



Implementation of the EU school scheme for fruit, vegetables and milk products: A mid-term review

European
implementation
assessment

STUDY



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Implementation of the EU school scheme for fruit, vegetables and milk products: A mid-term review

European implementation assessment

Starting with milk in the 1970s, the EU has a long history of supplying agricultural products to school children. With a dedicated EU school scheme for the 2017-2023 period, the EU is currently funding the distribution of fruit, vegetables, milk and milk products, and also educational and information measures. The main policy objective is to ensure that children's nutritional needs are met and healthy eating habits and lifestyles are established.

The European Parliament is scrutinising the implementation of the school scheme with a report on the subject that will be considered by its Committee on Agriculture and Rural Development in the autumn of 2022. This European implementation assessment (EIA), produced by EPRS in support of the committee's work, shows that, despite a significant level of flexibility in terms of national-level implementation, schools and suppliers face a good deal of red tape, and this is seen as the main factor reducing the scheme's effectiveness.

The EPRS findings were based partly on a purpose-made school survey. It collected more than 14 000 individual contributions from schools (including directors, teachers and parents) located in all Member States. The good response clearly demonstrates the importance the school community attributes to the EU school scheme.

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Executive summary

The European Parliament's Committee on Agriculture and Rural Development (AGRI) is scrutinising the implementation of the EU's ongoing school scheme. To support the AGRI committee's work on its own-initiative implementation report ([2021/2205\(INI\)](#)), the Ex-post Evaluation Unit of the European Parliamentary Research Service (EPRS) has prepared a European implementation assessment (EIA), Annex I to which presents the findings of a research project carried out by Panteia B.V. between February 2022 and May 2022. The research project covers the scheme's entire legislative framework, for the first four years of its implementation: all Member States and all educational levels – nursery, pre-school, primary and secondary schools.

For the purposes of the research project, Panteia B.V. collected secondary (existing) and primary (new) data. The information available on Member States' strategies and monitoring reports was cross-checked and complemented by stakeholders' views on implementation of the scheme in practice. The results of the June 2020 [Special Eurobarometer 'Europeans, Agriculture and the CAP'](#), which included questions on the EU school scheme, were also taken into account. The research team received more than 14 000 individual contributions from schools across all Member States, submitted in response to a school survey developed for the purposes of the research project. This showed stakeholders' interest in the scheme and its implementation and could also be seen as an acknowledgement of the importance of sharing their views with the European Parliament, as one of the EU co-legislators. The same could be said of the feedback submitted by the central and regional authorities of the 13 Member States that took part in the survey of national authorities, and by all the other stakeholders interviewed in the context of the research project.

EPRS analysed the data collected by the research project against the standard criteria for ex-post evaluation, as prescribed by the EU [better regulation agenda](#), namely: relevance, coherence, effectiveness, efficiency and EU added value. The analysis described sufficiently and insufficiently performing practices in-depth, and identified impacts on children, schools, suppliers and national authorities.

The results of the research project show that the EU school scheme is relevant to children's needs in terms of healthy diet and eating habits. The scheme was assessed as largely coherent internally and with other international and EU policies. However, despite a significant level of implementation flexibility at national level, there is a good deal of red tape for both schools and suppliers, which is perceived as a major factor reducing the effectiveness of the scheme's implementation on the ground. The stakeholders unanimously confirmed that Member States alone could not have achieved what has been achieved by the ongoing EU school scheme, which is designed and funded at EU level. On the basis of its findings, this EIA recommends ways to improve the scheme's implementation. These recommendations could also support the design of a revised post-2023 EU school scheme. Member States could meanwhile borrow from best practice identified as supporting effective implementation of the scheme.

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1. Context and scope of the research project

The first European Economic Community scheme giving Member States access to aid for supplying milk and certain milk products to children in schools was set up in 1977. While a key objective was balancing the market and stabilising prices, its role was also to stimulate milk consumption habits for EU citizens from the youngest age. The 2008 reform of the scheme reinforced its nutritional and educational objectives and tools. A new school fruit scheme was launched the same year in the framework of the [common organisation of agricultural markets](#) (Single CMO Regulation), a key element of the first pillar of the EU's common agricultural policy (CAP). The Single CMO Regulation envisaged measures to promote the consumption of fruit and vegetables, including within schools. In 2007, the Commission had already adopted a Community strategy to address overweight and obesity, with the [white paper on a strategy on nutrition, overweight, and obesity-related health issues](#). The strategy also identified the need to improve dietary habits, provide fruit and vegetables and promote physical activity among school children.

The current [EU school fruit, vegetables and milk scheme](#), applicable since August 2017 was adopted jointly by the European Parliament and Council and brought the previously parallel schemes together within the same legal framework. Its aim is to encourage children to adopt a healthy diet and lifestyle, by facilitating access to fresh fruit, vegetables and milk, and in so doing attempt to halt and reverse the increasing consumption of processed food, which is often high in added sugar, salt, fat and additives.

The scheme was allocated a budget of €250 million for each of the six school years between 2017 and 2023, distributed between Member States on the basis of the number of children per country. Following the withdrawal of the UK from the EU, this budget is now €220.8 million per school year, €130.6 million for fruit and vegetables and up to €90.1 million for milk. The bulk of the money is spent on the distribution of products, and Member States may encourage local, short supply chains, and seasonal, organic and quality products for nurseries, pre-schools, primary and secondary schools. In addition to distribution, the scheme allocates funds to educational measures, to reconnect children to agriculture and teach them about healthy diets. It also funds information measures, to raise the scheme's profile, and provides for monitoring and evaluation.

Member States participating in the scheme must adopt a strategy (at national or regional level), to cover six school years. The strategies set the objectives (in line with the recommendations for a healthy diet), and define the beneficiaries, the products for distribution, the education measures and arrangements for implementation of the scheme on the ground. The Member States have to produce one monitoring report per academic year, and must also prepare evaluation reports to cover several school years. The Member States must submit their first evaluation reports by 1 March 2023.

In preparation for its proposals on the renewal of the scheme for the post-2023 period, the European Commission has launched a combined [ex-post evaluation and ex-ante impact assessment](#) for the scheme.¹ According to the [roadmap](#), the scheme will be reviewed 'as part of the comprehensive approach in the [farm to fork strategy](#) for the creation of a favourable food environment that makes it easier to choose healthy and sustainable diets (Action 25), and in [Europe's Beating Cancer plan](#) (Action 3.4: Improving health promotion through access to healthy diets and physical activity). According to the Commission, the scheme also contributes to the action plan for the development of organic production (Action 4)'. Finally, 'The review will take into account the Council recommendation establishing the [European Child Guarantee](#), according to which Member States should guarantee effective and free access to at least one healthy school meal each school day for all children at risk of poverty or social exclusion'.

The Commission is in the process of collecting evidence for both the ex-post evaluation and the ex-ante impact assessment. At the time of writing, a public consultation is ongoing.² An external ex-post evaluation report is expected to be ready by the end of 2022.

In this context the [European Economic and Social Committee](#) has also launched an evaluation of the current school scheme with a series of [ongoing country visits](#) (France, Romania, Lithuania, Ireland, and Finland), and a presentation in the Committee's plenary scheduled for December 2022.

As co-legislator, the European Parliament has a central role in scrutinising implementation of the EU school scheme. In 2021, in a non-legislative resolution on the [farm to fork strategy](#), Parliament called for 'improvements to be made in a non-discriminatory manner to the EU promotion policy for agricultural and food products, as well as to the EU school scheme and the European Healthy School Lunches initiative'. In Parliament's view, these improvements would promote high-quality European agricultural production and contribute to sustainable production and consumption in line with the farm to fork strategy, the European Green Deal and the United Nations Sustainable Development Goals (UN SDGs). Parliament recommended that the improvements should focus on educational messages based on available scientific data, on EU quality labels such as the EU organic label and geographical indications, on short, local and regional supply chains, on healthy nutrition and lifestyles, and on promoting greater consumption of fruit and vegetables as part of a varied and balanced diet, and lower intake of sugar, salt and fats with the aim of reducing obesity rates.

The European Parliament also receives petitions on the EU school scheme. Some petitions, declared admissible by the European Parliament's Committee on Petitions, refer explicitly to implementation of the scheme in practice.³ Members of the European Parliament have also presented written questions to the Commission on the subject.⁴

The key element in Parliament's scrutiny of implementation of the current scheme will be a dedicated own-initiative implementation report of the Committee on Agriculture and Rural Development ([2021/2205\(INI\)](#)) to be considered in autumn 2022. This EPRS study, from the 'European Implementation Assessment' (EIA) series, has been prepared in support of the work of the European Parliament on this particular implementation report.

The EIA covers implementation of the legislative framework in all Member States and all four educational levels benefiting from the scheme – nursery, pre-school, primary and secondary school. The research paper covers only the first four school years of the programme's implementation, and should therefore be seen as a mid-term review of the ongoing EU scheme. The research project was carried out between February 2022 and May 2022 by Panteia B.V. at the request of the Ex-post Evaluation Unit of EPRS. The project's results have been published in a research paper entitled: 'Implementation of the EU school scheme on fruit, vegetables, and milk products', which is published under Annex I to this EIA.

The following sections give a brief overview of the methodology of the research project and its contribution to EU policy-making.

2. Methodology of the research project

2.1. Data collection

The research project's findings are based on secondary (existing) and primary (newly collected) data.

The research project benefited from a literature review of a large set of existing data sources. Member States' national strategies and annual monitoring reports offered a major source of secondary data. The scheme's data portal⁵ offered another key source of information on schools' and children's participation and in particular their involvement in the various measures under the

scheme. The results of the Special Eurobarometer 520 'Europeans, Agriculture and the CAP' survey, published in June 2022, which included questions on the EU school scheme survey, were also used.⁶ Lastly, a review was made of the relevant academic literature.

The research project also involved collecting primary data at both EU and national levels. This allowed the team to cross-check and complement the information already available from existing sources. Panteia developed tailor-made data collection tools, giving stakeholders the opportunity to share their views on the schemes implementation in practice. More specifically, the following primary data collection tools were designed:

- a survey of national competent authorities, to which central and regional authorities from 13 Member States replied;
- a survey of schools, to which more than 14 000 individual contributions were submitted by school directors, teachers, parents and respondents in other roles such as school managers (administrators, accountants, secretaries), school/municipal nutritionists, health coordinators, restaurant coordinators, caterers, representatives of municipalities and school counsellors;
- an interview programme, which involved EU and national stakeholders – such as, for example, suppliers (producers and distributors) – who were not covered by the surveys of national competent authorities and schools, and also stakeholders involved in selected practices identified as performing sufficiently or insufficiently. Experts in the field were also interviewed.

Primary data collected for the purposes of this research project were complemented by feedback submitted by stakeholders to the Commission roadmap,⁷ which launched the review of the scheme in summer 2021.

Auditing was not used as a data collection tool because neither EPRS nor the external team have auditing powers.

2.2. Analytical framework

The secondary and primary data collected on the practical implementation of the scheme were analysed against the standard set of criteria for ex-post evaluation used in the context of the EU's Better Regulation agenda,⁸ namely relevance, coherence, effectiveness, efficiency and EU added value. Furthermore, the impacts of the scheme's implementation were analysed. The main elements included in the scope of the analysis are presented below.

Under the **relevance** criterion, the team analysed whether the scheme set appropriate objectives and measures in line with children's nutritional needs and the creation of healthy eating habits and lifestyles. The findings on relevance can be consulted under Section 3.2 of the research paper.

Under the **coherence** criterion, the research team checked for contradictions within the scheme itself, as well as between the scheme and other relevant international policies (such as the UN SDGs), EU policies (such as the CAP, the farm to fork strategy, the 'beating cancer' plan, the EU action plan on child obesity), and national schemes applied in parallel to the EU scheme. The findings on coherence may be consulted under Section 3.3 of the research paper.

Under the **effectiveness** criterion, the key question was whether the objectives of the scheme were being achieved as a result of its implementation. Furthermore, the team analysed the administrative practices of Member States and how they affect the effectiveness of the scheme on the ground. Findings suggest that the significant level of implementation flexibility at national level has not prevented red tape for both schools and suppliers. This was seen as major factor reducing the effectiveness of the scheme. The details around this and other findings on effectiveness can be consulted under Section 3.4 of the research paper.

Data permitting, the research paper outlined **impacts** on children, schools, suppliers of products and national competent authorities stemming from the implementation of the scheme. The significant impact of the coronavirus pandemic on implementation of the school scheme in two of the school years in scope – 2019/2020 and 2020/2021 – was also considered. The findings on impacts are available in Section 3.5 of the research paper.

On the **efficiency** criterion, as for other policy fields, quantitative data was scarce, therefore the assessment of the cost-benefit ratio inherent in the implementation of the EU school scheme was difficult. The findings on efficiency can be seen under Section 3.6 of the research paper.

Under the **EU added value** criterion, the research project checked if Member States alone were likely to have achieved the same results without intervention at EU level. The findings on EU added value are available under Section 3.7 of the research paper.

3. Contribution of the research project to EU policy-making

Although limited in terms of the number of school years covered, the findings of this research project, carried out in line with the main principles established by the EU Better Regulation agenda and to the extent allowed by the available data, contribute to an in-depth understanding of the ongoing implementation of the EU school scheme (2017-2023).

This EIA is the first study published by the EU institutions and bodies to map and analyse the administrative practices established by Member States in terms of the impact they produce on the effectiveness of the scheme. The research paper also outlines a number of implementation practices deemed to be performing either sufficiently or insufficiently well. The transferability of practices considered to be performing effectively was explored, as potentially being a valuable support to Member States' efforts to ensure proper implementation of the scheme on the ground.

The findings of the research paper are presented in a way that makes clear the stakes relevant to each specific party with a vested interest in the EU school scheme. The research paper therefore provides a transparent account of the views expressed by stakeholders, and of clear disagreements between stakeholders. This represents another of the research paper's contributions to transparent EU policy-making on the scheme, in line with the EU Better Regulation agenda.

The feedback received from stakeholders through data collection tools designed specifically for the purposes of this research project brings valuable new knowledge for EU policy-makers. The high number of replies received to the schools survey – although not representative and therefore used only as indicative by the analysis – shows the importance that the main beneficiaries attribute to the EU school scheme. It also serves to demonstrate the stakeholders' motivation to inform the European Parliament – a co-legislator – on implementation of the scheme. The same applies to the central and regional competent authorities of the 13 EU Member States that submitted feedback to the dedicated survey to national authorities.

Against the above backdrop, the research paper's findings and the recommendations outlined in its Section 4.2 make a genuine contribution to the work of the European Parliament's AGRI committee, not least in the context of its draft implementation report. In addition, the research paper could support the work of other EU institutions and bodies that are currently evaluating the scheme. In particular, the findings of the research paper commissioned by EPRS could feed into the ex-post evaluations of the 2017-2023 scheme being prepared by the Commission and the EESC and expected to be published later this year. The research paper also contains findings relevant to the Commission's ex-ante impact assessment, which will accompany the legislative proposal revising the scheme, in particular as regards problem definition and policy options, and could thus contribute to the design of the post-2023 EU policy instrument.

ENDNOTES

- ¹ According to the Commission's intervention during the AGRI committee's initial exchange of views on the own-initiative implementation report on the scheme (2021/2205(INI)), held on 14 June 2022 ([agenda](#) item 8). A video recording of the meeting is available [here](#).
- ² Commission's [open public consultation](#) is available for contributions until 28 July 2022.
- ³ See, for example, [Petition No 1283/2020](#) by T.F. (Spanish) on improving the quality of school meals and [Petition No 0479/2020](#) by Milena Rasheva (Bulgarian) on alleged non-payment by the Bulgarian government of the food scheme deliveries for schoolchildren.
- ⁴ The European Parliament's database of questions, including individual written questions of Members of the European Parliament, can be searched via this [link](#).
- ⁵ [EU scheme data portal](#).
- ⁶ [Special Eurobarometer 520 'Europeans, Agriculture and the CAP'](#), 21 June 2022.
- ⁷ Stakeholders submitted their feedback to the Commission's [roadmap](#) from 29 June to 27 July 2021.
- ⁸ These evaluation criteria are internationally recognised (for example by the [OECD](#)), and adapted to the EU regulatory context. More specifically, they were taken on board by the EU in the Commission's Better Regulation Guidelines and toolbox, adopted in 2015. These guidelines and the toolbox were [updated](#) in November 2021 in the context of the Commission's [communication](#) 'Better Regulation: Joining forces to make better laws', published in April 2021.

1. Research paper – 'Implementation of the EU school scheme for fruit, vegetables and milk products'

Implementation of the EU school scheme for fruit, vegetables and milk products

Research paper

This research paper provides a mid-term evaluation of the implementation of the EU school scheme for fruit, vegetables and milk products for the first four school years of implementation (2017 to 2021). The implementation of the scheme is assessed against the standard set of criteria for ex-post evaluation, namely relevance, effectiveness, efficiency, coherence and EU added value, as defined by the EU Better Regulation toolbox. Focus is put on the identification of sufficiently and insufficiently performing practices and the reasons behind them. Impacts have also been analysed. Recommendations for improvements in all areas of implementation are also made. The research project identifies how the scheme has impacted stakeholders, such as children in establishing healthy eating habits, farmers, schools, national and local competent authorities, and other relevant stakeholders.

AUTHOR(S)

This paper has been written by Martin Clarke, Jacqueline Snijders, Paul Vroonhof and Thomas de Winter of Panteia at the request of the Ex-post Evaluation Unit of the Directorate for Impact Assessment and European Added Value, within the Directorate-General for Parliamentary Research Services (EPRS) of the Secretariat of the European Parliament.

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Executive summary

This research paper provides an **ex-post evaluation of the implementation of the EU school fruit, vegetables and milk scheme (2017-2023) for four school years (2017-2021)**. In particular, implementation is assessed against the standard set of criteria for ex-post evaluation, namely relevance, coherence, effectiveness, efficiency, impacts and EU added value, as defined in the EU Better Regulation toolbox. In addition to desk research and in-depth interviews, two surveys were carried out. The national authorities survey invited all 27 EU Member States and the UK to contribute, and a short online survey for schools in the EU (including the UK) targeting directors teachers, parents and other school stakeholders was developed in order to make an assessment of the impact of the scheme given that these stakeholders have closest contact with children. Examples of sufficient and insufficient practices related to the implementation of the Scheme were developed on the basis of the data collection activities.

The EU School scheme supports Member States in distributing fruit, vegetables, milk and milk products to children from nursery to secondary schools. It also supports educational and information measures. The main objective of the distributional, educational and information measures is to stimulate a healthy diet and lifestyle for children. Furthermore, all measures should give priority to healthy, fresh, unprocessed and local foods and ensure visibility to the scheme. The current Scheme covers a period of six school years, starting as of school year 2017/2018 and running until the 2022/2023 school year. The Scheme's overall combined annual budget amounting to €250 million (€220.8 million after the withdrawal of UK) is divided among Member States based on the number of children and the level of regional development. The scheme is governed by Regulation (EU) 1308/2013 of the European Parliament and the Council on the common organisation of the markets in agricultural products and Regulation (EU) 1307/2013¹ of the European Parliament and the Council establishing rules for direct payments to farmers under support schemes within the framework of the EU's common agricultural policy (CAP) as well as relevant regulations adopted by the European Commission.²

The Scheme remains relevant in regards to the needs, problems and issues through the objective of encouraging children to follow healthy diet and lifestyle. The activities within the Scheme are considered to be a positive means of contributing towards this objective. The distribution of products and the accompanying educational measures are perceived as highly positive.

In terms of the relevance of the activities provided/conducted under the scheme, **the educational measures have been perceived as the most relevant aspect in increasing the consumption of healthy foods on a long-term basis.** Some stakeholders suggest putting greater emphasis on these measures to an extent of requiring a minimum share of budget to be mandatorily allocated to them. A wider involvement of parents and other community participants in the accompanying measures has also been communicated as desirable.

The objectives and the activities that are provided for in the applicable legislative framework complement each other well and are thus coherent. In particular, the addition of compulsory education and information measures in the current Scheme, such as lessons, farm visits, school

¹ As amended by Regulation (EU) 2016/791 of the European Parliament and of the Council as regards the aid scheme for the supply of fruit and vegetables, bananas and milk in educational establishments.

² These are: Commission Implementing Regulation (EU) 2017/39 on rules for the application of Regulation (EU) No 1308/2013 with regard to Union aid for the supply of fruit and vegetables, bananas and milk in educational establishments, and Commission Delegated Regulation (EU) 2017/20 supplementing Regulation (EU) 1308/2013 of with regard to Union aid for the supply of fruit and vegetables, bananas and milk in educational establishments.

gardens, tasting and cooking workshops, further help to strengthen the achievement of the objectives.

Regarding wider EU policies, **there is a clear relationship between the Scheme and the wider objectives of the CAP**, such as its contribution towards the stabilisation of markets and availability of supply, through the creation of life-long customers thanks to the intervention at an early age when habits are formed easily. The Scheme also contributes towards the objectives of the European Green Deal and elements of the EU Farm to Fork Strategy. In regards to public health policies, elements of the Scheme contribute towards mitigating risk factors that start in childhood (obesity, diabetes) through the promotion of a healthy diet, which contribute towards Europe's Beating Cancer Plan, the EU4Health initiative and the EU Action Plan on Childhood Obesity. However, elements of the Scheme, such as allowing certain types of products with limited sugar and fat content and the distribution of only milk products instead of also offering plant-based are considered contradictory by some stakeholders. Regarding international policies, the scheme can be considered as contributing towards relevant policies such as the UN Sustainable Development Goals and the objectives of the Global Action Plan for the Prevention and Control of NCDs.

Three Member States had previously equivalent existing national schemes with complementary objectives to the EU scheme. In general, the Member States consider the scheme to be sufficiently in line with national policies and objectives and due to a certain level of discretion left for the Member States in its implementation, can be adjusted to specific national goals.

In terms of effectiveness, or whether the objectives of the EU School Fruit, Vegetables and Milk Scheme are being achieved as a result of its implementation, many stakeholders believe the Scheme does in fact stimulate healthy eating among children especially when the frequency of distribution is high and there are accompanying educational measures conducted. The Scheme also has a positive effect on suppliers and farmers in regards to expanding their markets. However, there is currently a limited amount of quantitative data available regarding the long-term effects.

On the other hand, **some stakeholders believe the budget of the Scheme to be too low to be effective in achieving the objective of long-term improvement of children's diet** and that the discretion of Member States to exempt some less healthy products goes directly against this objective of the scheme. There is some evidence that suggests an increase in children's awareness of the importance of healthy eating when distribution is provided alongside accompanying educational measures. Stakeholders agree on the need to expand the provision of educational measures, and to also ensure participation of parents for increased effectiveness.

Administrative procedures used in the implementation of the Scheme vary among Member States in regards to the selection of suppliers, publicising the scheme, performing administrative checks and the monitoring and evaluation. In terms of the suppliers' selection, the most widely used is the centralised system whereby the administrative authority at the central or regional level either approves eligible aid applicants or directly procures the products, but there are also Member States in which a de-centralised or a mixed system is used, where the responsibility for selecting eligible suppliers with aid applicants at the local or regional level. The biggest benefit of the centralised system seems to be the alleviation of the administrative burden from schools when the supplier contracts the school, the school not having to be responsible for the public procurement. The de-centralised system, although offering for higher flexibility, puts this administrative burden on schools and has a lower reach, while in the mixed system schools prefer a simplified route and give up some flexibility for lower administrative burden. Member States use these different approaches based on particular national circumstances.

The COVID-19 pandemic resulted in the closure of schools across Europe, which heavily affected the distribution of products, and the Scheme had to be suspended in some Member States where no alternative ways of distribution were found. Due to the uncertain situation,

Covid-19 has also led to a decrease in participation in the Scheme. Whilst Member States are reporting signs of recovery, the pandemic has highlighted the need to increase flexibility in the implementation measures, to ensure the continuation of the scheme also when schools have to close without losing its effectiveness and to give guarantees to suppliers.

The consultation activities identified a number of impacts that the EU Scheme has on a range of stakeholders, including children, schools, farmers, suppliers, and national and local competent authorities. Some studies suggest positive impacts on changing children's eating habits – particularly related to fruit consumption. Similarly, both the majority of schools and parents consulted agree that there is a positive impact present as children pay more attention to healthy diets. Some stakeholders consulted also perceive a positive impact of the fruit and vegetables part of the scheme on the health of children, but are slightly less positive when it comes to the milk part of the scheme.

For real long-lasting impact, however, holistic and interdisciplinary approach is deemed necessary, with attention given to the creation of healthy school environments rather than just to the provision of healthy products. **Whilst most schools consulted acknowledge the positive impact of the Scheme on children and their health, in many cases schools find the scheme burdensome from an administrative perspective, often lacking the time and resources to implement it in an effective manner.** The Scheme allows farmers and suppliers of products, through prioritising local purchasing and short supply chains, to have direct access to consumers to establish and develop long-term relationships. Farmers and suppliers in some procurement systems also indicate that they have to deal with excessive administrative burden. Several national authorities in the Member States have emphasised the need for simplification of the administrative, evaluation and monitoring procedures due to administrative burden.

Not all of the EU budget is used every year and even in the year with the highest absorption rate (2018-2019), only 11 out of 26 Member States (fruit and vegetable part of the scheme) and 11 out of 28 Member States (milk part of the scheme) used more than 90% of the budget. Member States that utilise high amounts of their allocated budget have called for an increase in allocated budget to be able to expand the frequency of distribution or to expand the target group. Stakeholders have stated that the main obstacle to the efficient use of the budget to be the complex administrative procedures for implementing the Scheme at national level, with national authorities and stakeholders in most Member States indicating that the Scheme places a burden on them in regards to the time and resources required to implement it, but there is no information on the costs associated with administrative burden and on the benefits of the Scheme and their ratio to costs in the literature. **There are Member States that indicated that the budget is insufficient to also fully realise a comprehensive programme of educational measures.** There is also a practical issue identified regarding the dependency of the educational measures budget on the level of distribution – if distribution is lowered, the aid for accompanying measures is lowered too making it challenging to plan educational measures at national level as they require same amount of work regardless of the level of uptake in the distribution element of the scheme.

Some Member States indicate that similar results and scope of implementation would be difficult to achieve without EU funding. Whilst the input costs of the Scheme (in regards to EU aid) do contribute somewhat towards the achievement of the goals of the Scheme, the budget is however generally considered to be insufficient to make a significant and wide-reaching impact. Even **under the current conditions, in many cases the budget is too low to include all institutions that want to participate in the school programme.** Some Member States also have concerns regarding inflation and rising costs of prices for food over the coming period, which would potentially reduce the scope (and therefore impact) of the Scheme. On the same note, the large number of refugee children fleeing the war in Ukraine have to be considered when looking at the budget, as with the current budgetary restrictions including more children would be very challenging. In June 2022, the European Commission published a regulation allowing for an internal

redistribution of the EU aid under the EU school scheme to cater for displaced Ukrainian children enrolled in EU schools.

The majority of Member States indicate the positive added value of the EU Scheme and an inability to achieve the objectives and impacts of the Scheme without any EU support. None of the Member States or stakeholders consulted advocates for the discontinuation of the Scheme. The EU Scheme has an equalising effect among all the Member States and provides for a greater scope, scale, budget and results as compared to schemes functioning without EU funding. The EU Scheme can be seen as forming a financial basis for supplying educational institutions with fruit, vegetables and milk and at the same time serves as a vehicle for education around the topic of nutrition. The previous national efforts in this regard are intensified by the EU intervention. **However, it has been also noted by some stakeholders that the EU funding alone is not able to leverage the desired impact and fully achieve the objectives of the Scheme.**

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List of abbreviations

AGRI - European Parliament's Committee on Agriculture and Rural Development

AgriMer - National Establishment of Agricultural and Seafood Products

AMA - Agricultural Market Austria

ANC - Areas of Natural or Other Specific Constraints

APAQ-W - Walloon Agency for the Promotion of Quality Agriculture

CAP - Common agricultural policy

CIA - Agricoltori Italiani

CMO - Common Market Organisation

COPA-COGECA - Interest Group for European Farmers and Agri-Cooperatives

DG EPRS - Directorate-General for Parliamentary Research Services of the European Parliament

EAPF - European Alliance for Plant-Based Foods

EC - European Commission

EDA - European Dairy Association

EEC - European Economic Community

EIA - European Implementation Assessment

EP - European Parliament

EU - European Union

EVAL - Ex-Post Evaluation Unit

F&V - Fruit and Vegetable

IA - Impact Assessment

LRF - Swedish Farmers' Association

NAK - National Chamber of Agriculture, Hungary

NCDs - non-communicable diseases

OPTA - Association of Organic Processing and Trade Companies in Europe

RVO - Netherlands Enterprise Agency

SDGs - Sustainable Development Goals

SPW-ARNE - Natural Resources and Environment of Public Administration of Wallonia

TFEU - Treaty on the Functioning of the European Union

UK - United Kingdom

UN - United Nations

WGI - Whole Grain Initiative

WHO - World Health Organisation

WUR - Wageningen University & Research

1. Introduction

This research paper provides the results of a research project on **the implementation of the EU school fruit, vegetables and milk scheme for four school years** employing the methodology for **ex-post evaluation**.

The EU School scheme supports Member States in distributing fruit, vegetables and milk products to children from nursery to secondary schools. It also supports educational and information measures. The main objective of the distributional, educational and information measures is to stimulate a healthy diet and lifestyle for children. Furthermore, all measures should give priority to healthy, fresh, unprocessed and local foods and ensure visibility to the scheme. The current Scheme covers a period of six school years starting as of school year 2017/2018.

The Scheme is governed by Regulation (EU) 1308/2013 of the European Parliament (EP) and the Council on the common organisation of the markets in agricultural products and Regulation (EU) 1307/2013³ of the European Parliament and the Council establishing rules for direct payments to farmers under support schemes within the framework of the CAP as well as relevant regulations adopted by the European Commission (EC).⁴

1.1. Objectives and scope of the research

The European Parliament's Committee on Agriculture and Rural Development (AGRI) has launched an own-initiative implementation report on the EU School fruit, vegetables and milk scheme. The Ex-Post Evaluation Unit (EVAL) of the Directorate for Impact Assessment and European Added Value (within the Directorate-General for Parliamentary Research Services of the European Parliament, DG EPRS) will provide expertise in support of this AGRI implementation report.

In order to prepare the required research evidence, the Directorate for Impact Assessment and European Added Value commissioned this research paper on the 'Implementation of the EU School's scheme for fruit, vegetables and milk products'. The results of this research paper are consolidated into a European Implementation Assessment (EIA), prepared by the EVAL Unit.

In particular, this research paper assesses the implementation against the standard set of criteria for ex-post evaluation, namely relevance, effectiveness, efficiency, coherence and EU added value, as defined under the European Commission's Better Regulation toolbox.⁵ Focus is put on the identification of sufficiently and insufficiently performing practices and the reasons behind them. Recommendations for due improvements in all implementation aspects will be outlined. Given that the research paper was able to evaluate ex-post the implementation of the EU school fruit, vegetables and milk scheme for the first four school years only (2017/2018, 2018/2019, 2019/2020 and 2020/2021), it should be seen as a mid-term review of the implementation of the ongoing EU scheme.

In the context of the 'effectiveness' criterion in particular, the research paper scrutinises the administrative procedures established by Member States (at the relevant level of governance) with the aim to ensure the implementation of the scheme, and in particular whether the procedures are

³ As amended by Regulation (EU) 2016/791 of the European Parliament and of the Council as regards the aid scheme for the supply of fruit and vegetables, bananas and milk in educational establishments.

⁴ These are: Commission Implementing Regulation (EU) 2017/39 on rules for the application of Regulation (EU) No 1308/2013 with regard to Union aid for the supply of fruit and vegetables, bananas and milk in educational establishments, and Commission Delegated Regulation (EU) 2017/20 supplementing Regulation (EU) 1308/2013 of with regard to Union aid for the supply of fruit and vegetables, bananas and milk in educational establishments.

⁵ European Commission, 'Better Regulation Toolbox', 2021, available at: https://ec.europa.eu/info/sites/default/files/br_toolbox-nov_2021_en_0.pdf.

fit for purpose. In the same vein, the research paper also identifies and analyses implementation practices that account for both sufficient and insufficient performance against the objectives of the scheme. The research paper also assesses how the scheme has impacted stakeholders such as children in establishing healthy eating habits, farmers, schools, national and local competent authorities, and other relevant stakeholders.

Desk research and targeted stakeholder consultation involving interviews and stakeholder surveys covers all EU Member States. A significant number of responses was collected from stakeholders in Germany, Poland, Romania, Luxembourg, Portugal and Croatia, all of which have been the subject of further study in this report, given the fact that this selection represents Member States with both high and low absorption rates of EU budget, a good geographical spread, as well as including both smaller and larger Member States. Furthermore, five of these six Member States submitted responses to the survey to national authorities which gives a fuller picture of the implementation of the Scheme in these Member States. Based on the results from desk research and the surveys, a sample of Member States implementation practices have been studied further. More information on the methodology can be found in Annex 1.

The research paper also provides recommendations.

1.2. Structure of the report

The report follows the following structure:

Chapter 2 provides a background to the EU School Scheme for fruits, vegetables and milk products, looking in particular at the legal basis, the relevant policy context and background to the scheme, as well as the objectives, target audiences and measures included under the scheme.

Chapter 3 provides the evaluation results. The chapter commences with an overview of the evaluation matrix and study questions used to develop the research paper, as well as the intervention logic of the scheme that was developed and utilised during the project. Following this, the evaluation results are presented, which are divided into sub-sections on the basis of the evaluation criteria (effectiveness, efficiency, relevance, coherence, impacts and EU added value). Examples of sufficient and insufficient practices are also presented in this chapter.

Chapter 4 presents the conclusions on the basis of each of the evaluation criteria.

Chapter 5 provides recommendations, which are aimed at various types of stakeholders.

Additionally, a number of **annexes** are included:

- **Annex 1: Technical annex that includes an overview of methods used to carry out the desk research, consultation activities (including the surveys) and the identification of sufficient/insufficient**
- **Annex 2: Bibliography**

2. Background to the EU School Scheme for fruits, vegetables and milk products

2.1. Legal basis

The main legal instruments in relation to the ongoing Scheme are the consolidated Regulations (EU) 1308/2013⁶ and 1307/2013⁷. Within the Regulation (EU) 1308/2013 Chapter 2 Section 1 presents the Scheme (Subsection 1 – School fruit and vegetables scheme, Subsection 2 – School milk scheme), setting out the target group of the measure, specifying the aid for the supply of the products, and gives power to the Commission to adopt delegated and implementing acts concerning rules within the Scheme and laying down measures necessary for the application of the Scheme. Annex V of the Regulation further specifies products excluded from the Scheme and from receiving Union aid. Regulation (EU) 1307/2013 sets out the application of Regulation (EU) 1306/2013⁸ to the Scheme, laying down the rules on financing of the Scheme within the CAP and on establishment of management and control systems by the Member States.

The Scheme is further governed by more detailed provisions of the Commission Implementing Regulation (EU) 2017/39⁹ and Commission Delegated Regulation (EU) 2017/40¹⁰. The Implementing Regulation provides for rules on the application of Regulation (EU) 1308/2013, such as the required elements of the Member States' strategies, the process of requesting Union aid, and monitoring and evaluating obligations. The Delegated Regulation offers supplementary information and rules in matters such as the accompanying educational measures, costs eligible for the Union aid and criteria for approval of an aid application.

