

# Synthesis and analysis of the public consultation and evaluation reports of Member States pertaining to the EU School fruit, vegetables and milk Scheme 2017-2022

**Executive Summary** 









# **EUROPEAN COMMISSION**

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European Commission B-1049 Brussels Synthesis and analysis of the public consultation and evaluation reports of Member States pertaining to the EU School fruit, vegetables and milk Scheme 2017-2022

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#### 1. INTRODUCTION

The EU School Scheme, applicable since 2017, supports the distribution of fruit, vegetables, milk and milk products to school children from nursery up to secondary school. It also includes educational activities to increase these products' consumption and to help instil healthy eating habits, while reconnecting with agriculture.

The European Commission (EC) launched a review of the EU School Scheme as part of the Farm to Fork Strategy with the goal of creating a favourable food environment that makes it easier to choose a healthy and sustainable diet. To support the EC in the review of the Scheme, the study focused on analysing two main sources of information: the public consultation (PC) and the Member States' evaluation reports for 2017-2022.

The public consultation on the EU School Scheme, which ran between 5 May and 28 July 2022, aimed to collect the views from all relevant stakeholders, namely: schoolchildren and their parents or guardians; educational establishments and their associations; businesses and their associations; non-governmental organisations; public authorities; and research institutes, universities and academia.

The results of the consultation were analysed in the view of replying to eight synthesis questions looking at relevance and coherence of the Scheme, educational measures, administrative burden and the increase in children's consumption of fruits, vegetables, milk and milk products.

The Member States' evaluation reports were submitted to the European Commission by 1 March 2023, providing an evaluation of the Scheme for the five-year period of 2017-2022. Article 8(2) of Regulation (EU) 2017/39 sets out the legal basis for Member States to evaluate the Scheme for the specified period. In addition, the Annex to Regulation (EU) 2017/39 outlines the minimum requirements for the format and content of the evaluation reports. Outcomes of the assessment and analysis of Member States' evaluation reports have fed into the replies of four synthesis questions looking at the effectiveness of the Scheme.

The report covers both the public consultation results and 29 Member States' evaluation reports. The objective of this study is to provide DG AGRI with an in-depth analysis of both sources of information and present the coherence between the two.

#### 2. METHODOLOGY

To analyse the responses to the public consultation, several steps were taken, in line with the Better Regulation Toolbox. First, data were screened and cleaned to identify and isolate potential duplicates and campaigns among the responses. The data contained 6 916 responses. Since no duplicates nor clear-cut campaigns were identified, the total number of 6 916 responses was analysed. To ensure comparability of information and to make the responses more accessible, a typology of participants was developed, grouping categories of respondents with similar characteristics. Following this grouping exercise, frequency tables and figures were created for each closed question of the questionnaire. Responses to open questions and position papers were analysed through quantitative and qualitative content analysis. A coding system was developed to reflect the synthesis questions and applied to all open questions and position papers.

The analysis of the Member States' evaluation reports was conducted in two steps. A checklist was developed for a) completeness and b) comprehensiveness checks. The completeness check focused on verifying and analysing that the evaluation reports complied with the minimum requirements set in Regulation (EU) 2017/39 regarding format and content. The comprehensiveness check was built on the non-binding guidelines provided by the European Commission to the Member States. These guidelines include definitions and examples for a shared understanding of the evaluation requirements of the EU School Scheme, to ensure consistent and comparable results among Member States. These two checks supported the analysis of the reports in order to provide responded to the synthesis questions.

#### 3. ANALYSIS OF THE OPEN PUBLIC CONSULTATION

#### **Relevance of the EU School Scheme**

To assess the relevance of the EU School Scheme, the results of the PC were analysed in light of Synthesis Question 1 (To what extent do the respondents share a common vision of the relevance of the EU School Scheme?). For this purpose, the analysis focused on exploring the views of the respondents on the objectives, design, implementation and target groups<sup>1</sup>.

The results indicated that citizens responding to the consultation largely support the Scheme and its objectives, except for the objective of encouraging school children's consumption of milk and milk products, which was deemed unimportant by 74% of respondents (4 095). Citizens also preferred to transition to a plant-based diet to promote environmental sustainability and overall health. Businesses consider all objectives important, except for encouraging children's consumption of organic products, and believe that regionality and seasonality are important criteria for promoting sustainable sourcing of products. Educational establishments have a balanced view of all objectives and believe that the Scheme has contributed to increasing consumption of fruits and vegetables.

