Department of Health and Children, Ireland.  
Response to Towards a possible European school fruit scheme – Consultation document for impact assessment

The Department of Health and Children, Ireland welcomes the opportunity to respond to the consultation Towards a possible European school fruit scheme which the Department believes can contribute to increasing the consumption of fruit and improving the health of the Irish population, as well as populations through the European Union (EU).

The Department recognises the importance of fruit and vegetable consumption as part of a healthy diet, as advocated by the White Paper on Nutrition, Overweight and Obesity (EU,2007), which stresses the need for coherent action at European level and draws attention to the role the reformed Common Agricultural Policy/Common Market Organisation could play in shaping the European diet, especially to combat obesity and overweight.

In addressing the questions raised in the Consultation document for impact assessment, the Department takes cognisance of the objectives of the scheme as set out by the Inter- Service Group (ISG):

- Increase the long-term consumption of fruit and vegetables among schoolchildren;
- Foster healthy eating habits among schoolchildren, so contributing to a lasting improvement in health and a decline in obesity;
- Facilitate access to initiatives promoting the consumption of fruit and vegetables by schoolchildren in poorer regions and among disadvantaged sections of the population;
- Bring Europe closer to its citizens by responding to their real concerns.

Key Points:
Evidence

- The case for action to increase consumption of fruit and vegetables as part of a healthy diet has been recommended in a number of reports at a European level. These include the EU White Paper on Nutrition, Overweight and Obesity, (EU,2007) and the World Health Organisation Second WHO European Action Plan for Food and Nutrition Policy 2007-2012 (2007) and the WHO European Charter on Counteracting Obesity (WHO,2006a). There is good evidence that increasing fruit and vegetable consumption reduces the rate of cardiovascular diseases, some cancers and has links with reducing
rates of obesity (WHO, 2006b). The prevalence of overweight and obesity among children in the EU population (estimated at 30% in 2006) and the positive impacts of fruit and vegetable consumption in combating these developments are important.

- Increased consumption of fruit and vegetables as part of a healthy diet has been recommended in a number of Irish policy reports including the Cardiovascular Health Strategy (DOHC, 1999) and the National Task Force on Obesity (DOHC, 2005). The National Task Force on Obesity stated that 300,000 children in Ireland were overweight or obese and projected an annual increase of 10,000 per year on this figure.

- The forthcoming National Nutrition Policy (2008), which will provide strategic direction on nutrition in Ireland for the next ten years, has as it’s the key target group young people aged 0-18 years, and the priority actions are obesity and food poverty. The Policy has as one of it’s specific goals to increase fruit and vegetable intake among young people.

Consumption patterns

- Consumption of 5 or more servings of fruit and vegetables (excluding potatoes) per day is widely recommended on public health grounds (WHO, 2003) and is justified by substantial evidence exists to support a protective role of fruit and vegetables against cardiovascular disease, and possibly also certain cancers and osteoporosis. This is based on a total intake of ≥400g/day or 5 notional servings of 80g each. Consumption of fruit and vegetables is well below this desirable level in the majority of Irish children and teenagers and there is considerable scope to improve the intake of fruit. (IUNA, 2005 & 2008; HBSC, 2007)

- Irish adult surveys have found that increasing intake of fruit and vegetables was associated with improved compliance with dietary guidelines for fat, saturated fat, fibre and a range of vitamins and minerals (O’Brien, 2003). This may also be true for school-children. Fruit in schools could be provided as a healthy snack, displacing the usual children’s snacks, found in the National Children’s Food Survey to be chocolate (17g /day), non-chocolate confectionery (11g /day), savoury snacks( 12g /day) and 26g of biscuits, cakes and pastries (26g /day) (IUNA, 2005). These snack food products contribute to a significant amount of the daily fat and
carbohydrate intake of children. There is convincing evidence that a high intake of such energy-dense foods promotes weight gain

- The Health Behaviour in School Children surveys asked children about the frequency of their consumption of a variety of foodstuffs, including fruit. In total, 19% report that they consume fruit more than once a day. Across all age groups, the rates in girls (23%) continue to be higher than for boys (16%). No changes were found between 2002 and 2006 in boys, however a slight increase in reported fruit consumption is evident among girls. (HBSC 2002 & 2006)