2.2. Policy context and background to the scheme

2.2.1. Origins of the current scheme

The origins of the current Scheme date back to 1977, to the days of the European Economic Community (EEC), when the Council together with the Commission through Regulations (EEC) 1080/77¹¹ and 1598/77¹² created a legal framework for the supply of milk and certain milk products at reduced prices to school children. The rationale behind the framework was market based, as in stemming from food surpluses accumulated throughout the 1970s as a result of the then design of

⁶ Regulation (EU) No 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common Organisation of the markets in agricultural products and repealing Council Regulations (EEC) No 922/72, (EEC) No 234/79, (EC) No 1037/2001 and (EC) No 1234/2007 [2013] OJ L 347/671.

⁷ Regulation (EU) No 1307/2013 of the European Parliament and of the Council of 17 December 2013 establishing rules for direct payments to farmers under support schemes within the framework of the common agricultural policy and repealing Council Regulation (EC) No 637/2008 and Council Regulation (EC) No 73/2009 [2013] OJ L 347/608.

⁸ Regulation (EU) No 1306/2013 of the European Parliament and of the Council of 17 December 2013 on the financing, management and monitoring of the common agricultural policy and repealing Council Regulations (EEC) No 352/78, (EC) No 165/94, (EC) No 2799/98, (EC) No 814/2000, (EC) No 1290/2005 and (EC) No 485/2008 OJ L 347, 20.12.2013

⁹ Commission Implementing Regulation (EU) 2017/39 of 3 November 2016 on rules for the application of Regulation (EU) No 1308/2013 of the European Parliament and of the Council with regard to Union aid for the supply of fruit and vegetables, bananas and milk in educational establishments [2017] OJ L 5/1.

¹⁰ Commission Delegated Regulation (EU) 2017/40 of 3 November 2016 supplementing Regulation (EU) No 1308/2013 of the European Parliament and of the Council with regard to Union aid for the supply of fruit and vegetables, bananas and milk in educational establishments and amending Commission Delegated Regulation (EU) No 907/2014 [2017] OJ L 5/11.

¹¹ Council Regulation (EEC) No 1080/77 of 17 May 1977 on the supply of milk and certain milk products at reduced prices to schoolchildren [1977] OJ L 131/8.

¹² Commission Regulation (EEC) No 1598/77 of 15 July 1977 laying down detailed rules for the sale of milk and certain milk products at reduced prices to schoolchildren [1977] OJ L 177/22.

the CAP.¹³ This policy was adopted in the context of increased demand for daily consumption products such as bread, milk, sugar and beef following the Second World War, with the aim to encourage production through subsidies and minimum guaranteed prices with the ultimate goals of ensuring food security and facilitating regional development.¹⁴ Fulfilling its objectives beyond expectations, the surpluses that started to emerge in the 70s were addressed through various measures, of which the EU School Milk Scheme aimed to distribute the excess milk stock amongst schoolchildren.

The Common Market Organisation (CMO) provided Member States the competence to introduce such schemes at national level in 1968, and the Council Regulation (EEC) 804/68¹⁵ also enabled the subsidisation of the distribution of milk to schools under such schemes in the same year. Within the EU Scheme no national contribution was required, with the Scheme relying solely on EU funds.

The original clear-cut objective of the EU School Milk Scheme has gradually evolved into two shared objectives due to the nature of the Scheme. In addition to the “market” objective, with the aim of increasing EU milk consumption and the stabilisation of prices, a second objective of “nutrition and health” has been later recognised, by promoting increased consumption of milk and milk products also promoting healthy eating. Keeping in mind the original objective, however, the Scheme in its initial form did not include any health-related educational measures and monitoring and evaluation was also kept on a very low level.

In 1990, the Commission considered in an internal note that the Scheme was in fact not designed as a mean for disposal of the surplus milk but instead a true educational measure with a primary intent to promote the consumption of milk and milk products in schools and with an added nutritional aspect. Within the Commission document, the effect of reducing the milk surplus has been presented as a secondary effect of the Scheme.¹⁶

The Commission had the EU School Milk Scheme evaluated externally in 1999¹⁷, resulting in a recommendation to have the Scheme suspended after its 22 years of functioning. The evaluation measured the effectiveness and efficiency of the Scheme against the last documented objectives (i.e. increasing the milk and milk products consumption and positively impacting the healthy eating habits) and based purely on that concluded that the Scheme had “only a marginal positive impact and represents poor value for money” and that “the Commission should give serious consideration to withdrawing the measure”. In concrete terms, any impact of the Scheme on the milk products market was at best very small relative to the context of the total market and for the impact on the healthy eating habits it has been concluded that price does not seem to be a major factor influencing the consumption of milk and milk products. This means that the main delivery mechanism of the Scheme – the price subsidy, targets a factor of minor influence on the consumption behaviour and therefore cannot increase healthy milk consumption significantly.

Despite these low efficiency results of the Scheme, the evaluation backed the rationale of the Scheme as continuously relevant – the surplus of milk being there at that point and for another few years at least, and the nutritional goals in Member States were still not being met. Therefore,

¹³ Christopher A Birt, ‘Food and Agriculture Policy in Europe’, *AIMS Public Health*, 2016, available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5690269/#b34>.

¹⁴ Ibid.

¹⁵ Regulation (EEC) No 804/68 of the Council of 27 June 1968 on the common organisation of the market in milk and milk products [1968] OJ L 148/13.

¹⁶ European Court of Auditors, ‘Are the School Milk and School Fruit Schemes Effective?’, 2011, available at: https://www.eca.europa.eu/Lists/News/NEWS1110_24/NEWS1110_24_EN.PDF.

¹⁷ CEAS Consultants Ltd Centre for European Agricultural Studies, Institute for the Management of Dairy Companies Technische Universität München, ‘Evaluation of the School Milk Measure Final Report’, 1999, available at: https://ec.europa.eu/info/sites/default/files/food-farming-fisheries/key_policies/documents/ext-eval-schoolmilk-sum_1999_en.pdf.

alongside with the suspension of the Scheme, it has been recommended to re-invest the funds allocated for the Scheme to other measures that aim to meet the key objectives set for the EU School Milk Scheme and demonstrate reasonable effectiveness and are a better value for money than the EU School Milk Scheme. Such measures were suggested to be the following: measures increasing consumption of milk and milk products, measures contributing to the positive educational and nutritional development of children, and a development of a more efficient model in place of the EU School Milk Scheme, the latter being the preferred option according to the evaluation.

The Court of Auditors have reported no substantial initiative to reform the Scheme has been taken by the Commission in the aftermath of the evaluation report.¹⁸ In 2000, however, the Commission based on the evaluation, proposed a discontinuation of the Scheme. This proposal was rejected by the Council, in response to which the Directorate General VI - Agriculture came up with a new proposal incentivising Member States to share the financial burden of the Scheme on a 50/50 basis.¹⁹ This model aimed at maintaining the Scheme despite its low efficiency and an all-in-all tight budgetary framework based on it being defended in terms of broader health, nutritional and social objectives. Member States invoking such objectives were expected to contribute to the responsibility for expenditure under the Scheme.

This proposal has not been fully endorsed by the Council either and even though the Commission continued in its efforts to adjust the Scheme to a higher efficiency in the following years, these efforts were concluded to be only marginal by the Court of Auditors.²⁰

In 2008 a minor reform to the EU School Milk Scheme took place, including all pupils within the Scheme (also allowing secondary schools to participate within the Scheme) and putting more emphasis on the nutritional character of the Scheme demonstrated by adding a wider variety of dairy products and cutting down on added sugar. These changes/adjustments were adopted within the legal framework of a Commission Regulation (EC) 657/2008²¹, which laid down detailed rules for applying Council's Regulation (EC) 1234/2007 (Single Common Market Organisation Regulation)²² from the year before.

Although only a minor reform of the EU School Milk Scheme took place in the 2008, the period from 2007 to 2009 was significant in the context of the introduction of the EU School Fruit Scheme. In line with one of the objectives of the Single CMO Regulation,²³ the Scheme was adopted to encourage (at the time stagnating) consumption of fruits and vegetables with a specific focus on the most vulnerable consumers – young people. The new EU Scheme of School Fruit was formally set up by a Council Regulation (EC) 13/2009²⁴ in 2009, reflecting Council's political commitment to fight poor nutrition and increasing rates of child obesity (there has been a declining trend in healthy consumption and an increasing one for unhealthy foods especially among young people within the European market) and realizing that habits gained in childhood tend to last throughout the life of an individual. Prior to this came Commission's proposal on the Scheme, that was agreed to by the

¹⁸ European Court of Auditors, 'Are the School Milk and School Fruit Schemes Effective?', 2011, available at: https://www.eca.europa.eu/Lists/News/NEWS1110_24/NEWS1110_24_EN.PDF.

¹⁹ Ibid.

²⁰ Ibid.

²¹ Commission Regulation (EC) No 657/2008 of 10 July 2008 laying down detailed rules for applying Council Regulation (EC) No 1234/2007 as regards Community aid for supplying milk and certain milk products to pupils in educational establishments (2008) OJ L 183/17.

²² Council Regulation (EC) No 1234/2007 of 22 October 2007 establishing a common organisation of agricultural markets and on specific provisions for certain agricultural products (Single CMO Regulation) (2007) OJ L 299/1.

²³ Ibid.

²⁴ Council Regulation (EC) No 13/2009 of 18 December 2008 amending Regulations (EC) No 1290/2005 on the financing of the common agricultural policy and (EC) No 1234/2007 establishing a common organisation of agricultural markets and on specific provisions for certain agricultural products (Single CMO Regulation) in order to set up a School Fruit Scheme (2009) OJ L 5/1.

Council in November 2008 and following the Council Regulation a Commission Regulation (EC) 288/2009²⁵ was adopted laying down detailed rules for EU aid within the Scheme.

Within the EU School Fruit Scheme, the distribution of fruits and vegetables were originally intended to be free of charge and done through a unified distribution channel outside the canteens. In contrast to the EU School Milk Scheme, the Fruit Scheme introduced obligatory co-financing by Member States for educational measures. The source of these national contributions was left upon the discretion of each individual Member State and could have been based on public, private or parental funding. There was no possibility to circumvent paying for accompanying measures by not providing them at all as the distribution of fruits and vegetables was conditional to the educational measures. In addition to this limitation, the Commission has also introduced a list of excluded products for which funding was not available as they were designated to be unhealthy. A fixed budget was introduced for the Scheme and allocation of the funds was based on specific criteria. In terms of further Member States responsibilities, each individual Member State had to draw up their own strategy and was responsible for monitoring and evaluation measures.²⁶ Many of the new aspects of this Scheme in comparison to the Milk one, including the responsibility for drawing up a national strategy or mandatory educational measures were also implemented within the context of the EU School Milk Scheme in the future. With the Commission's Proposal for a new financial framework for the CAP in the years 2014 to 2020, significant changes to the financing of the EU School Fruit Scheme and an even strengthened educational dimension were introduced (only adopted later).²⁷

2.2.2. Evaluation of the Schemes by the European Court of Auditors and Commission's Impact Assessment

As described, 2011 was not only a year of changes for the Schemes, but also a year in which evaluation of the Schemes by the European Court of Auditors took place. As only very little has changed in the past 10 years, the inefficiency of the EU School Milk Scheme remained the most criticised. In a cost-benefit analysis the Scheme proceeded to produce a very poor ratio, the market objective of the Scheme seemed diminished by a significant deadweight of payments for quantities which the beneficiaries would have purchased anyway, and low subsidy rates, despite no budgetary ceiling for the Scheme, highlighted the fact that the Scheme would not survive without significant national contributions, that were not mandatory at the same time. Other problems were identified in the non-existence of the educational measures, no mechanisms for targeting nutritional priority needs, and the low visibility of the Scheme. Increasing the visibility of the Scheme was at the same time considered to be among the solutions to the unattractive design of the Scheme that produces disproportionate administrative burden and low aid rate, together with the introduction of mandatory co-financing models.²⁸

Following the evaluation by the Court of Auditors from 2011, in 2012, in the context of the proposal for an amendment of the Regulation, the Commission conducted an Impact Assessment (IA) of the

²⁵ Commission Regulation (EC) No 288/2009 of 7 April 2009 laying down detailed rules for applying Council Regulation (EC) No 1234/2007 as regards Community aid for supplying fruit and vegetables, processed fruit and vegetables and banana products to children in educational establishments, in the framework of a School Fruit Scheme (2009) OJ L 94/38.

²⁶ AFC Management Consulting AG, CO CONCEPT Marketing Consulting, 'Evaluation of the European School Fruit Scheme Final Report', 2012, available at: <https://op.europa.eu/en/publication-detail/-/publication/f13ff859-4555-491f-bca6-3a7eb563047a/language-en/format-PDF/source-search?msckid=6d85c8e0b03711ecb36b17dfa77967fd>.

²⁷ European Commission, 'Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) No 1308/2013 and Regulation (EU) No 1306/2013 as regards the aid scheme for the supply of fruit and vegetables, bananas and milk in the educational establishments' (Explanatory Memorandum) COM (2014) 32 final.

²⁸ European Court of Auditors, 'Are the School Milk and School Fruit Schemes Effective?', 2011, available at: https://www.eca.europa.eu/Lists/News/NEWS1110_24/NEWS1110_24_EN.PDF.

EU School Fruit Scheme.²⁹ Within this assessment the public was consulted through online questionnaires, hearings and a stakeholder meeting in the spring of 2013. Despite the document not being made accessible to the public, the findings of this assessment have been summarised in an explanatory memorandum to a legislative proposal submitted to the European Parliament and the Council in 2014³⁰. Having compared impacts of three different potential scenarios for the two Schemes (1 = maintaining the status quo, 2 = introducing changes beyond the CAP 2020 but only limiting these to the provision of the educational measures and increasing synergies between the Schemes, and 3 = common legal and financial framework for the two schemes) against their potential to achieve the objectives of the Schemes, the assessment resulted in a conclusion that the Schemes needed to be revised. The “new common framework” scenario came out of the assessment as a strongest option due to allowing for a progressive refocus of the Schemes towards the overarching long-term problems and goals, for an establishment of a crucial link of young people with agricultural and the variety of its products, and for an overall administrative simplification.

In 2012 and 2013 two external evaluation reports were published by the Commission – one for each of the two Schemes.^{31 32} In terms of the outcomes of these, the evaluation of the EU School Fruit Scheme was more positive than the evaluation of the EU School Milk Scheme, with EU funds playing an essential role in provision of fruit and vegetable to children in most Member States and the involvement of the EU providing more credibility to national and regional schemes. The administrative burden of the Schemes was concluded to be lower in comparison to other measures within the CAP, however, notwithstanding the reporting obligations being intense for national controlling authorities – monitoring and reporting overlapping for both Schemes and products checks overlapping with national quality checks. Furthermore, involved schools and suppliers themselves reported excessive organisational and logistical burden (safety guarantees, applications for licenses, collection of parental contributions, etc.).

2.2.3. Extension of the Schemes and the Commission’s Proposal

Despite the not-so-favourable evaluation, in June 2013 both Schemes were extended and the annual budget for the EU School Fruit Scheme was increased from the original maximum budget of 90 million per school year (Council Regulation No 13/2009 art. 2(4)(a)) by an additional 60 million euros per year within the CAP Reform,³³ this demonstrating the significant changes to the financing of the Scheme as previously mentioned.

In the winter of the same year, Regulation (EU) 1308/2013³⁴ has been adopted by the Council and the Parliament establishing separate financial and legal frameworks for the Schemes. This regulation highlighted the relevance of the Schemes within the broader context of the CAP– consumption encouraged to durably increase the share of the relevant products in the diets of children when the

²⁹ European Commission, ‘Staff Working Document – Impact Assessment accompanying the document Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) No 1308/2013 and Regulation (EU) No 1306/2013 as regards the aid scheme for the supply of fruit and vegetables, bananas and milk in the educational establishments’ SWD (2014) 28.

³⁰ European Commission, ‘Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) No 1308/2013 and Regulation (EU) No 1306/2013 as regards the aid scheme for the supply of fruit and vegetables, bananas and milk in the educational establishments’ (Explanatory Memorandum) COM (2014) 32 final.

³¹ AFC Management Consulting AG, CO CONCEPT Marketing Consulting, ‘Evaluation of the European School Fruit Scheme Final Report’, 2012, available at: <https://op.europa.eu/en/publication-detail/-/publication/f13ff859-4555-491f-bca6-3a7eb563047a/language-en/format-PDF/source-search?msckid=6d85c8e0b03711ecb36b17dfa77967fd>.

³² AFC Management Consulting AG, CO CONCEPT Marketing Consulting, ‘Evaluation of the European School Milk Scheme Final Report’, 2013, available at: <https://op.europa.eu/en/publication-detail/-/publication/5ff5eaa2-bf17-478c-97d6-4eb053f8789d/language-en?msckid=57796c22b03911ec914334ecfb5ffbf>.

³³ European Commission, ‘CAP Reform – an explanation of the main elements’ (Memo) COM (2013) 621.

³⁴ Regulation (EU) No 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common organisation of the markets in agricultural products and repealing Council Regulations (EEC) No 922/72, (EEC) No 234/79, (EC) No 1037/2001 and (EC) No 1234/2007 (2013) OJ L 347/671.

eating habits are being formed, contributing to the achievement of stable markets and ensured availability of current and future supplies.

Shortly after entering into force, the Commission proposed an amendment³⁵ to the Regulation (EU) 1308/2013 based on the recommendations made during the evaluations and the outcomes of the impact assessment. Within an explanatory memorandum to the proposed amendment the Commission explained the need for a unified legal and financial framework for both Schemes to maximise the management efficiency and the aim of the amendment to strengthen the educational dimension of both Schemes (15-20% of the budgets to be used for accompanying measures), to contribute to the reconnection of young citizens with the agriculture (60% of accompanying measures to be dedicated to agriculture) and to increase visibility of the EU intervention (EU wide communication campaign to be started). The Commission based this desired unification on the shared objective of both Schemes of increasing healthy eating in short time while also having educational influence on healthy eating habits in the long run, contributing to the efforts of decreasing obesity and malnourishment among young people.

Table 1: Comparison between the situation before the amendment and that proposed by the amendment

BEFORE THE AMENDMENT	PROPOSED BY THE AMENDMENT
Objectives of the Schemes similar but administrative, legal and financial frameworks different	Common procedures for selection of aid applicants, distribution of products (fresh fruit and drinking milk only! as the most frequently distributed to reduce administrative burden), aid payments and administrative controls
No fixed budget for EU contribution	Fixed overall limit on EU expenditure for both Schemes (80 million Milk, 150 million Fruit) with a certain flexibility for the Member States to transfer certain amounts between the two Schemes
No ceiling on EU aid within the Milk Scheme	Ceiling for milk subsidy with an increased aid per portion
Compulsory national funding within the Fruit Scheme	Fixed EU aid per portion of fruit with national top up
No mandatory educational measures within the Milk Scheme	Educational measures compulsory for both Schemes
Weak evaluation and monitoring systems	Mandatory national strategies and the development of common evaluation methodology

2.2.4. The legislative process

In 2014, the EPRS has issued a reaction³⁶ to the Commission's Impact Assessment. In this initial appraisal, the EPRS, which is tasked with checking the quality of Commission's impact assessments, criticised the insufficient reasoning for the Scheme only supporting two products – fresh fruit and

³⁵ European Commission, 'Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) No 1308/2013 and Regulation (EU) No 1306/2013 as regards the aid scheme for the supply of fruit and vegetables, bananas and milk in the educational establishments' (Explanatory Memorandum) COM (2014) 32 final.

³⁶ European Parliamentary Research Service, 'Review of the school distribution programmes in the area of agriculture: Impact Assessment of a Commission proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) No 1308/2013 and Regulation (EU) No 1306/2013 as regards the aid scheme for the supply of fruit and vegetables, bananas and milk in the educational establishments (COM (2014) 32 final)' (2014): [https://www.europarl.europa.eu/RegData/etudes/BRIE/2015/528795/EPRS_BRI\(2015\)528795_REV1_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2015/528795/EPRS_BRI(2015)528795_REV1_EN.pdf) accessed 4 May 2022.

drinking milk, pointing out the lack of discussion on what the impact of this limitation would be on different Member States and on the children and their preferences. It was also highlighted that the proposed financial changes do not consider possible negative impacts such as lower quality of products or a potential need for high parental contribution as the national top up cannot be expected to stay the same once made voluntary. The EPRS further pointed out that the desired reduction of administrative burden might not be efficiently answered by unifying the Schemes as this solution does not consider the difficulties in establishing logistical and distributional synergies rising from the inherent differences in the products distributed within the two Schemes and the different ways of addressing the shared objectives. It also suggested the possibility of increased administrative burden for national administrators and schools arising from the mandatory accompanying measures and the monitoring and reporting obligations.

Despite the recommendation of the incoming Juncker Commission to put the proposal on hold and suspend all work related to it because of an ongoing review in December 2014, the Council decided to carry on with their work relating to the Proposal ultimately resulting in an adoption of a report in April 2015 endorsing the Commission's plan to merge the two Schemes.³⁷ The report however was far from being purely affirmative of the Commission's Proposal, including 29 amendments to it. Essentially, what the Council was proposing was extending the list of the healthy products distributed to children, a fairer distribution of EU funds among Member States, paying more attention to educational measures and expanding the budget of the EU School Milk Scheme by 20%.³⁸

Additionally, while examining the Commission's Proposal the Council has identified an issue with its legal basis – art 43(3) TFEU being unanimously agreed upon to be more appropriate by all Member States than art 43(2), the main difference between the two being the less prominent role of the Parliament within the legislative procedure in the former.³⁹

To resolve this, the Parliament has opened interinstitutional negotiations in May 2015.⁴⁰ During the fifth trialogue meeting in December 2015, the negotiating teams have agreed upon applying art 43(2) TFEU and hence the ordinary legislative procedure when deciding on the Schemes' budgets, the funds allocation criteria and transfer of funds between the Schemes, and art 43(3) TFEU when deciding on the actual fixing of the national allocations.⁴¹

After the Council has endorsed the compromise text in January 2016, the Parliament has adopted a legislative resolution on the Proposal amending the Regulation (EU) 1308/2013. Based on this resolution, the Council has adopted the Regulation (EU) 2016/791⁴² on 11 April 2016.

2.3. Objectives, target audiences and measures of the current EU School Scheme for fruits, vegetable and milk

In 2016, in its re-established position within the legislative procedure, the Parliament has strengthened the Commission's proposal in terms of the focus on healthy eating, adopting a total budget of 250 million euros (100 million euros for Milk and 150 million euros for the Fruit Scheme),

³⁷ European Parliamentary Research Service, 'At a glance – New scheme for fruit and milk in schools', 2015, available at: <https://www.europarl.europa.eu/EPRS/EPRS-AaG-557016-New-scheme-fruit-milk-in-schools-FINAL.pdf>.

³⁸ Ibid.

³⁹ Ibid.

⁴⁰ European Parliamentary Research Service, 'At a glance – Reformed scheme for fruit and milk in schools', 2016, available at: [https://www.europarl.europa.eu/RegData/etudes/ATAG/2016/577993/EPRS_ATA\(2016\)577993_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/ATAG/2016/577993/EPRS_ATA(2016)577993_EN.pdf).

⁴¹ European Parliamentary Research Service, 'Agreed text resulting from interinstitutional negotiations', 2016.

⁴² Regulation (EU) 2016/791 of the European Parliament and of the Council of 11 May 2016 amending Regulations (EU) No 1308/2013 and (EU) No 1306/2013 as regards the aid scheme for the supply of fruit and vegetables, bananas and milk in educational establishments (2016) OJ L 135/1.

ensuring a balanced distribution of funds among Member States and a wider range of eligible products provided they do not contain sweeteners, artificial flavour enhancers and added salt, sugar or fat – this is when other dairy products such as yoghurt and cheese and processed fruit and vegetable products such as soups were included to the Scheme. The Parliamentary Amendments also highlighted efforts to be made for distribution of local and regional products and in accompanying measures supporting the distribution. National strategies were to be drawn up for both Schemes.⁴³

The primary objective of the current Scheme is to encourage children to follow healthy diet and lifestyle through distribution of fruit, vegetables, milk and milk products in educational establishments, accompanied by various educational measures.⁴⁴ This aim of the Union came in response to consumption of such products within the Union not meeting the international nutritional recommendations, while the rise of consumption of processed food is further causing increased rates of obesity in the population.⁴⁵ The encouraged consumption of fruit, vegetables, milk and milk products by school children durably increasing the share of these products in the diets of children at the stage when their eating habits are being formed also contributes to the broader CAP objective of stabilising markets and ensuring the availability of current and future supplies.⁴⁶

In the pursuance of the goal of altering children's' eating habits in the formative years, the Scheme is targeted at children regularly attending nurseries, pre-schools, primary and secondary-level educational establishments.⁴⁷

The Scheme consists of distributional, educational and informational measures. Within the distribution aspect it supports the distribution of fruit, vegetables, milk and milk products while excluding products with added sugar, salt, fat, artificial flavour enhancers or sweeteners. It is left to the discretion of Member States which concrete products are being distributed provided they help achieve the Scheme's objective of helping children to follow healthy diet. While there is a priority for fresh fruit and vegetables and plain milk, processed fruit and vegetables products and various milk products may be included for the distribution to children. In deciding on the distributed products, criteria such as seasonality, availability and environmental impact shall be considered with Member States being also able to encourage for example local or organic products.⁴⁸ Member States have a great deal of discretion in how they implement the Scheme, and what products and administrative procedures are included within the national schemes.

In terms of educational measures, the participating schools are to facilitate lessons, farm visits, school gardens, cooking workshops, games, etc. to teach children about healthy lifestyle and eating and reconnect them with agriculture. These accompanying measures are also encouraged to include teachers/parents as role models for the children healthy lifestyle.⁴⁹

⁴³ European Parliament, 'Aid Scheme for the Supply of Fruit and Vegetables, Bananas and Milk in the Educational Establishments', 2019, available at: <https://www.europarl.europa.eu/legislative-train/theme-deeper-and-fairer-internal-market-with-a-strengthened-industrial-base-products/file-school-schemes>.

⁴⁴ European Commission, 'School scheme explained', available at: https://ec.europa.eu/info/food-farming-fisheries/key-policies/common-agricultural-policy/market-measures/school-fruit-vegetables-and-milk-scheme/school-scheme-explained_en#legalbases.

⁴⁵ Ibid.

⁴⁶ Regulation (EU) No 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common Organisation of the markets in agricultural products and repealing Council Regulations (EEC) No 922/72, (EEC) No 234/79, (EC) No 1037/2001 and (EC) No 1234/2007 [2013] OJ L 347/671.

⁴⁷ Ibid.

⁴⁸ European Commission, 'School scheme explained', available at: https://ec.europa.eu/info/food-farming-fisheries/key-policies/common-agricultural-policy/market-measures/school-fruit-vegetables-and-milk-scheme/school-scheme-explained_en#legalbases.

⁴⁹ Ibid.

Information measures are intended to raise awareness/visibility of the Scheme and of the EU funding, and to monitor and evaluate the Scheme to ensure proper functioning of it and possibly identify areas for improvement.⁵⁰

It is important to highlight the fact that Member States have a great deal of flexibility in terms of how they implement the Scheme. Each Member State has its own national strategy on how they propose to implement the Scheme, in regards to not only the types of products eligible for distribution, but also in terms of the administrative structures, procurement procedures, monitoring and evaluation requirements, among other aspects.

⁵⁰ Ibid.

3. Evaluation results

3.1. Evaluation questions and intervention logic

Chapter 2 dealt with the assessment of the policy context before and at the time of the preparation of the ongoing EU school fruit, vegetables and milk Scheme. This chapter concerns the assessment of the relevance, coherence, effectiveness, efficiency, impacts and EU added value of the Scheme. This evaluation addresses a number of questions, covering the evaluation criteria. Additionally, an assessment is made regarding the impact of the EU School Scheme. In line with the Better Regulation Guidelines, the effectiveness analysis focuses on the extent to which the objectives of the EU school fruit, vegetables and milk Scheme have been achieved, the efficiency analysis looks at the costs and benefits of the EU School Scheme, and the analysis of relevance investigates the relationship between the needs and problems and the objectives of the policy. Coherence looks at to what extent is the EU Scheme coherent and does not contradict other interventions with similar objectives. Finally, EU added value assesses the changes (impacts) that can reasonably be attributed to the Scheme, as designed and implemented at EU level, rather than to what could have been achieved if Member States have acted alone.

Table 2 outlines the research questions (evaluation matrix).

Table 2: Evaluation matrix

Question	Sub question
Relevance - To what extent is the EU school fruit, vegetables and milk Scheme pertinent to the needs, problems and issues to be addressed?	To what extent did the scope and objectives of the Scheme remain relevant over the implementation period?
	To what extent do the original objectives of the Scheme correspond with the current needs?
	How did the Scheme correspond to wider EU goals/priorities?
	To what extent is the Scheme relevant given the objectives?
	To what extent do the needs/problems require intervention at the EU level?
	What was the impact of COVID-19 on the needs, problems and issues to be addressed?
Coherence - To what extent is the EU school fruit, vegetables and milk Scheme coherent and does not contradict other interventions with similar objectives?	To what extent are the various elements of the intervention coherent with one another?
	To what extent is the Scheme coherent with wider EU policies?
	To what extent is the Scheme coherent with other relevant national policy interventions?
	To what extent is the intervention coherent with international obligations, including the SDGs?
Effectiveness - To what extent have the objectives of the EU school fruit, vegetables and milk Scheme been achieved?	What are the main benefits of the Scheme?
	How has the Scheme achieved the objectives of encouraging children to follow a healthy diet and lifestyle and reconnecting children to agriculture and teach them about healthy eating habits?
	What does the available data say on quantitative/qualitative effects?
	What external factors have affected progress towards objectives?
	How did the administrative procedures impact the effectiveness?

Question	Sub question
	Any unexpected or unintended effects (including the impact of COVID-19)?
Impacts – What have been the impacts of the EU school fruit, vegetables and milk Scheme?	What are the impacts of the Scheme for each of the stakeholders groups: children, suppliers (producers and distributors), schools, the responsible authorities (government and implementation agencies), and other relevant stakeholders?
	What is the impact on consumption of fruits, vegetables and milk?
	What measures have been taken over time to improve the impact of the Scheme?
Efficiency - To what extent have the effects of the EU school fruit, vegetables and milk Scheme been achieved at a reasonable cost?	Are data available on the costs and benefits for the various stakeholders? If so, what qualitative information on costs and benefits is available?
	Are the costs justified?
	Have the changes/effects of the Scheme been achieved at initially expected costs? Or were these different for any reasons?
	Have inefficiencies been identified? Could the implementation have been done in a more efficient way? What lessons can be learned?
EU-added value – What is the EU added value of the EU school fruit, vegetables and milk Scheme?	Could the objectives have been achieved by Member States alone?
	Could results/outputs/impacts of the Scheme have been achieved without EU intervention?
	What are the likely consequences of stopping the Scheme?

Source: Panteia, 2022.

Additionally, an important feature when designing and conducting an evaluation is understanding the rationale and causal mechanisms involved in the policy intervention under study, which in this case is EU School's Scheme for fruit, vegetables and milk products. This is known as the intervention logic. Mapping out the process underlying how a policy intervention is expected to generate outputs, outcomes and impacts is important to establish which aspects of an intervention require consideration within an evaluation. The intervention logic is important to operationalise evaluation questions for a given programme or policy measure. The following text describes the intervention logic, which can be found in Figure 1 below, as developed by Panteia for the purposes of this research paper.

Needs, Objectives and Activities

The EU Scheme, as applicable since August 2017, aims to address two key issues – the fact that consumption habits of children in the EU do not meet recommended nutritional intake at, both, international and national levels; and that the consumption by EU children of processed foods (i.e. foods with high levels of added sugar, salt, fat and/or additives) has been on the rise. Based on these needs, the EU seeks to encourage children to:

- **adopt and learn about a healthy diet and lifestyle;**
- **reconnect children with agriculture; and,**
- **raise awareness and educate children on matters such as local food chains, organic farming, sustainability in food production, and food waste.**

This Scheme, which is a combination of the preceding school fruit and vegetables Scheme and the school milk Scheme, relies on a threefold approach in the form of support for the appropriate distribution of fruit, vegetables and milk products, as supplemented by educational and information measures. More concretely, the EU school's Scheme promotes the following activities to pursue its aims:

Distribution measures

- **Effective distribution of fruit, vegetables and milk products for children in nursery to secondary school level;**
- **Primary goal is to distribute fresh fruits, vegetables and plain milk but alternative options are also possible with the distribution of processed fruit and vegetable products, such as fruit juices, and soups, and other milk products, such as yoghurt and cheeses;**
- **Distribution to consider seasonality, availability, health and environmental factors, locality, short-supply chains, organic nature and products' quality, as well as Member States' approval of products listed as per national health and nutrition authorities and varied nutritional needs.**

Educational measures

- **Provision of lessons on the subject matter at nursery and primary school level, including classes on local food chains, organic farming, sustainable food production and food waste;**
- **Other activities include farm visits, developing school gardens, conducting tasting and cooking workshops, hosting theme days and introducing new games;**
- **Promotion of teacher and parent involvements is also recommended.**

Information measures

- **Aimed at raising awareness on the Scheme;**
- **Monitoring and evaluation activities to enable the proper functioning of the Scheme.**

Inputs and Budget

The EU school's Scheme is established via the following legal instruments:

- **EU Regulation 1308/2013, Articles 22 to 25 and Annex V;**
- **EU Regulation 1307/2013, Article 5 and Annex I;**
- **EU Implementing Regulation 2017/39, with rules for uniform implementation of the Scheme;**
- **EU Delegated Regulation 2017/40, with additional specific rules for the implementation of the Scheme.**

The total EU budget for the Scheme, in the period 2017-23, was set at €250 million per school year (up to €150 million for fruits and vegetables and up to €100 million for milk and dairy products). After the withdrawal of the United Kingdom from the EU, the total EU budget for the Scheme amounts to €220.8 million per school year, consisting of up to €130.6 million for fruit and vegetables and up to €90.1 million for milk.