All respondents agree that the Scheme should continue to address the entire educational cycle, from nursery to secondary school. However, they differ on whether it should cover after-school care, summer camps, or other beneficiaries. There are divergent views on whether the Scheme should prioritise children from vulnerable groups or aim to provide equal access to all children.

#### **Coherence of the EU School Scheme**

Views on the coherence of the EU School Scheme with other EU policies was primarily expressed by respondents representing public authorities, businesses and NGOs. These results were analysed in light of Synthesis Question 2 (To what extent do the respondents share a common vision of the coherence of the EU School Scheme with regards to other EU policies?).

The analysis indicated that respondents agree that the EU School Scheme can be an effective tool for promoting sustainable and healthy diets, and highlight the potential to align the Scheme with other EU policies and strategies, such as the Farm to Fork Strategy, EU Green Deal, EU Organic Action Plan, Europe's Beating Cancer Plan, European Child Guarantee, etc.

For instance, NGOs and particularly plant-focused businesses support the revision of the Scheme to promote more sustainable food consumption, including plant-based alternatives and promoting organic production.

Moreover, public authorities and NGOs agree that the EU School Scheme is inconsistent with EU environmental policies due to the support for dairy products and the incentive to buy the cheapest products rather than the most sustainable or highest quality ones.

NGOs demand that all subsidised milk or milk-based products, through the EU School Scheme, be organic only. At the same time, the few plant-focused businesses express concern that fortified plant-based drinks may be excluded from school meals in countries or regions where there is a promotion of 100% organic in public procurement, since the products are not eligible under EU organic legislation.

# Content and financing of the educational measures

The views of the respondents on the content and educational measures was analysed in the light of Synthesis Question 3 (To what extent do the respondents share a common view on the content and financing of educational measures?).

Overall, respondents do not have a common view on the topics to be covered through educational measures. Only educational establishments, NGOs and public authorities placed 'healthy, balanced and nutritious diets' at the top of the list. Nonetheless, respondents from all groups agree that 'sustainable trade', 'advertising and marketing of foods', and 'organic products' are the least important topics for educational measures.

 $<sup>^{\</sup>mathrm{1}}$  Target groups in terms of types of establishments and children of vulnerable socio-economic background.

A comparison between the results of the public consultation and the Eurobarometer<sup>2</sup> shows different views among respondents concerning the contents of educational measures.

For example, citizens responding to the public consultation considered production-related aspects like animal welfare and environmental impacts as most important for educational measures, while respondents to the Eurobarometer assessed healthy diets and food waste as a top priority. Eurobarometer respondents gave relatively low relevance to the environmental impacts of food.

Regarding the financing of educational measures, respondents share a common view to a great extent, as the majority would like the current 15% of EU budget for educational measures to be increased. Yet opinions differ among certain groups on whether the system should continue as it is with a maximum of 15% of the budget or if rather a minimum percentage of the budget should be set aside for educational measures. For instance, businesses and public authorities would like the system to continue as it is, using up to 15% of the budget for implementing educational measures., whereas NGOs disagree. Educational establishments show the highest total agreement for increasing the 15% budget among all stakeholders.

## Administrative burden of the EU School Scheme

Views on these aspects were targeted specifically to respondents from businesses and educational establishments, yet responses from public authorities, citizens and NGOs were also included where they made reference to administrative burden. The analysis sought to reply to Synthesis Question 4 (What are the proposals tabled by the respondents to reduce the administrative burden of the EU School Scheme procedures?).

Overall, the common proposals across the different groups aim to simplify administrative procedures, increase efficiency, and make the Scheme more flexible and adaptable to the needs of stakeholders and beneficiaries.

Public authorities and businesses propose digitalising administrative procedures, such as for the application process and billing system, to make them more streamlined. According to the stakeholders, this can significantly reduce the volume of paperwork. Additionally, they suggest introducing a risk-based control system to increase efficiency. Businesses and educational establishments propose to increase flexibility in the Scheme, such as giving more autonomy on the choice of suppliers and product range and making the Scheme more adaptable to changing circumstances.

