



Review of the Common Agricultural Policy (CAP) schemes providing agricultural products to school children

Summary of contributions to the public consultation

On 28 January 2013, the Commission invited interested parties to contribute to the review of the current CAP schemes providing fruit, vegetables and milk products to children in schools. The public consultation process was based on a consultation document that was structured around 9 open-ended questions.

The aim of the consultation was to give as many citizens and other stakeholders as possible the opportunity to have their say early on in the reflection process about the future of the school schemes, and in particular to:

- allow the interested parties to submit their views on the problem definition, objectives and options set out in the consultation document, and
- gather additional input on potential problems and objectives which had not been addressed in the consultation paper and on the expected impact of proposed options.

The consultation ran for 12 weeks, until 22 April 2013, and was conducted on the basis of an online questionnaire. Contributions were also made by email and post.

The consultation was successful, with 347 contributions made by an array of parties with an interest in the topic. Most contributions came from organisations or companies (37%), public authorities (34%) and citizens (23%). Within those categories, the most represented groups were schools (41%), professional organisations representing various sectors (15%) and NGOs (7%). Individual contributions came from farmers, processors, universities and consultancies. The largest proportion of contributions originated in Poland (44%), followed by Germany (19%), Belgium (7%), France (5%) and other EU and non-EU countries.

Overview of opinions on the orientation of the review

In the consultation document, the Commission services identified problems which, from its viewpoint, need to be addressed to increase the efficiency and effectiveness of the current school schemes in the short and the longer term. In order to adequately address those problems, several policy objectives were put forward. The paper also discussed three policy options which were identified as possible scenarios to reach those objectives.

The overwhelming majority of respondents (85%) agreed with the 'diagnosis' of problems from the consultation paper, which covered both internal problems inherent to the functioning of the schemes and external challenges, such as the changes in consumption patterns. Some respondents, however, did not agree with the analysis, either fully or in part, for the following reasons:

- many respondents, especially those from professional organisations representing either the fruit and vegetable or the milk sector and some public authorities, stated that the problems to be addressed by schools schemes appeared to be too broad, moving away from the central focus of the current schemes. This meant that there was a risk that the main long-term objective of changing children's eating habits, which has not yet been achieved, would be diluted. A few contributors argued that other CAP instruments, such as rural development measures, would be better placed to address some of the problems identified.
- conversely, others argued that the analysis was too narrow in its focus. They stated that it ignored other important aspects such as health problems, the environment, poverty and wider food sustainability. They argued that it focused too much on the situation with fruit and vegetables and issues related to producers, while overlooking processors.

The Commission had encouraged respondents to the public consultation to **identify other issues, problems, objectives and/or options** that had not been highlighted in the consultation document but that are important for the review. The responses to this request sometimes lacked focus and did not put forward concrete proposals. They also often overlapped. Nevertheless, the following main themes emerged:

As regards the problems and challenges, the following issues were additionally raised:

- the current regimes are viewed as excessively burdensome and bureaucratic, especially by public authorities, and there is a need to better address schools' logistical difficulties in implementing the current programmes;
- the schemes are not attractive or visible; the subsidy for the milk scheme is low and there are no supporting measures. In the absence of any EU-wide communication campaign, both current programmes lack visibility;
- there are conflicting messages on the nutritional benefits of products, with some contributors claiming that the benefits of milk products are often underestimated, while others argue that these benefits are not confirmed, unlike those on consumption of fruit and vegetables;
- the differences between fruit and vegetables and milk should be better explored and taken into account, which makes difficult to bring the current regimes closer together;
- some contributors mentioned the environmental impact of dairy production (farming of animals) and non-organic agriculture and food waste.

On the objectives, some contributors stated that the school schemes should aim to:

- put a greater focus on distributing regional/local/seasonal and fresh products, while some emphasised organic products;
- simplify the administrative requirements and procedures;
- provide for a high level of subsidiarity and flexibility for national authorities, by taking into the account very different situations between EU countries, including on issues such as the educational systems, food provisions (provision or lack of canteens) and competition rules on the procurement of products;
- put a greater focus on the health dimension and objectives. Some suggested focusing exclusively on the well-established importance of fruit and vegetable consumption, while others wanted a greater focus on the nutritional benefits of milk;
- involve all relevant players (farmers and farmers' associations, wholesalers, retailers, schools, parents, civil society, etc.).

In addition to the three options set out in the consultation paper, namely CAP 2020, adjustment and new framework, other options put forward by contributors were the following:

- only reform the current milk scheme by introducing some of the well-functioning and well-received elements from the fruit scheme. These could be the accompanying measures, communication, free distribution and annual envelopes; increasing the aid per kilogram and simplifying the administration of the programme;
- merge the two schemes but keep their separate funding models;
- mix all three options by pooling their best elements;
- focus on increased visibility/communication only of the benefits of the school fruit scheme;
- discontinue the milk scheme and focus on fruit and vegetable distribution.

Opinions concerning the proposed policy options and their potential impacts

The consultation paper identified three policy scenarios to address the objectives set:

- CAP 2020 proposals as option 1, which represents an ‘improved’ status quo;
- an ‘adjustment’ scenario as option 2, whereby the current regimes would be brought closer together through administrative synergies while their separate financing models would be maintained; and lastly
- a completely new framework as option 3, that would bring the current schemes together under a common framework and upgrade them by introducing certain new elements.

None of the options received overwhelming support. On the contrary, the outcome was very balanced with each option receiving almost equal backing, with a slight preference for option 2 (36%), followed by options 3 (33%) and lastly option 1 (31%).