Outputs

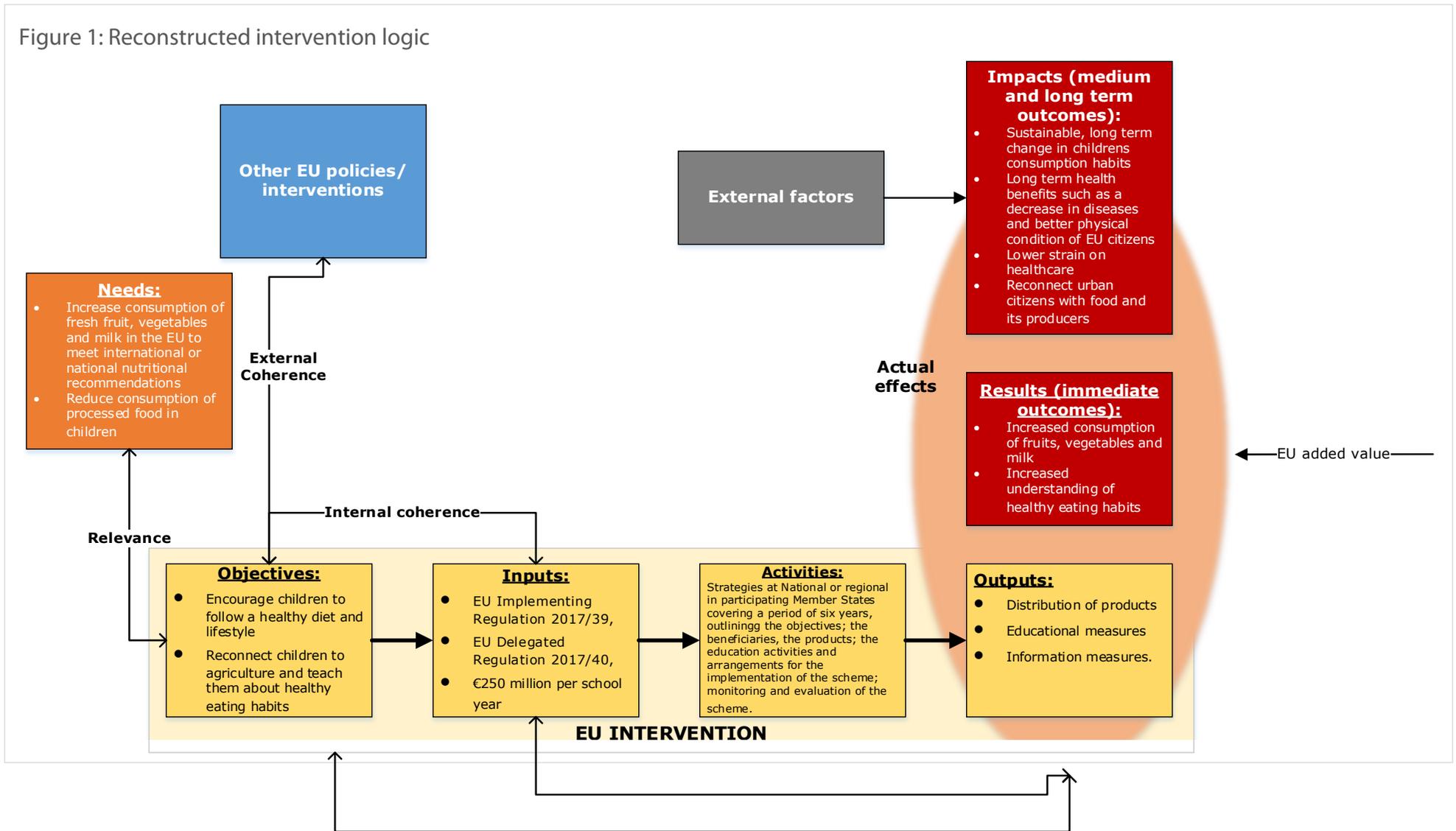
Outputs generated by the EU school's Scheme include national level strategies, as well as monitoring and evaluation reports. Accordingly, participating Member States have to draw up a strategy, at either national or regional level, which encompasses a period of 6 years. The national level strategies provide information on objectives (such as an increase in fruit and vegetables consumption to meet the recommended five portions per day), beneficiaries of the Scheme (e.g. children in primary schools), relevant products that will be focused on, education activities and other arrangements for the implementation of the EU school's Scheme. Based on this, each Member State has to monitor and evaluate progress. In practical terms this means that Member States have to produce one monitoring report per academic year and one evaluation report per 5 academic years. The first set of the latter will be available on 01 March 2023. The Commission does not approve the

countries' strategies, or monitoring and evaluation reports. It makes them public, and provides a contact point in each country for information on how to participate and details on implementation. At the EU level, currently available outputs include five separate budget reports for every academic year (from 2017/2018 to 2021/2022) and annual school monitoring report summaries for the first four academic years (from 2017/2018 to 2020/2021), since the launch of this Scheme. Additionally, from 29 June 2021 until 27 July 2021, a feedback period was initiated (in the context of the review of the Scheme by the Commission), which resulted in 74 different responses from stakeholders.

Results and Impacts

The expected results and impacts in the EU are that of a general increase in the healthy consumption of fruits, vegetables and milk whilst also integrating better healthy eating habits into children's routines both in the short and long term. These direct results correlate with trickle down impacts including a greater promotion of sustainable food production; long term health benefits for EU individuals leading to decreased rates of diseases and better physical conditions; a decrease in the strain put on healthcare services; and, reconnect urban citizens with healthy food and its producers.

Figure 1: Reconstructed intervention logic



3.2. Relevance

This section looks at relevance, and specifically **to what extent is the EU school fruit, vegetables and milk Scheme pertinent to the needs, problems and issues to be addressed**. The following evaluation questions will be addressed in this section.

Relevance - To what extent is the EU school fruit, vegetables and milk Scheme pertinent to the needs, problems and issues to be addressed?	To what extent did the scope and objectives of the Scheme remain relevant over the implementation period?
	To what extent do the original objectives of the Scheme correspond with the current needs?
	How did the Scheme correspond to wider EU goals/priorities?
	To what extent is the Scheme relevant given the objectives?
	To what extent do the needs/problems require intervention at the EU level?
	What was the impact of COVID-19 on the needs, problems and issues to be addressed?

In order to address these questions, firstly it must be determined whether the Scheme's objectives and the scope remained relevant over the implementation period. Secondly, it must be determined whether the actual activities carried out under the Scheme remained relevant. Information was collected on the basis of desk research (including analysis of the Member States national strategies and annual monitoring reports), the national authorities survey, the schools survey, stakeholder interviews, as well as information relating the sufficient/insufficient practices. For the schools survey, a significant number of responses was collected from stakeholders in Germany, Poland, Romania, Luxembourg, Portugal and Croatia, all of which have been the subject of further study in this section.

3.2.1. Relevance of the objectives

The Scheme's primary objective is to promote the healthy eating habits of children through the distribution of fruit, vegetables, milk and milk products in educational establishments, accompanied by various educational measures. According to Regulation (EU) No 1308/2013, 'the consumption of fruit and vegetables, as well as of milk and milk products by school children should be encouraged with a view to durably increasing the share of those products in the diets of children at the stage when their eating habits are being formed, thereby contributing to the achievement of the objectives of the CAP, in particular stabilising markets and ensuring the availability of both current and future supplies.'⁵¹

In this respect, **stakeholders consulted suggest that the objective of the Scheme remains relevant**.⁵² For instance, the European Dairy Association (EDA) has noted that the original objective of the EU School Milk Scheme, to increase consumption and healthier eating habits among children, remain relevant. Consuming milk and other dairy products are considered important for nutrient intake throughout life as well as for learning to drink milk and consume dairy products at a young age in order to continue to drink milk in adulthood.⁵³ COPA-COGECA (interest group for European farmers and agri-cooperatives) has noted that the Scheme has successfully provided children with fruit, vegetables and milk for a number of years and contributes to promoting a balanced diet and

⁵¹ Regulation (EU) No 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common Organisation of the markets in agricultural products and repealing Council Regulations (EEC) No 922/72, (EEC) No 234/79, (EC) No 1037/2001 and (EC) No 1234/2007 [2013] OJ L 347/671.

⁵² National authorities survey, Panteia, 2022.

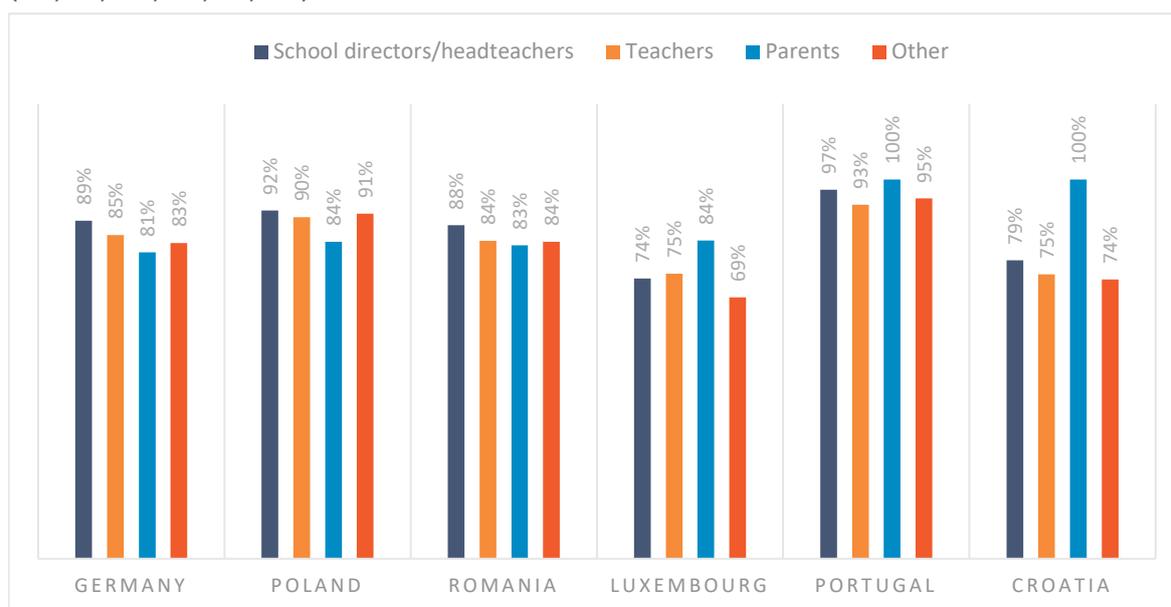
⁵³ Stakeholder interview, European Dairy Association, Panteia, 2022.

healthy eating habits.⁵⁴ The number of Member States and the rate of its uptake (i.e. in the year 2019/20, some Member States like Bulgaria, the Czechia or Estonia exhausted 100% of the budget allocated for both Schemes) clearly shows the relevance and importance of this Scheme.⁵⁵

3.2.2. Relevance of the scope

In regards to the scope of the Scheme, **stakeholders are highly positive regarding the relevance of the provision and education measures relating to fruits and vegetables that meet current needs.** This can be highlighted by results from the school survey, whereby a high number of respondents believe that the provision of fruits, vegetables and also milk and/or milk products has a positive impact on children following a healthy diet and lifestyle. Around 93% of school directors and 92% of teachers who took part in the survey in Germany for example agree with this in respect of the fruits and vegetables element of the Scheme, with similar results in both Poland (91% for both) and Portugal (96% and 95%, respectively). As can be seen from Figure 2, stakeholders are also very positive in regards to the impact of educational measures relating to fruits and vegetables having a positive impact on children.

Figure 2: % of survey respondents who agree with the statement 'Educational measures under the EU school Scheme relating to fruit and vegetables have a positive impact on the behaviour of children to pay more attention to following a healthy diet and lifestyle'. (DE, PL, RO, LU, PT, HR)



Source: Schools survey, Panteia, 2022.

A special Eurobarometer carried out in 2022 also indicated that more than eight in ten Europeans consider that fresh fruits and vegetables should be distributed through the schools Scheme.⁵⁶

As regards to milk, however, based on an analysis of the survey results and feedback submitted by various stakeholders to the Commission in the context of the review of the Scheme, **various**

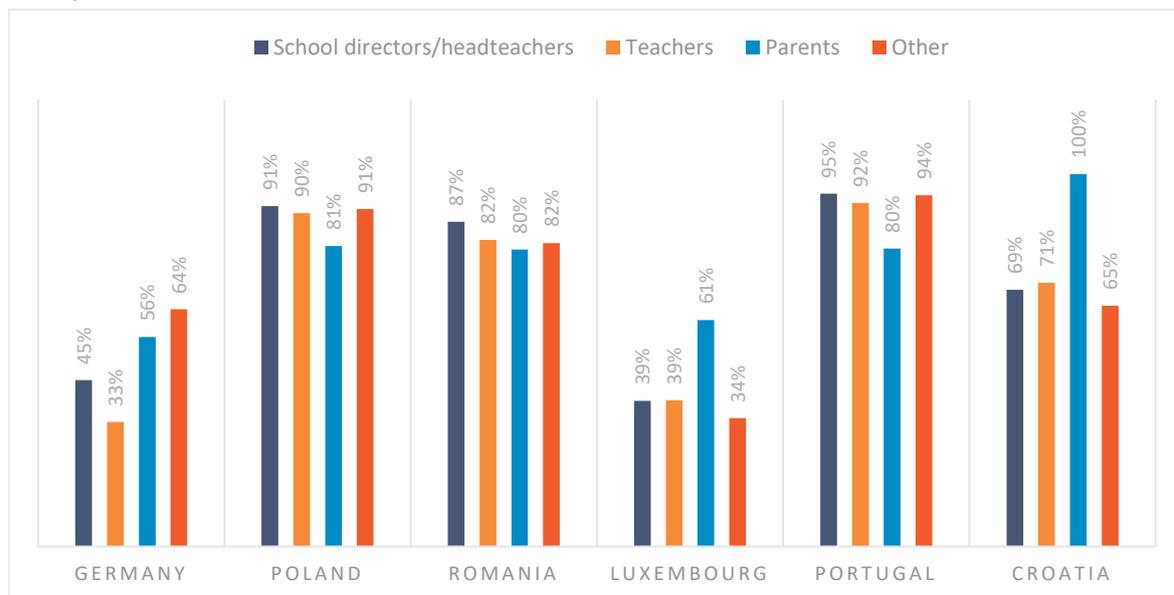
⁵⁴ Position of Copa-Cogeca submitted to Commissions Review of the EU school fruit, vegetables and milk scheme, 2021, available at: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12970-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme/F2663178_en.

⁵⁵ Ibid.

⁵⁶ Special Eurobarometer 520, 'Europeans, Agriculture and the CAP', 2022, available at: <https://europa.eu/eurobarometer/surveys/detail/2665>.

stakeholders point out that the EU School Scheme does not currently address the relevant needs. In particular, these stakeholders are slightly less positive regarding the relevance of milk in the context of the Scheme, in line with an ongoing trend towards plant-based alternatives. This is also somewhat illustrated in the results of the stakeholder survey conducted for this research paper, whereby in regards to whether the provision of milk and/or milk products in a school setting has a positive impact on children to pay more attention to following a healthy diet and lifestyle, only 25% of school directors/head teachers surveyed in Luxembourg agreed with this, and across other Member States, results were lower than for that of fruits and vegetables. However, in some cases there were exceptions, for example, 95% of school directors/head teachers and teachers surveyed in Portugal reacted positively in regards to impact of the provision of education measures relating to milk and or milk products on children in terms of following a healthy diet and lifestyle. As can be seen from Figure 3, there are differences between Member States regarding the provision of educational measures in relation to milk products in terms of having a positive impact, which is less apparent when compared to fruits and vegetables.

Figure 3: % of survey respondents who agree with the statement 'Educational measures under the EU school Scheme relating to milk and/or milk products have a positive impact on the behaviour of children to pay more attention to following a healthy diet and lifestyle' (DE, PL, RO, LU, PT, HR)



Source: Schools survey, Panteia, 2022.

There have been calls from some stakeholders (who sent feedback to the Commission review of the Scheme) to ensure that plant-based drinks are to be included in the scope of the eligible products, which can be noted on the basis of five grounds: to make the transition to sustainable food systems, promote health and nutrition, guarantee socio-economic fairness, promote sustainable plant-based diets and ensure level playing field within the EU⁵⁷. On the other hand, stakeholders from the dairy industry argue against the inclusion of plant-based milk alternatives, on the basis of a number of arguments, which include that the nutrient richness of milk cannot be

⁵⁷ Position of Oatly submitted to Commissions Review of the EU school fruit, vegetables and milk scheme, 2021, available at: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12970-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme/F2663238_en.

replaced by plant-based drinks that are marketed as alternative to milk.⁵⁸ Including plants based drinks on the other hand would also recognise the needs among children who cannot or does not want to drink traditional cows' milk, thus removing structural hurdles hindering the shift to plant-based diets.⁵⁹ The European Alliance for Plant-Based Foods (EAPF) also addresses the issue that the milk component of the Scheme disregards the environmental impacts of dairy, the diversity of food sources for essential nutrients, and the disadvantage of crop farmers who do not benefit from the Scheme. The EAPF has called on the European Commission and Member States to revise the EU School Scheme and to integrate plant-based foods as part of eligible products.⁶⁰ The recent Eurobarometer showed that one quarter on Europeans believe plant-based foods should be included in the scope of the Scheme.

Other stakeholders advocate for an increased scope of the Scheme to include additional products. For instance, the Whole Grain Initiative (WGI) has advocated for the extension of the EU's School Fruit and Vegetables Scheme to include whole grain products, in order to increase children's preference for such foods, which may increase subsequent whole grain consumption by children outside of school and in later years.⁶¹ Processed fruit and vegetable products have also been suggested as an additional type of product that can contribute to the goals of the Scheme. In particular, processed fruit and vegetable products have a longer shelf-life, which can help to reduce food waste.⁶² OPTA – the Association of Organic Processing and Trade Companies in Europe has also noted that there is strong need to raise the demand for organic products, and that the EU school fruit, vegetables and milk Scheme offers a major chance to fulfill the strategic commitments and plans of the EU Commission in relation to this.⁶³ They therefore recommend a 25% minimum share of organic fruits, vegetables and milks/drinks offered under the future EU school Scheme – in line with the Organic Action Plan.⁶⁴ In France, the aim is to encourage the distribution of quality products that promote children's knowledge of organic farming and sustainable production, especially in regards to geographical indications.

3.2.3. Relevance of activities

Relevance of provision measures

National authorities report positively in regards to the ongoing relevance of the provision activities. The implementation flexibility inherent to the Scheme allows Member States to prioritise different types of products in line with their national priorities. This can be seen from Figure 4, which

⁵⁸ Position of Dutch Dairy Association (Nederlandse Zuivel Organisatie) submitted to Commissions Review of the EU school fruit, vegetables and milk scheme, 2021, available at: <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12970-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme/details/F2663158> en.

⁵⁹ Position of Oatly submitted to Commissions Review of the EU school fruit, vegetables and milk scheme, 2021, available at: <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12970-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme/F2663238> en.

⁶⁰ Position of European Alliance for Plant-based Foods submitted to Commissions Review of the EU school fruit, vegetables and milk scheme, 2021, available at: <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12970-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme/F2663160> en.

⁶¹ Position of Whole Grain Initiative submitted to Commissions Review of the EU school fruit, vegetables and milk scheme, 2021, available at: <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12971-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme-EU-aid/F2663176> en.

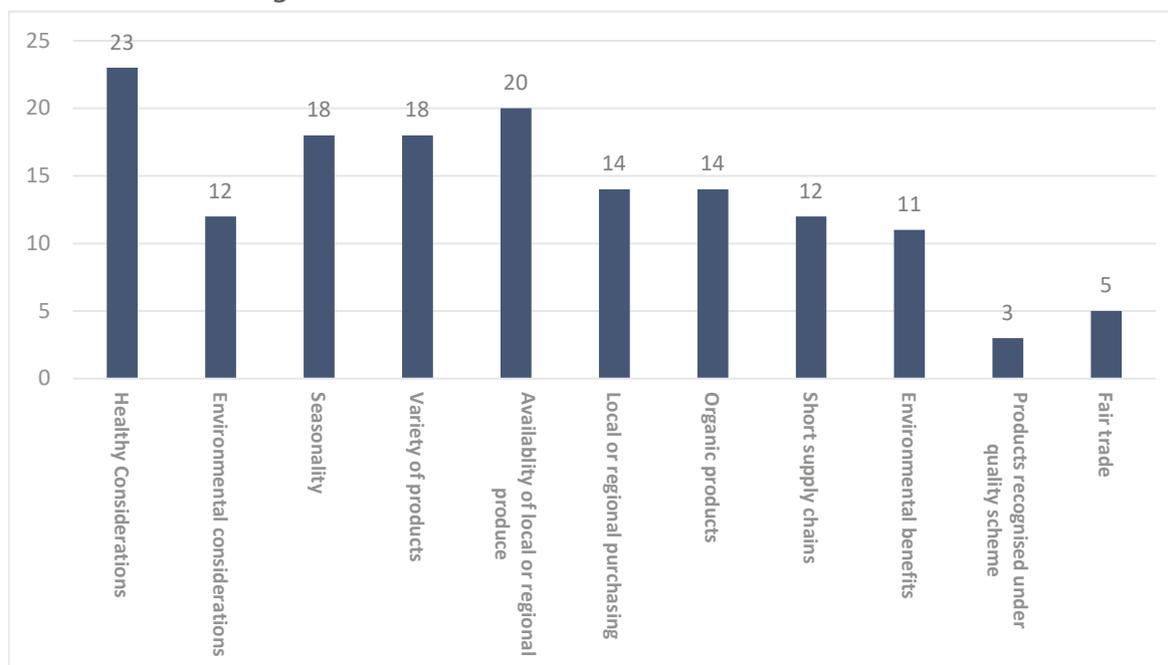
⁶² Position of PROFEL – European Association of Fruit and Vegetable Processing Industries submitted to Commissions Review of the EU school fruit, vegetables and milk scheme, 2021, available at: <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12970-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme/F2663117> en.

⁶³ Position of Organic Processing and Trade Association Europe submitted to Commissions Review of the EU school fruit, vegetables and milk scheme, 2021, available at: <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12971-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme-EU-aid/F2661952> en.

⁶⁴ European Commission, 'Organic action plan', available at: <https://ec.europa.eu/info/food-farming-fisheries/farming/organic-farming/organic-action-plan> en.

indicates how many Member States indicated preferences for certain types of products in their national strategies, with a preference amongst Member States for local/regional purchasing.

Figure 4: Number of Member States who indicate preferences for types of products within their national strategies



Source: [National strategies](#).

However, it should be noted that it was reported by national authorities⁶⁵ of several Member States (such as Estonia, Greece and Lithuania) that **the Scheme became less relevant during the Covid-19 pandemic, mostly on the basis of it not being possible to implement distribution as planned, which led to a number of administrative challenges**. For example, in Lithuania it was decided to allow schoolchildren to receive at home a product basket during distance learning (parents had to pick it up from the school). In some Member States, the Scheme ceased entirely during the pandemic, as was the case in Greece.

On the other hand, **some stakeholders have also suggested that the Covid-19 pandemic underlined the importance of a healthy diet**. Some argue for an increase or stabilisation of the available budget under the Scheme, even though the current budget usage in the EU does not reach 100%.⁶⁶

Stakeholders are generally positive about the continued relevance of the provision of fruits and vegetables. Multiple respondents to the schools survey commented on the positive benefits of receiving fresh fruits and vegetables. One respondent from Germany noted that 'children need fruits and vegetables. Having this made available in this programme is a great benefit to children's

⁶⁵ National authorities survey, Panteia, 2022

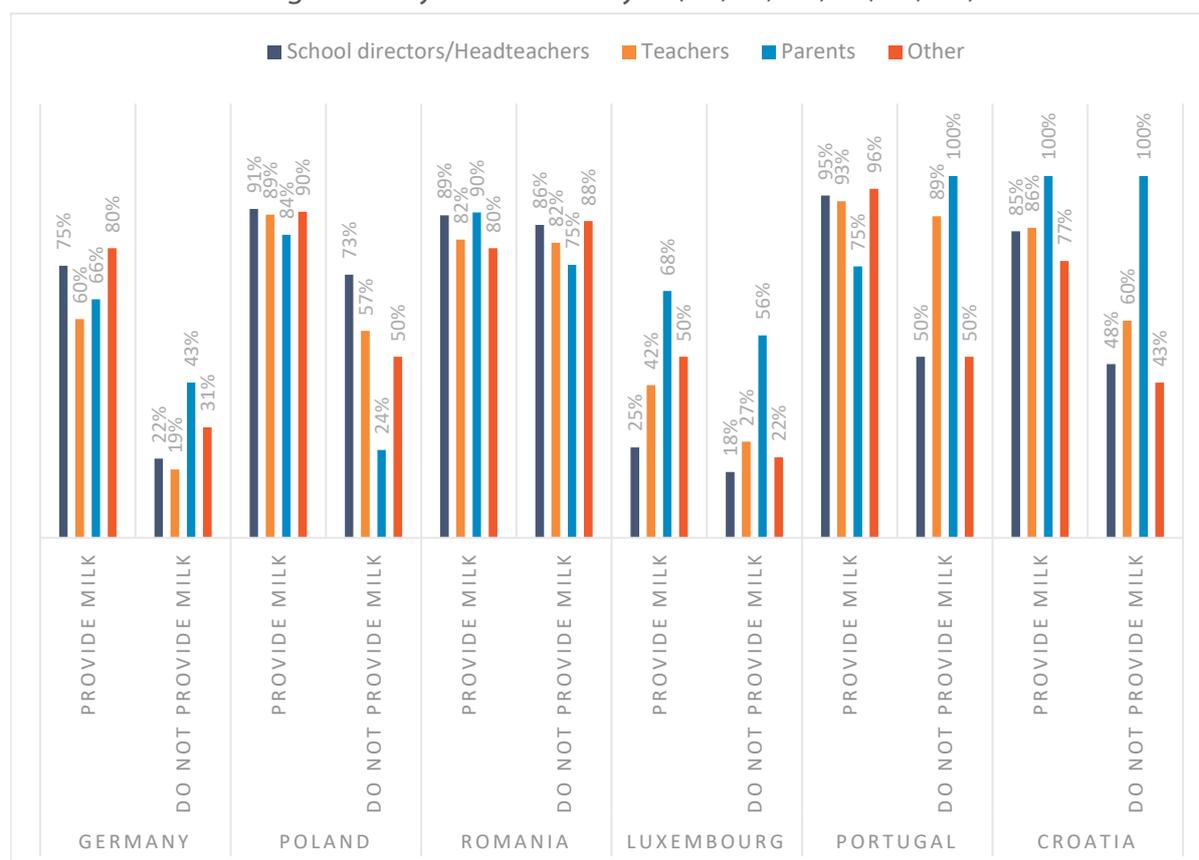
⁶⁶ Position of Fresh Produce submitted to Commissions Review of the EU school fruit, vegetables and milk scheme, 2021, available at: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12971-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme-EU-aid/details/F2663137_en.

development'.⁶⁷ Another respondent from Estonia stated that the EU Scheme is 'a very good EU programme which gives children more possibilities for eating healthy'.⁶⁸

However, although not related to the current Scheme, a study from Poland conducted from 2012 to 2015 among students at 85 primary schools showed that even though the Scheme has led to an increase in the consumption of fruits and vegetables significantly (by 18% a day) over three years of the Scheme, the low total fruit and vegetable consumption as compared to the WHO recommendations (400g a day) is still a concern, as is the minimal effect of the Scheme on vegetable consumption.⁶⁹ The results indicate however that providing fruits and vegetables in schools free of charge can be an effective strategy for enhancing consumption among children, in particular by raising the awareness of the health importance of F&V consumption and gradually influencing children's eating habits, especially when it comes to the habit of fruit consumption.

Stakeholders are more mixed in their views regarding the positive effects of the provision of milk and/or milk products. As can be seen from Figure 5, stakeholders in some Member States who responded to the schools survey are generally less positive regarding whether the provision of these products have a positive impact on children to pay more attention to following a healthy diet and

Figure 5: % of survey respondents who agree with the statement 'The provision of milk and/or milk products in a school setting has a positive impact on children to pay more attention to following a healthy diet and lifestyle' (DE, PL, RO, LU, PT, HR)



Source: Schools survey, Panteia, 2022.

⁶⁷ School survey, Panteia, 2022.

⁶⁸ School survey, Panteia, 2022.

⁶⁹ Katarzyna Wolnicka et al, 'Can the School Fruit and Vegetable Scheme Be an Effective Strategy Leading to Positive Changes in Children's Eating Behaviours? Polish Evaluation Results', *Int. J. Environ. Res. Public Health*, 2021, available at: <https://doi.org/10.3390/ijerph182312331>.

lifestyle. There are notable differences however between stakeholders whose schools participate in the milk Scheme (and provide the products) when compared to those who do not participate in the milk Scheme. Those who take part in the milk scheme are generally more positive than those who do not take part in the provision of milk and milk products.

In certain cases, national cultural considerations play a role in the relevance of the provision of milk. For instance, in France, plain liquid milk as a beverage remains a product that is poorly integrated into the eating habits of French children. Milk is rarely distributed at lunchtime because it is not very common in French dietary habits. During meals, the only drink recommended by the French health authorities is water.⁷⁰

Relevance of education and information measures

Since the implementation of the present EU School Fruit, Vegetables and Milk Scheme on 1 August 2017, there has been an enhanced educational dimension of the Scheme. In their national or regional level strategies, Member States also provide for accompanying measures necessary to make the Scheme effective, which may include information on measures for education about healthy eating habits, about local food chains and about combating food wastage.⁷¹ This is related to the promotion of healthy eating habits in children.

Stakeholders consulted are positive in relation to the relevance of education and information measures in the context of the Scheme. For instance, COPA-COGECA (interest group for European farmers and agri-cooperatives) strongly advises allowing for a minimum share of the EU budget provided to the Scheme to be devoted to the implementation of educational measures, as education or educational measures such as school gardens and excursions on farms contribute towards the healthy habits of children.⁷²

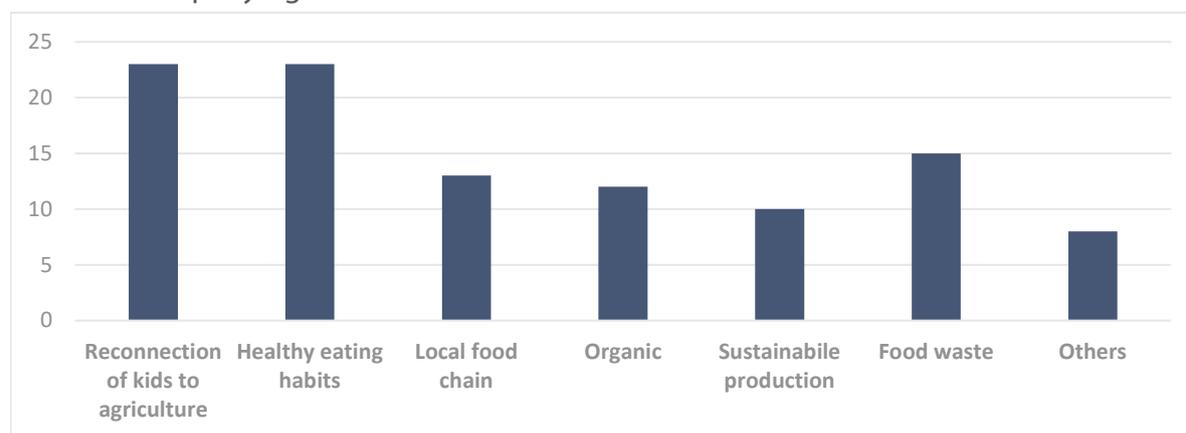
⁷⁰ National authorities survey, France, Panteia, 2022.

⁷¹ Regulation (EU) No 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common organisation of the markets in agricultural products and repealing Council Regulations (EEC) No 922/72, (EEC) No 234/79, (EC) No 1037/2001 and (EC) No 1234/2007 [2013] OJ L 347/671.

⁷² Position of Copa-Cogena submitted to Commissions Review of the EU school fruit, vegetables and milk scheme, 2021, available at: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12970-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme/F2663178_en.

In the national strategies, Member States have identified key themes to be included in accompanying measures. Figure 6 shows what are the main priorities for Member States by themes, and the number of Member States who have prioritised each theme in their national strategies.

Figure 6: Number of Member States who have indicated a particular theme to be included within accompanying educational measure



Source: [National strategies](#).

A special Eurobarometer carried out in 2022 indicated that healthy and balanced diets and food waste are the main topics which should be covered by the educational measures in the EU school Scheme.⁷³

Stakeholders consulted in schools survey also address the continued relevance of the provision of information and education measures. One respondent noted that there should be *'more emphasis on educational activities for children about the benefits of fruit, vegetables and milk products and their importance in a healthy diet.'*⁷⁴ However, it was mentioned by several respondents that in addition, more communication should be provided to the parents. One respondent commented that *'in order to be successful this initiative should have a mandatory programme where the whole community is involved, including parents.'*⁷⁵

Literature also provides additional insights into the relevance of information and educational measures. For instance, a study in The Netherlands conducted by the Wageningen University & Research (WUR), among others, shows that the EU school fruit and vegetables Scheme is primarily of added value to Dutch schools that have not implemented any nutrition policy yet.⁷⁶ This ties in with the expectation that pupils at schools without a nutrition policy are probably less concerned with healthy nutrition and that there is more to gain with food education compared to schools where healthy consumption is already the norm. Also, school children who participated in the 'taste lessons' programme organised under the Scheme, gained more knowledge about healthy nutrition, regardless of their school's policy on nutrition.

⁷³ Special Eurobarometer 520, 'Europeans, Agriculture and the CAP', 2022, available at: <https://europa.eu/eurobarometer/surveys/detail/2665>.

⁷⁴ School survey, Panteia, 2022.

⁷⁵ School survey, Panteia, 2022.

⁷⁶ Wageningen University and Research, 'EU School Fruit primarily of 'added value' for children who are not encouraged to develop a healthy lifestyle at home or school', 2021, available at: <https://www.wur.nl/en/research-results/research-institutes/economic-research/show-we-cr/eu-school-fruit-primarily-of-added-value-for-children-who-are-not-encouraged-to-develop-a-healthy-lifestyle-at-home-or-school.htm>.

Selected Practice

THE NETHERLANDS – ‘Smaak lessen’ (Taste lessons)

Background

In The Netherlands, the accompanying educational measures about healthy food and good nutrition offered under the Scheme are a part of a wider ‘Taste Lessons programme’. Taste lessons are targeted at primary school children, encouraging them to learn to make healthy food choices based on their own preferences. During these lessons, the children explore the food in front of them by all their senses – they not only taste the food, but also smell it, feel it, listen, and look. Teaching materials within this programme are freely available for 5 (or in some cases 9) 45-60 minute long lessons, that can be taught by a teacher directly and can be spread around the year flexibly based on the preference of the school. The materials and the lessons cover the topics of flavour, health, food production, consumer skills and cooking.

A study has been conducted by the Wageningen University in 2020, whose results clearly show the positive impact the programme has on helping children to develop a responsible eating pattern – the more taste lessons the children follow, the more they pay attention to whether they eat a healthy and varied diet. The researchers have also come to a conclusion that the knowledge gained during the lessons about healthy eating is retained by the children until the next school year, the lessons contributing to a long-term development. A previous study of the same research institution from 2011 also indicates the potential of the lessons to stimulate children to try unknown products. These Taste Lessons are also included as a part of the current Scheme in The Netherlands.

Stakeholders involved

Wageningen University & Research, Steunpunt Smaaklessen & EU-School fruit national contact office that is primarily responsible for the educational activities, providing the ‘Smaaklessen programme’ for the EU School Fruit Scheme. Furthermore, the participating schools are responsible for implementing the accompanying measures including the ‘Smaaklessen programme’ targeted at children in primary schools aged 4 to 12 years. The Taste lessons are made possible through the contributions from the Ministry of Agriculture, Nature and Food Quality, the Nutrition Centre, and the Food Education Platform.