NGOs and citizens are generally more concerned with making the Scheme more accessible to schools by reducing the administrative burden and ensuring thorough controls on the quality of the products distributed.

# **Products distributed through the EU School Scheme**

The views of the respondents informed the reply to the Synthesis Question 5 looking at what nutritional characteristics the products distributed should have (according to the inputs from the respondents, what nutritional characteristics should the products distributed through the Scheme have?).

Citizens, businesses, and educational establishments express a preference for fresh fruits and vegetables, whole grains and cereals, and the need for products to be of high quality and nutritional value. The importance of seasonality and locally sourced products was also highlighted by all three groups of respondents. Additionally, there is a shared concern about the added sugar, salt, and fat content in products distributed through the Scheme, with a call for a prohibition or restriction on their use.

There are also divergent points of view among the respondents. Citizens express a preference for plant-based drinks and protein alternatives such as legumes and pulses, while businesses express a higher preference for milk and milk-based products, with some plant-focused businesses advocating for fortified plant-based drinks as an alternative. Educational establishments rate plain milk highly, but also highlight issues with storage for products that require refrigeration.

Overall, while there are some differences in preferences among the groups, there is a clear consensus on the importance of fresh, nutritious, and locally sourced products for the School Scheme, as well as a concern about the negative health impacts of added sugar, salt, and fat.

<sup>&</sup>lt;sup>2</sup> Note that the comparison with the Eurobarometer it is made as the exercise is considered a statistically representative sample.

# Sustainability criteria for the products distributed

The responses to the public consultation informed the reply to Synthesis Question 6 regarding the sustainability criteria that should be prioritised when choosing the products distributed through the Scheme (According to the inputs from the respondents what sustainability criteria should be prioritised for the choice of the products distributed through the Scheme?).

In terms of common views, all stakeholder groups indicate seasonal products among the three most important factors for the choice of products provided through the Scheme, which is aligned with findings of the Eurobarometer. All stakeholders suggest reducing packaging and supporting the transition to a more plant-based diet. Overall, respondents agree on the aim of the Scheme to promote sustainability and encourage the consumption of organic and sustainable products.

In other regards, the views differ between stakeholder groups, in particular regarding the ranking of the criteria. On the one hand, the most important factor for citizens is low environmental and climate impact, followed by animal welfare standards and seasonality of the products. Citizens also emphasise the importance of sustainable sourcing of food through local supply chains and organic produce. Similarly, NGOs also consider low environmental and climate impact and seasonal products as the top two factors, followed by organic food products and animal welfare standards. On the other hand, businesses highlight the importance of local and short supply chains, seasonal products, and a wide variety of products. Educational establishments consider seasonal products and local and short supply chains also as the most important factors. Public authorities have the highest preference for local and short supply chains, followed by seasonal products.

# Increasing children's consumption of fruit, vegetables, milk and milk products

To provide an analysis of how the EU School Scheme has contributed to increasing children's consumption of fruit, vegetables, milk and milk products, the Synthesis Question 7 was divided into two sub-questions. This allowed a separate analysis of the views of the respondents for the consumption of fruits and vegetables on the one hand, and milk and milk products on the other.

Overall, according to citizens, businesses, and NGOs respondents, the EU School Scheme has had a limited impact on increasing children's consumption of fresh fruits and vegetables as well as milk and dairy products.

Despite this, all stakeholders strongly support distributing fresh fruits and vegetables through the EU School Scheme. To achieve better results, stakeholders suggest having a definition of "fresh" fruits and vegetables, having a greater variety of fresh fruits and vegetables and making sure they are of good quality, giving preference to organic and locally sourced produce, reducing excessive packaging and ensuring that they are free from additives, pesticides, and herbicides.

All respondents generally support children's consumption of milk and milk products; as some referred, they provide essential nutrients for growth and development. However, there are some concerns about potential health risks associated with dairy consumption, such as allergies and lactose intolerance.

Some respondents advocate for alternatives to dairy products, such as plant-based drinks, while others emphasise the importance of ensuring access to quality dairy products for all children. Additionally, there are discussions around the ethical and environmental impacts of dairy farming and production, with some advocating for more sustainable and humane practices in the industry. Overall, the views on children's consumption of milk and milk products vary depending on stakeholders' perspectives and priorities.

