforce the good functioning, the efficiency of the scheme and its sustainable development. Availability of fresh produce is not all. It is therefore suggested that part of the budget (e.g. 5 %) might be allocated for educational material, rewards, unbranded promotion kits, etc.
- The scheme should be simple from an administrative point of view for all the parties involved, namely schools, parents, operators and local authorities. Ultimately the volume per school is small, probably just a few boxes each week.
- A budget is key to the success of any scheme. The proposed budget of € 100 Million is a starting point. If the scheme is to be a success, a bigger budget would need to be made available over time. It is also important that the project is introduced and outlined on a long-term basis as it is in the long-term where we will see the benefits.

• **What would be the advantages of an EU initiative in this field?**

- EU action is much needed and without EU support and guidance, it is unlikely that efficient programmes could be implemented across Europe by Member States. The industry itself is unlikely to find the resources to implement such a large scale operation, which also relies heavily on public health and education. Despite these matters being generally among Member States competence, the EU has an opportunity to set the basis of a successful and effective programme and be a catalyst for best practice among Member States.
- The debate on obesity is a European debate as the epidemic is threatening all EU Member States. The magnitude of this epidemic has the potential to destabilise government(s).
- A pan-European framework would build upon the recommendation from the Dutch presidency in 2004, materialise DG SANCO and DG AGRI findings, implement WHO/FAO recommendations, as well as react with concrete steps to the warnings from scientists to act now.
- A pan-European scheme would allow existing schemes to further develop and facilitate the undertaking of new initiatives. Continuity of the action is an asset and a pan-European framework could guarantee stability in the long-term.
- A pan-European scheme would bring economies of scale and synergy if coordination could lead to standardisation of images and the messages to be circulated to the public and children.
- Such EU action could help reverse trends and better educate consumers and children of tomorrow on the benefits of healthy eating. Improving the diet of children across Europe will have huge financial benefits. Some figures released by the University of Tilburg, reveal that the health costs of insufficient fruit and vegetable intake amounts to 633 million €/year only in the Netherlands. This is probably the best example of the benefits and added value of spending an initial annual amount of € 100 million of EU public money in the fight against obesity.
- EU action in schools will raise the profile and awareness of Europe among families across the Member States. It shows the EU cares about the welfare of all its children. If handled correctly such a scheme would deliver a hugely positive PR message to the citizens of Europe.

- **What are the main obstacles to a successful initiative?**

Budget is key for the development of a successful initiative. Initially Freshfel called for a minimum annual budget of € 100 million. Based on the UK school fruit programme and extrapolation of the costs involved, a budget of more than € 900 million might be desirable for allowing the distribution of a piece of fruit to each child aged (4-6) during the ca 30 weeks of school per year across Europe. Should this be extended to cover children over this age, and include proven psychological stimulants to change dietary habits amongst children, then a larger budget will need to be considered. These figures are minuscule in light of the consequential cost of obesity to Health Insurers and Health Boards in Member States across Europe.

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