Lessons learned

- This interactive, experience-based model of educating children about healthy food and diet has proven efficient in numerous studies indicating increase in the level of knowledge about healthy and conscious eating behaviour. However, no direct effect of the measure on the actual intake of fruit and vegetables have been found.
- The demonstrated flexibility of this educational measure – variety of working methods, activities to be used individually or in combination with other nutritional activities, has been also evaluated positively.
- Implementation of a wide coverage educational measure alongside the distribution aspect of the school Scheme has contributed to a significant increase in children’s nutrition knowledge in comparison to just a provision of the products alone, especially when a higher number of lessons was conducted. The inclusion of a well-functioning national measure within the implementation of the Scheme can therefore prove beneficial and should not be overlooked.
- In addition to flexibility and efficiency, the measure is also widely available and easily implementable, both desirable qualities for achieving a substantial change in the dietary habits of the population and the youth specifically.

Transferability of the practice

As mentioned above, the measure can be characterised by its flexibility – the teachers can allocate the lessons as they find fit throughout the year, and availability – the teaching materials being freely downloadable online and fit to be used by any teacher in a regular class environment. These characteristics make the measure easily transferable to the practice of other Member States, not requiring heavy administrative or organisational changes but rather just an entity that will take up on the task of developing such a programme in the national language of the Member State in question. The budget for developing such a measure in other Member States could involve the aid for the educational measures from the Scheme’s budget and contributions from relevant ministries and agencies.

Source: [Smaaklessen, Wageningen University and Research](#)

The 2021 study by Wageningen University showed that children who receive less encouragement about healthy nutrition at home tend to eat more fruit and vegetables when participating in the Scheme and particularly in the educational measures. This was not the same for children who eat a lot of fruits or vegetables at home. Children participating in the educational measures were more

aware about healthy nutrition than those who were not exposed to them. However, this increase in knowledge was not visible among children who only participated in the Scheme without educational measures. In addition, the number of lessons taken as part of the programme had an impact on the amount of knowledge garnered by children. Children who completed three to five lessons learned more than those who participated in less than three.⁷⁷

Additionally, a study carried out within a framework of the mid-term evaluation of the EU Action Plan on Childhood Obesity 2014–2020 showed that in terms of strengths and weaknesses, **the most reported most successful activities are those promoting healthier environments especially at schools and pre-schools** – with setting standards for food provided in schools, nutrition education and provision of free healthy meals being mentioned the most.⁷⁸ Generally speaking, the provision of fruit and vegetables in schools was reported by several respondents to the national authorities survey and the schools survey as the most difficult aspect due to low participation rates by schools, effects not spilling over to life beyond school and low motivation of local stakeholders.

Regarding information measures, insufficient information from the literature review and the stakeholder surveys was available to make an assessment of their relevance.

3.3. Coherence

This section analyses the coherence in the context of this evaluation and considers **to what extent is the EU school fruit, vegetables and milk Scheme, as a policy instrument, coherent (internal coherence) and does not contradict other interventions with similar objectives (external coherence)**. The following evaluation questions will be addressed in this section.

Coherence - To what extent is the EU school fruit, vegetables and milk Scheme coherent and does not contradict other interventions with similar objectives?	To what extent are the various elements of the intervention coherent with one another?
	To what extent is the Scheme coherent with wider EU policies?
	To what extent is the Scheme coherent with other relevant national policy interventions?
	To what extent is the intervention coherent with international obligations, including the SDGs?

This section will start by considering the coherence of the measures within the Scheme itself, followed by looking at the coherence of the Scheme with other interventions and policies at European level, national level and the international level. This section has mostly been developed on the basis of desk research, with this information being complemented by inputs submitted to the Commissions Review of the EU school fruit, vegetables and milk scheme and the national authorities survey.

3.3.1. Internal coherence

In regards to the internal coherence of the Scheme, **stakeholders consulted through the national authorities survey believe that the objectives and the activities that are provided for in the relevant legislative framework complement each other well**. In particular, when looking at the previous Scheme, the addition of compulsory education and information measures further help to

⁷⁷ Wageningen University and Research, 'EU School Fruit primarily of 'added value' for children who are not encouraged to develop a healthy lifestyle at home or school', 2021, available at: <https://www.wur.nl/en/research-results/research-institutes/economic-research/show-wecr/eu-school-fruit-primarily-of-added-value-for-children-who-are-not-encouraged-to-develop-a-healthy-lifestyle-at-home-or-school.htm>.

⁷⁸ European Commission, Directorate-General for Health and Food Safety, Pushkarev, N., Hansen, J., Drienaar, J., et al., 'Supporting the mid-term evaluation of the EU action plan on childhood obesity : the childhood obesity study', 2018, available at: <https://op.europa.eu/en/publication-detail/-/publication/7e0320dc-ee18-11e8-b690-01aa75ed71a1/language-en>.

strengthen the achievement of the objectives, in addition to the mere provision/distribution of products.

As discussed above under relevance, studies show that children who participate in the educational measures organised under the Scheme have more knowledge about healthy nutrition compared to those that do not. These include measures such as school gardens and excursions to farms, which one stakeholder considered as a means of contributing towards the healthy habits of children and a great connection to agriculture.⁷⁹ Some stakeholders consulted in the context of this study suggest putting greater emphasis on these measures to an extent of requiring a minimum share of budget to be allocated to them on a mandatory basis.⁸⁰

3.3.2. Coherence with wider EU Policies

In this section, the coherence of the EU Scheme with other EU policies with similar objectives, is assessed. Two types of policies are relevant: 1) agriculture related policies, and 2) public health related policies.

Agricultural policies (also in the context of the European Green Deal)

In terms of wider agricultural related policies, the **CAP**, within the context of which the School Scheme was developed, is described in more detail in Chapter 2. Representing a partnership between agriculture and society, the CAP, among others, aims to improve agricultural productivity to ensure stable supply of affordable food, through income support, market measures and rural development measures.⁸¹ The consumption of fruit and vegetables, and milk and milk products by school children is set to be encouraged within the context of CAP and its instruments in pursuance of the objectives of contributing to the stabilisation of markets and ensuring availability of supplies of the products in question.⁸² The Scheme aims to increase the share of fruit, vegetables, milk and other dairy products in the diets of children at the stage when their eating habits are being formed, therefore facilitating the creation of a life-long healthy, balanced, nutritious diet for an entire generation of consumers. This adds to the efforts of ensuring the stable supply of agricultural production through raising a stable consumer of such supply. Another way in which the Scheme is coherent with the CAP include the voluntary coupled support (VCS)⁸³ for bovine and the ANC⁸⁴-payment in certain areas help farmers so that they can continue with milk production.⁸⁵

The provision of Union aid to finance or co-finance the supply of fruit, vegetables, milk and milk products to children in educational establishments⁸⁶ can be considered coherent with the goals of the CAP (see Chapter 2). It is worth noting, however, that the potential of the Scheme may be undermined by its budget, coverage, definition of eligible products and distribution and

⁷⁹ Position of Copa-Cogena submitted to Commissions Review of the EU school fruit, vegetables and milk scheme, 2021, available at: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12970-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme/F2663178_en.

⁸⁰ National authorities survey, Panteia, 2022, and Stakeholder interviews, Panteia, 2022.

⁸¹ European Commission, 'The common agricultural policy at a glance', available at: https://ec.europa.eu/info/food-farming-fisheries/key-policies/common-agricultural-policy/cap-glance_en.

⁸² Regulation (EU) No 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common organisation of the markets in agricultural products and repealing Council Regulations (EEC) No 922/72, (EEC) No 234/79, (EC) No 1037/2001 and (EC) No 1234/2007 (2013) OJ L 347/671.

⁸³ The VCS scheme is targeted aid that aims to prevent the escalation of difficulties faced by certain agriculture sectors/sub-sectors, which could cause abandonment of production and could affect other parts of the supply chain or associated markets.

⁸⁴ ANC: Areas of natural or other specific constraints.

⁸⁵ Stakeholder interview, European Dairy Association, Panteia, 2022.

⁸⁶ Regulation (EU) No 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common organisation of the markets in agricultural products and repealing Council Regulations (EEC) No 922/72, (EEC) No 234/79, (EC) No 1037/2001 and (EC) No 1234/2007 (2013) OJ L 347/671.

implementation methods.⁸⁷ CAP is also still mostly considered a tool for agricultural rather than nutritional policy, however, the EU School Scheme has the potential to coherently contribute to objectives of other EU policies as explained below.⁸⁸

The new CAP due to be implemented from January 2023 incorporates the sustainable ambitions of the **European Green Deal**, that aims to make Europe the first climate-neutral continent by 2050, through supporting sustainable and inclusive growth across sectors without leaving anybody behind, improving people's health and life quality, and caring for nature.⁸⁹ Although the transition to more sustainable systems has commenced, current mass production patterns make it quite challenging as they still cause substantial air, water and soil pollution and massively contribute to climate change, while great amounts of food are wasted. In this regard, the aim of the policy is therefore to lead to a wide use of sustainable practices in food production, such as precision agriculture and organic farming.⁹⁰

At the same time, on the consumption side, the European Green Deal highlights the contribution of low quality diets to obesity and diseases, such as cancer, urging for healthier food consumption patterns giving preference to organic products and sustainable agricultural products. This demonstrates the availability of new opportunities for all operators/stakeholders in the food value chain, and illustrates how new technologies and scientific discoveries in food processing combined with increasing public awareness and demand for sustainable food, will benefit all stakeholders.⁹¹

The Scheme's coherence with the efforts of the European Green Deal can be therefore seen in two separate instances. Requiring the Member States to choose the products to be distributed under the Scheme or to be included in accompanying educational measures based on environmental considerations, seasonality, variety or the availability of local or regional produce, giving priority to products originating in the Union; and additionally, allowing Member States to individually encourage local or regional purchasing, organic products, short supply chains or environmental benefits (e.g. sustainable packaging).⁹²

At the heart of the European Green Deal, the **Farm to Fork Strategy** aims to make food systems fair, healthy and environmentally friendly accelerating the transition to a sustainable food system. This system, among other goals, should ensure food security, nutrition and public health.⁹³ The Farm to Fork Strategy strives to stimulate sustainable food consumption and promote affordable healthy food for all. Within the Strategy, the Commission is to propose actions to help consumers choose healthy and sustainable diets and reduce food waste and explore new ways in which the consumers can be better informed about the details of the origin of the food they are consuming. Consumers should be empowered to choose sustainable food and all actors in the food chain should see this as their responsibility and opportunity. If European diets were in line with dietary recommendations, the environmental footprint of food systems would be significantly reduced,⁹⁴ and this is where the

⁸⁷ Stakeholder interview, Panteia, 2022.

⁸⁸ Ibid.

⁸⁹ European Commission, 'The common agricultural policy at a glance', available at: https://ec.europa.eu/info/food-farming-fisheries/key-policies/common-agricultural-policy/cap-glance_en.

⁹⁰ European Commission, 'Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions The European Green Deal' COM (2019) 640 final.

⁹¹ Ibid.

⁹² Regulation (EU) No 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common organisation of the markets in agricultural products and repealing Council Regulations (EEC) No 922/72, (EEC) No 234/79, (EC) No 1037/2001 and (EC) No 1234/2007 (2013) OJ L 347/671.

⁹³ European Commission, 'Farm to Fork strategy', available at: https://ec.europa.eu/food/horizontal-topics/farm-fork-strategy_en.

⁹⁴ European Commission, 'Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions The European Green Deal' COM (2019) 640 final.

EU school Scheme is also in coherence with both the European Green Deal and the Farm to Fork Strategy as one of its main pillars.

Public Health policies

The **Europe's Beating Cancer Plan** is perceived a key pillar of a strong European Health Union setting out a new approach to cancer prevention, treatment and care. Cancer risk being heightened by the joint effects of unhealthy diets and physical inactivity being a known fact, the campaign HealthyLifestyle4All (as a part of the Plan) promotes healthy diet and physical activity as easy and affordable choices, involving authorities of Member States as well as local and regional structures and civil society. The Beating Cancer Plan then also focuses on measures to make healthy foods more available and addresses the fact that obesity and diabetes (both related to a higher risk of cancer) start in childhood.⁹⁵ Whilst the School Scheme clearly remains coherent, as its accompanying measures also promote active, healthy lifestyle as an attainable choice, some stakeholders have claimed inconsistencies in regards to the Scheme in relation to the Beating Cancer Plan. In particular, reference is made to studies that consider the possible health impacts of milk consumption.⁹⁶

Obesity not being only a risk factor in relation to cancer but also a challenge within the public health efforts in itself, the **EU Action Plan on Childhood Obesity 2014-2020** aims to fight and ultimately halt the growing rates of childhood and adolescent overweight and obesity by 2020. The Action Plan is envisioned to do this by, among others, supporting a healthy start in life, promoting healthier environments focusing on schools and pre-schools, making the healthy option the easier option, and informing and empowering families.⁹⁷ The Plan counts on the actions in support of achieving its objectives to be supported by the European Commission, Member States and civil society stakeholders such as the ones in the agricultural sector.⁹⁸

The Schemes role in this Action Plan can be seen within the promotion of healthier environments – adding to the improvement of uptake of healthy and quality school meals and limiting access to less healthy food options on school premises, ultimately making the healthier option the easier option. Similarly, the Scheme contributes to the information of the consumer, providing information about nutritional values and health benefits of fruit and vegetables directly to children but also indirectly to their parents and teachers.⁹⁹

Within the public health domain, **EU4Health 2021-2027** is relevant, responding to Covid-19 with a vision for a healthier EU. Within this vision, 4 general goals with 10 specific objectives are to be achieved – the improvement of health in the Union, protection of people in the Union from serious cross-border threats, improvement of medical products and the strength of health systems. The school Scheme can be considered coherent with the first objective of the first goal, improving disease prevention and health promotion. Within this objective, by promoting healthy diet and

⁹⁵ European Commission, 'Europe's Beating Cancer Plan Communication from the commission to the European Parliament and the Council', available at: https://ec.europa.eu/health/system/files/2022-02/eu_cancer_plan_en_0.pdf.

⁹⁶ Position of Humane Society International/Europe submitted to Commissions Review of the EU school fruit, vegetables and milk scheme, 2021, available at: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12971-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme-EU-aid/F2662743_en.

⁹⁷ World Obesity Federation, 'EU Action Plan on Childhood Obesity 2014-2020', available at: <https://www.worldobesity.org/healthy-voices/learn/policy-summaries/eu-action-plan-on-childhood-obesity-2014-2020#:~:text=The%20European%20Commission%20has%20decided,and%20young%20people%20by%202020>.

⁹⁸ 'EU Action Plan on Childhood Obesity 2014-2020, 2014, available at: https://www.anses.fr/fr/system/files/02-childhoodobesity_actionplan_2014_2020_en.pdf.

⁹⁹ Ibid.

lifestyle among the young population the burden of non-communicable diseases is being slowly reduced as a new generation of healthy living people is being formed.¹⁰⁰

3.3.3. Coherence with national level policies

According to the National Strategies of all Member States,¹⁰¹ only Finland, Ireland, and Portugal had an existing national scheme prior to the implementation of the EU school Scheme in 2017. Only in Belgium and Germany is the Scheme implemented at the regional level, with all other Member States implementing at the national level.

Member States consulted in the context of this study have indicated the EU Scheme is in line with national policies and objectives. For instance, in Lithuania, only organic products or products produced under a national quality scheme are distributed under the Scheme. This is in line with the country's overall policy of increasing the supply of high quality products to children. One of the programme's educational activities is also related to reducing food waste, which is also in line with national policy objectives.¹⁰² The French version of this Scheme is consistent with national public policies for healthy, sustainable, quality food and in particular the National Nutrition and Health Plan and the National Food Programme 2019 - 2023. The French version of the Scheme helps to combat obesity by preventing "snacking" outside of meals or double eating, and is also consistent with the national nutritional guidelines, which recommend that children in France eat three dairy products a day and at least five fruits and vegetables a day.

Similarly, in Finland the Scheme also contributes towards meeting national policy goals in relation to increasing the level of organic consumption nationwide, as indicated through the practice indicated below.

Selected practice

FINLAND - EU school fruit, vegetables and milk Scheme with organic emphasis

Background

Under the EU School Scheme for fruits, vegetables and milk, it is within the discretion of individual Member States to encourage local/regional purchasing or organic products among the criteria used for the selection of products to be distributed in schools. In Finland, in line with the Government development programme for the organic product sector and objectives to 2020, greater financial support was allocated to organic products within the Scheme (e.g., the support for skimmed liquid milk products was 13 cents per litre while for a corresponding organic product it was 31 cents per litre). In this manner, Finland has encouraged kitchens and catering services to work towards the governmental goal of 20% of the food offered by them being organic in year 2020 while using EU funds from the Scheme. Within the overall goal of the Scheme of increasing consumption of healthy food products, the country-specific goal of increased consumption of organic food is therefore also being achieved, making the Scheme even more desirable and efficient. The practice is directly linked to the EU school Scheme, as it adjusts the Scheme itself in accordance with the governmental goals. The practice offering higher funding within the Scheme for organic foods, not only adjusts the Scheme to correspond to the governmental goal of increasing organic food consumption but also taps into the funds provided by the EU for the implementation of the Scheme. While implementing the Scheme, the potential of it to add to the efforts in pursuance of that goal was realised and taken advantage of, encouraging higher accessibility and thus higher consumption of organic food among pupils through subsidizing the product more in comparison to a non-organic product.

Stakeholders involved

In broader context of the Government development programme for the organic product sector and objectives to 2020 as well as the Scheme itself, the Ministry of Agriculture and Forestry can be identified as a key stakeholder together with Ministry of Rural Affairs. Further, the Regional Council of South Ostrobothnia is listed as an owner of

¹⁰⁰ Regulation (EU) 2021/522 of the European Parliament and of the Council of 24 March 2021 establishing a Programme for the Union's action in the field of health ('EU4Health Programme') for the period 2021-2027, and repealing Regulation (EU) No 282/2014 (2021) OJ L 107/1.

¹⁰¹ See: 'School scheme by country, available at: https://ec.europa.eu/info/food-farming-fisheries/key-policies/common-agricultural-policy/market-measures/school-fruit-vegetables-and-milk-scheme/country_en.

¹⁰² National authorities survey, Lithuania, Panteia, 2022.

the good practice – municipalities/inter-municipal associations being responsible for the implementation of the Scheme and hence for aspiring to support organic products more too.

Lessons learned

- The effectiveness of the practice can be demonstrated through the increased level of organic consumption nationwide after the greater provision of EU funds for this type of products in contrast to the non-organic ones. Study shows, that in Finland 67% of schools prefer to buy milk that is subsidised – the greater the support, the higher the demand. This results in a higher demand for the more subsidised product – the organic foods, just as the country wants.
- Whilst 790,092 children participated in the EU school Scheme in the school year 2020/2021, the effects and results of the practice on the children's consumption of organic food have not been measured yet due to the recent nature of the practice and no additional information on the outcomes have been found.
- However, this practice shows other Member States how EU funds provided by the Scheme via schools can contribute to reaching national policy goals, in this case supporting citizens to consume more organic products and ensure a healthy lifestyle. This practice can be taken as an example of a firm political commitment towards greater organic consumption nationwide and of great flexibility in achieving it.

Transferability of the practice

The practice can be adopted by other Member States due to its easy implementation (a product fulfilling specific criteria is financially supplemented more) and can facilitate a nation specific goal not necessarily limited to organic foods consumption – a similar practice could for example support local/regional purchasing also.

Sources: [Finnish Ministry of Agriculture and Forestry](#), [Interreg Europe](#)

3.3.4. Coherence with wider international policies

In September 2015, the 2030 Agenda for Sustainable Development with 17 concrete but universal **Sustainable Development Goals (SDGs)** was adopted by the General Assembly of the United Nations. This new Agenda putting emphasis on a holistic approach to achieving sustainable development for everyone came to life shortly before the latest adjustments to the Scheme were agreed upon, providing for an interesting question of alignment between the two policies and their goals.¹⁰³

Among the 17 Goals, 3 stand out as relevant to the objectives of the Scheme – Goal 2 Zero Hunger ending hunger, achieving food security and improving nutrition and promoting sustainable agriculture, Goal 3 Good Health and Well-being ensuring healthy lives and promoting well-being for all at all ages, and Goal 4 Quality Education ensuring inclusive and equitable quality education and promoting lifelong learning opportunities for all.¹⁰⁴

To each of the Goals there is a number of targets and indicators by which the actual progress made in achieving the Sustainable Development Goal can be measured. Starting with the Goal 2 aimed at ending all forms of hunger and malnutrition by 2030 and specifically focused on sufficient nutrition of children the targets as relevant to the Scheme's objectives are as follows: (1) by 2030 end all forms of malnutrition [...] and address the nutritional needs of adolescent girls [...], (2) by 2030 double the agricultural productivity and incomes of small-scale food producers [...] through [...] markets and opportunities for value addition [...], (7) adopt measures to ensure the proper functioning of food commodity markets [...].¹⁰⁵

The second Goal identified as related to the Scheme's objectives is the Goal 3 aimed at building good health for all. The Scheme-relevant target within this Goal is target (4), which by 2030 reduce

¹⁰³ FOCUS 2030, 'Understanding the Sustainable Development Goals', available at: <https://focus2030.org/Understanding-the-Sustainable-Development-Goals>.

¹⁰⁴ United Nations Development Program, 'The SDGs in action', available at: <https://www.undp.org/sustainable-development-goals>.

¹⁰⁵ United Nations Development Program, 'Goal 2 Zero Hunger', available at: <https://www.undp.org/sustainable-development-goals#zero-hunger>.

by one third premature mortality from non-communicable diseases through prevention and promote mental health and well-being.¹⁰⁶ Goal 4 aims to achieve inclusive and quality education for all corresponds with the objectives of the Scheme in the following targets: (7) by 2030 ensure that all learners acquire the knowledge and skills needed to promote sustainable development, including, among others, through education for sustainable development and sustainable lifestyles [...].¹⁰⁷

Drawing on the EU Regulation 1308/2013, the Scheme in its current form is set out to encourage the consumption of fruit, vegetables, milk and milk products by school children with a view to durably increase the share of those products in their diets helping them to form healthy eating habits and healthy lifestyle that can be maintained throughout the course of their life.¹⁰⁸ This means the Scheme addresses the nutritional needs of children including adolescent girls and helps in the fight against malnutrition and hence adds to the efforts towards the achievement of the SDG 2 and can be counted towards the efforts within the target 2.1. By supporting the adoption of a healthy lifestyle in a young, formative age the Scheme also contributes to the Goal 3 specifically the target 3.4 of reducing premature mortality from non-communicable diseases. Cardiovascular diseases and diabetes falling under this category of diseases, children being encouraged to lead a healthy lifestyle substantially adds to the fight against the widespread of these diseases and the deaths caused by them.

Within the Scheme, in order to make it more effective and to ensure its objectives have the highest potential to be efficiently achieved, aid can be granted to accompanying measures too in addition to the aid for the distribution of the products. This aspect of the Scheme can be seen as adding to the efforts towards the achievement of the SDG 4 target 7 ensuring education for sustainable lifestyle through many educational activities such as lessons, farm visits, games, etc. Bringing the children closer to the origins of the products they are consuming and creating a relationship between them and agriculture.

Lastly, the Scheme being intended to improve the distribution of agricultural products to children and durably increase the share of those products in the children's' diets it contributes to the stabilisation of markets. This can be seen as a further addition to the efforts within the SDG 2 concretely with regards to targets 2.2 and 2.7. Additionally in the context of the 2.2 target, within the Scheme Member States might also choose to give preference to local, small-scale agricultural producers.

Based on the above considerations, it can be concluded that the Scheme in its objectives and processes to achieve them is coherent with the subject-related SDGs and through that substantially contributing to the 2030 Agenda in the areas it can.

To support countries in their national efforts to reduce premature mortality from non-communicable diseases (NCDs), WHO developed a **Global Action Plan for the Prevention and Control of NCDs 2013-2020**. This plan includes nine global targets, including, among others, reduction in population intake of salt and the halt of the rise in diabetes and obesity, and works towards 6 objectives, one of them being the reduction of modifiable risk factors for non-communicable diseases and underlying social determinants through creation of health-promoting

¹⁰⁶ United Nations Development Program, 'Goal 3 Good Health and Well-being', available at: <https://www.undp.org/sustainable-development-goals#good-health>.

¹⁰⁷ United Nations Development Program, 'Goal 4 Quality Education', available at: <https://www.undp.org/sustainable-development-goals#quality-education>.

¹⁰⁸ Regulation (EU) No 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common organisation of the markets in agricultural products and repealing Council Regulations (EEC) No 922/72, (EEC) No 234/79, (EC) No 1037/2001 and (EC) No 1234/2007 [2013] OJ L 347/671.

environments and another one the raise of the priority accorded to the prevention and control of non-communicable diseases in global, regional and national agendas.¹⁰⁹

The Scheme falling under a regional agenda, it highlights the importance of forming healthy habits and adapting to a healthy lifestyle in young age to raise the chances of continuance of the habit throughout the course of one's life and hence adds to the efforts of prioritising prevention of non-communicable diseases – maintaining a healthy life style being one of the key aspects of prevention for a number of these diseases. It similarly reduces the risk factors for non-communicable diseases, promoting healthy food instead of unhealthy snacks among children, and educating them about the importance of good nutrition and the benefits of healthy eating. Furthermore, the products distributed under the Scheme being strictly scrutinised in contains of additional fat/sugar/salt, the Scheme also supports the efforts towards the reduction of salt intake.

Also aiming to reduce the burden of preventable diet-related non-communicable diseases, but this time specific to the European Region the **European Food and Nutrition Action Plan 2015-2020** calls for all countries to act through health-in-all-policies approach. The priority of the plan is to contribute to the improvement of food systems governance and to the overall quality of the European population's diet, through achieving the objectives of creation of healthy food and drink environments, promotion of the gains of healthy diet throughout life with specific focus on the most vulnerable groups and many more. These objectives are trying to be achieved by following the guiding principles of reducing inequalities in access to healthy food, [...], and empowering people and communities through health-enhancing environments.¹¹⁰

3.4. Effectiveness

This section presents the results of the assessment of the effectiveness of the Scheme, and specifically as **to what extent have the objectives of the EU school fruit, vegetables and milk Scheme been achieved as a result of its implementation**. The following evaluation questions will be addressed in this section.

Effectiveness - To what extent have the objectives of the EU school fruit, vegetables and milk Scheme been achieved?	What are the main benefits of the Scheme?
	How has the Scheme achieved the objectives of encouraging children to follow a healthy diet and lifestyle and reconnecting children to agriculture and teach them about healthy eating habits?
	What does the available data say on quantitative/qualitative effects?
	What external factors have affected progress towards objectives?
	How did the administrative procedures impact the effectiveness?
	Any unexpected or unintended effects (including the impact of COVID-19)?

In order to reply to the effectiveness questions shown above, this section will first consider what has worked well (effectiveness) and what the benefits are and what has not worked so well (ineffectiveness) in regards to the achievement of the objectives as a result of the implementation of the Scheme. Then, an overview of the administrative procedures implemented at national level will be provided, along with the effectiveness of the three types of measures under the Scheme (based on national level examples). Finally, this section will look at whether there have been any

¹⁰⁹ World Health Organization, 'Global Action Plan for the Prevention and Control of Non-Communicable Diseases 2013-2020', 2013, available at: <https://www.who.int/publications/i/item/9789241506236>.

¹¹⁰ World Health Organization, 'European Food and Nutrition Action Plan 2015-2020', 2015, available at: https://www.euro.who.int/_data/assets/pdf_file/0003/294474/European-Food-Nutrition-Action-Plan-20152020-en.pdf.

unintended or unexpected effects, including the impact of COVID-19 on the effectiveness of the Scheme.

Effectiveness will be considered against the objectives of the Scheme, the primary objective being encouraging children to follow healthy diet and lifestyle through distribution of fruit, vegetables, milk and milk products in educational establishments, accompanied by various educational measures. The encouraged consumption of fruit, vegetables, milk and milk products by school children durably increasing the share of these products in the diets of children at the stage when their eating habits are being formed also contributes to the broader CAP objective of stabilising markets and ensuring the availability of current and future supplies.

Desk research revealed that there is very limited quantitative data regarding the effectiveness of the Scheme. Many Member States are currently undertaking evaluations of the implementation of the Scheme, whereby some relevant data will be collected. At the time of writing, this data is unavailable.

This section was developed on the basis of desk research, the two stakeholder surveys (national authorities and schools), stakeholder interviews and the development of the selected sufficient/insufficient practices.

3.4.1. The main health benefits of the Scheme

There is currently very little literature or data available that relates specifically to the effectiveness of the current Scheme. Given also the fact that it now runs for only 4 years, the long-term effects of the current Scheme from a health perspective are yet to be known or studied in detail. However, information available that relates to previous Schemes provide some insights regarding how this type of intervention is effective, which is therefore potentially relevant for the current Scheme and therefore used by the effectiveness analysis below.

Distribution of products to children

The European Commission 2019/20 summary report on the implementation of the Scheme indicated that 19.1 million out of 76.2 million pupils in the EU participated in the Scheme in the school year 2019-2020. A special Eurobarometer carried out in 2022 entitled 'Europeans, Agriculture and the CAP' showed that 22% of persons who responded indicated that they had children who benefit from the provision of fruits, vegetables, milk and milk products in schools.¹¹¹ Member State procedures and approaches have an effect on the effectiveness of the Scheme in terms of achieving health related goals. As mentioned before, **one of the main potential long-term values of the Scheme is that children can effectively discover and become accustomed to the variety of tastes and qualities of vegetables and fruit at a young age, which will have knock-on effect for food choices in the future.** There is however, very little literature pertaining to the current Scheme as to how effective the provision of fruits, vegetables and milk products are in regards to achieving the objective of children following a healthy diet and lifestyle.

A study conducted in Spain over a period of eight years (2009-2017), showed that the development and scope of the previous School Fruit and Vegetables Scheme in Spain are still insufficient to generate an equitable healthy dietary pattern in the school population. However the Scheme has generated an economic market for agricultural production due to the number of fruits and vegetables distributed in each academic course.¹¹²

¹¹¹ Special Eurobarometer 520, 'Europeans, Agriculture and the CAP', 2022, available at: <https://europa.eu/eurobarometer/surveys/detail/2665>.

¹¹² Pamela Soares, 'Implementation of the European School Fruit and Vegetables Scheme in Spain (2009–2017)', *Int. J. Environ. Res. Public Health*, 2019, available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6843461/>.

Some stakeholders consulted are more positive about the effects of the Scheme. In particular, the level and frequency of distribution is often mentioned as key point in regards to making the Scheme more effective in the long run. For instance, in North Rhine-Westphalia (Germany), the preventive approach of the Scheme in regards to ensuring children are exposed to healthy food is considered as the decisive success factor of the programme, and the opportunity to participate over an entire school year and the consumption of fruit, vegetables and dairy products several times a week establishes the programme as an integral part of everyday school and day-care life. According to a study carried out in North Rhine-Westphalia, the actual supply of fruit, vegetables and milk has a significantly greater positive influence on the development of healthy eating habits than educational measures, and advocates expanding the actual supply of fruit, vegetables (and possibly milk) to reach more children and placing the focus of the programme on this.¹¹³ Similarly, in Baden-Württemberg, it has been noted that the less frequently the distributions take place, the smaller the effect on the children towards a long-term and stable, positive attitude for fresh, unprocessed, regional food. In Flanders (Belgium), the (limited) budget forces choices to be made in regards to the number of weeks for which distribution can be subsidised. For the overall Scheme and to consolidate healthy eating habits, it has been noted that it would be better to have the budget to subsidize a whole year of more frequent (for example: two times per week) distribution of fruit, vegetables and/or milk.¹¹⁴

A survey of 1,935 primary schools in The Netherlands in 2022 found that the big majority of surveyed schools are (very) positive about the EU school fruit programme (99%), and state that children are enthusiastic and positive about being introduced to fruit and vegetables.¹¹⁵ The survey showed also that the programme stimulates healthy eating and that making the programme free has added value as parents do not always have the financial means to provide their children with different types of fruit and vegetables. Of the schools surveyed, 43% indicate that because of the EU School Fruit Scheme, children more regularly take fruit and vegetables to school outside of the days fruits are provided in schools.

In Romania, there is a positive view that the EU School Scheme has achieved the objectives of encouraging children to follow a healthy diet and lifestyle when combined with carrying out educational measures along with the distribution of fruits, vegetables, milk and dairy products. In particular, the provision of products when alongside educational measures helps children develop healthy eating habits and contributes towards preventing various health conditions (such as diabetes, cardiovascular disease and childhood obesity).¹¹⁶ The Scheme ensures a balanced snack for children during the school programme, covering part of the daily nutritional needs of children with an optimal mix of quality nutrients (proteins, lipids, carbohydrates, minerals and vitamins). In this way children consume a food recommended by nutritionists and form healthy eating habits.

In Croatia, increasing the frequency of the distribution has been mentioned as a means to increase the effectiveness of the Scheme, as well as have a positive effect on envelope absorption and participation in the Scheme.¹¹⁷ However, budget restrictions has led a choice between ensuring a sufficient level of quality and variety of products versus increased distribution, as indicated by the case provided below.

¹¹³ National authorities survey, Germany, Panteia, 2022.

¹¹⁴ National authorities survey, Belgium (Flanders), Panteia, 2022.

¹¹⁵ Netherlands Enterprise Agency, 'Resultaten evaluatie EU-Schoolfruit- en groenteprogramma 2020-2021', 2021, available at: <https://www.rvo.nl/sites/default/files/2020/07/Evaluatie%20schoolfruit%20en-groenten%202019-2020.pdf>.

¹¹⁶ National authorities survey, Romania, Panteia, 2022.

¹¹⁷ National authorities survey, Croatia, Panteia 2022.

Selected Practice

CROATIA – Reduction in duration of provision to ensure quality/variety of products

Background

In line with the amendments of the National strategy for the implementation of the School Scheme in Croatia from the school years 2017/2018 to 2022/2023, the duration of product distribution has been shortened from an initial 35 weeks to 12 – 24 weeks in order to increase the financial resources per child and per implementation day, by allowing schools to order more attractive products to stimulate interest from children. The goal of this measure was to achieve greater performance as well as visibility and effectiveness of the school Scheme.

Stakeholders involved

Stakeholders involved in the implementation of the Scheme include public bodies (Ministry of Agriculture, Ministry of health, Ministry of science and education, Paying Agency for Agriculture, Fisheries and Rural Development, State inspectorate of Croatia, Croatian Institute of public health, beneficiaries (schools) and their Founders (local and regional government), natural and legal persons (suppliers of fruit and vegetables and milk and milk products participating in the distribution and/or delivery measure).

Lessons learned

- Decreasing the number of weeks in which products were distributed, allowed for the expansion of the list of eligible products in the Scheme (to now include figs, grapes, strawberries, radish, plums etc.), products from organic production, as well as fruit and vegetable juices.
- According to the Croatian Ministry of Agriculture, this increased product diversity has led to increased willingness of schools to participate in the Scheme, and had a positive result on the envelope absorption and the number of students participating in the Scheme. On the basis of this, and other parallel activities, the School Scheme in 2021/2022 witnessed an increase of around 100,000 students participating in the Scheme.

Source: National authorities' survey, Croatia, Panteia, 2022.