# Administrative burden of procedures

For the analysis of the level of administrative burden on specific procedures related to the EU School Scheme, a limited number of responses were considered, as the PC questions targeted specifically public authorities, businesses and educational establishments. Some NGOs included their opinions in position papers. The analysis provided a reply to Synthesis Question 8 (How burdensome are the procedures related to the EU School Scheme?).

Overall, respondents agree on the challenges of the administrative burden and paperwork related to the EU School Scheme. This is highlighted to a larger extent by public authorities, businesses and educational establishments, and to a lesser extent by NGOs.

More specifically, public authorities find checks, controls, monitoring and evaluation to be the most burdensome procedures, while educational measures are considered the least burdensome.

The implementation of the EU School Scheme requires a high administrative and control burden on Member States compared to the budget allocated. In particular, smaller suppliers that have less capacity and human resources available are among the most affected, hindering their participation in the Scheme.

Educational establishments are concerned about the burden associated with product distribution, which they find to be the most burdensome process, and the administrative burden on school staff who are not remunerated for the time spent on associated tasks.

#### 4. ANALYSIS OF THE MEMBER STATES' EVALUATION REPORTS

This report based its analysis of the effectiveness of the EU School Scheme on the Member States' evaluation reports over the five-year period, between 2017 and 2022. The analysis covered four synthesis questions (SQs) looking at: children's consumption of fruit, vegetables and milk (SQ9); shaping children's healthier eating habits (SQ10); effectiveness of the implementation of the EU School Scheme with regards to the choice of target group (SQ11.1); the supply/distribution of products (SQ11.2); accompanying educational measures (SQ 11.3); administrative burden of implementing arrangements and provisions (SQ 12.1); and governance arrangements and provisions (SQ 12.2).

# Children's consumption of fruit, vegetables and milk

Looking at the extent to which the EU School Scheme has increased children's consumption of fruit, vegetables and milk, Member States' reports consider that the impact has been limited. Over the studied period, consumption increased only in a few Member States among those children participating. In most Member States, consumption remained unchanged or even decreased.

There is also no clear impact attributed to the EU School Scheme in contributing to an increase in the percentage of children meeting the dietary recommendations regarding the targeted products. More specifically, for fruits and vegetables, only five Member States reported a positive change, while for milk and dairy three Member States reported an increase in consumption. Decreases in the number of children meeting the dietary recommendations were also recorded, indicating that more action is needed to meet the dietary recommendations.

Except in very few cases, the observed changes could not be attributed to implementing the School Scheme since they were either not significantly different than for non-participants, presented methodological constraints or were limited by a lack of data. Therefore, the reported results should be used as indication of the existing trends, but not necessarily related to the School Scheme.

#### Shaping children's healthier eating habits

According to Member States' evaluation reports, the EU School Scheme has had a limited impact in shaping children's eating habits. A minority of Member States provided a positive assessment of the Scheme (i.e., Austria, Bulgaria, France, Hungary, Italy, and Romania), whereas for the remaining ones, no significant trend was identified, or the limited available data did not allow for an assessment. The reports show that overall children's attitude towards eating fruits, vegetables, milk and milk products and their knowledge of the health benefits related to their consumption is good. However, the Scheme does not seem to have measurably improved the situation further, as the trends observed were either stable or not possible to define. The changes observed regarding attitudes and knowledge were most often linked to changes/patterns within families rather than attributable to the Scheme.

The EU School Scheme has been effective in introducing new products to children, thus increasing their curiosity and knowledge of product diversity. To some extent the Scheme has shown positive effects in particular for children who might otherwise have less access to a wide variety of fruits and vegetables. The increase in the percentage of children showing a positive attitude towards fruits and vegetables is in most cases associated to a positive attitude towards fruits (rather than vegetables). Conversely, the interest in milk and milk products is generally lower than for fruits and vegetables, and is decreasing in at least five out of 17 Member States who reported on it (France, Germany, Greece, Hungary, Romania). There is a good level of general knowledge of the health benefits associated with the consumption of at least one of the two groups of products (i.e., fruits & vegetables or milk/dairy) for eight of the Member States.