- A recent survey of 441 Irish teenagers aged 13 – 17 years, showed that there was very low fruit and vegetable intake. One third of Irish teenagers don’t eat any fruit. Of those who did eat fruit, over half of their intake was from fruit juice. (IUNA, 2008)

**Strategies**

- School fruit and vegetable programmes are effective at increasing both intake of, and positive knowledge and attitudes to fruit and vegetable consumption tracking into adulthood (De Sa and Lock, 2007)

- Strategies to increase compliance with the 5 a day fruit and vegetables recommendation should include increasing the number of consumers, the frequency of consumption and amount per eating occasion for all categories of fruit. In Ireland there is considerable scope for increasing fruit intake by targeting the consumption of fruit as a snack. (FSAI, 2004)

- Existing models such as the EU School Milk Scheme should be reviewed in the context of its potential as a model for an EU School Fruit Scheme, recognising the need for flexibility in implementation given the different needs of schools in different EU regions.

**Schools**

- Schools are an ideal environment to focus interventions designed to increase fruit consumption among children and reduce the burden of ill health in later life, as they can reach almost all children and teenagers during their first two decades of life. Studies have
shown that healthy diets in children and teenagers have been found to lead to increased fruit and vegetable intake in adulthood (Kelder SH, et al. 1994).

- Schools provide an ideal opportunity for combining healthy nutrition education and increased fruit intake – i.e. learning about fruit as a healthy food choice in classroom and also eating, tasting and experiencing fruit provided at schools.

- A review of school fruit and vegetable programmes worldwide published by the London School of Hygiene and Tropical Medicine in December 2007 suggests that school-based schemes are effective at increasing both intake of, and positive knowledge and attitudes to fruit and vegetable consumption. One study showed that free school fruit and vegetable schemes can also help to reduce inequalities in diet in different social groups. (De Sa and Lock, 2007)

- A School Fruit Scheme in Ireland could add value to the existing School Food Programme in Ireland for children living in socially deprived environments.

- An EU School Fruit Scheme in Ireland could be supported at Member State level by planning health promotion and prevention activities to address diet and physical activity.

**ISG QUESTIONS**

**Q. 1. What is the option preferred?**

The consultation document presents four options identified by the Inter-Service Group (ISG) for implementing an EU School Fruit Scheme. The Department of Health and Children believes that option 4 would be the best proposed option to increase fruit consumption in children and teenagers. To ensure that the scheme delivers optimum cost/benefit in relation to health improvement, option 2 which identifies a sharing of Member States’ experiences on interventions that work, should also be included, as education about the taste and health benefits of fruit needs to supplement fruit being given to children.

Please see further details below.
Option 1: Status Quo
The Department of Health and Children does not support the maintenance of the status quo as a positive option. This option would do nothing to achieve the objectives of the scheme as set out by the Inter-Service Group (ISG). The cost of doing nothing will contribute to an escalation in overweight, obesity, coronary heart disease, type 2 diabetes and some cancers and will do nothing to help improve the health of the next adult generation of Europeans.

Option 2: Networking
The proposal from the EU to create a forum to share information and best practice is a welcome one. Bringing together MS experiences from the agricultural, health, education and social welfare sectors can facilitate the exchange of experience and the transfer of know-how. It is likely that EU diet-related networks that already exist could develop this as part of their brief.

However, this option alone would not achieve the objectives of the scheme as set out by the Inter-Service Group (ISG).

Option 3: Supporting Initiatives
Under this option, the emphasis is primarily on targeted promotional activities under the Common Market Organisation for fruit and vegetables set within a very specific legislative and financing framework.

The Department of Health and Children acknowledges that in the Irish context, models such the Food Dudes programme have played a role in educating children on the importance and benefits of fruit consumption and in introducing them to the wide range of fruits available.

Any model being used as an EU-wide model needs convincing evidence of long-term sustainability and needs to be an appropriate model for all children, especially disadvantaged children.

This option would not achieve the objectives of the scheme as set out by the Inter-Service Group (ISG) and could increase inequalities. This option is embedded in a co-financing structure, where the EU's possible financial contribution to the programmes could be modulated and not exceed, for instance, 50% of the real cost, except in convergence regions where it could be raised 75%. Co-financing would be compulsory; the proposing organisations would have to fund part (for instance 20%) of the real costs of the programme. Some countries may
not be able to implement this option as a free fruit scheme is very costly and will need strong political commitment and in convergence regions funds may not be available.