In terms of ineffectiveness of the Scheme, an expert indicated that at the time when the Scheme was first introduced in Europe, it was considered revolutionary because it bridged the gap between consumer demands and production.¹¹⁸ However, **several stakeholders consulted consider the budget for the Scheme too low to be fully effective from a public health perspective.**¹¹⁹ Some stakeholders feel that **the effectiveness of the Scheme from a health perspective is hindered due to the fact that national authorities are currently permitted to exempt products with limited quantities of added sugar and/or fat which potentially goes against the general objectives of the Scheme to promote healthy eating habits in children.**¹²⁰ For instance, in Austria, sweetened milk products fall under the scope of the Scheme, which has led to the preference of those products to the disadvantage of pure drinking milk.¹²¹

One interviewed expert also suggested that currently there is a gap between, on the one hand, supply and distribution of products under the Scheme and, on the other, accompanying educational measures.¹²² This view has also been supported by the Danish national strategy which indicates that at present, very few schools apply for aid to organise accompanying measures. Some schools are simply not familiar with the possibility to utilise the Scheme for organising accompanying educational measures, while others have deemed the task to be administratively burdensome. As can be seen from the following section, the most effective approach in regards to promoting health and wellbeing of children through the Scheme relates to a holistic approach that encompasses both distribution of products as well as accompanying educational and information measures.

¹¹⁸ Stakeholder interview, Panteia, 2022.

¹¹⁹ Stakeholder interviews, National authorities survey, Panteia, 2022.

¹²⁰ Stakeholder interviews, Panteia, 2022.

¹²¹ National authorities survey, Austria, Panteia, 2022.

¹²² Stakeholder interview, Panteia, 2022.

Education and information measures

Shaping children's healthy eating habits is the core objective of the Scheme. In addition to the provision of products, emphasis is also placed on the educational dimension aiming at connecting children to agriculture as well as other important aspects such as health, local food chain, organic farming, sustainable production, and food waste. There is currently limited literature on the effectiveness of accompanying educational measures and information measures, as included in the current Scheme. Literature in relation to the previous EU Fruits and Vegetables Scheme provides some insights regarding the effectiveness of these types of measures. For instance, a study evaluating the effectiveness of the five a day for KIDS Scheme in Poland (which was conducted between 2012-2015 and surveyed primary schools that participated or did not participate in the EU School Fruit and Vegetable Scheme) concluded that 135 minutes educational classes at school did not seem to increase fruit and vegetable consumption among children.¹²³ However, there was an increase in children's awareness of the importance of eating fruit and vegetables for their health, an increase in knowledge about the recommended number of daily portions of fruit and vegetables and an increase in preference for this group of products.

The study conducted by the Wageningen University & Research (WUR) (The Netherlands) also shows that the EU school fruit and vegetables Scheme is primarily of added value, as school children who participated in 'taste lessons' programme organised under the Scheme, gained more knowledge about healthy nutrition, regardless of their school's policy on nutrition. Students participating in the educational measures were more aware about healthy nutrition than those who were not exposed to them. However, this increase in knowledge was not visible among children who only participated in the Scheme without educational measures. In addition, the number of lessons taken as part of the programme had an impact on the amount of knowledge garnered by children. Children who completed three to five lessons learned more than those who participated in less than three.¹²⁴

In Lithuania, the development of short video clips and colourful puzzles for children, as well as competitions on sustainable agriculture and food waste have shown to be effective.¹²⁵ A wide array of activities have also been provided in Croatia, where every year, a public invitation is sent to schools who would like to participate in educational measures. Out of 15,000 students that participated in accompanying educational measures, more than 11,000 children participated in lectures relating to the school Scheme, 1,500 children participated in visits to producers and farms, and more than 2,000 in tasting classes.¹²⁶ Starting from the 2022/2023 school year, all Member States will be obliged to perform accompanying educational measures for all children participating in the Scheme.

One of the interesting elements that has been raised by stakeholders during the consultation is the **need to ensure participation of parents in the educational and information measures to ensure the effectiveness of the Scheme in regards to ensuring a healthy lifestyle for children.** Some Member States take a more holistic approach and include measures to ensure parents participation and buy-in with the Scheme, as shown in the example from Flanders (Belgium) below.

¹²³ Katarzyna Wolnicka et al, 'Can the School Fruit and Vegetable Scheme Be an Effective Strategy Leading to Positive Changes in Children's Eating Behaviours? Polish Evaluation Results', *Int. J. Environ. Res. Public Health*, 2021, available at: <https://doi.org/10.3390/ijerph182312331>.

¹²⁴ Wageningen University and Research, 'EU School Fruit primarily of 'added value' for children who are not encouraged to develop a healthy lifestyle at home or school', 2021, available at: <https://www.wur.nl/en/research-results/research-institutes/economic-research/show-wecr/eu-school-fruit-primarily-of-added-value-for-children-who-are-not-encouraged-to-develop-a-healthy-lifestyle-at-home-or-school.htm>.

¹²⁵ National authorities survey, Lithuania, Panteia, 2022.

¹²⁶ National authorities survey, Croatia, Panteia, 2022.

Selected Practice

BELGIUM (Flanders) – ‘Oog voor lekkers’ (‘Eye for goodies’) programme

Background

The project ‘Oog voor Lekkens’ was set up as an initiative to ensure that schools provide products after the subsidised period with their own means. In Flanders (BE), EU and regional (Flemish) subsidies provide financial support for 10 or 20 weeks. In terms of provision, on a fixed day of the week, students receive a piece of fruit/vegetables together and/or drink a glass of milk as a snack. The regular fruit/vegetable and/or milk day is also the starting point for a broader approach to healthy nutrition in class and at school (in the context of health policy).

Under the ‘Oog voor Lekkens’ project, Parents are considered an important player, whereby it is acknowledged that the eating habits of children are very dependent on the influence of the parents. Therefore, an initiative within the Scheme includes "Healthy in the schoolbag!", whereby schools ask parents to provide fruit/vegetables and/or milk on one or more days a week as a snack, which is then eaten or drunk together in the classroom. By seeing each other and the teacher eating/drinking, children are motivated to continue eating healthy products. Additional tips are also provided for involving parents in the project on the Oog voor Lekkens website. These include a healthy snack planner and lunchbox recipes (also videos), and also material to try to convince schools which are not part of the programme to participate.

Stakeholders involved

Oog voor Lekkens is a project with European and Flemish support (policy areas Agriculture and Fisheries & Welfare, Public Health and Family & Education) and the Flanders' Agricultural Marketing Board (VLAM). In collaboration with the Flemish Institute for Healthy Living, Flemish Logos and Nice (Nutrition Information Centre).

Lessons learned

- Adding to the efforts of the Scheme, the Oog voor Lekkens project ensures a healthy snack at school once a week. This way the Flemish government contributes to a regular consumption of healthy products by children in kindergartens and primary schools to make sure the children have sufficient time to develop and maintain an important healthy habit.
- Offering a healthy snack to children during a school day not only helps with energy but further facilitates concentration in classes.
- A wide variety of products being included in the project, children learn to discover new flavours and try products they have not tried before. They can share their experience with one another during a joint class moment, motivating them to be open to try new things.
- The project aims to indirectly, through children, also encourage parents to offer a varied range of fruit, vegetables and milk products to their children at home and to take with them to school after the subsidy period ends.
- The project gives schools the chance to start and develop a comprehensive health policy and promote other healthy products as well.

Transferability of the practice

The Oog voor Lekkens project is contributing to the distribution efforts and hence the main objective of the Scheme to facilitate healthy eating habits among children, and it is possible to implement such a programme in other Member States within the context of the Scheme also. The budgetary costs should not be too high either, as the funded distribution period is limited, and the project further counts on the involvement of parents. Furthermore, the project involving various stakeholders from agricultural, educational and public health domain, it has a potential to facilitate a long-lasting cooperation beyond the scope of the project itself.

Sources: [Vlaams Instituut Gezond Leven](#), [Oog Voor Lekkens](#)

In Bremen (Germany), there is also focus on including the children’s parents, whereby they are continually kept up to date with the Scheme through parents’ evenings and consultation days, which in turn influences the implementation of the Scheme’s structuring.¹²⁷

According to CIA – Agricoltori Italiani, which represents Italian farmers and agricultural business owners, the Commission should consider including families of children among the beneficiaries of

¹²⁷ National authorities survey, Germany, Panteia, 2022.

the programme, and to reserve a part or a percentage of the available budget for this.¹²⁸ The National Chamber of Agriculture (NAK) in Hungary also advocates for a similar approach, whereby parents should also be the target of education and information measures.¹²⁹ An empirical study in Poland among 6 413 primary schools, which was collected in November 2017 (therefore shortly after implementation of the current Scheme in August 2017) also suggests that informational and education activities under the Scheme should be also targeted towards teachers and parents in order to be more effective.¹³⁰

3.4.2. Consumption of products

One of the objectives of the Scheme is also to stabilise markets, to ensure the availability of current as well as future supplies, to improve the competitiveness of the agricultural sector and the quality of life in rural areas, and to encourage the diversification of the rural economy in general. **The provision of fruits, vegetables and milk products under the EU Scheme has an “equalising effect”, which means that children across all socio-economic groups have access to these products.** In Latvia for instance, in terms of the children from the target audience - 92% of all children receive fruit and vegetables, and 88% of all children receive milk.¹³¹ In Germany, 94% of school directors and 96% of teachers surveyed indicate that fruits and vegetables are provided to children under the Scheme. As can be seen from the Table 3, which covers a selection of Member States across the EU, the majority of those surveyed indicate that fruits and vegetables are provided to children. The table also shows that, in some Member States there is a significantly lower number of school heads/directors and teachers who indicate that milk and/or milk products are distributed to children, suggesting differences between the perception of the fruit and vegetable and milk elements of the Scheme.

Table 3: % of school heads/directors and teachers surveyed who indicate that fruits, vegetables and milk and/or milk products are distributed to children

	Type of respondent	Does your school provide fruit and vegetables to children?		Does your school provide milk and/or milk products to children?	
		Yes	No	Yes	No
GERMANY	School Heads/Directors	94%	6%	29%	71%
	Teachers	96%	4%	19%	81%
POLAND	School Heads/Directors	97%	3%	98%	2%
	Teachers	98%	2%	98%	2%
ROMANIA	School Heads/Directors	89%	11%	92%	8%
	Teachers	84%	16%	92%	8%
LUXEMBOURG	School Heads/Directors	100%	0%	52%	48%
	Teachers	98%	2%	51%	49%
PORTUGAL	School Heads/Directors	95%	5%	97%	3%

¹²⁸ Position of Cia-Agricoltori Italiana submitted to Commissions Review of the EU school fruit, vegetables and milk scheme, 2021, available at: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12971-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme-EU-aid/F2663141_en.

¹²⁹ Position of Anonymous submitted to Commissions Review of the EU school fruit, vegetables and milk scheme, 2021, available at: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12970-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme/F2663145_en.

¹³⁰ Sławomir Wawrzyniak, Krystyna Krzyżanowska, ‘Children’s Food Preferences Included and Offered in the “School Scheme”’, *Roczniki Naukowe*, 2018, available at: <https://ageconsearch.umn.edu/record/293809/>.

¹³¹ Stakeholder interview, Panteia, 2022.

	Type of respondent	Does your school provide fruit and vegetables to children?		Does your school provide milk and/or milk products to children?	
	Teachers	88%	12%	95%	5%
CROATIA	School Heads/Directors	98%	2%	71%	29%
	Teachers	92%	8%	58%	42%

Source: Stakeholder survey, Panteia, 2022.

The Scheme also has significant effects for suppliers and farmers. As an example, about 5% of the produced drinking milk in Sweden is covered by the application of the EU School Milk Scheme subsidy.¹³² The fact that it is possible to drink milk at school has also a long-term effect on milk consumption and if the children do not consume milk at school and at younger ages, there is a high risk that they will not consume milk in adulthood, which in the long run has an even greater impact on Sweden's dairy farmers' income.¹³³ According to the Federation of Swedish Farmers (LRF), a survey of Sweden's municipal administrations regarding school meals and the serving of milk in preschools, compulsory schools, and upper secondary schools the municipal food service managers (or others with a similar role) showed that in almost 25% of the municipalities, it was indicated that serving milk would decrease if the milk component of the EU School Scheme subsidy was to be halved.¹³⁴

A study carried out in North Rhine Westphalia (Germany)¹³⁵ in relation to the previous Scheme noted that, more rural suppliers found negative effects of the Scheme rather than urban suppliers. One of the explanations was, that schools in rural areas are smaller than in urban areas, which implies a lower sales volume per school, and in addition the distance and logistical costs are higher.¹³⁶ In some Member States, there are rules which outline the geographic limitations of product provision. For instance, the general rule is that the product cannot be transported more than 300 km from the place where it was produced.¹³⁷ Feedback from Romania indicates that provision of unattractive products also has a negative effect on the implementation of the Scheme, leading to the lack of regular and conscious consumption of products (some children do not consume the products, and they are either thrown away or given to other children whose schools are located in urban areas).¹³⁸

3.4.3. Impact of the administrative procedures on the effectiveness of the Scheme

EU Member States have a significant degree of discretion in regards to how the Scheme is implemented at the national level. This section has been based on a comprehensive review and analysis of Member States national strategies, whereby an overview of the types of administrative procedures is provided below, as well as available data regarding the effectiveness of the measures. Unless stated, all information provided has been sourced on the basis of the Member States national strategies. Information on Member States is included where such information has been provided within the national strategies, with some Member States providing more information when compared to others.

¹³² Stakeholder interview, Panteia, 2022.

¹³³ Ibid.

¹³⁴ Ibid.

¹³⁵ In Germany, the scheme is executed by the German Federal Provinces (Deutsche Bundesländer).

¹³⁶ Jan-Paul von Germeten et al, 'Analysis of Rural and Urban Supply Chains in the European School Fruit Scheme Using Qualitative Interviews and Network Analysis of Content', *Journal of Junger & Environmental Nutrition*, 2016, available at: <https://www.tandfonline.com/doi/abs/10.1080/19320248.2016.1146198>.

¹³⁷ Stakeholder interview, Panteia, 2022.

¹³⁸ National authorities survey, Romania, Panteia, 2022.

Administrative procedures related to the selection of suppliers

The EU School and Fruit Scheme leaves EU Member States with discretion for selecting suppliers to distribute fruits, vegetables, milk and accompanying educational, monitoring and information measures. **Member States generally use three systems to choose eligible suppliers for the products under the Scheme, centralised, de-centralised and mixed.** Those systems differ based on whether central governmental authority is responsible for selecting eligible suppliers. In a mixed system, schools can procure products themselves or through a central market. Some Member States also have different procedures for selecting suppliers of fruit, vegetables and milk and accompanying educational, monitoring, evaluation, and information measures. This section will present different administrative practices that Member States employ to choose suppliers for such measures.

De-centralised system for the selection of suppliers

In the de-centralised system, governmental authorities do not choose suppliers at the central level. Instead, they place the responsibility for selecting eligible suppliers with aid applicants at the local or regional level. The aid applicants must then procure the eligible products or establish their own criteria for selecting suppliers. Subsequently, they apply for aid with state authority. The state authority is only involved in connection to aid application, payment, monitoring, and enforcement of the Scheme. National authorities monitor the reasonableness of expenses and therefore also looks at whether the supplier chosen by educational institution fulfils the requirements set by national and EU law. However, a national authority is not involved ex-ante in the choice of supplier. Austria, Belgium (for instance, in the Brussels and Flanders regions), Denmark, Estonia, Finland, Latvia, Lithuania, Portugal, Romania, Germany, Slovenia, Sweden and Cyprus use such a system.

In the first group of Member States, namely Belgium (specifically Brussels and Flanders), Denmark, Germany (specifically Bavaria, Hesse, and Schleswig-Holstein), Lithuania, Slovenia and Cyprus, educational institutions establish procedures to select organisations or bodies to distribute the products. In Austria, Belgium, Slovenia and Cyprus, schools must additionally hold public procurement procedures. In Belgium and Cyprus schools decide on eligible suppliers and they must follow public procurement procedures. Additionally, in Belgium, the national authority provides schools with a list of suppliers they may consider. However, the list is not binding nor exhaustive. Although it is important to avoid adding administrative burdens to schools, it has been identified that in Flanders some schools still want to keep as much freedom as possible in their choice of supplier, product and focus (for instance, choice of organic products, short supply chains). It is also the case however that despite all publicity efforts, some schools are not reached, and some schools are scared of the administrative burden of the Schemes or have a financial arrangement with the parents for a weekly/daily distribution of fruit at schools so EU aid is not required.

In Slovenia, schools must select local producers under the principles of short supply chains and following public procurement rules. In Austria, the school also purchases eligible products in compliance with public procurement rules. However, the supplier applies for aid to Agricultural Market Austria (AMA) in most cases. Therefore, both suppliers and schools can be applicant for aid, which potentially means less administrative burden for schools.¹³⁹ AMA approves suppliers if criteria for the choice are met. The Austrian national authority noted that EU funds could be used in a more efficient way (as in ensuring the use of the whole allocated budget) in the case of a public procurement act with one single or very few suppliers of products. This would be challenging to adapt however, as there are lots of approved applicants who are used to supplying products to schools for a long time, which therefore makes it difficult to change the system.¹⁴⁰

¹³⁹ National authorities survey, Austria, Panteia, 2022.

¹⁴⁰ Ibid.

In for example Germany, Denmark, Lithuania and Estonia, schools are not required to hold public procurement procedures. Furthermore, schools can decide if they want to participate in the Scheme and apply for the aid directly or indirectly through another stakeholder such as a supplier. The national authority checks eligibility in connection to aid applications but does not centrally select them. For instance, in Denmark, schools decide whether to participate directly as aid applicants or through a supplier, organisation, or municipality. The Danish Agricultural Agency is not involved in selecting suppliers but approves these in connection with the application and/or payment. The applicant must indicate whether the distribution of products is covered by public procurement procedures, which in all cases is checked by administrative control. In Lithuania, schools are also involved in the selection of suppliers. Other parties such as suppliers of products can apply for the aid only after they either have won a public tender for the supply of products to schools or have obtained such a right on a contractual basis.

In Estonia, applications for aid under the School Scheme may be submitted by schools, city, or rural municipality governments on behalf of schools located on their administrative territory and suppliers of fruit and vegetable products and milk and milk products. Other applicants than schools may apply for the aid under the Scheme only if agreed in writing with schools. Before applying for aid under the school Scheme, the Estonian Agricultural Registers and Information Board must have approved the applicant for aid. In order to obtain approval, an applicant must submit an application in which they confirm that they meet the requirements for applying for the aid. The data concerning the applicant must have been entered in the Agricultural Aid and Agricultural Parcels Register. In Estonia, nearly 90% of the target group is covered, and to reach even more there would need to be a consideration of possible exceptions to procedures or more of a target group demand approach.¹⁴¹

Other entities (such as municipalities) can also be responsible for selecting suppliers within the decentralised system, which is the case in for example, Finland, Portugal, Romania, Latvia and Sweden. In Finland, aid applicants responsible for procuring fruit, vegetable and milk products can also be distributors, municipalities, joint municipal authorities, companies, foundations, or associations that own schools and day centres. Aid applicants procure eligible products themselves following the procurement legislation in force. Finland has a free school lunch system so schools/municipalities/other organisations are already responsible for the procurement and distribution of products, based on the pre-existing national system, and are therefore well aware of such procedures. The school lunch system also provides an easy daily distribution of produce (milk). For fruit and vegetables the time periods are shorter than for milk because the system is new in Finland and there is more need to be aware of the budget in a different way than in milk.¹⁴² However, the administrative burden on both the aid applicants and the administration's side is something that could be reduced.

In for example Sweden, Portugal, and Romania, municipalities or city councils can apply for the aid at the regional or local level. Sweden participates only in the milk part of the Scheme and the suppliers for milk are selected in the same manner as providers of school meals, whereby milk is distributed as part of the free school meals. The meals are usually purchased through a tendering procedure by the municipalities and schools. Although this can be considered an efficient means to distribute products to the children, the Federal Ministry of Food and Agriculture in Germany has noted that the implementation of the educational aspect would be significantly more difficult if products from the school programme were processed as part of regular school meals as this takes away the provision of products from the classroom setting.¹⁴³

¹⁴¹ National authorities survey, Estonia, Panteia, 2022.

¹⁴² National authorities survey, Finland, Panteia, 2022.

¹⁴³ Position of Anonymous submitted to Commissions Review of the EU school fruit, vegetables and milk scheme, 2021, available at: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12971-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme-EU-aid/F2663076_en.

In Portugal it is the task of municipalities to select eligible suppliers. The Scheme has been implemented in a way that the government does not support the supply but the demand, whereby municipalities have to ask to join the Scheme and take care of the distribution. Each municipality (and each school) has to deal with its own procurement, which results in excessive administrative burden, particularly in municipalities with small number of children.¹⁴⁴ 50% of school directors/head teachers from Portugal who responded to the schools survey indicated that the Scheme is a burden on schools in terms of time and resources needed to implement it. If municipalities in Portugal decide to apply for the support under the Scheme, they assume the responsibility to select suppliers and purchase products which are then distributed to schools under their authority. These municipalities must ensure that all primary schools in their reach receive eligible products under the Scheme and must also acquire products in compliance with product selection criteria, which include seasonality, variety and nutritional balance. Also, in some cases organic products should be preferred.

In Romania, suppliers are selected through a public procurement procedure initiated at the county level. One county council carried out procurement procedures for the Scheme because no other territorial administrative unit in the county wanted to assume the organization of the purchase of the products and the development of the educational measures.¹⁴⁵ According to one respondent from the national authorities survey, the fact that national legislation established rather low prices for milk and fruit and vegetable portions, there were not many bidders in the procurement procedures and the quality of the products suffered, as appears to be confirmed by the claims of parents who submitted feedback to the schools survey.

Selected Practice

Concerns about the quality of products

Background

The provision of a great variety of quality products is one of the aims included in the national strategy of Romania and minimum criteria for product quality and presentation are set. Feedback received from school representatives and parents (to the schools survey) regarding the Scheme indicates some concerns regarding the quality of the products distributed, with reports of unappealing look of fruit and vegetables or a spoiled smell of the milk and milk products.¹⁴⁶ Newspaper articles collected from desk research also indicate these concerns in some counties, with one source noting that a food safety enforcement authority indicated the respective food products can have a negative impact on the health of the childred. The same media source also stated that children have been receiving wrinkled apples, yogurts in dirty packages and hard croissants, which was also indicated by some parents in their feedback to the school survey. A respondent to the national authorities survey reported that the vast majority of procurement procedures have the lowest price as their sole award criterion, which reduces the capacity of bidders to offer high quality products, and can in return affect the attractiveness and consumption of the products offered. Some parents indicate in their survey responses corruption in the State structures as the reason for the low quality of distributed products. The quality of products can create a negative perception of the Scheme amongst some stakeholders, which is despite the fact that Romania absorbs a large amount of its available Scheme budget.

Stakeholders involved

In Romania, the Scheme is administered by the Ministry of Agriculture and Rural Development jointly with the Ministry of Health and the Ministry of National Education but the measures themselves (distribution of products, etc.) are being implemented at county level – county councils being the aid applicant and thus responsible for the distribution of quality products as they are the ones choosing the products suppliers under a public procurement procedure. The Ministry of Agriculture and Rural Development sets the minimum criteria for product quality and presentation.

¹⁴⁴ National authorities survey, Portugal, Panteia, 2022.

¹⁴⁵ National authorities survey, Romania, Panteia, 2022.

¹⁴⁶ The opinions expressed are not representative for the country as a whole and should therefore be understood as subjective views on individual cases where products with insufficient quality are reported to have been distributed.

Lessons learned

- In the reported cases of providing poor quality products in contravention to what the Scheme aims to achieve, as in receiving spoiled and low quality products, children cannot build a positive relationship with healthy food if the products they receive are not of sufficient quality.
- Besides schools and parents not being satisfied with the products distributed in terms of quality and variety, the perception of the Scheme as a whole possibly resulting in lower school participation and a negative perception of EU efforts.
- If procurement procedures have the lowest price as their sole award criterion, bidders are not able to offer high quality products, which affects the attractiveness and consumption of the products offered.
- Responsible authorities - at all levels of governance - should see the importance of choosing good suppliers with quality products to ensure the success of the Scheme. Thus next to reassessing the price criterion for choosing a supplier, authorities should ensure possibilities to improve the looks and the quality of the distributed products in terms of better, more eco-friendly packages or fresher products. The frequency of delivery and storing methods can be revisited addressing these issues too.

Sources: Schools survey and national authorities survey, Romania, Panteia, 2022, [Independentonline.ro, Jurnalul Olteniei](https://www.independentonline.ro/jurnalul-olteniei)

In Latvia, traditionally, municipalities choose suppliers for the products and they must hold a public procurement procedure to select them. Additionally, other entities such as producers of eligible products, a food business providing catering services to the relevant educational institution, educational institution, and the local authority within whose jurisdiction the school is located can apply for the aid. The Rural Support Service chooses and publishes the list of producers of eligible products, educational institutions, and aid applicants certified to distribute the products through a platform. Persons published on the platform agree among themselves on the implementation of the Scheme before the beginning of each school year. Each approved aid applicant is awarded different rights. Distributors get the right to distribute to schools for each group of products and for each school separately. Schools receive a right to be supplied with items from the same group of products based on the number of children. The right to supply schools is awarded by the Rural Support Service based on aid applicants' applications to participate in the school Scheme, which indicate the schools to be supplied with the products, the products to be supplied and their producers. The written consent of the school for participation in the Scheme to supply the products indicated must be attached to the application.

Centralised system for the selection of suppliers

In contrast to the de-centralised system, **most Member States, namely Croatia, Czechia, France, Germany¹⁴⁷, Greece, Hungary, Italy, Ireland, Luxembourg, Malta, Netherlands, Slovakia and Spain,¹⁴⁸ use the centralised system for the selection of suppliers. In the centralised system, the administrative authority at the central or regional level either approves eligible aid applicants or directly procures the products.** The approval is subject to eligibility criteria, and after the approval, the educational institution either contracts the suppliers or the supplier contracts schools. The second modality is when the governmental authority centrally contracts the supply of goods through tender or public procurement procedures. Those suppliers are then allocated to schools or geographic regions.

¹⁴⁷ Specifically, Baden-Württemberg, Berlin, Brandenburg, Bremen, Lower Saxony, Saxony, Saxony-Anhalt and North Rhine-Westphalia, Rhineland-Palatinate, Saarland.

¹⁴⁸ In Spain the selection of suppliers is carried out at regional level by the competent authorities, based on the provisions laid down in Article 9 of Royal Decree No 511/2017 of 22 May setting out the implementation in Spain of the European Union legislation on the school fruit, vegetables and milk scheme.

In Croatia, Germany,¹⁴⁹ Czechia, France, Hungary, The Netherlands and Slovakia, an administrative authority ex-ante approves or certifies the suppliers of the products. Suppliers apply for the aid to the administrative authority and once granted the approval, contract schools. In Croatia, Hungary and some German Federal Provinces, suppliers also apply for aid and are approved by the administrative authority. However, schools must additionally either choose the supplier or hold tender or public procurement procedures. In Brandenburg and Berlin, although it is a comparatively small funding programme, the administrative burden is relatively high. Brandenburg and Berlin only take part in the milk component because there are not enough personnel capacities available to also implement the requirements for the fruit and vegetable component.¹⁵⁰ In Baden-Württemberg, well-structured grant applications with clear questions are considered the most important aspect of the process, as this reduces the error rate in the information provided by the applicant.¹⁵¹ In Spain, the selection of suppliers is carried out at regional level by the competent authorities. In Croatia, participating schools had a number of issues in the early stage of implementation when selecting, drafting and signing contracts.¹⁵²

Selected Practice

CROATIA – Administrative burden having an effect on participation

Background

In Croatia, participating schools have reported some issues regarding the level or burden evident in the implementation of the Scheme. This has also been noted in the responses from schools in the survey, whereby participants noted that ‘the paperwork is too extensive and time consuming’ and an ‘over-regulated supplier selection process and over-complicated paperwork in relation to the value of goods received’. Around 54% of school directors/head teachers indicated in the schools survey that the Scheme is a burden on schools in terms of time and resources. Also, the Ministry of Agriculture has received some dissatisfaction from participating schools with an argument that the implementation of the programme is resulting in additional administrative burden for which they cannot reimburse costs in any way except from the measure distribution, which is already overstretched.

Stakeholders involved

Stakeholders involved in the implementation of the Scheme include public bodies (Ministry of agriculture, Ministry of Health, Ministry of Science and Education, Paying Agency for Agriculture, Fisheries and Rural Development, State inspectorate of Croatia, Croatian Institute of public health, beneficiaries (schools) and their Founders (local and regional government), natural and legal persons (suppliers of fruit and vegetables and milk and milk products participating in the distribution and/or delivery measure).

Lessons learned

- From the administrative point of view, the Ministry of Agriculture has tried to integrate schools stronger into the process based on monitoring and planning the needs of children and most importantly, the direct management of the budget. However, it has been noted that participants (schools) are stating that the amount of administrative activities takes up school's working capital and time, and therefore participants are advocating simplification of the programme in terms of administration (invoices, delivery notes, tables, reports etc.).
- This was also noted in the schools survey, whereby it was reported that ‘administrative procedures should be simplified as much as possible’.
- The implementation of further rules could trigger a decrease in the willingness of schools to participate in School Scheme in the coming years.

Source: Schools survey and national authorities survey, Croatia, Panteia, 2022

¹⁴⁹ Specifically Baden-Württemberg, Berlin, Brandenburg, Bremen, Lower Saxony, Saxony, Saxony-Anhalt and North Rhine-Westphalia.

¹⁵⁰ National authorities survey, Germany, Panteia, 2022.

¹⁵¹ National authorities survey, Germany, Panteia, 2022.

¹⁵² National authorities survey, Croatia, Panteia, 2022.

Suppliers contract schools

In Czechia, France, Germany, The Netherlands, and Slovakia, **suppliers apply for approval by the administrative authority, subject to fulfilment of objective criteria. Once approved, suppliers contract schools.** In those countries, supplier generally means a private entity (legal or natural persons - entrepreneurs) supplying relevant products and/or accompanying measures under the Scheme. The system's main advantage is that schools are not responsible for public procurement or tendering procedures. For example, The Netherlands has a different procedure for the selection of suppliers of fruits and vegetables and milk. Fruit and vegetable suppliers can register during the open application period with the Netherlands Enterprise Agency (RVO) to be accredited as a school fruit supplier and take part in the Scheme. If they fulfil the conditions for recognition and state in writing that they agree to the Scheme's requirements, they can participate. The conditions for approval include that the applicant can deliver products nationwide to at least 300 schools. Furthermore, the applicant declares that they are aware of and accepts a flat-rate aid of €0.17 per portion to cooperate fully for the on-spot checks and to supply the schools allocated during the periods of delivery. The application must also include a fully completed form of application provided by RVO, a recent extract from the Chamber of Commerce commercial register and the maximum number of schools that can be delivered. The Agency grants accreditation for eight suppliers (subject to the special procedure if more applicants) for two consecutive years. Once schools register for the Scheme, the Agency allocates suppliers to schools. In the case of milk, there is no limited number of suppliers, and accreditation is subject to submitting the application and fulfilling the conditions. The conditions for approval are that the supplier fulfils the conditions laid down in Article 6 of Regulation (EU) 2017/40; declares that they will keep a price calculation to demonstrate that aid is used for the benefit of the participating pupils, declares that they are aware of and accepts a flat-rate amount of aid of €0.25 per unit and that will cooperate fully for the on-the-spot checks.

In Czechia, aid applicants for products can be a producer of fruit, vegetables, milk and dairy products, which is a private entity either directly supplying products or managing the supply of products to schools (a distributor). The applicant must furnish necessary documentation, including application, and in the case of a producer, documentation proving production (for instance, a copy of a sales document, a copy of an LPIS extract and a copy of a certificate of registration as an agricultural business). Furthermore, the applicant must provide a list of names of products and other necessary documentation. Once approved, the applicant must contract the school, furnish a contract concluded with the school, fulfil a commitment to make the minimum number of deliveries of products to the school as determined by the agricultural paying agency and fulfil a commitment to supply products throughout the school year.

In France, the local authorities organising school catering are the applicants for the School Scheme: public institutions (local authorities, colleges, high schools and other structures bearing the cost of school catering) and the private institutions management organizations. The applicant is responsible for selecting suppliers (organising the public procurement procedure and notifying to the paying agency), organising the distributions, and applying for the aid. These authorities organising school catering also have sufficient cash flow to advance the distribution costs of the school scheme. Suppliers must apply to the National Establishment of Agricultural and Seafood Products (AgriMer). This state-controlled organisation will grant approval to suppliers who only offer eligible products under the programme, provide separate delivery notes/invoices specific to the products delivered under the programme and draw up a consistent summary of the quantities delivered.

In Germany,¹⁵³ the administrative authority in the respective state certifies the suppliers. For example, in Saxony, eligible suppliers must comply with the conditions as established in Article 5(2)(c) of Delegated Regulation (EU) No 2017/40, be registered or licensed as food companies

¹⁵³ Baden-Württemberg, Berlin, Brandenburg, Bremen, Lower Saxony, Saxony, Saxony-Anhalt and North Rhine-Westphalia.

according to Art. 6 of Regulation (EC No 852/2004 on the hygiene of foodstuffs, can apply for a license to operate as a supplier under the EU school Scheme. Depending on specific state the school then either contracts the suppliers from the list or suppliers contract the school.

Schools contract suppliers

In Croatia, Germany, and Hungary, **suppliers must apply for approval, but schools purchase eligible products through tender or public procurement procedures.** In Croatia, the Paying Agency for Agriculture, Fisheries and Rural Development approves aid applicants for the distribution and/or delivery of fruit and vegetables and milk and milk products. Schools subsequently select suppliers using the list of approved and evaluated suppliers and supplier checklist issued by the ministry. In Germany,¹⁵⁴ the government publishes a list of eligible suppliers from which the schools select.

Hungary has separate procedures for the selection of suppliers of fruits and vegetables and for milk. Regarding supply of fruits and vegetables, the conditions for prior approval include that the supplier is recognised as: a) a fruit and vegetable producer group, producer organisation or association, or b) the supplier produced at least one type of fruit or field vegetable to be supplied under the school fruit and vegetable Scheme in the previous two years based on an application for single area payments or based on a valid extract from the register of companies, the supplier's owners are exclusively entities listed under points a) or b). The supplier must also agree in writing to comply with the requirements concerning product distribution and accompanying measures under Article 6 of Commission Delegated Regulation (EU) 2017/40. The operators of public educational establishments select the suppliers from the approved list through a tender based on the criteria set by the national decree on the implementation of school fruit and vegetable part of the Scheme (such as product quality, locally produced products, accompanying measures). The agreements cannot be concluded for longer than three years. For the milk part of the national authority does not publish a list of eligible applicants. Instead, educational institutions select them through tender procedures.