# Implementation of the EU School Scheme

#### Choice of target group

The effectiveness of the EU School Scheme in reaching (specific) target groups varies across Member States. While most Member States focus on primary and/or nursery schools, some extend their target group to older age children, recognising that teaching healthy habits is a long-term process. However, a lack of resources prevents many Member States from reaching a wider target group, either to cover the entire educational cycle or go beyond it. Moreover, improving the cost-effectiveness of implementation could also allow more schools to participate in the School Scheme, as was the case in Belgium-Wallonia and the Netherlands.

# Supply/distribution of products

In terms of products distributed, Member States have generally prioritised local, organic, and minimally processed products for distribution to schools. Although the focus is on fresh products among all Member States, fourteen of them have also allowed processed fruit and vegetables and nineteen have allowed processed milk products. Furthermore, even if a wide range of fresh fruits and vegetables was authorised for distribution, there was sometimes much less variety in practice. For example, in Slovakia, Lithuania, and Hungary, the distribution of fresh fruit and vegetables consisted mainly of apples and/or carrots. Besides, the way in which the Scheme is implemented (centralised/decentralised) affects the distribution of fruit, vegetables, and dairy products differently. External developments, such as the pandemic and other events, have also affected the distribution of produce to schools. Despite some difficulties and challenges, most Member States reported satisfaction with distribution, although there were sometimes problems with product quality and a limited range of products distributed.

#### Accompanying educational measures

Member States implemented various educational measures to promote healthy eating habits among children and bring them closer to agriculture, with varying effectiveness. Some educational measures were well received and provided children with a memorable experience, while others faced obstacles in terms of implementation, quality, and provision of digital materials during the pandemic. Moreover, the evaluation reports showed that teachers and parents had often little awareness of the existence of educational materials, which may be also due to the lack of awareness about the general functioning of the School Scheme. In cases where educational materials were used in class, it was sometimes found inadequate or not adapted to the target audience.

Overall, the effectiveness of the EU School Scheme in terms of reaching target groups, product distribution, and educational measures varies across Member States. The effectiveness in promoting healthy eating habits could be improved by optimising implementation of each of the above aspects, for example by working towards a more diverse and efficient distribution of products.

## Administrative burden of implementing arrangements and provisions

The implementation of the EU School Scheme has posed administrative challenges for 22 Member States. However, six Member States (Austria, Belgium, Cyprus, Finland, the Netherlands, and Sweden) have been able to identify good practices that effectively ensure the programme's success. It is worth noting that half of the Member States have identified administrative burdens as a bottleneck for the implementation. In response to this, nine Member States have recommended measures to simplify administrative and financial management, reduce bureaucratic burdens, and ensure programme success at Member State level. Despite these challenges, some Member States, such as Belgium (Flanders) and Denmark, have expressed satisfaction with the administration of the programme's arrangements and provisions. Notably, certain Member States, including Lithuania, Spain, France and Finland, have reported differences or synergies in the fruit/vegetable and milk part of the Scheme. Moreover, merging the programmes has proved beneficial in some cases, as it has made the programme's administration easier.

#### Governance arrangements and provisions

The governance arrangements and provision for the EU School Scheme differ across Member States, resulting in variation in the involvement and engagement of authorities and stakeholders. While 22 Member States have reported on their arrangements and established mechanisms to involve relevant authorities and stakeholders, some have struggled with engagement from key actors, such as school administrators and teachers, parents, producers and suppliers. Several bottlenecks have been identified, including procurement, coordination, and communication issues, which have hindered the Scheme's effectiveness. However, there are also good practices identified among some Member

States (Austria, the Netherlands, Poland and Slovenia), such as establishing clear guidelines and standards for procuring local produce, using a flat rate system for subsidies to suppliers, encouraging cooperation between schools and local food providers, and simplifying administrative processes. According to Member States, these good practices could ensure the continuous availability and quality of food products and support local farmers and producers.