Given the complexity of an EU fruit scheme and the range of policy domains across which it intersects, the Department of Health and Children recommends an EU-wide structure that provides coherence, monitoring and evaluation and sees option 4 as the best way to deliver on its objectives.

**Option 4: Driving Initiatives**

Option 4 is the option preferred by the Department of Health and Children. This option is where the European Union would establish a fund for the purchase of fruit and vegetables to be distributed in schools. Ireland would agree to looking at options for inter-sectoral funding for accompanying activities to promote fruit and vegetable consumption.

The Department of Health and Children believe that this is the only option which will achieve the objectives of the scheme as set out by the Inter- Service Group (ISG), in particular "long-term consumption of fruit and vegetables among children" and a "lasting improvement in health and a decline in obesity". It would also contribute towards achieving one of the objectives of the CMO which is to reverse the declining consumption of fruit and vegetables.

In view of the range of stakeholders involved and the need for policy coherence, this option provides the best opportunity to achieve the long-term objectives of the Scheme. Given the public health epidemic of overweight, obesity, coronary heart disease, type 2 diabetes and some cancers facing the next adult generation of Europeans, the Department of Health and Children believes that this option provides the optimal framework for increasing the availability of and access to fresh, quality fruit in schools across the EU. The EU School Milk programme provides a tested model.

**What, in your experience, are the necessary conditions for a successful initiative, able to promote a sustainable increase in the consumption of fruit and vegetables by young people and to have a lasting influence on their behaviour?**

- **a successful initiative needs:**
  - to be set within a national framework which will ensure policy cohesion. This strategic and financial framework needs to be
sustainable - ideally a 10 year financing arrangement should be considered.

-a national steering committee needs to be established that includes all stakeholders - relevant government departments (education, health, agriculture, environment and social welfare), statutory bodies, farming organisations, teachers’ unions, national parents’ organisations, fruit suppliers and distributers and community/voluntary organisations. The school children themselves need to be involved - especially children aged 11/12 onwards

– in addition to providing the fruit and/or fruit juice, education about the benefits of eating fruits and vegetables should be part of the programme

– the programme needs to be embedded in existing national schools healthy eating guidelines and programmes

– it needs to link with existing networks eg distributed via the EU School Milk Scheme model and/or the City Councils/Local Authorities (or other suppliers of school lunches in socially disadvantaged areas) or other existing fruit distribution networks

– it needs to be flexible and adaptable to local conditions - some schools may already have programmes in place and it needs to integrate positively with these

– for maximum effectiveness of the school fruit scheme, snacks high in fat, salt and sugar and sugar-sweeted soft drinks should not be available in the schools (EU Nutrition Policy Development Group, 2005).

– it needs to take a whole school approach, perhaps using the Schools for Health in Europe model (previously the Health Promoting Schools programme), which is co-funded by the EU

What are the main obstacles to a successful initiative?
the main obstacles include
– failure to secure adequate resources for the initiative would severely compromise its success. In addition to the food costs
involved, there will be significant distribution/administrative costs. Examination of the EU School Milk Scheme model and/or the City Councils/Local Authorities School Food Scheme could provide important information

- lack of Government support at MS level, lack of support from school principals and teaching staff

- the absence of an appropriate national framework within which to drive this initiative could serve as a barrier to it’s implementation.

What would be good criteria for evaluating the cost-effectiveness of an initiative?

Good criteria are

- analysing potential savings from a reduction in premature mortality and morbidity

- looking at the high and rising costs of inaction and the benefits that will accrue from making a lasting positive contribution to the health and welfare of children. In Ireland, the economics costs associated with obesity have been estimated at 4 billion euro per year. (DOHC, 2005)

- looking at both evidence of effectiveness of the scheme itself (uptake by children etc) and the potential for population impact. The Preffi tool and the new WHO appraisal tool being developed could provide strong evaluation results

What would be the value added of an EU initiative in this field?