Public procurement and tender procedures for the selection of suppliers

In the centralised system, the government procures the products itself through public procurement or tendering procedure. Germany¹⁵⁵, Greece, Ireland, Italy, Luxembourg, Malta use such procedures to select suppliers. For example, in Greece, the contractor for the free distribution of the products and potentially some of the accompanying education and information measures, as well as the evaluation of the programme is selected through an open public tender procedure. Regarding procurement procedures for selection of suppliers and the involvement of authorities and stakeholders, they are carried out by the central authorities because they had the experience from the previous school Scheme or other similar programmes. For drafting the technical specifications, stakeholders were involved through meetings and consultations with collective bodies representing different parts of the food chain. However, one of the main issues in terms of effectiveness identified in Greece are the mandatory public procurement procedures, which are time-consuming, and may lead to limited participation and avoidance of new entrants to the Scheme due to concerns over bureaucratic and time-consuming procedures. Therefore, administrative burden is provoked by the public procurement procedures, which may obstruct the implementation of the school Scheme.¹⁵⁶

In Rhineland-Palatinate (Germany), it is a political requirement that educational establishments should have as little effort as possible. There are different processes for identifying suppliers for fruit/vegetables and milk due to historical reasons when there were separate programmes for

¹⁵⁴ Specifically Bavaria, Hesse, North Rhine-Westphalia.

¹⁵⁵ Specifically Rhineland-Palatinate, Saarland, Thüringen.

¹⁵⁶ National authorities survey, Greece, Panteia, 2022.

fruit/vegetables and milk. Moreover, in the past it was easier to find milk suppliers than fruit and vegetable suppliers. Suppliers of fruit and vegetables are chosen as part of a European-wide tender process. The tender includes 60 lots (delivery areas). The contract between the supplier and the competent authority will be awarded to the bidder with the most economical offer (best value for money). The portion price per lot is then valid for the entire school year. Educational establishments have no choice to choose a special supplier. Suppliers of milk must declare each year whether they want to participate in the programme and which region they are able to supply. If there are several suppliers for a particular region, the establishment is free to choose the supplier.¹⁵⁷ Therefore, the administrative effort for the authorities is quite high in this case. In particular, a European-wide tender process is complicated and moreover labour and time intensive. In previous years, the Europe-wide tender was conducted annually. Starting with the school year 2021/22, the duration of the contract (framework agreement) has changed to up to 4 years.

In Ireland, the tender process for the selection of suppliers of fruits and vegetables is held by a non-commercial state body Bord Bia. Such process is subject to review by the Department of Agriculture, Food & the Marine. National Dairy Council, which is a trade body with a remit to promote the consumption of milk and milk products, will hold such procedure for the selection of suppliers of milk.

Luxembourg chooses the suppliers for fruits and vegetables through an open European public procurement procedure. Suppliers purchase products themselves and distribute them to educational establishments involved in the programme. For milk, suppliers are selected via a tendering procedure. Beneficiaries are the suppliers of products. The white milk is totally subsidised by the school programme, for chocolate milk, only an aid for the milk component is subsidised.

Lastly, Italy and Germany (specifically Rhineland-Palatinate and Saarland) choose suppliers through European calls for tenders. Italy reformed the provisions regulating call for tenders to overcome some criticisms that emerged in the past year. The objective was to create a distribution schedule that is more consistent with school needs but above all with the more typical seasonality of products, especially fruit and vegetables. In Germany, suppliers who won the tender previously are afforded the opportunity to continue to participate in the Scheme, and the previous licence remains in place.

Mixed system

In Bulgaria, Belgium (Wallonia), Germany, Poland, and the UK, **the system is not fully de-centralised because national authority is involved in the approval of suppliers and not fully centralised because schools or other entities have a more important role in the selection of suppliers than in the centralised system.** For example, suppliers need to furnish contracts with schools before applying for aid to the relevant authority. In Poland and Belgium, both centralised and de-centralised system is used. Looking at Poland, due to suppliers covering the whole territory of the country, this means that the products are accessible also to pupils in the far-distance country areas and schools located in the mountain regions. However, there is a decreasing trend in the number of suppliers and producers of milk products dedicated to the School Scheme in Poland. They argue that the implementation of the Scheme is becoming increasingly difficult in economic terms due to the need to keep the target group unchanged.¹⁵⁸ Schools tend to not be interested in organising deliveries and applying for aid themselves, and prefer to make use of approved supplier's services instead because it significantly limits administrative obligations relating with participation in the Scheme. Limiting of administrative burdens is also important from supplier's point of view. Taking into account experience gained during the pandemic, it is considered important to ensure

¹⁵⁷ National authorities survey, Germany, Panteia, 2022.

¹⁵⁸ National authorities survey, Poland, Panteia, 2022.

enough flexibility in the execution of the Scheme. A more detailed look at the system in Wallonia is provided in the outlined practice below.

Selected Practice

BELGIUM (WALLONIA) - Dual regime for selection of suppliers in Walloon region to alleviate administrative burdens of schools

Background

Prior to 2020, Wallonia (Belgium) used a decentralised system to select suppliers. In July 2020, the Walloon ministry initiated reforms and implemented a dual system for the selection of suppliers and participation of schools in the EU School Fruit, Vegetables, and Milk Scheme. According to Walloon's regional strategy for implementing the Scheme, the reason for starting this practice was a decreasing trend in the total number of participating schools in the Scheme. The schools reported that participation in the Scheme was administratively burdensome, specifically in managing public contracts and the advanced recovery of funds. Therefore, the dual system introduced by the reform allows for two modalities for participating in the Scheme.

Under the first modality, schools participate in the Scheme through a centralised public market. Schools submit participation requests and the application form before the deadline to the public service of Wallonia - agriculture, natural resources and environment (SPW-ARNE) using the online system. SWE-ARNE selects suppliers in compliance with Belgian and EU legislation. It also assesses and approves the applications of schools. The authority validates and registers schools in the system if fully applied, allocates the suppliers of products, and subsequently awards the aid to reimburse the suppliers for the entire school year. Suppliers contract the schools, and schools undertake a commitment to perform their duties under the Scheme. Schools are not considered aid seekers, but suppliers are; therefore, schools are not responsible for public procurement procedures, nor advance payments.

Under the second modality, schools participate in the Scheme through the public schools' market, which means that schools must select the supplier in compliance with public procurement rules before enrolling to the Scheme. Schools are considered as aid seekers under the Scheme. In contrast to the first modality, except for the online participation request form, the schools must also submit several documents up to 20 days after applying to the programme. Those are documents proving simultaneous competition between several potential suppliers including the award criteria, demonstration that the suppliers have had sufficient time to be able to submit their offer. Such documents include, for instance, a copy of the invitation to public procurement, a copy of proof of posting of all invitations to tender sent to all competing suppliers, a copy of the request for quotation appended to the invitation to tender, proof of all offers received, copy of award report (which includes a comparison of all submitted offers, the justification of award) or proof of consultation (e.g. copy of the minutes of all the conversations carried out). Schools must archive those documents for at least four years. SPW ARNE will inform the school whether its applications have been validated or not. Once approved, the schools are recognised as aid seekers. The distribution must start in November, but schools need to submit a request for assistance till March. If approved, they receive fixed aid per child per day for fruit and vegetables and for milk for period of three months. Schools must continually submit a new request for assistance.

Stakeholders involved

The practice is implemented at the regional level in the Belgium region Wallonia. Stakeholders involved in the process include participating schools (Nurseries, Pre-Schools and Primary schools) and a number of regional stakeholders: the Walloon Agency for the Promotion of Quality Agriculture (APAQ-W) which is a public interest organisation (OIP), The Ministry of Agriculture, Natural Resources and Environment of Public Administration of Wallonia (SPW – ARNE), which administers the Scheme, and distributors of the products.

Lessons learned

- The reform has been just recently implemented; therefore, it is premature to fully assess its effectiveness.
- However, according to SPW – ARNE, the practice is expected to alleviate administrative burden on schools since, under the first modality, schools do not need to carry out a selection of supplier processes and evidence the compliance with public procurement rules. If schools are required to carry out a public procurement process, they need to invest a substantial workforce and additional costs. The approach also provides schools with flexibility if they wish to select their specific suppliers of products in accordance to their own public procurement procedures (under second modality).
- Furthermore, under the previous system, schools had to bear expenses in advance because regional authorities reimbursed them ex-post, after occurring the costs for the distribution of products. The schools needed to take all the necessary measures not to favour one economic operator (supplier) over another whenever consulting suppliers or when drafting the request for a price. They faced the increased risk that the paying agency would not reimburse

them if their procedure had been administratively faulty. For all those reasons the region experienced a decrease in participation rates of schools and policy makers chose to adjust the procedure to be better suited to the needs of schools and boost participation in the Scheme.

- The reform was developed and implemented through a working group under the coordination of SPW ARNE. The working group consults relevant stakeholders, including schools, whenever making decisions on the strategy. Based on the feedback received from schools, the group adjusted the strategy to address the critique of schools. Therefore, the first reflection point is that the practice is an example of pro-active adjustment of implementation strategy based on multi-stakeholder dialogue.
- The reform prioritises schools, which are essential facilitators of healthy environment for children. Therefore removing the obstacles for schools is essential to boost their participation and consequently reach and extent of the Scheme.

Transferability of the practice

Member States could take this approach if they face decreased rates of participating schools in the Scheme. Reforms have been based on feedback from schools, provides them with flexibility if they wish to select their specific suppliers of products in accordance to their own public procurement procedures (under the second modality), but also if they do not want to burden themselves with public procurement procedures (under the first modality). The practice is aimed towards schools, which are cornerstones of the Scheme.

Sources: Wallonia '[Participer au programme européen Lait, Fruits et Légumes à l'école](#)', [Wallonie Agriculture SPW, Strategy for the implementation of the School Scheme in Belgium, Walloon Region](#)

In Bulgaria, schools decide how to participate in the Scheme - directly or through an applicant. Individual traders, commercial companies and cooperatives which have committed to supply fruit and vegetables and/or milk and milk products to one or more educational establishments, fruit and vegetable producers, including organisations and groups of fruit and vegetable producers and milk and milk product producers, municipalities, on behalf of educational establishments within their territory can apply for the aid. In all cases, the applicants are subject to the approval of the State Fund for Agriculture.

In the UK, individual education authority, individual school, supplier, or an organisation set up specifically for the purpose of supplying milk or milk products under the Scheme can apply to claim the aid. The aid is subject to approval by the Rural Payment Agency or the Department of Agriculture, Environment and Rural Affairs in advance. To be approved, organisations must certify that they will comply with the Scheme rules.

In Germany (specifically Mecklenburg-Western Pomerania), the administrative authority makes a call for suppliers to submit tenders in a declaration of interest procedure. In the call also the names and addresses of schools and the number of children are published. The suppliers submit tenders to those schools. The suppliers chosen under the declaration of interest procedure must apply for a licence as applicants. Funding requests are to be made after licensing.

Lastly, in Poland, suppliers apply to National Centre for Agricultural Assistance. The authority approves applicants with organisational resources necessary for the proper conduct of activities related to fruit and vegetable or dairy product distribution, which has been active in the production, processing or marketing of dairy, fruit or vegetable products for at least six months prior to applying for approval. Approved applicants may conclude contracts for free supply with any primary school. Under the second modality, primary schools will act as applicants and supply themselves with eligible products.

Administrative procedures relating to the selection of suppliers for providing accompanying education, information, communication, monitoring and evaluation measures and their provision

This section looks at the administrative procedures relating to the selection of suppliers for providing accompanying education, information, communication, monitoring and evaluation

measures, as well as their provision. Information illustrating different approaches taken at Member State level has been provided where relevant.

Selection of suppliers of accompanying education, information, communication, monitoring and evaluation measures

Regarding accompanying measures, Member States either use the same procedure for the selection of suppliers of products or use separate procedures. Some countries do not indicate in their national strategies whether they use procedures different from the ones applied for the distribution of products under the Scheme for example, Bulgaria, and the UK.

Same procedure

The first group of Member States applies one and the same administrative procedure for the selection of suppliers of fruits, vegetables, milk, and for the selection of suppliers of the other measures under the Scheme. For example, Croatia, Czechia, Denmark, Estonia, Greece, Hungary, Italy, Romania, and Slovakia. This means that the aid for educational measures is included in the award to the aid applicant. The practices of a few Member States, belonging to this group, are illustrated below.

In Czechia, approved applicants for the aid for the supply of products can carry out accompanying educational measures, which they can commission from other providers. In Estonia, the same procedure applies; however, if the applicant asks for funding for educational measures exceeding 500 EUR, the applicant must have obtained at least three comparable bids. If the applicant did not obtain three bids, it must provide justification. Whilst it is noted that in Estonia these measures have a key value, often there is limited budget, which can have an impact on the effectiveness and reach of the measures, and therefore it is important to have a selective approach for these measures.¹⁵⁹

In Denmark, it is a mandatory condition for applicants to arrange for accompanying educational measures. If applicants do not wish to organise accompanying educational measures themselves, the Danish Agricultural Agency provides educational tools. At present, very few schools apply for aid to organise accompanying measures. Some schools are simply not familiar with the possibility to utilise the Scheme for organising accompanying educational measures, while others have deemed the task to be administratively burdensome. In Hungary, the responsibility to carry out accompanying measures is shared between suppliers and public educational establishments.

In Croatia, suppliers for educational measures undergo the same procedure; however, a different authority is involved in their approval and subsequent granting of the aid. The Ministry of Agriculture approves aid applicants for the promotion measure and for accompanying educational measures, the Ministry of Health approves aid applicants for the monitoring and evaluation measure, while the Paying Agency for Agriculture, Fisheries and Rural Development approves aid applicants for the distribution and/or delivery of fruit and vegetables and milk and milk products measure.

Different procedure

The second group of Member States uses different procedures for the selection of suppliers for measures under the Scheme, unrelated to the product supply and distribution. For instance, if schools oversee the selection of suppliers, accompanying educational, but also communication, information and monitoring and evaluation measures are usually procured at the central level. The countries which use different procedures are Austria, Belgium (specifically Flanders and Wallonia), Cyprus, Finland, France, Germany, Ireland, Latvia, Lithuania, Malta, The Netherlands, Poland, Portugal, Cyprus, Slovenia, and Sweden. This means that there are two separate systems for accompanying measures and supply and distribution of products. In Austria, as previously

¹⁵⁹ National authorities survey, Estonia, Panteia, 2022.

mentioned, schools as aid applicants also apply for aid for educational measures. However, information, communication and evaluation measures are centrally procured by the government. Austria has indicated that it would be easier to implement accompanying measures by means of a single supplier that has been selected via public procurement.¹⁶⁰ In Portugal, there are two levels regarding organisation of educational measures – local (schools and municipalities) and national level, with the latter attempting to highlight the Scheme and improve the communication. However, messages communicated to pupils are mostly not from an agricultural point of view, due to parallel intervention of the health authorities.¹⁶¹

Similarly, in Germany, monitoring, evaluation and accompanying educational measures are carried out at the federal or regional level. For example, in Mecklenburg-Western Pomerania, the government centrally procures accredited educational providers for accompanying measures. In Belgium (specifically Wallonia), for all other activities than supply and distribution of products, the Walloon Region has carried out a public contract.

In France, the national authorities have chosen to go through an external service provider, the Eveil association. Regarding information and publicity activities, the national authorities have at this stage used their internal communication service. They may use external service providers, if necessary. Interestingly, in Sweden, individual schools cannot apply for aid for accompanying measures but must work with the existing measures. The Board of Agriculture will inform all participating schools about existing accompanying educational measures. The schools may decide which measures are suitable for their children.

In Ireland, Luxembourg and the Netherlands, schools alone are responsible for educational measures and for that purpose, they are awarded additional aid. In Poland, head teachers at primary schools participating in the Scheme are required to ensure, starting from the 2017/2018 school year, that schools carry out activities that shape healthy eating habits amongst pupils and enhance their knowledge of where agricultural products come from. Poland centrally allocates budget for educational measures. In 2017/2018, the budget has been provided to preparing packages and teaching materials for teachers, pupils, and parents.

The next sections provide information on how information and communication as well as monitoring and evaluation measures are provided by the selected suppliers. There is no separate section on the provision of educational measures because these are commented across the entire research paper.

Administrative procedures related to provision of information and communication measures on the Scheme

Member States participating in the school Scheme must publicise their involvement in the Scheme and the fact that the Scheme is subsidised by the European Union, as stipulated under Article 23a (8) of the CMO Regulation and Article 2(1)(m) of the Implementing Regulation.¹⁶² They may publicise this either at school premises or other relevant places, and may use tools such as posters, websites, informative graphic material, and information and awareness-raising campaigns. Member States must also ensure the added value and visibility of the school Scheme in relation to the provision of other meals in schools. **While all Member States set up posters throughout school establishments, dedicate websites for the school Scheme and use other channels of social media, others have gone to further lengths in achieving publicity for the Scheme.**

¹⁶⁰ National authorities survey, Austria, Panteia 2022.

¹⁶¹ National authorities survey, Portugal, Panteia 2022.

¹⁶² Commission Implementing Regulation (EU) 2017/39 of 3 November 2016 on rules for the application of Regulation (EU) No 1308/2013 of the European Parliament and of the Council with regard to Union aid for the supply of fruit and vegetables, bananas and milk in educational establishments (2017) OJ L 5/1.

For example, in Greece and Malta, children in the target group receive promotional souvenirs and materials of the Scheme. In Malta, children are further involved in sharing awareness of the Scheme by designing a mascot for it on the basis of a competition. Promotional content is also broadcasted through television spots to access a broader audience, and animators are hired for use in several events. Hungary and Poland take the same approach in raising awareness of the Scheme among the public at large, by providing information events, meetings, conferences, seminars, and workshops. In Poland, information and publicity measures are implemented on the basis of annual plan of promotional measures approved for a given school year. Scope of activities vary every year and is adjusted to current needs. Applicants are selected on the basis of public procurement law. The same procedure is applied for educational measures implemented as a part of the Scheme. National authority responsible for implementation of information, promotional and educational measures is National Support Centre for Agriculture (Krajowy Ośrodek Wsparcia Rolnictwa) and its dedicated departments. Luxembourg arranges a magazine outlining the programme, which is distributed to all households, and disseminates information of the Scheme through presentations in agricultural fairs. Also, in Austria and the Wallonia region in Belgium, information of the Scheme is distributed in fairs. It is important to note that in Austria, information measures are limited and must focus on fresh fruit and vegetables and/or drinking milk, due to the fact that in Austria it is possible for schools to choose the milk products provided, which can also include cocoa and sweetened products.

Selected Practice

AUSTRIA – Limiting of subject of information measures

Background

In Austria, information measures are provided that are aimed at parents, teachers, pupils and the general public, and contribute towards increasing awareness of the EU school Scheme, such as brochures, folders, TV and radio campaigns, digital media campaigns, information sessions and newspaper articles. A logo has been created in order to establish and cement recognition of the school Scheme. All measures must be generic in nature and must not help individual companies to acquire customers or increase sales. Brand advertising and the advertising of individual companies are therefore not allowed. Additionally, information about the EU school Scheme is provided at Interpädagogica, which is Austria's only trade fair for the education sector and therefore the most important information hub for educators and all those with an interest in education. It is aimed at educators from all types of schools and childcare facilities, representatives of education authorities and school providers, trainers, people working in school canteens, people working in the youth sector, students in pedagogy, parents and all those interested in further education.

However, information measures aimed at children and teenagers must focus on fresh fruit and vegetables and/or drinking milk, due to the fact that in Austria it is possible for schools to choose the milk products provided, which can also include cocoa and sweetened products. As a contextual point, it has been noted that it is difficult to establish priority for fresh milk in Austria because children are used to choosing the milk products they want since the introduction of the school milk Scheme in 1995, with a preference for sweetened products. For many years, the EU funded sweetened milk products in the framework of the EU School Milk Scheme and this led to the preference of those products to the disadvantage of pure drinking milk.

Austria has opted for the approach to sustainably influence the sensation of taste of the children by means of permanent reduction of sugar in the products subsidised within the framework of the school programme and to alleviate in this way a conversion to pure drinking milk. The suppliers of school milk invested in their production to meet this provision. It was necessary to consider their efforts and preserve their marketing channels. In this regard, specific communication measures can provide information about sugar reduction measures. In addition, schools should be informed about the possibility and usefulness of accompanying educational measures.

Stakeholders involved

Agrarmarkt Austria sets out detailed rules on communication measures and accepts applications for EU funding for such measures. Information brochures are created by the Federal Ministry of Agriculture, Regions and Tourism. Interpädagogica accumulates information about the Scheme as the most important information hub for educators.

Lessons learned

- Information measures aimed at children and teenagers should focus only on fresh fruit and vegetables and/or drinking milk.

- In the new Scheme there should be a considerable shift in the consumer behaviour of children towards pure drinking milk. However, it should be noted that it is difficult to change the consumer behaviour in short time.
- To enhance priority for fresh milk, means of giving priority to drinking milk have been introduced, such as drinking milk being delivered for free to children of primary schools during a certain period of the school year (milk action) and drinking milk being more heavily funded and by far the cheapest of all the products offered in the milk sector.
- School milk distributors had to adapt their products to the permanent reduction of sugar provision.
- Finally, the quantity of distributed pure drinking milk increased during the school year 2020/21 in a more than marginal way compared to the previous years.

Sources: National authorities survey, Austria, Panteia, 2022, [National Strategy Austria](#)

In Italy, when distributing the products by the contractor's staff, they all must wear badges, clothes, and emblems clearly identifying the EU Scheme, increasing the visibility of the programme. One of the dedicated websites in Ireland is designated for teacher's support, which includes lesson plans, activities, and web resources for conducting the school milk part of the Scheme, which is considered to be a useful tool for teachers.¹⁶³ Finally, in Germany, the Saxony-Anhalt region arranges letters and leaflets filled with information and tips specifically for parents and guardians of the participating children. Bremen also focuses on the children's parents, as they are continually kept up to date with the Scheme through parents' evenings and consultation days, which in turn influences the implementation of the Scheme's structuring. In Baden-Württemberg, at the suggestion of the institutions, the developed flyer was translated into eight languages and made available for download. The funding guide of the state of Baden-Württemberg and the school programme homepage make all information available to anyone who is interested at any time.

Administrative procedures related to provision of monitoring and evaluation requirements

Each participating Member State is required to monitor and evaluate the school Scheme, as stipulated under Article 2(2)(g) of the Implementing Regulation, which must then be sent to the European Commission. The monitoring reports cover each school year, and the evaluation reports cover five school years and will be available from 1 March 2023. The monitoring reports draw upon the data originating from management and control obligations, such as the requirements set out in Articles 4 and 5 of the Implementing Regulation.

Member States generally conduct annual monitoring through a designated public authority (which can be more than one body), while evaluation is mostly conducted externally, through a public procurement procedure. In Slovenia and Slovakia, a public authority explicitly evaluates the Scheme. Moreover, in the German Federal Provinces of Berlin and Brandenburg, a private institution has already been chosen to conduct the evaluation of the Scheme, rather than conducting a request for tenders. Input from the national authorities survey for the provinces indicated that the basic data in the monitoring reports should include: the number of educational establishments participating in the school Scheme; the number of children involved in the school Scheme under the aid for the supply of fruit and vegetables, the aid for the supply of milk and milk products and the aid for additional educational measures; the quantities applied for under the aid for the supply of fruit and vegetables in educational institutions, by category; the quantities applied for under the aid for the supply of milk and milk products in educational institutions, by category; the amount of EU and (if applicable) government aid for the supply of fruit and vegetables, milk and milk products and for carrying out additional educational measures.

While the procedures of all the Member States are uniform regarding monitoring and evaluation, two countries have supplementary procedures. Outside the scope of the school Scheme, the Netherlands conducts additional and separate monitoring and evaluation of the links between the accompanying measures and the broader "Jong Leren Eten" educational programme. In Slovakia, the monitoring and evaluation is conducted by four different bodies on separate areas of the

¹⁶³ Stakeholder survey, Panteia, 2022.

Scheme. One body is focused on the basic data of the Scheme, another on the Scheme's ability to raise awareness of health and a change to healthy eating habits, one body for the implemented education, sporting, and movement activities, and the last body evaluates the basis of data from stakeholders, which sends the reports and other communications to the European Commission.

In Estonia, monitoring is a yearly based process, and evaluation contains five-year conclusion, which is considered a very time consuming process and the outcome is already predicted and seen through monitoring.¹⁶⁴ The current timeframe for evaluation is demanding in one part, and it is important to assess whether Member States have time to benefit from the result of EU and National evaluation process. Currently, there is no time to take evaluation results into consideration and implement those into the national strategy.

Administrative and on-the-spot checks

As part of the regulation of the school Scheme, **Member States must conduct systematic administrative checking of all the aid applicants under the Scheme.** They must outline the supporting documents relating to the supply and distribution of the products, which must then be submitted with the aid applications and subsequently conduct checks of these documents. Administrative checks must also include aid applied in relation to monitoring, evaluation, publicity, and accompanying educational measures. In terms of aid applied for the supply and distribution of products and accompanying educational measures, these checks must be supplemented by on-the-spot checks. Each on-the-spot check must be completed with a control report. Moreover, where an applicant applies for aid relating to accompanying educational measures, on-the-spot checks on the premises of the applicant may be replaced, based on a risk analysis, by on-the-spot checks at the locations where the measures are carried out.

All Member States have allocated authoritative bodies which conduct administrative and on-the-spot checks. States do not heavily differ in their method and procedure as established under Article 2(2)(g) of the Implementing Regulation. For instance, in Bulgaria and Spain, the supporting documents that must be submitted by aid applicants include: initial accounting documents, product delivery, average weights, diversity requirements, compliance with price caps, the number of children enrolled at the start of the school year in the centre or schools to receive the products, and so on.

The same goes for on-the-spot checks. These usually include information as to whether accompanying measures are carried out, checks on bookkeeping, accounting, sales prices, the quantities supplied to children, and the children's attendance. However, some Member States have additional checks. For example, the Netherlands conducts checks on whether the posters for the Scheme have been clearly hung near the main entrance to the schools, or whether the school's website includes the EU flag and the statement that the school participates in the Scheme and that the EU provides a financial contribution. In Romania, the checks verify children class attendance rate, by also comparing the data in the records kept by each school with regard to the number of attending students and the number of portions consumed. Moreover, for each month related to the aid application, the inspectors will select a day with the maximum student attendance rate according to the records kept by each school. Where there are differences recorded, the extra quantities indicated in the aid application will be reduced in relation to the number of attending students. Where the reduction in quantities for the days checked exceeds by 20% of the quantities requested for the days subject to checks, said checks will be extended to all the days in the period covered by the aid application. In relation to accompanying educational measures, the organisation of competitions, and the day when the prizes, honours, and attendance prizes were awarded, are also checked.

¹⁶⁴ National authorities survey, Estonia, Panteia, 2022.

Most Member States have designated one authoritative body responsible for both the administrative and on-the-spot checks of the Scheme (Austria, Slovenia, Romania, Portugal, Finland, Ireland, Bulgaria, Czechia, Denmark, Estonia, Spain, France, Croatia, Italy, Cyprus, Latvia, Lithuania, Germany (Baden-Württemberg, Berlin and Brandenburg, Bremen, Mecklenburg-Western Pomerania, Saarland, Saxony, Thuringia and Schleswig-Holstein)). Some others have two different bodies conducting separate checks for the fruit and vegetables and milk parts of the **Scheme** (Luxembourg, Slovakia and Germany (Rhineland-Palatinate region)), **or multiple bodies in liaison with one another** (Hungary, Malta, the Netherlands, Poland, Slovakia, Sweden, Greece, Belgium (Wallonia and Brussels region) and Germany (Bavaria, Hesse, and North Rhine-Westphalia)). Particularly in Slovakia, there are 3 different authoritative bodies conducting different types of checks. One body examines the standard applicant claims, including checks in relation to the chilling of products during transport and storage, as well as the verification of vending machine documentation if they are used to supply such products. Another body is specifically designated to the hygiene conditions in schools receiving the products. The final authoritative body performs separate checks on fruits and vegetables and milk.

In 2022, the Commission deemed it appropriate to derogate from certain provisions of Implementing Regulation (EU) 2017/39 in respect of school year 2021/2022.¹⁶⁵ In particular, this referred to allowing Member States to carry out on the spot checks remotely. For instance, in Estonia, due to COVID-19, on-the-spot controls can now be carried out from distance, whereby all documents can be sent by e-mail or through school Scheme e-system, therefore removing the need for on the spot activity, thus reducing burden. In

Some stark differences that deviate from the standard checks are observed in Croatia, Malta and the Wallonia region in Belgium. In Croatia, the on-the-spot checks include verifying the procedure for selecting suppliers. There have been no recorded difficulties in Croatia regarding carrying out on-the-spot checks over the implementation period.¹⁶⁶ From the start of the 2020/2021 school year in Malta, the on-the-spot checks have been replaced by a voucher-based system. The original vouchers are presented together with a request for payment form and the invoice for each payment period. In the Wallonia region, the national strategy in 2017 indicated a process of checks that differs for schools using a centralised system and those in a non-centralised system.

3.4.4. Unintended and unexpected effects (including impact of COVID-19)

This section will look at the unintended and unexpected effects that occurred during the implementation period, including impact of the COVID-19 pandemic on the Scheme. Specific examples of effects will be provided, based upon inputs provided by Member States in the context of the national authorities' survey.

COVID-19

Initial impacts

The COVID-19 pandemic had a large impact on schools, and in particular, the distribution of products. The pandemic brought about the closure of most schools all over Europe, and in short-term created a situation where perishable products were bought by schools but could not be delivered. In the medium and long term, schools had to address the completely disrupted planning of the distribution of products. Even when schools were re-opened the uncertainty regarding the virus situation meant that schools could not conclude contacts and distribute products to children. **The consequent closure of schools, due to the pandemic, also made it necessary to have**

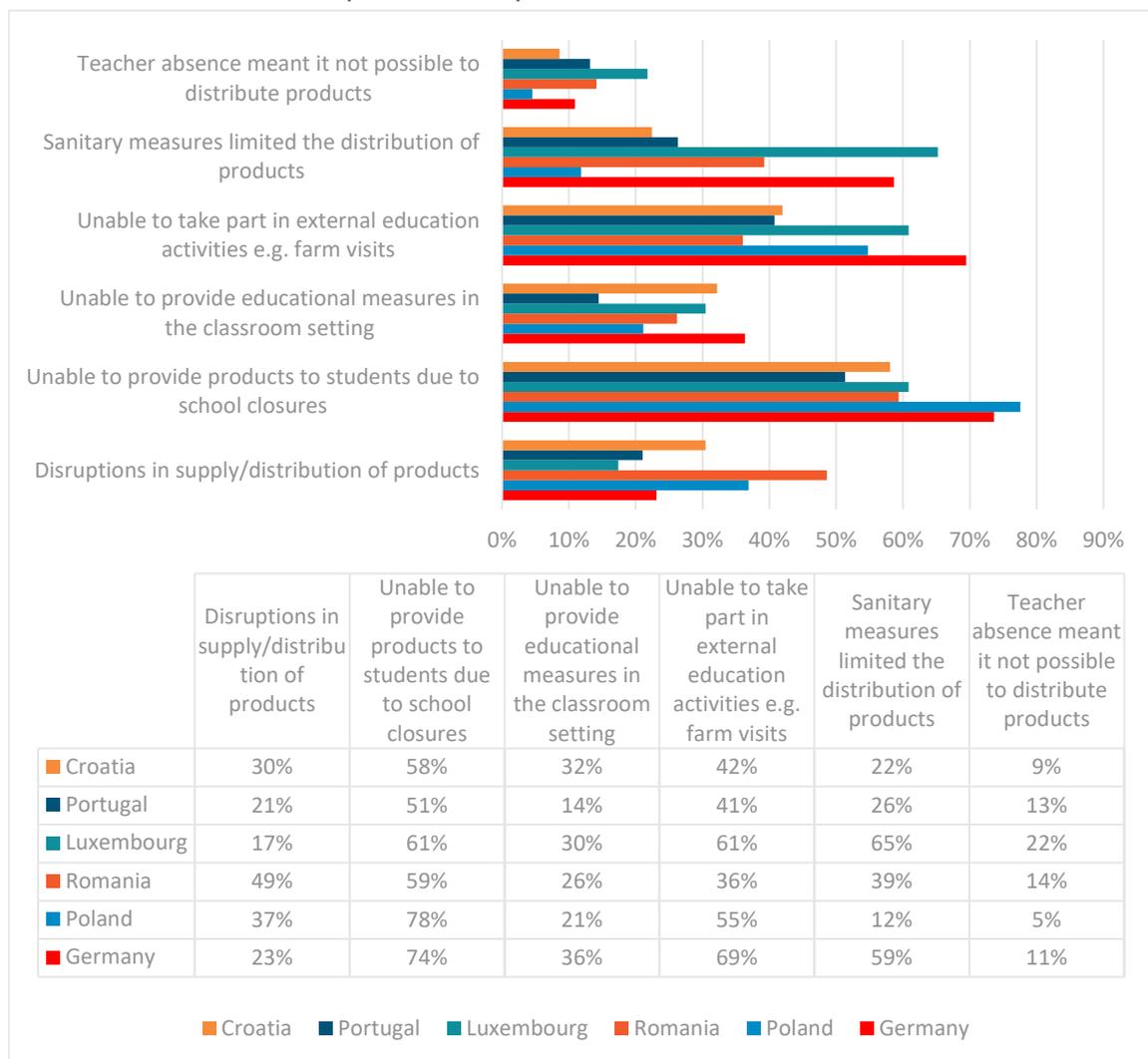
¹⁶⁵ Commission Implementing Regulation (EU) of 1.4.2022 derogating from Implementing Regulation (EU) 2017/39 in respect of school year 2021/2022 as regards on-the-spot checks on the premises of aid applicants or educational establishments for the purposes of the school scheme, available at: [https://ec.europa.eu/transparency/documents-register/detail?ref=C\(2022\)1924&lang=en](https://ec.europa.eu/transparency/documents-register/detail?ref=C(2022)1924&lang=en).

¹⁶⁶ National authorities survey, Croatia, Panteia, 2022.

adequate flexibility in the implementation of measures, both to give guarantees to suppliers and to allow the programme not to lose its effectiveness.¹⁶⁷ As can be seen from the school survey results presented in Figure 7, school directors/head teachers surveyed in the six EU Member States, where respondents were most active in sharing their views, indicated that being unable to provide products due to school closures was the biggest disruption to the Scheme during the pandemic.

Analysis carried out in the framework of this study has considered whether the national Schemes have been effective in reaching the target group. The following table indicates how many primary schools out of the countries' target group were participating in the Scheme. As can be seen from the Table 4, there has been a drop off in terms of the number of primary schools participating in the Scheme in the first year of the pandemic.

Figure 7: % of survey respondents (school directors) who selected 'Yes' in regards to whether COVID-19 had a particular impact on their school (DE, HR, LU, PL, PT, RO)



Source: Schools survey, Panteia, 2022.

¹⁶⁷ Position of Cia-Agricoltori Italiani submitted to Commissions Review of the EU school fruit, vegetables and milk scheme, 2021, available at: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12971-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme-EU-aid/F2663141_en.