This equal balance in support of the different options was also reflected in the positions of public authorities. Of the 12 national/regional administrations that responded to the consultation, opinions were almost evenly divided between the three options, with authorities in four Member States preferring either the completely new framework or an improved status quo, while three opted for an adjustment to the current system. One Member State, in contrast, saw potential in all three options and therefore suggested pooling the best elements from the different options and putting them together.

Stakeholders representing sector interests largely preferred option 1, i.e. keeping the CAP2020 scenario, with some possible adjustments to the milk scheme. The new framework option also received some support, while option 2 was the least preferred. The main arguments were that a move to bring the two current schemes closer together, either fully or just administratively, would be difficult to achieve. This is because of the differences between fruit and vegetables and milk products in terms of suppliers, logistics required, consumption patterns (as milk is drunk during meals) and nutritional recommendations. Sector representatives feared that the distribution of one or the other product would be jeopardised and the impact of the current schemes would be reduced. This view was particularly prominent among fruit and vegetable stakeholders who feared that the image and message of school fruit schemes could be compromised.

When asked about the **potential difficulties that could emerge from implementing the options**, the following main elements were put forward:

- option 1: some fear that, under this option, the shortcomings of the current school milk scheme would persist, especially the lack of supporting measures, low visibility and low level of aid. They are concerned that this would limit the development and effectiveness of the school milk scheme compared with the school fruit scheme. Other contributors stated that the low visibility and the lack of an EU-wide communication campaign would continue to be problematic for both current regimes.
- option 2: the most frequently raised issues were difficulties in finding synergies between very different programmes in terms of logistics and distribution. Respondents were against having the same communication campaign for both products, arguing that the health message of milk is weaker. Contributors argued that option 2 does not provide for EU financing for supporting measures for the milk scheme and that the EU subsidy for milk is still low. They identified the continuation of the current school milk scheme financing model as a problem. They stated that because there is no overall envelope but aid is given per kilogram, there is insufficient flexibility in the scheme. Others pointed out that some administrative procedures cannot be merged because of the different natures of the financing models for each scheme, with the risk of reducing the impact/reach of one or the other scheme.
- option 3: questions were asked as to whether a merger is possible given the differences between fruit and vegetables and milk products, their suppliers and logistics. As with option 2, arguments against the different health messages were put forward (a fear that the message and image of the school fruit scheme would be damaged). The fear was also expressed that the current wider target group for the school milk scheme would be reduced and the quantities of products distributed would drop. Contributors argued that administration and controls could become complex and that merging budgets could be to the detriment of one of the products. They mentioned that adding other products would dilute the benefits of existing schemes by reducing the funds available for fruit and vegetables or milk if the budget remains unchanged. There were calls to exclude bananas and exotic fruit, while contrasting fears were expressed that focusing on local supply could limit the variety of products offered. Questions were raised as to whether individual producers have the capacity to supply schools. Finally, as regards introducing products, it was said that they might not be in line with national health and nutritional policies or recommendations.

There was limited feedback on incorporating **agricultural products other than fruit and vegetables and milk in the 'new framework'**. Some even argued against adding new products to the regular distribution in order not to weaken the distribution of fruit and vegetables and milk and also because this could increase the distribution burden on schools. A few contributors questioned whether adding other products would be in line with national nutritional and public health recommendations and suggested that scientific evidence and additional funding for each new product should be provided. However, several contributors saw the scheme as an opportunity to bring new products in to schools on an occasional basis (such as special breakfasts) and to give children a stronger connection with local agricultural products. The products mentioned included honey, olive oil, plain cereals, oats, rye bread, other dairy products, poultry and eggs, nuts, dried fruit and soy.

The consultation asked interested parties for their input on **the conditions or requirements that should be introduced if the 'adjustment' or 'new framework' options were to be implemented**. There was a very limited response, with several contributors not replying at all to this question. Of the contributions received, the following conditions and requirements were most frequently mentioned:

- flexibility and freedom for national administrations and schools to decide on whether to participate in the distribution of one or the other product;

- compulsory implementation of supporting measures and strong financial support for them;
- greater involvement by parents and teachers through their participation in the school board that would approve, monitor and evaluate the programme; greater involvement of other stakeholders;
- distribution of products free of charge;
- economic incentives for suppliers and higher margins for farmers;
- reduction of administrative burden and requirements in general;
- leaving the main principle and elements of the school fruit scheme unchanged;
- inclusion of products from local supply chains;
- increase in the EU subsidy for milk products;
- restriction on the use of highly processed products, dairy products to be limited only to drinking milk without flavour, added juices or cocoa;
- maintenance of the existing target groups of milk and fruit schemes;
- EU-wide communication campaign to increase visibility of the schemes.

The importance of supporting measures and the main drivers of their success

The vast majority of respondents saw supporting measures as crucial or at least important in increasing the effectiveness of school programmes. Only a minority were of the opinion that they are not important.

Many different suggestions were put forward as regards the **main drivers of the success of supporting measures**. From the array of views received, the following elements seemed to be the most popular:

- supporting measures should have strong EU financial backing if they are to be efficient and effective;
- they should be suitable for the target group (posters for example do not work) and involve activities such as farm visits or gardening sessions;
- they should be evidence-based, last a long time and be repeated;
- initiatives that bring together the agriculture, health and education sectors are important; different players, in addition to teachers, need to be involved, including parents, suppliers, farmers and local communities;
- schemes should be balanced so as not to overburden schools' core programmes and be properly defined, planned and managed by experts;
- teachers should be stimulated, supported and trained.