Added value at European level – the Scheme:

- acknowledges the importance of EU support across Member States

- provides stronger links between the High Level Group on Diet, Physical Activity and Health and the EU Platform on Diet, Physical Activity and Health. The EU Platform has among it’s members representatives of the Fruit and Vegetable industry – this is an example of a win/win situation, where both policy makers and industry can benefit
- provides a quick response action to one of the recommendations in the EU White Paper

- supports the WHO Europe in achieving goals set out in the Second WHO European Action Plan for Food and Nutrition Policy and the WHO European Charter on Counteracting Obesity

- supports fruit and vegetables promotion objectives within the CMO and in the framework of the general agricultural promotion Programmes

- promotes initiatives aimed at increasing the share of fruit and vegetables in the diet of schoolchildren, at an age when eating habits are established

- provides possible beneficial effects on the environment through initiatives such as community growing schemes and food markets which would have positive impact on rural development and on environmental sustainability

- provides a framework to enrich, strengthen and ensure coherence across the EU - bringing Europe closer to its citizens by responding to their real concerns.

Q. 2. How could it be improved? – Are there factors not taken into account or elements of uncertainty that could significantly influence the impact of the options under consideration? If so, what are they? What would be their influence?

factors not taken into account:

- given the social gradient which exists with regard to fruit intake among children, the possibility of introducing a two-tier approach should be investigated. A possible mechanism might be to provide all children with one item of fruit per day and to increase it to two or three items per day in schools which have significant numbers of disadvantaged students. It may be possible to utilise existing school food initiatives to target disadvantaged children, thereby maximising synergies across the various initiatives. The Department of Health and Children supports this proposal put forward by the Health Food for All initiative. (the Department is represented on their Advisory Group)
- possible financial support by the European Fruit and Vegetable growers and distributors - eg a small percentage of annual profits could be donated to the School Fruit Scheme

- CMO new fruit opportunities where over-production in MS can be used to contribute to the School Fruit Scheme eg, oranges used to provide orange juice for the Scheme

**Should the ISG seek to incorporate into its analysis an assessment of any specific impacts other than those envisaged in chapter 2?**

**specific impacts :**

- The ISG has provided a very comprehensive list of possible impacts - perhaps more emphasis could be put on reducing inequalities and choosing the best option to help disadvantaged children have access to free fruit.

**Do you have any examples of 'best practice' that could improve the options?**

**examples of 'best practice'**

- examine the review of school fruit and vegetable programmes worldwide published by the London School of Hygiene and Tropical Medicine in December 2007.

- investigate existing models such as the Limerick Food Partnership, a pilot project by the Health Services Executive, North East and the Food Dudes - these have elements of best practice which could inform the development of an EU-wide Scheme.

- review the EU School Milk Scheme for possible mechanisms

**What conditions (compulsory and/or optional) should be introduced and/or developed for the 'Supporting Initiatives' and 'Driving Initiatives' options?**

**conditions for the 'Supporting Initiatives' and 'Driving Initiatives' options?**
- the overall school environment must be supportive of the School Fruit Scheme. The Schools for Health in Europe network could be a driver for this, as could the WHO Nutrition Friendly Schools Initiative

- the fruit products available for the Scheme should be appropriate to the children’s age, likes and dislikes. MS could carry out some research on fruit to provide this information, thereby ensuring Scheme is most cost-effective

- the Scheme could to be pilot-tested and/or should be rolled out on a phased basis in all MS

Q3. Is there any other option that you would consider adequate to reach the stated objectives?

The Department of Health and Children is confident that Option 4, supported by option 2, is the best approach to meet the stated objectives.

**Summary Matrix**

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<tr>
<th>Status Quo</th>
<th>Networking</th>
<th>Supporting Initiatives</th>
<th>Driving Initiatives</th>
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<tr>
<td>Long term increase of fruit and vegetables consumption among school children</td>
<td>(1)</td>
<td>(3)</td>
<td>(3)</td>
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<tr>
<td>Decrease in obesity of school children and health improvement</td>
<td>(1)</td>
<td>(3)</td>
<td>(3)</td>
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<tr>
<td>Increased fruit and vegetables consumption in poorer regions and by deprived persons</td>
<td>(1)</td>
<td>(3)</td>
<td>(3)</td>
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<tr>
<td>Appropriate level of initiative and administration; European value added</td>
<td>(2)</td>
<td>(3)</td>
<td>(4)</td>
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<tr>
<td>Appropriate disbursement of public funds (both national and</td>
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### Grading

The option would have a (1) very negative impact (2) negative impact (3) neutral impact (4) positive impact (5) very positive impact;

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<th>Positive impact on the environment</th>
<th>(2)</th>
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<td>Bringing Europe closer to its citizens</td>
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### References