Table 4: Indication of the % of participating primary schools out of the target group throughout the years 2017-2020 in the EU Members States, including UK

Countries	Year 2017-18	Year 2018-19	Year 2019-20
Portugal	99%	N/A	99%
Romania	98%	81%	90%
Czechia	98%	97%	N/A
Lithuania	98%	97%	91%
Latvia	98%	99%	N/A
Poland	98%	96%	N/A
Slovakia	96%	94%	64%
Luxembourg	94%	97%	27%
Bulgaria	93%	92%	86%
Slovenia	92%	90%	N/A
Hungary	90%	88%	7%
Sweden	86%	92%	55%
Germany	77%	70%	83%
Croatia	77%	76%	N/A
Estonia	63%	42%	91%
Cyprus	52%	53%	12%
Denmark	47%	24%	0.1%
Italy	43%	45%	N/A
Netherlands	37%	35%	N/A
Ireland	33%	27%	0,2%
United Kingdom	31%	28%	N/A
France	7%	7%	1%
Belgium	N/A	32%	5%
Greece	N/A	23%	N/A
Spain	N/A	17%	N/A
Austria	N/A	72%	18%
Malta	N/A	100%	N/A
Finland	N/A	N/A	N/A
Latvia	N/A	N/A	71%

Source: Panteia, 2022 based on monitoring reports 2018-2020

As evident from the table, some Member States did not include such information in their monitoring reports. **The available data shows that many countries had a lower target group participation in the year 2019-2020; which could have been caused by the COVID-19 pandemic or due to an increased target group.** Some Member States tend to have all schools as their target group, and

others increase their overall target group over time. Except for six countries, all those reported in the 2017-2018 school year indicated that more than 50% of their target group had been reached, with eleven countries even reaching over 90% of their target.

In Flanders (Belgium), there was a noticeable drop in schools participating during the COVID period and the participating schools could distribute less products to their pupils.¹⁶⁸ In Lithuania, education establishments continued teaching remotely, which meant products were distributed in the form of baskets for parents to come to collect from the educational establishments. However, only a small proportion of parents took the opportunity to receive the product baskets.¹⁶⁹ In Vrancea County in Romania, the closure of educational establishments and the restrictions in the access of external visitors to school premises led to the EU Scheme being suspended between March 10, 2020 and February 19, 2021.¹⁷⁰ In Croatia, one school director who responded to the schools survey noted that *'during COVID pandemic we did not apply for the Scheme because it was unpredictable how many classes will be online in the following week. This year the situation looked better, so we applied and implemented the Scheme'*.¹⁷¹

The COVID-19 pandemic had a number of different effects in Germany, with regional variations given that the German Federal Provinces are responsible for implementing the Scheme. In Schleswig-Holstein, the pandemic led to a reduction in the products distributed under the programme (fruit, vegetables, milk), in particular due to temporary school closures and hygiene concerns. The implementation of accompanying educational measures were only possible to a limited extent during the pandemic for hygienic reasons. In Brandenburg, Berlin and Baden-Württemberg, some institutions have dropped out of the school programme because other requirements such as hygiene and capacity concerns, as well as prioritising the provision of regular education to students. There were also significant effects for the suppliers, who had to deal with the lack of participation from an economic perspective. In Rhineland-Palatinate, the suspension of the programme has had a potential impact factor on consumption patterns, where there were temporarily no deliveries during programme implementation, particularly in the school years 2019/20 and 2020/21, due to nurseries and school closures. In Mecklenburg-Western Pomerania, accompanying educational measures such as visits to farms or companies in the food industry only took place to a very limited extent in the last two years of the pandemic, even after the schools were gradually opened or schools were completely opened. The protection and hygiene measures to be observed conflicted with the desire of many schools to excursions. One German school director who responded to the schools survey noted that *'due to significant (organizational) additional effort regarding corona hygiene measures and the associated shortage of skilled workers, educational measures could not be carried out in the facility as planned'*.¹⁷²

In Schleswig-Holstein it was also difficult to carry out the evaluation during the pandemic (such as carrying out interviews, missing product issue, etc.), although on-site inspections could be carried out in accordance with the rules despite COVID-19.

More significant effects can be found in the case of Greece, whereby COVID-19 led to the suspension of the entire programme at the national level.

¹⁶⁸ National authorities survey, Belgium, Panteia, 2022.

¹⁶⁹ National authorities survey, Lithuania, Panteia, 2022.

¹⁷⁰ National authorities survey, Romania, Panteia, 2022.

¹⁷¹ Schools survey, Panteia, 2022.

¹⁷² Schools survey, Panteia, 2022.

Selected practice

GREECE - Impact of COVID-19 resulting in suspension of the programme

Background

In the 2018-2019 school year, the implementation of the School Scheme in Greece fully achieved the national strategy objectives for fruit and vegetable consumption targets (5% increase in consumption of at least 2 portions of fruit per day, 4% increase in the consumption of vegetables daily), although the milk related targets were missed. Students were enthusiastic about the distribution of fruit, vegetables and milk. Also, the distribution was rated as good or rather good by the parents (89%) and the school managers (93%).

This trend was expected to continue in the school year 2019/2020, whereby the school programme had a good absorption rate. By the 10th of March 2020, 50% of the programme/actions had been implemented. Due to Covid-19, the country went into lockdown and all educational structures were closed. Primary schools reopened on the 1st of June with strict protection measures. Due to the strict lockdown, the School Scheme stopped, as no alternative solution could be found for the distribution of products and the implementation of educational measures.

In the school year 2020/2021, schools passed to e-learning from November 7 to January 11. Due to the uncertainty about whether and when the schools would open, the programme was not implemented in that school year.

Stakeholders involved

In Greece, the Ministry of Rural Development and Food together with the Ministry of Education, Research and Religious Affairs and the Ministry of Health are responsible for the implementation of the Scheme. While the Ministry of Rural Development and Food supervises and monitors the implementation of the Scheme as a whole, the Payment and Control Agency for Community Guidance and Guarantee Aid is responsible for signing the contract with the supplier and for administrative checks, the Ministry of Education, Research and Religious Affairs - naturally for the supervision of educational activities and the communication with the schools and the Ministry of Health - for the list of products that can be distributed. The on-the-spot checks are carried out by the Rural Economy and Veterinary Affairs Directorates of the Regional Units and the appropriate Regional Plant Protection and Quality Control Centers.

Lessons learned

The evaluation of the first year of implementation of the school Scheme pointed out a positive impact on consumption especially for fruits/vegetables, but the implementation of the Scheme was abruptly interrupted by the pandemic of Covid-19, followed by severe problems in public procurement procedures.

- The prolonged crisis caused by the ongoing pandemic of Covid-19, followed by the current global economic crisis had a severe negative impact throughout the agrifood chain (farmers, producers/processors/traders, etc.). The implementation of the Scheme seems to contribute in a positive way in the income of all the stakeholders and in the operation of the market in these turbulent years.
- Despite its considerable positive results in the first year of implementation, the lack of flexibility of the Scheme rendered it impracticable in a situation deviating from the normal.
- In the school year 2020/2021 it also became clear the Scheme cannot be operated in an uncertain circumstance, not even in part, further highlighting its unworkable rigidity.

Sources: National authorities survey, Greece, Panteia, 2022, [Strategy for the implementation of the School Scheme in Greece](#)

In some countries the pandemic had less of an effect on the implementation of the Scheme. For instance, in Finland, Covid-19 had some impact on the amounts of produce delivered to children. However, the impact has not been as big as in other countries, although some regional variation exists. This is because school year 2020-2021 was able to start quite normal in Finland, and continued to remain open after this time, with there being a priority to keep schools and nurseries open whenever it was possible.¹⁷³

¹⁷³ National authorities survey, Finland, Panteia, 2022.

Recovery and lessons learned

As of April 2022, **several Member States have indicated that signs of recovery are starting to occur following the pandemic, in regards to the uptake and participation in the Scheme.** In Estonia, as shown in the Table 5, volumes or products provided are starting to recover to pre-COVID levels.

Table 5: Overview of quantities of products distributed and value of educational measures in the years 2018-2021 in Estonia

School Scheme	2018/2019	2019/2020	2020/2021
School Fruit and vegetable	1 018 341 kg	829 494 kg	984 233 kg
School milk	3 831 352 litres	3 180 770 litres	3 544 395 litres
Educational measures	165 300 €	165 800 €	188 067 €

Source: National authorities' survey, Estonia, Panteia, 2022.

However, in Estonia, the need to apply distance learning has provided policy makers with different views regarding school food issues. In Estonia, approximately 35% daily food ratio for children comes from school food (including school Scheme products) and during the pandemic when food packages were supplied, quality and quantity varied a lot between schools.¹⁷⁴

In Poland, adaptations and a flexible approach implemented at national level positively influenced the budget execution and helped reach relatively high level absorption of the EU budget (approximately 90% in 2020/2021 school year).¹⁷⁵ In Sweden however, almost all high schools were closed during a large period of the pandemic, this had an unintended impact on the milk consumption. Some elementary schools were closed partially as well with the same effect. Throughout the duration of the pandemic, it was challenging for the implementation agency to forecast the volume of the support applications. Applicants have had the same difficulty because the restrictions changed frequently and quickly during the pandemic.¹⁷⁶ In North Rhine-Westphalia, nothing changed in the basic structure of the programme and since the 2021/2022 school year the programme has been running again without major restrictions or failures.¹⁷⁷ In Croatia, the Ministry of Agriculture introduced force majeure in the implementation ordinance and drafted contracts to enable distribution of products to charity institutions and similar beneficiaries if a lockdown of schools was to occur again for a particular reason (including COVID-19).¹⁷⁸

Regarding educational measures, in Lithuania, these have been reviewed during the pandemic, and new activities are being developed to be adapted for online implementation.¹⁷⁹ In Portugal, educational measures relating to the Scheme occurred online (within the context of regular school teaching), with additional lessons provided on public television in the mornings, which meant that the lessons reached a larger target group than those from schools who were taking part in the Scheme.

The pandemic also led to some other interesting effects. For instance, in Estonia, due to COVID-19, on-the-spot controls are now be carried out from distance, whereby all documents can be sent by e-mail or through school Scheme e-system, therefore removing the need for on the spot activity. This was reflected in a Commission way of derogation from Article 10(3) of the Implementing Regulation (EU) 2017/39, where due to the measures put in place to address the COVID-19 pandemic

¹⁷⁴ National authorities survey, Estonia, Panteia, 2022.

¹⁷⁵ National authorities survey, Poland, Panteia, 2022.

¹⁷⁶ National authorities survey, Sweden, Panteia, 2022.

¹⁷⁷ National authorities survey, Germany, Panteia, 2022.

¹⁷⁸ National authorities survey, Croatia, Panteia, 2022.

¹⁷⁹ National authorities survey, Lithuania, Panteia, 2022.

Member States not in a position to carry out on-the-spot checks on the premises of aid applicants or educational establishments in respect of school year 2021/2022 may carry them out remotely.¹⁸⁰

Price fluctuations

In some Member States, fluctuations in the prices of products have had an effect on the implementation of the Scheme. For instance, in Estonia it is becoming more challenging to offer school scheme products with same budget as stated several years ago. **Current prognoses (April/May 2022) are warning that food prices are going to increase even more, which means that the current budget level of the Scheme is not enough to continue to reach the same number of participants or the same frequency/duration.**¹⁸¹ Similar to the case in Estonia, in Baden-Württemberg (Germany), the organization of delivery is also managed independently between suppliers and facilities. Up until now, pricing has been centrally updated once a year. In the current situation, it remains to be seen whether a price adjustment makes sense due to the strong price fluctuations on the market in the second half of the school year.¹⁸²

War in Ukraine

Although not considered in depth in the context of this research, **some Member States are currently having to deal with a number of refugees fleeing from the war taking place in Ukraine, among which many are children.** The large numbers of refugees have to be considered in regards to the change in numbers of schoolchildren. For instance, in Estonia latest situation is that approximately 40 thousand refugees have reached to Estonia and roughly 25-30% (12 thousand) of them are children, with these figures subject to change.¹⁸³ **Given budgetary restrictions, this is proving challenging for including more children within the Scheme. Commission proposes to increase EU aid under the EU school scheme to the countries catering for displaced Ukrainian children**

In June 2022, the European Commission **published a regulation allowing for an internal redistribution of the EU aid under the EU school scheme to cater for displaced Ukrainian children enrolled in EU schools.**¹⁸⁴ The new regulation invites Member States to review their requests for EU aid for the next school year, running from 1 August 2022 to 31 July 2023, in the light of the unprecedented situation calling for solidarity to ease the burden on those in the frontline for action to cater for the displaced Ukrainian children.¹⁸⁵ Member States can submit by 15 June the additional amount requested or the amount of their allocation not requested. The Commission will decide by 15 July 2022 on the new allocations for the next school year in light of the notifications received, by redirecting the unused amounts to the countries welcoming the highest number of Ukrainian children.

¹⁸⁰ European Commission, 'EU school fruit, vegetables and milk scheme – remote checks in 2021/22 due to Covid-19, 2022, available at: [https://ec.europa.eu/transparency/documents-register/detail?ref=C\(2022\)1924&lang=en](https://ec.europa.eu/transparency/documents-register/detail?ref=C(2022)1924&lang=en).

¹⁸¹ National authorities survey, Estonia, Panteia, 2022.

¹⁸² National authorities survey, Germany, Panteia, 2022.

¹⁸³ National authorities survey, Estonia, Panteia, 2022.

¹⁸⁴ Commission Implementing Regulation (EU) 2022/861 of 1 June 2022 laying down exceptional rules for the Member States' second requests for Union aid for school fruit and vegetables and for school milk and derogating from Implementing Regulation (EU) 2017/39 as regards the reallocation of Union aid, for the period from 1 August 2022 to 31 July 2023 available at: https://eurlex.europa.eu/legalcontent/EN/TXT/?uri=uriserv%3AOJ.L_.2022.151.01.0042.01.ENG&toc=OJ%3AL%3A2022%3A151%3ATO.C.

¹⁸⁵ Ibid.

3.5. Impacts

One of the key aspects to consider in the context of this study is **the impacts of the EU School Scheme for fruits, vegetables and milk and milk products on different types of relevant stakeholders**. The following evaluation questions will be addressed in this section.

Impacts – What have been the impacts of the EU school fruit, vegetables and milk Scheme?	What are the impacts of the Scheme for each of the stakeholders groups: children, suppliers (producers and distributors), schools, the responsible authorities (government and implementation agencies), and other relevant stakeholders?
	What is the impact on consumption of fruits, vegetables and milk?
	What measures have been taken over time to improve the impact of the Scheme?

In particular, this section will look at the identified impacts of the Scheme on children, schools, farmers and suppliers of products in relation to the Scheme, as well as national and local competent authorities. Information was collected on the basis of desk research, the national authorities survey, the schools survey, stakeholder interviews. It is important to point out that interviews indicated that it is challenging to measure concrete impacts of the EU Scheme alone, due to the fact that in some cases (for instance, in regards to the impact on health of children), there is no relevant data currently available on the impact of the particular Scheme as effects could be attributed to broader activities. Additionally, at the time of writing, many Member States are still in the process of conducting national evaluations of the Scheme, meaning that the data is currently unavailable on the impact of current Scheme throughout the current implementation period. These include Austria, Estonia, Lithuania, Latvia, Flanders, Finland, France, Greece and Portugal, who have confirmed through the survey of national authorities that these activities are currently taking place. One Member State consulted noted that there cannot be identified that there are different impacts on children, schools and farmers when compared to the previous Schemes.¹⁸⁶

3.5.1. Children

Impacts on health

Consultation with stakeholders has indicated that it is hard to measure the specific impact of the EU Scheme on children and their dietary patterns and health eating habits.¹⁸⁷ A healthy diet consists of and is influenced by many components. The Scheme constitutes only one aspect influencing overall diet and dietary patterns of children that leads to a wider health impact. Additionally, in regards to assessing the long-term impacts, this proves to be challenging (in terms of isolating certain impacts of the Scheme itself when compared to other possible factors) if the same children are now followed or monitored over a longer period of time. Due to the constant influx of new students within schools, this means that the baseline is constantly changing.

However, **there are some studies suggesting that the Scheme as a policy instrument had positive impacts on changing children's eating habits.** A study from Poland indicated that over the three years of the Scheme, fruit consumption has significantly increased by approximately 30 g per day, i.e., 18%. Although this amount is not significant, it indicates an upward trend in the consumption of healthy food products. Vegetable consumption remained at a similar level for the first two years of the Scheme, while in the third year, it rose significantly in both groups. The results showed positive effects of the Scheme mostly on fruit consumption.¹⁸⁸ However, it has been

¹⁸⁶ National authorities survey, Panteia, 2022.

¹⁸⁷ Stakeholder interviews, Panteia, 2022.

¹⁸⁸ Katarzyna Wolnicka et al, 'Can the School Fruit and Vegetable Scheme Be an Effective Strategy Leading to Positive Changes in Children's Eating Behaviours? Polish Evaluation Results', *Int. J. Environ. Res. Public Health*, 2021, available at <https://doi.org/10.3390/ijerph182312331>.

suggested that if the Scheme should have real and long-lasting impact on children, it is necessary to adapt to a holistic and interdisciplinary approach, which can make significant difference in eating patterns of children. This means that the intervention at school should not be limited to provision of products but focused on creating healthy school food environments.¹⁸⁹ Stakeholders note that engagement with healthy, fresh food creates a positive group dynamics outside the family environment in relation to fruit, vegetables, milk and milk products, although these need to be accompanied with the necessary educational measures.¹⁹⁰

The survey also reveals the general positive views of stakeholders that the Scheme has an impact on children in regards to paying more attention to following a healthy diet and lifestyle. In addition to schools, parents are also mostly positive regarding the Scheme, with over 80% of parents surveyed in Germany, Poland, Romania, Luxembourg, Portugal and Croatia agreeing that the Scheme to provide fruits and vegetables has a positive impact on the health of children. Parents surveyed are slightly less positive in regards to the health impact of the provision of milk/and or milk products, with results ranging from 83% agreeing with this, to only 52% in Germany.¹⁹¹

Impacts on consumption

In regards to assessing the impact of the Scheme on the consumption of fruits and vegetables by children, in most cases this is currently taking place in the unknown as part of national evaluations of the Scheme.¹⁹² It should also be noted that the meaningfulness of directly comparing the consumption of products in previous periods with the current period of the programme is reduced because in many Member States during the pandemic (consisting of up to two school years), the implementation of the programme was disrupted due to distance learning of children and unable to receive products as part of the Scheme. For instance, in Greece, the evaluation of the first year of implementation of the Scheme suggested a positive impact on consumption, especially for fruits and vegetables, but the implementation of the Scheme was abruptly interrupted, followed by severe problems in public procurement procedures.¹⁹³

Some information regarding the impact on consumption has been collected in the context of the survey of national authorities. In Rhineland-Palatinate (Germany), although a long-term evaluation of the Scheme within the context of the current regional strategy is yet to be completed, statistical data from the baseline report and interim reports show that the consumption of fruit, vegetables and milk has stabilised and is higher in schoolchildren participating in the Scheme than in the control group, although the recommendation to consume five servings of fruits and vegetables a day is mostly not met.¹⁹⁴ In Lithuania, it can be seen that there is a direct positive impact on children by providing them with a healthy product as a snack, thus shaping consumption habits.¹⁹⁵ Educational activities also contribute significantly towards this, and schools benefit by receiving educational tools developed and used in the educational process. In Greece in school year 2018-2019, the Scheme fully achieved the national strategy objectives for fruit and vegetable consumption targets (5% increase in consumption of at least 2 portions of fruit per day, 4% increase in the consumption of vegetables daily). In regards to milk consumption targets, milk consumption rates for children were already very high before the start of the School Scheme (over 90%) and it appears that the milk consumption target (5% increase in consumption of at least 1 portion of milk

¹⁸⁹ Julia Haß, Monika Hartmann, 'What determines the fruit and vegetables intake of primary school children? - An analysis of personal and social determinants', *Appetite*, 2018, available at: <https://pubmed.ncbi.nlm.nih.gov/28843972/>.

¹⁹⁰ National authorities survey, Panteia, 2022.

¹⁹¹ Stakeholder survey, Panteia, 2022.

¹⁹² National authorities survey, Panteia, 2022.

¹⁹³ National authorities survey, Greece, Panteia, 2022.

¹⁹⁴ Rhineland-Palatinate, Ministry for Climate Protection, Environment, Energy and Mobility, 'Evaluation of the program', available at: <https://mkuem.rlp.de/de/themen/ernaehrung/schule-isst-besser/evaluation-des-programms/>.

¹⁹⁵ National authority survey, Lithuania, Panteia, 2022.

at breakfast) was not achieved in this period. Despite this, students, school managers and parents were all enthusiastic about the distribution of fruit, vegetables and milk.¹⁹⁶

In regards to the milk scheme in Portugal, previously this part of the scheme was a big success, with a high absorption rate, whereby every child in the target group could drink milk on a daily basis. However, this is no longer the case as many parents do not want their children to consume milk and/or milk products. In order to increase consumption, greater focus should be put on communication in relation to distribution.¹⁹⁷

3.5.2. Schools

Schools (including directors/head teachers, teachers and other administrative staff) surveyed in relation to this research paper are generally positive about the impact of the Scheme.

Research has shown that schools welcome the initiative and report excitement on part of children when receiving free products subsidised by the Scheme. This can be also witnessed by increased rates of participation of schools in the Scheme in some Member States. Some studies also suggest that provision of products under the Scheme at schools may have important domino effects on children's food preferences.¹⁹⁸

Results from the schools survey indicate that for many who work in schools across the Member States, the provision of fruits and vegetables in a school setting has a positive impact on children to pay more attention to following a healthy diet and lifestyle. For instance in Germany, 93% of school directors and 92% of teachers surveyed agree with this statement, with similar results in both Poland (91% for both) and Portugal (96% and 95%, respectively). More variation can be seen in regards to whether the provision of milk and/or milk products in a school setting has a positive impact on children to pay more attention to following a healthy diet and lifestyle, with only 25% of school directors/head teachers in Luxembourg agreeing with this, and 95% in Portugal.

As can be seen from the findings from the survey (as shown in Figure 2 above), stakeholders are also positive regarding the provision of educational measures in the context of the Scheme, although more stakeholders are positive in regards to measures relating to fruits and vegetables when compared to milk. This can also be seen in the practice from Estonia referred to below, who responded positively to the provision of education measures under the Scheme in the national authorities survey.

¹⁹⁶ National authority survey, Greece, Panteia, 2022.

¹⁹⁷ National authority survey, Portugal, Panteia, 2022.

¹⁹⁸ Sławomir Wawrzyniak, Krystyna Krzyżanowska, 'Children's Food Preferences Included and Offered in the "School Scheme"', *Roczniki Naukowe*, 2018, available at : <https://ageconsearch.umn.edu/record/293809/>.

Selected Practice

ESTONIA – Potential of provision of educational measures

Background

Estonia provides a wide variety of accompanying educational activities within the Scheme covered proportionally from both the budgets for the aid for the supply of fruit and vegetables and for the supply of milk. The measures raise children's awareness of the agricultural and food market, of healthy eating, and of cultivation of fruit and vegetables. Measures also further aim to raise children's interest in the production of agricultural products through practical activities.

There is a high stakeholder participation potential in educational measures, whereby nearly 90% target group covered, with the potential to reach even more. However, the budget is moderate and restricted to 15% of the EU budget. In Estonia, this results in 8% from the total (both EU funding and national contributions) EU School Scheme budget being allocated to fund (i.e. cover transport costs, ticket fees, guide/instructor) the accompanying educational measures to raise children's awareness about the agricultural and food sector. In concrete terms, this is being done through visits to undertakings in the agricultural and food sector connected to the products supplied to the children under the Scheme, visits to other relevant places such as agricultural museums and fairs, food markets, etc., teaching-related activities connected to the preparation of food such as tasting classes and food preparation exhibitions or focus days, establishment of school gardens and their maintenance, and through organizing different competitions and games. Within these activities, a wide range of topics is covered ranging from healthy eating habits, through local and organic food chains to sustainable production and food waste.

The procedures regarding the provision of educational measures gives schools the opportunity to guide the participation and type of measures (such as through farm visits, school gardening, food day, etc.) and make their own choices.

Stakeholders involved

The stakeholders involved in providing the accompanying educational measures and activities within, are particularly the Estonian Agricultural Museum, Estonian Dairy Museum and Olustvere School of Service and Rural Economics. Additionally, Rapina Horticultural School, the Estonian Food Industry Association and the Estonian Chamber of Agriculture and Commerce also add to the educational activities on more a sporadic basis. The Implementation of the Scheme itself is led by the Estonian Agricultural Registers and Information Board. Schools also have discretion in terms of the types of measures that can be carried out. Farmers and producers also have indirect involvement, whereby the most popular choice in educational measures is farm visits.

Lessons learned

- A comprehensive programme of educational measures adds towards the efforts to fulfil one of the key objectives of the Scheme – to reconnect children with agriculture, and is being funded from the Scheme's budget. Educational measures also provide a benefit in terms of increased acknowledgement of local food systems.
- Funding within the Scheme can be used in addition to distribution measures to support the effectiveness of the distribution itself through engaging the children with the food itself and with the places from which the food comes increasing both their awareness and interest in healthy eating through utilizing a great variety of accompanying measures.
- Education measures in Estonia are deemed to be effective as the number of participating children in the accompanying educational measures have increased. To illustrate this, in the school year 2015/16 only 8 892 children were covered by accompanying educational measures under the previous school fruit and vegetables Scheme with total of 67 397€ aid for the implementation of such activities. In the school year 2020/21 the aid for accompanying educational measures was 188 067€, the farm visits themselves covering 6 152 children.
- However, it is important to understand that there is also a social component next to nutritional recommendations, what always affects children nutritional choices in the long term. Nutritional recommendations also change, and initiatives come and go, therefore it is a challenge to be up the date in terms of information provided.

Transferability

- There is an opportunity to raise the level of educational measures participation in many Member States, but this would take a considerable budget increase devoted to the provision of the measures.

Sources: National authorities survey, Estonia, Panteia, 2022

However, additional data collected in the context of this study also reveals that schools often have mixed feelings in relation to the Scheme. **Whilst the majority note that the Scheme is successful and has a positive impact on children and their health, it should be noted that in many cases schools find the Scheme burdensome from an administrative perspective, often lacking the time and resources to implement it in an effective manner.** For instance, 55% of Romanian school directors/head teachers and 52% of teachers surveyed feel that the Scheme to provide fruits, vegetables and milk is a burden on schools in terms of time and resources needed to implement it. 72% of school directors/head teachers and teachers surveyed in France feel the Scheme is a burden, whereas only 13% feel so in Luxembourg.

In some Member States, there have been procedures implemented to try and reduce the level of burden for schools. In Austria, both suppliers and schools can be applicants for aid, which potentially means less administrative burden for schools¹⁹⁹, and in Wallonia (Belgium), rules were changed so that schools do not need to carry out a selection of supplier processes and evidence the compliance with public procurement rules, whilst leaving them with the flexibility to select specific suppliers of products in accordance to their own public procurement procedures if necessary.²⁰⁰ In Poland, schools tend to not be interested in organizing deliveries and applying for aid themselves, preferring to make use of approved supplier's services instead because it significantly limits administrative obligations relating with participation in the Scheme.²⁰¹

It should be noted that in some Member States where schools do not have appropriate infrastructure such as refrigerators or kitchen/restaurants for school meals (such as Greece, the Netherlands or Cyprus), this has an impact on schools to be able to provide products to children.

3.5.3. Farmers and suppliers of products

One of the main impacts of the Scheme on farmers and the suppliers or products is that in many Member States, **the Scheme allows for them to have some form of direct access to consumers, whereby they can establish and develop longer-term relationships.** The Scheme **can also act as an additional source of income for farmers and suppliers of products.**²⁰² For instance, as indicated in the case of Croatia, the Scheme provides an opportunity for farmers and producers to distribute their goods to nearby schools, which is also in line with a preference to shorter supply chains and the Farm to Fork strategy, and contributing towards the reconnection of children to agriculture through contributing towards educational measures (such as farm visits).²⁰³ **Preference for local purchasing, short-supply chains and organic products are mentioned as ways in which the Scheme has a particular impact on farmers and suppliers within the Member States.**²⁰⁴ Particularly in the case of fruit and vegetables, it can be observed that food retailers and wholesalers have become aware of the school Scheme, and based on the views of Copa Cogeca, in the procurement of subsidies, there must be no predominance of large suppliers to the detriment of farmers and agri-cooperatives participating in the Scheme.²⁰⁵ In France, it was noted that the School Scheme does not contribute directly to improving farmers' incomes.²⁰⁶

¹⁹⁹ National authorities survey, Austria, Panteia, 2022.

²⁰⁰ Le site officiel de la Wallonie, 'Participer au programme européen Lait, Fruits et Légumes à l'école', available at: <https://www.wallonie.be/fr/demarches/participer-au-programme-europeen-lait-fruits-et-legumes-lecole>.

²⁰¹ National authorities survey, Poland, Panteia, 2022.

²⁰² National authorities survey, Panteia, 2022.

²⁰³ National authorities survey, Croatia, Panteia, 2022.

²⁰⁴ Stakeholder interview, Panteia, 2022.

²⁰⁵ Position of Copa-Cogeca submitted to Commissions Review of the EU school fruit, vegetables and milk scheme, 2021, available at: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12971-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme-EU-aid/details/F2663178_en.

²⁰⁶ National authorities survey, France, Panteia, 2022.

In some Member States, farmers and suppliers had to adjust their products to be able to be distributed in the context of the Scheme. In Austria for example, school milk farmers had to adapt their products to account for the permanent reduction of sugar provision.²⁰⁷ Regarding organic products, suppliers also note that the EU School Scheme can potentially enlarge the organic market by creating the demand for organic products which will in turn incentivise farm conversion from conventional to organic. This can have positive impact and help to reach targets of the Farm to Fork strategy. Various stakeholders believe that more stringent harmonisation should take place at EU level to ensure that all Member States adapt procedures prioritising organic products.²⁰⁸ Some Member States, such as Belgium (Flanders) include a high degree of freedom for schools to be able to choose their own suppliers of products, based on preferences, which can include areas relevant for the type of product and focus (for instance, choice of organic products or those with short supply chains). **Current procedures however potentially have an exclusionary effect on certain types of crop farmers, which some stakeholders have suggested would be addressed through the inclusion of plant-based products in the milk part of the Scheme.** According to the European Alliance for Plant-based Foods, the Scheme in its current form creates a bias because crop farmers have less opportunities to benefit from the Scheme, and also distorts the competition on the market of plant-based products and slows down their uptake in the diets of EU citizens.²⁰⁹

One of the impacts of the Scheme on farmers and suppliers of products involved in the Scheme is the perceived level of administrative burden that is involved in participating. Although (as already identified in the section above) schools often suffer the most administrative burden relatively, farmers and suppliers often suffer similar burdens in participating in the Scheme. In Finland, it has been noticeable that administrative burden for farmers and suppliers of fruit and vegetables increased, given that the system is new in Finland, and that the administrative burden on both the aid applicants and the administration's side is something that could be reduced.²¹⁰ In Greece, the mandatory and time-consuming public procurement procedures have led to limited participation and avoidance of new entrants to the Scheme due to concerns over bureaucratic and time-consuming procedures.²¹¹ As noted in Poland, the pandemic showed that ensuring enough flexibility in the administrative procedures required under the Scheme has a positive impact on farmers and suppliers of products.²¹²

Additionally, **the prolonged crisis caused by the ongoing COVID-19 pandemic, followed by the current global economic crisis has had a severe negative impact throughout the agrifood chain** (farmers, producers/processors/traders, etc.). In some Member States, such as Greece, it has been indicated that the implementation of the Scheme contributes in a positive way towards the income of all these stakeholders and in the operation of the market in these turbulent years.

3.5.4. National and local competent authorities

In regards to the impact of the Scheme on national and local competent authorities, this is very much dependent upon the type of system in place within each Member State, and the levels of responsibilities outlined towards each stakeholder in the process. In some cases, it can be seen from the information collected that **there is a degree of administrative burden on**

²⁰⁷ National authorities survey, Austria, Panteia, 2022.

²⁰⁸ Position of IFOAM Organics Europe submitted to Commissions Review of the EU school fruit, vegetables and milk scheme, 2021, available at: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12970-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme/details/F2662823_en.

²⁰⁹ European Alliance for Plant-based Foods, 'EAPF Position on EU School Scheme', 2021, available at: https://plantbasedfoodalliance.eu/wp-content/uploads/2021/08/EAPF-Position-on-EU-School-Scheme_July-2021.pdf.

²¹⁰ National authorities survey, Finland, Panteia, 2022.

²¹¹ National authorities survey, Greece, Panteia, 2022.

²¹² National authorities survey, Poland, Panteia, 2022.

Member States in regards to implementation of the Scheme. For example, in Brandenburg and Berlin (Germany), although it is a comparatively small funding programme, the administrative burden is relatively high. Brandenburg and Berlin therefore only take part in the milk component of the Scheme because there are not enough personnel capacities available to also implement the requirements for the fruit and vegetable component.²¹³

In some Member States (such as The Netherlands, Greece and Cyprus) it is not customary to provide food in school canteens and therefore they do not have necessary equipment or food premises to ensure the distribution of products. This may prevent some Member States from exhausting assigned budget for the scheme. Also in some countries when the food is distributed in food canteens, some pupils who do not subscribe to lunches at school may be unable to access the canteen premises and therefore prevented from access to products. Against this backdrop, in Greece for instance, the responsible national authorities are required to implement public procurement system regarding the selection of suppliers in relation to the Scheme, which is considered a large administrative burden on the authorities. However, this is considered to be the most effective means to implementing the Scheme, due to the fact that the national competent authorities have the most experience in initiating this type of procedure.²¹⁴ Additionally, **several Member States have indicated that the evaluation and monitoring requirements are a burden on national authorities, and that simplified procedures should be considered.**²¹⁵

In France, the School Scheme has also generated exchange of knowledge and practices between the Ministry of Agriculture with national authorities in the fields of education, health, social affairs, and authorities of French overseas territories. The school scheme has also generated cooperation and exchanges with local and regional authorities (mainly in the fields of education and agriculture).²¹⁶

3.6. Efficiency

In order to consider the efficiency of the EU School Scheme for fruits vegetables and milk, this section will look at **the extent to which the effects have been achieved at a reasonable cost.** This will start with an analysis of the costs of the Scheme, followed by any inefficiencies that have been identified. The following evaluation questions will be addressed in this section.

Efficiency - To what extent have the effects of the EU school fruit, vegetables and milk Scheme been achieved at a reasonable cost?	Are data available on the costs and benefits for the various stakeholders? If so, what qualitative information on costs and benefits is available?
	Are the costs justified?
	Have the changes/effects of the Scheme been achieved at initially expected costs? Or were these different for any reasons?
	Have inefficiencies been identified? Could the implementation have been done in a more efficient way? What lessons can be learned?

Information was collected on the basis of desk research (including analysis of the Member States national strategies and figures reported by Member States in the annual monitoring reports), the national authorities survey and the schools survey.

3.6.1. Costs of the Scheme

Regarding the costs of the Scheme, **the EU School Scheme is funded through the European Union's CAP, and has an overall combined annual budget of €250 million per school year.** This

²¹³ National authorities survey, Germany, Panteia, 2022.

²¹⁴ National authorities survey, Greece, Panteia, 2022.

²¹⁵ National authorities survey, Panteia, 2022.