In summary, the implementation of the EU School Scheme has been effective to varying degrees across different Member States. While implementation challenges and administrative burdens have posed significant challenges, good practices and recommendations have been identified by some Member States to mitigate these. Engagement from key actors such as school administrators and teachers, parents, and producers and suppliers has also been a bottleneck for the program's effectiveness. The assessment of the effectiveness of governance arrangements and provisions has also faced significant challenges and limitations, with some Member States not involving key stakeholders such as parents and scientific experts.

#### 5. CONCLUSIONS

The conclusions outlined in this section aim to provide a reply to Synthesis Question 13, assessing the coherence between the results of the Open public consultation and the Member States' evaluation reports. The aim is to understand whether the views of the respondents to the public consultation concur with the results of the Member States' evaluation reports. To this end, the focus is on identifying the common views on the main elements of the School Scheme such as:

a) the objectives of increasing children's consumption of fruits, vegetables, milk and milk products; as well as increasing children's knowledge of healthy eating habits; b) the target groups and wider scope, with a particular focus on vulnerable children; c) the products distributed, their variety and quality, as well as the distribution arrangements in place; d) the educational measures and their effects on children, parents and teaching staff; e) the administrative burden of the implementation of the Scheme.

#### Achieving the EU School Scheme's objectives

The EU School Scheme aims, among others, to increase children's consumption and knowledge of fruits, vegetables, milk, and milk products. While it introduced new products and increased children's curiosity and knowledge of product diversity, the Scheme's overall impact on consumption and knowledge of healthy eating habits was limited. This is in part due to the challenges encountered in measuring the effectiveness of the Scheme making it difficult to show a clear impact. Member States' reports suggest that the Scheme had little effect on children's consumption of milk and milk products and had stable or unclear impacts on attitudes and knowledge. However, positive effects were highlighted for children that had less access to a wide variety of fruits and vegetables. Member States suggest that further efforts may be needed to encourage healthy eating habits among children in Europe.

#### Extending the target groups

The EU School Scheme has been implemented differently across Member States, with varying target groups. While some Member States extended the Scheme to older age groups and targeted vulnerable children, resource constraints prevented many from reaching a wider target group. Respondents to the consultation largely agreed that the Scheme should continue to target the formal educational cycle (from nursery to secondary school) and vulnerable children, with schools in small, rural, and poorer communities potentially benefiting the most. Some Member States prioritised schools with special needs or a higher percentage of vulnerable students, which proved effective. Further resources could increase the scope of the Scheme by extending the programme to either cover more age groups, different socio-economic backgrounds or different types of educational establishments.

#### Greater variety and higher quality of products

The distribution of fruits, vegetables, milk and milk products to schools in Member States has focused on local, organic, and minimally processed products. Yet, some Member States have faced challenges in obtaining organic products and ensuring product quality. Whether centralised or decentralised, the distribution system has affected the diversity of products provided by increasing or decreasing the variety of produce. The importance of high-quality products was strongly emphasised by Member States and respondents to the public consultation. While taste is an important factor, there is a need to limit the negative health impacts of added sugar, salt, and fat. Member States should continue to

work towards providing a diverse range of high-quality products to schools, while also ensuring that they are affordable and accessible.

#### Increasing uptake of educational measures

Member States have implemented various educational measures to promote healthy eating habits among children and bring children closer to agriculture, with mixed effectiveness. In some Member States educational measures were well-received and provided a memorable experience for children, while other Member States faced obstacles in the implementation, the quality, and the provision of digital materials during the pandemic. Additionally, awareness of the School Scheme among teachers and parents was fairly low, and some educational materials were insufficient or not adapted to the target group. Member States suggest that regularly providing information about healthy eating habits could increase awareness and facilitate sustainable change in the long run.

#### Towards a simpler implementation

The implementation of the EU School Scheme has posed challenges for Member States and smaller suppliers, leading to a high administrative burden. The merging of the two programmes has somewhat reduced this burden, but it still remains an issue for many. Half of the Member States have identified bottlenecks related to procurement, monitoring, and reporting processes, deterring schools and suppliers from participating. However, ten Member States have recommended solutions to simplify administrative and financial management, using digital tools to improve efficiency and effectiveness and streamlining procedures. Good practices have also been identified in some Member States, such as procurement and distribution through authorised suppliers and using electronic systems to submit applications. Despite the difficulties encountered, many Member States believe that the benefits of the EU School Scheme justify the effort expended.

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