²¹⁶ National authorities survey, France, Panteia, 2022.

is split on the basis of up to €150 million for the fruits and vegetables part of the Scheme, and up to €100 million for milk. This budget was broken down by country based on the number of children, the level of regional development and, for milk, on how the budget was previously used. **After the withdrawal of the United Kingdom from the EU, the total EU budget for the Scheme amounts to €220.8 million per school year, consisting of up to €130.6 million for fruit and vegetables and up to €90.1 million for milk.**

In practice, each country may transfer part of its EU budget for fruit and vegetables to milk, or vice versa, depending on its priorities and needs. It may also request only part of its budget, or conversely more than its budget. The European Commission adopts a decision to fix the EU budget by country for each school year. Not all of the EU budget allocated is used up every year for either part of the Scheme, as can be shown from the table below.

Table 6: Use of allocated EU budget and absorption rate, 2017 - 2020

School Year	Allocated budget Fruits and vegetables	Budget used Fruits and vegetables	Absorption rate	Allocated budget Milk	Budget used Milk	Absorption rate
2017/2018	€ 146.042.787	€ 109.040.553	75%	€ 103.957.212	€ 64.308.998	62%
2018/2019	€ 145.628.692	€ 111.588.509	77%	€ 104.371.307	€ 70.818.403	68%
2019/2020	€ 146.284.752	€ 90.917.347	62%	€ 103.715.248	€ 55.834.796	54%

Source: Panteia, based on Annual monitoring reports 2017-2020 (Incomplete data for school year 2020/2021)

As can be seen from Table 6 above, **the COVID-19 pandemic had a significant impact on the absorption of the EU budget in the school year 2019-2020.** Additionally, Member States utilise different amounts of their allocated budgets. For instance, as can be seen in Table 7 below, in year 2018/2019 (which has the highest absorption rate noted thus far for both the fruits and vegetables element and milk element of the Scheme), only 11 out of 26 Member States²¹⁷ used 90% or more of the total allocated budget for fruits and vegetables, and 11 out of 28 Member States did the same for milk. Some Member States utilised their entire budget for fruits and vegetables (Luxembourg, Hungary, Malta and Slovakia) and milk (Czechia, Estonia, Hungary, Malta, Romania and Slovakia).

Table 7: Use of allocated EU budget by Member State and the UK and absorption rate, 2018 - 2019

Member State	Allocated budget Fruits and vegetables	Budget used Fruits and vegetables	Absorption rate	Allocated budget Milk	Budget used	Absorption rate Milk
Austria	€ 3,069,443	€ 1,865,415	61%	€ 1,102,449	€ 771,007	70%
Belgium	€ 2,958,129	€ 1,306,318	44%	€ 836,416	€ 192,998	23%
Bulgaria	€ 2,590,974	€ 1,808,365	70%	€ 1,130,879	€ 1,058,198	94%
Croatia	€ 1,664,090	€ 1,468,254	88%	€ 800,354	€ 444,094	55%
Cyprus	€ 390,044	€ 332,013	85%	€ 400,177	€ 274,141	69%
Czechia	€ 4,106,491	€ 3,552,626	87%	€ 2,000,440	€ 2,000,440	100%

²¹⁷ Sweden and the United Kingdom did not take part in the fruits and vegetables component of the Scheme.

Member State	Allocated budget Fruits and vegetables	Budget used Fruits and vegetables	Absorption rate	Allocated budget Milk	Budget used	Absorption rate Milk
Denmark	€ 2,290,761	€ 1,447,731	63%	€ 1,460,645	€ 986,020	68%
Estonia	€ 566,857	€ 493,018	87%	€ 752,222	€ 750,558	100%
Finland	€ 1,599,047	€ 443,803	28%	€ 3,824,689	€ 2,877,575	75%
France	€ 17,990,469	€ 3,177,777	18%	€ 17,123,194	€ 335,041	2%
Germany	€ 25,980,170	€ 24,756,972	95%	€ 10,374,930	€ 8,723,717	84%
Greece	€ 3,218,885	€ 2,632,168	82%	€ 1,550,685	€ 875,687	56%
Hungary	€ 3,876,775	€ 3,876,774	100%	€ 2,101,190	€ 2,101,190	100%
Ireland	€ 1,849,760	€ 1,387,320	75%	€ 1,031,797	€ 914,829	89%
Italy	€ 20,857,865	€ 16,529,126	79%	€ 8,924,496	€ 6,831,951	77%
Latvia	€ 812,444	€ 803,785	99%	€ 772,987	€ 766,758	99%
Lithuania	€ 1,135,083	€ 1,100,981	97%	€ 1,127,665	€ 1,117,579	99%
Luxembourg	€ 373,724	€ 373,724	100%	€ 170,000	€ 163,233	96%
Malta	€ 324,636	€ 324,636	100%	€ 207,081	€ 207,081	100%
Netherlands	€ 7,263,203	€ 7,088,025	98%	€ 1,320,849	€ 683,598	52%
Poland	€ 14,532,073	€ 13,372,856	92%	€ 10,846,847	€ 10,019,377	92%
Portugal	€ 1,500,000	€ 738,007	49%	€ 2,220,981	€ 1,362,616	61%
Romania	€ 5,493,478	€ 5,327,520	97%	€ 12,516,778	€ 12,516,608	100%
Slovakia	€ 2,186,812	€ 2,186,685	100%	€ 1,094,760	€ 1,094,760	100%
Slovenia	€ 703,870	€ 664,088	94%	€ 353,423	€ 288,336	82%
Spain	€ 18,293,609	€ 14,530,522	79%	€ 5,986,702	€ 2,979,724	50%
Sweden	€	€	N/A	€ 9,400,831	€ 6,531,683	69%
United Kingdom	€	€	N/A	€ 4,937,840	€ 3,949,604	80%
EU	€ 145,628,692	€ 111,588,509	77%	€ 104,371,307	€ 70,818,403	68%

Source: Annual monitoring report 2018/2019.

It should be noted however that achieving a 100% absorption rate does not necessarily equate to the achievement of the objectives of the scheme. Whilst some Member States can have high absorption rates, this does not mean that the Scheme is running effectively.

The table 7 above also shows that there are some notable outliers.

Selected practice

France – Available budget not being utilised

Background

For the period 2017-2023, the European Union has allocated France a budget of more than 210 million euros for 6 years, i.e. more than 35 million euros annually for the "Fruits and milk in school". However, over the period 2017-2022, Scheme expenditure remains low to date, since the average level of consumption of the French envelop has been around 10% since 2017, although the years 2019-2020 and 2020-2021 have been strongly impacted by the health crisis linked to Covid-19. Information collected from the contribution of INTERFEL to the EC consultation on Scheme indicate that none of the proposals made for several years by the public authorities has made it possible to effectively implement this programme in France, even though most European countries used up significantly more of the budget. INTERFEL and feedback from the schools survey suggested that complex procedures for implementing the programme at the national level are the main obstacles to the effective use of budgets, and that a simplification of administrative procedures would improve this further. The effect of simplification and the communication actions implemented since 2019 are now beginning to show signs of progress, with projected expenditure for the 2021-2022 school year estimated by the paying agency at around 15% of the overall budget.

Stakeholders involved

In France, the national strategy was established in consultation with the services and cabinets of the Ministries responsible for agriculture, national education, health and the services of FranceAgriMer. Stakeholders were also consulted for the renovation of the system, within the framework of official bodies which are the specialized Councils Fruits and vegetables and Milk of FranceAgriMer, bringing together in particular the interprofessional fruit and vegetables (Interfel) and cow's milk (CNIEL), representatives of suppliers or local authorities.

Lessons learned

Stakeholders have suggested that complex procedures for implementing the programme at the national level are the main obstacles to the effective use of budgets, and that a simplification of administrative procedures would improve this.

Sources: Survey of national authorities, National Strategy and annual monitoring reports for France, [INTERFEL contribution to the EC consultation on the Fruits and milk programme at school](#)

In addition to the aid provided by the EU, some Member States also provide national funds to further support the Scheme. Analysis has taken place regarding the levels of EU aid as a percentage of the total aid in Member States throughout the years (on the basis of the information provided in the annual monitoring reports between 2017-2020). Table 8 illustrates the percentage of EU aid out of the combined EU and National aid for the Scheme and how this developed over the years.

Table 8: Overview of the % of EU aid for fruits and vegetables as part of the total aid in a Member State throughout the years. (Total aid = EU aid + National aid) in EU Member States and the UK, 2018 -2021

Member State	School year 2018-19	School year 2019-20	School year 2020-2021
Austria	45%	45%	45%
Belgium	94%	94%	94%
Bulgaria	43%	62%	54%
Croatia	86%	89%	89%
Cyprus	100%	100%	100%

Member State	School year 2018-19	School year 2019-20	School year 2020-2021
Czechia	32%	37%	37%
Denmark	100%	100%	100%
Estonia	54%	70%	66%
Finland	100%	100%	100%
France	100%	100%	100%
Germany	72%	78%	80%
Greece	100%	100%	N/A
Hungary	42%	49%	51%
Ireland	86%	100%	95%
Italy	100%	100%	100%
Latvia	56%	52%	56%
Lithuania	63%	71%	82%
Luxembourg	41%	64%	56%
Malta	28%	71%	0%
Netherlands	100%	100%	100%
Poland	50%	50%	78%
Portugal	100%	100%	100%
Romania	82%	82%	88%
Slovakia	51%	55%	46%
Slovenia	72%	71%	70%
Spain	99%	89%	99%
Sweden	N/A	N/A	N/A
United Kingdom	N/A	N/A	N/A

Source: Panteia, 2021, based on Monitoring reports 2018-2021

Many larger Western European Member States (Portugal, France, the Netherlands, Italy, and Spain) have included limited or no national aid within their schemes. The combination of national aid and EU aid seems to be much more common for Central and Eastern European Member States such as Slovenia, Slovakia, Poland, Lithuania, Latvia, Romania, Hungary and Czechia. The table above also shows that national aid as part of the total aid has decreased over the years for many countries. Most countries that used national aid, such as Luxembourg, Germany, Poland, and many others, decreased the national aid over the years compared to the total aid.

Table 9 looks at the differences between EU aid per product and national aid per product, separated between the fruit/vegetable part and the milk part of the Scheme (taken from the 2020 monitoring reports). Interestingly, **countries using the most EU aid per product for fruits and vegetables tend to have very little to no national aid per product to supplement the distribution.** It should be noted that countries with a lower percentage of EU aid per product (fruit, vegetables and milk) are primarily some Eastern European Member States. These eastern European countries even appear to use mostly national aid, especially in Czechia. In some Member States (5 in total), a cost is attached

to the provision of products. However, in the majority, products are provided free of charge (19 Member States in total indicated this).²¹⁸

Table 9: EU and national aid per fruit, vegetable and milk portion in each Member State and the UK, 2019 - 2020

Member State	EU aid - fruit/veg per portion (EUR)	EU aid - Milk per portion (EUR)	National aid - fruit/veg per portion (EUR)	National aid - Milk per portion (EUR)
Austria	0.16	0.07	N/A	N/A
Belgium	0.29	0.33	0.02	0.02
Bulgaria	0.15	0.06	0.09	0.22
Croatia	0.19	0.21	0.02	0.04
Cyprus	0.37	0.51		N/A
Czechia	0.07	0.03	0.29	0.32
Denmark	0.24	0.09		0.27
Estonia	0.07	0.06	0.03	0.06
Finland	0.02	0.02	0	0
France	0.17	0.18	N/A	N/A
Germany	N/A	N/A	N/A	N/A
Greece	0.31	0.36	N/A	N/A
Hungary	0.08	0.04	0.09	0.19
Ireland	0.42	0.15	0	0.13
Italy	0.48	N/A	N/A	N/A
Latvia	0.13	0.21	N/A	N/A
Lithuania	0.2	0.13	0.08	0.09
Luxembourg	0.18	0.22	0.1	0.01
Malta	0.59	0.29	N/A	N/A
Netherlands	0.23	0.14	N/A	N/A
Poland	N/A	N/A	N/A	N/A
Portugal	0.11	0.13	N/A	N/A
Romania	0.09	0.09	0.02	0.07
Slovakia	0.47	0.27	0.47	0.27
Slovenia	0.12	0.11	0.05	N/A
Spain	0.43	0.31	N/A	N/A
Sweden	N/A	0.02	N/A	N/A
United Kingdom	N/A	0.28	N/A	N/A

Source: Panteia, 2021, based on Monitoring report 2019-2020

Stakeholders consulted through the national authorities survey and the schools survey are generally positive regarding the benefits of the Scheme, and that the Scheme is an effective tool in shaping

²¹⁸ National strategies 2017-2023 – it is of note that four Member States did not provide information on this.

children eating habits. **Member States indicate that similar results and scope of implementation (number of schools participating) would be very difficult to achieve without EU funding, which can also be seen in the case of the number of Member States who rely solely on EU aid to support the provision of fruits, vegetables and milk products.**

However, consultation with stakeholders has indicated that **whilst the budget of the Scheme (in regards to EU aid) does contribute somewhat towards the achievement of the goals of the Scheme, the budget is generally considered to be insufficient to be far reaching and make a significant and wide-reaching impact.** In some cases the **budget is too low to include all institutions that want to participate in the school programme.**²¹⁹ Several national authorities have indicated that national funds are required to reach the national targets, which could not be achieved in total with EU funds alone.²²⁰ Although relating to a previous Scheme, analysis of data provided by one of the Member States that completed the survey indicates that during the 2009 financial crisis when national funding for the Scheme was halted (although EU funds for the Scheme were still provided), the targets were not met and the Scheme lost significant impact on schoolchildren.²²¹ In Belgium (Flanders), the (limited) size of the budget means that a decision has been made regarding the number of weeks for which distribution can be subsidised. The authority indicates that to achieve sufficient impact regarding children developing healthy eating habits, it would be better to have an increased budget to subsidise a whole year of more frequent (for example: two times per week) distribution of fruit, vegetables and/or milk.²²²

Several examples of this can be found in Germany, which already utilises a high share of its allocated EU aid and also tops this up with regional funds.²²³ The Ministry of Environment, Agriculture, Conservation and Consumer Protection of North Rhine-Westphalia has indicated that whilst the Scheme remains hugely popular, the demand to participate by educational institutions each year exceeds the financial attributions available. Therefore, the implementation of the Scheme is limited only to primary and special schools, although a need clearly also exists in day nurseries and secondary schools.²²⁴ In Bremen, decreased financial resources has led to a noticeable deterioration in the scope and quality of the Scheme (such as reduced delivery options, and less attractiveness for educational institutions and suppliers).²²⁵ In order to reach the largest possible number of children with the school programme, Brandenburg and Berlin have decided to charge a fee for milk and use EU funds to subsidise the costs.²²⁶ This means that products can be offered every school day throughout the school year in order to achieve a continuous supply, and that no schools are unable to participate in the programme. In Mecklenburg-Western Pomerania, the current EU funds are not sufficient to provide all six to ten-year-old children in the federal state with free product deliveries at least once a school week. If more funds were available, the programme could be used on a larger scale.

²¹⁹ National authorities survey, Panteia, 2022, and Position of Stellungnahme auf Basis der Rückmeldungen der Bundesländer Bayern, Rheinland-Pfalz und Saarland mit Ergänzung des Bundes submitted to Commissions Review of the EU school fruit, vegetables and milk scheme, 2021, available at: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12971-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme-EU-aid/F2663076_en.

²²⁰ National authorities survey, Panteia, 2022.

²²¹ Stakeholder interview, Panteia, 2022.

²²² National authorities survey, Belgium, Panteia, 2022.

²²³ As already discussed at large in section 3.4.3., in Germany, the Federal Provinces are responsible for implementing the Scheme. Therefore, levels of additional support and absorption rates differ per region.

²²⁴ See feedback provided by Ministry of Environment, Agriculture, Conservation and Consumer Protection of North Rhine-Westphalia to the Commission review of the EU scheme for fruits, vegetables and milk, 2021, available at: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12971-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme-EU-aid/details/F2662382_en.

²²⁵ National authorities survey, Germany, Panteia, 2022.

²²⁶ National authorities survey, Germany, Panteia, 2022.

Some Member States also have concerns regarding rising costs of prices for food over the coming period, which would potentially reduce the scope (and therefore impact) of the Scheme. For instance, Estonia notes that it will be more and more challenging to offer school Scheme products with same budget as stated years ago. The current school Scheme EU budget level is therefore considered not enough to offer sufficient support rates to a wider level.²²⁷ Also, the provision of organic products is noted to be more expensive than the standard fruit, vegetables, milk and milk products, which can have an impact on overall budget if required to provide.²²⁸

Regarding the costs and benefits of educational measures, as shown in the previous chapters, these measures are of added value to the Scheme, with stakeholders and studies indicating that they have a positive effect on children who participate. There is an obligation under the Scheme that all children participating in the deliveries take part in the accompanying educational measures.

As can be seen from the Table 10 (which refers to 2018-2019 school year), **the amount of EU aid which is allocated towards educational measures varies across Member States.** What can also be seen is that in some Member States (such as Ireland, Germany, Hungary, The Netherlands and Slovakia) there are large national funds which are provided towards the provision of educational measures, which is higher than the aid provided by the EU for these measures.

Table 10: Total value and % of EU aid towards educational measures by Member State and the UK in 2018 -2019

Member State	EU Aid Educational measures	National aid educational measures	Total	% of total EU aid allocated to educational measures
Austria	€153,558	N/A	€153,558	8%
Belgium	€124,093	€11,043	€135,136	10%
Bulgaria	N/A	N/A	N/A	N/A
Croatia	€26,288	€5,818	€32,106	2%
Cyprus	€40,145	N/A	€40,145	12%
Czechia	€553,865	€931,849	€1,485,714	19%
Denmark	€353	N/A	€353	N/A
Estonia	€72,694	€54,153	€126,847	15%
Finland	€142,765	N/A	€142,765	32%
France	€304,045	N/A	€304,045	10%
Germany	€46,993	€350,531	€397,524	12%
Greece	€29,426	N/A	€29,426	1%
Hungary	N/A	€448,812	€448,812	N/A
Ireland	€277,464	€1,175,779	€1,453,243	20%
Italy	€2,032,885	N/A	€2,032,885	17%
Latvia	€3,928	€10,047	€13,975	28%
Lithuania	€24,409	€2,891	€27,300	3%
Luxembourg	N/A	€888	€888	N/A

²²⁷ National authorities survey, Estonia, Panteia, 2022.

²²⁸ National authorities survey, Lithuania, Panteia, 2022.

Member State	EU Aid Educational measures	National aid educational measures	Total	% of total EU aid allocated to educational measures
Malta	N/A	N/A	N/A	N/A
Netherlands	N/A	€266,645	€266,645	N/A
Poland	€21,410	N/A	€21,410	100%
Portugal	€22,265	N/A	€22,265	3%
Romania	€165,817	€26,806	€192,623	3%
Slovakia	N/A	€360,839	€360,839	N/A
Slovenia	N/A	N/A	N/A	N/A
Spain	€1,267,932	€344,580	€1,612,512	9%
Sweden	N/A	N/A	N/A	N/A
United Kingdom	N/A	N/A	N/A	N/A

Source: Annual monitoring report 2018-2019

In some cases, Member States have indicated that there is insufficient budget to fully realise a comprehensive programme of educational measures, given that budgets are not sufficient for this.²²⁹ Additionally, one Member State indicated that if the distribution is lowered, the aid for accompanying measures is lowered too, which makes it challenging to plan educational measures at national level.²³⁰ Therefore, costs for the provision of educational measures (as well as those associated with monitoring and evaluation) should not be lowered because, to develop and implement these activities, requires the same amount of work regardless of the level of uptake in the provision/distribution element of the Scheme. Aid provided for distribution has been suggested to be variable, whereas other costs (such as costs spent on educational, monitoring and evaluation measures) should be fixed for the sake of consistency and planning.²³¹ Additionally there are schools that are more interested in product deliveries, but do not necessarily attach importance to the offer of accompanying educational measures. A new additional financial framework for the accompanying educational measures that would not be at the expense of the means for financing product delivery would be more favourable, as indicated by several German Federal Provinces.²³² There have been calls for a mandatory allocation of funds to be provided towards educational measures. Stakeholders disagree however on whether this would be an efficient use of funds. In Germany itself, the Federal Ministry of Food and Agriculture has rejected this proposal due to the increased administrative burden and that it would remove funds from the possible distribution of products.²³³ On the other hand, some stakeholders providing feedback to the Commission Roadmap IA, such as the Fresh Produce Centre from the Netherlands, advocate for the mandatory use of a minimum share of the EU aid for educational measures, due to their important role in improving the healthy behaviour of children.²³⁴

²²⁹ National authorities survey, Panteia, 2022.

²³⁰ National authorities survey, Portugal, Panteia, 2022.

²³¹ National authorities survey, Portugal, Panteia, 2022.

²³² National authorities survey, Germany, Panteia, 2022.

²³³ Position of Anonymous submitted to Commissions Review of the EU school fruit, vegetables and milk scheme, 2021, available at: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12971-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme-EU-aid/F2663076_en.

²³⁴ Stakeholder interview, Panteia, 2022, and Position of Fresh Produce Centre/GroentenFruit Huis' submitted to the Commission Review of the EU school fruit, vegetables and milk scheme, 2021, available at:

3.6.2. Inefficiencies

As indicated in the previous section on effectiveness, **administrative burden is considered one of the main factor causing inefficiencies in the implementation of the EU Scheme, which has a detrimental effect on national and regional bodies implementing the Scheme, as well as on suppliers and schools.** Information on the costs associated with administrative burden and on the benefits of the Scheme and their ratio to costs cannot be located in the literature, and many Member States are currently carrying out evaluations of the Scheme, which could provide more information in this regard.

Although Member States (and in some cases regions) have discretion in terms of how the Scheme is implemented in terms of administrative procedures, national authorities and stakeholders in most of the Member States surveyed (for the purposes of this research project) indicate that the Scheme places a burden on them in regards to the time and resources required to implement it. For instance, in Greece, the main inefficiency identified is related to mandatory public procurement procedures conducted by the national authority, which are time-consuming and may lead to only few participations and avoidance of newcomers (suppliers) who fear bureaucratic and time-consuming procedures.²³⁵ Austria indicated that EU funds could be used in a more efficient way in the case of a public procurement act with one single or very few suppliers of products, which could help contribute to increasing the budget absorption of the Scheme.²³⁶ This would also apply to the provision of accompanying educational measures. Lithuania also indicated that the administrative burden on both the aid applicants and the administration's side is something that could always be lighter. Lithuania also noted that aid per pupil might be easier to implement than aid based on kilos/litres.²³⁷

Schools also have indicated that there are costs that are associated with the implementation of the Scheme which are burdensome. For instance, in Croatia, the Ministry of Agriculture has received dissatisfaction from participating schools, who argue that participation in the programme is resulting in additional administrative burden for which schools cannot reimburse costs in any way, except from reducing the funds available to distribute products.²³⁸ This ultimately is having an effect on an already overstretched budget for the provision of products. Similarly in Belgium (Flanders), schools complain about the administrative burden of providing the necessary evidence for their aid claims as described in the EU regulation, although most of the times the aid claims only account for small amounts (500-1000 euro).²³⁹

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12971-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme-EU-aid/F2663137_en.

²³⁵ National authorities survey, Greece, Panteia, 2022.

²³⁶ National authorities survey, Austria, Panteia, 2022.

²³⁷ National authorities survey, Lithuania, Panteia, 2022.

²³⁸ National authorities survey, Croatia, Panteia, 2022.

²³⁹ National authorities survey, Belgium (Flanders), Panteia, 2022.

3.7. EU added value

This section will look at **what is the EU added value of the EU school fruit, vegetables and milk Scheme**, therefore considering what is the added value that resulted directly from the EU intervention (the EU Scheme), and not from public policies designed and implemented only at Member States' level. In particular, this section will consider whether the objectives could have been achieved by the Member States alone, whether the impacts could have been achieved without EU intervention, and what would the likely consequences would be in regards to stopping the Scheme. The following evaluation questions will be addressed in this section.

EU-added value – What is the EU added value of the EU school fruit, vegetables and milk Scheme?	Could the objectives have been achieved by Member States alone?
	Could results/outputs/impacts of the Scheme have been achieved without EU intervention?
	What are the likely consequences of stopping the Scheme?

This section was developed on the basis of desk research, the two stakeholder surveys (national authorities and schools) and stakeholder interviews.

3.7.1. Achievement of objectives by Member States alone

Only three Member States (Finland, Ireland, Portugal) had a previous existing national level Scheme prior to the implementation of the EU school Scheme in 2017. Several Member States indicate that the objectives of the Scheme and the related impacts (in their beneficial aspects) would not be able to be achieved by Member States alone.²⁴⁰ By making the Scheme available to all Member States, allowing them to implement a national programme which is supported by EU funding, this create an 'equalising effect' that ensures children across the EU are able to benefit from the Scheme.

For instance, prior to introducing the EU School Scheme in Poland and Austria, there were not any similar national activities of the same scope and comparable budget. The results of an evaluation of School fruit and vegetables scheme In Poland, carried out in 2017, proved that this kind of programme is an effective tool in shaping children eating habits, and that similar results and scope of implementation (number of schools participating) would be very difficult to achieve without EU funding.²⁴¹ Additionally, Greece doesn't finance/implement similar programmes on such a large scale at national level.²⁴²

In Portugal, EU funding for the milk Scheme is not considered essential to being able to achieve the objectives, given that there was a previous Scheme relating to milk prior to the EU funding. However, the necessity of funding would be apparent should there be the need for the scope of the Scheme to extend to plant-based alternatives. In contrast, Portugal has indicated that without EU budget there would be no fruit and vegetable Scheme in schools, and that the objectives would not be able to be achieved without²⁴³. In Croatia, it was indicated that national policy could also achieve similar results/outputs/impacts if implemented in the same manner with the equivalent budget.²⁴⁴

²⁴⁰ National authorities survey, Panteia, 2022.

²⁴¹ National authorities survey, Poland, Panteia, 2022.

²⁴² National authorities survey, Greece, Panteia, 2022.

²⁴³ National authorities survey, Portugal, Panteia, 2022.

²⁴⁴ National authorities survey, Croatia, Panteia, 2022.

3.7.2. Impacts of EU intervention

Whilst there is a general lack of data regarding the link between the EU Scheme and the impacts on stakeholders, **Member States are mostly positive regarding the added value of EU intervention** in this area. This can be seen in one manner through the level of national budget/funding also provided to the Scheme. **Analysis of the annual monitoring reports of school years 2017-2020 show that the majority of Member States heavily rely on EU funds to finance the provision of fruits, vegetables and milk to schools (see Table 8 above).** Eleven Member States do not use any national funds to supplement EU School fruit and vegetable Scheme - Sweden, Portugal, Bulgaria, France, Croatia, Greece, Netherlands, Cyprus, Estonia, Finland, and Italy. In ten Member States, the EU aid forms substantial part of total budget (more than 50%) reserved for the Scheme - Spain, Belgium, Malta, Slovenia, Germany, Ireland, Luxembourg, Slovakia, Lithuania, Romania. Only in seven Member States (EU-28) aid totals to less than 50% of total Scheme budget - Austria, UK, Denmark, Poland, Czechia, Hungary, and Latvia. EU aid has lowest contribution in the total budget for the Scheme in Czechia (28%). Also, only three out of the 27 Member States had previous Schemes comparable to EU School Fruit, Vegetables and Milk Scheme (Finland, Ireland, Portugal). This shows that the initiative at EU level incentivised the provision of fruit, vegetables, and milk in all Member States and could thus be seen as a certain indication for EU added value of the current Scheme at least in the Member States which entirely rely on EU funding.

For instance, in Lithuania, the support provided by the EU Scheme is making a substantial contribution to increasing the consumption of health promoting products and supporting related educational activities.²⁴⁵ In Mecklenburg–Western Pomerania, it has been noted that the EU Scheme has made it possible to reach a larger number of schools and children than would have been possible with a national programme alone, and the Federal Province could not have made the financial resources available on this scale. In addition, **the Scheme's focus on accompanying education measures makes an additional contribution to imparting knowledge about agricultural topics to children and helps to redevelop the cultural value of food and regional cycles.**²⁴⁶ Similarly in Sweden, the accompanying educational measures lead to more involvement and engagement in relevant questions surrounding health, environmental and agricultural issues. The EU intervention forms the (financial) basis for supplying the educational institutions with fruit/vegetables and milk and at the same time serves as a vehicle for the topic of nutrition. The results and impact of the programme are increased and intensified by the EU intervention.²⁴⁷ In France, as there is no national aid to complement the EU School Scheme funding, without the Scheme the distribution of milk, dairy products, fresh fruit and vegetables to pupils accompanied by an educational measure would not have been carried out in schools.²⁴⁸

However, **some stakeholders consulted have noted that EU funding for the Scheme alone is not able to leverage the desired impact and fully achieve the objectives.**²⁴⁹ Although relating to a previous Scheme, analysis of data provided by one Member State indicated that during the 2009 financial crisis when national funding for the Scheme was halted (although EU funds for the Scheme were still provided), the targets were not met and the Scheme lost significant impact on schoolchildren.²⁵⁰ However, in spite of the fact that in some Member States, national contributions are required in order to ensure substantial impact or full reach of the Scheme, **the fact that EU funds are provided gives a great source of support for the distribution of fruits, vegetables and milk**

²⁴⁵ National authorities survey, Lithuania, Panteia, 2022.

²⁴⁶ National authorities survey, Germany, Panteia, 2022.

²⁴⁷ National authorities survey, Sweden, Panteia, 2022.

²⁴⁸ National authorities survey, France, Panteia, 2022.

²⁴⁹ Stakeholder interview, Panteia, 2022.

²⁵⁰ Stakeholder interview, Panteia, 2022.

products, as well the related requirement for providing accompanying education and information measures.

3.7.3. Consequences of stopping the Scheme

No Member States or stakeholders consulted advocate for the discontinuation of the Scheme, and have indicated that **abandoning the programme would be a considerable loss in the area of healthy eating in schools.**²⁵¹ Stakeholders in some cases indicated that discontinuation of the Scheme would stop the provision of fruit, vegetables and milk products in schools altogether. As an example, in North Rhine-Westphalia (Germany), without EU financial support, no comparable programme would exist. It can therefore be assumed that the programme would be discontinued with the cancellation of EU funds, as alternative financing options are completely lacking.²⁵²

²⁵¹ National authorities survey and School survey, Panteia, 2022 and stakeholder interviews.

²⁵² National authorities survey, Germany, Panteia, 2022.

4. Conclusions and recommendations

Chapter 4 provides the main conclusions and recommendations. Firstly, the conclusions are presented on the basis of the analysis of the evaluation criteria provided in chapter 3 of this research paper. Following this, recommendations are presented, both towards the European Union, as well as the Member States. The conclusions and recommendations have been based upon analysis of the information collected throughout the development of the research paper, including the extensive consultation with stakeholders.

4.1. Conclusions

4.1.1. Relevance

In regards to the extent to which the EU School Fruit, Vegetables and Milk Scheme remains relevant to the needs, problems and issues, **the sustained relevance of the objective of encouraging children to follow healthy diet and lifestyle is confirmed on the basis of stakeholder agreement on the continuous need for encouraging children towards a healthy diet.** The activities within the Scheme are considered to be a positive means of contributing towards this. **The distribution of products and the accompanying information and educational measures were perceived as highly relevant and positive.** The continuous relevance of the Scheme's objective was further demonstrated by the complete budget absorption (both milk and fruit and vegetables aspects of the Scheme) in a number of Member States in the year 2019/20.

Some stakeholders are less positive regarding the continued relevance of the scope of the Scheme. In particular, one of the main concerns identified by some stakeholders consulted (through the schools survey, analysis of the inception IA feedback and through interviews) is the fact that the Scheme does not make it possible for plant-based alternatives to milk products to be included within the scope, in order to facilitate the transition to sustainable food systems, to promote health and nutrition, to guarantee socio-economic fairness, to promote sustainable diets and to ensure a level playing field within the Union. Additionally, a strong necessity to raise demand for organic products has been mentioned.

In terms of the relevance of the activities provided/conducted under the Scheme, **the information and educational measures have been perceived as the most relevant aspect in increasing the consumption of health foods on a long-term basis.** Some stakeholders suggest putting greater emphasis on these measures to an extent of requiring a minimum share of budget to be mandatorily allocated to them. A wider involvement of parents and other community participants has been communicated as desirable. The relevance of educational measures has been further highlighted by the increase in knowledge about nutrition among children participating in the educational measures in comparison to children only participating to the distribution part of the Scheme.

4.1.2. Coherence

The coherence of the EU School Fruit, Vegetables and Milk Scheme has been examined in connection to national, European and International related policies, answering the question to what extent is the Scheme coherent internally and does not contradict other interventions (at international, EU and national level) with similar objectives. **Stakeholders consulted believe that the objectives and the activities that are provided for in the relevant legislative framework complement each other well.** In particular, when looking at the previous Scheme, the addition of compulsory education and information measures to the ongoing Scheme further help to strengthen the achievement of the objectives, in addition to the mere provision/distribution of products.

Regarding wider EU policies, **there can be considered a relationship between the Scheme and the wider objectives of the CAP,** such as its contribution towards the stabilisation of markets and availability of supply, through the creation of a life-long customer thanks to the intervention at an

early age when habits are formed easily. The Scheme also has the potential to be coherent with the objectives of the European Green Deal, substantially contributing to the achievement of sustainable food production through putting emphasis on environmental considerations in the products selection process, and healthier food consumption patterns through not only providing children with healthy products but also educating them about healthy diet and nutrition. Through the Scheme, the sustainable practices in food production are emphasised both on the production side and the consumer side.

Furthermore, the Scheme, through the information and educational accompanying measures and through the distribution of the fruit, vegetables and milk and milk products itself, promotes healthy diets in children, assuming they are going to maintain it through their lifetime. In this way the Scheme can contribute towards the creation of healthier food consumption patterns in the society. One of the ways of keeping consumers informed and gently leading them into the right direction is ensuring that from a very young age, children are aware of the benefits of healthy diets including the consumption of fruit, vegetables and dairy. The Scheme provides for a channel in this and can not only facilitate the desirable communication to children but can also involve teachers and parents reaching a wider and more diverse audience. Information measures can involve a variety of stakeholders and be that more to the point about the details of the products and much more engaging and efficient. This way, the Scheme is not only providing information about the food directly and indirectly to a great range of consumers but through the distribution of products also directly helps them to consume healthy food at least to a certain extent. The Scheme is also coherent with elements of the **Farm to Fork Strategy - an essential pillar of the European Green Deal**- being particularly relevant with regard to forming a well-informed consumer from a young age and the engagement of various stakeholders, both facilitating sustainable food consumption, healthy nutrition and public health.

In regards to public health policies, **elements of the Scheme contribute towards mitigating risk factors that start in childhood (obesity, diabetes) through the promotion of a healthy diet, which contribute towards Europe's Beating Cancer Plan, the EU4Health initiative and the EU Action Plan on Childhood Obesity.** However, elements of the Scheme, such as allowing certain types of products with limited sugar and fat content and the distribution of only milk products instead of also offering plant-based alternatives were seen as contradictory by some stakeholders consulted.

The coherence with the national policies was assessed briefly as only three Member States (Finland, Ireland and Portugal) had previously existing national Schemes with comparable objectives to the EU Scheme. In general, the **consulted Member States indicated the Scheme is sufficiently in line with national policies and objectives and due to a certain level of discretion left for the Member States in its implementation,** can be adjusted to specific nutritional national goals.

Regarding international policies, it was discussed that **the Scheme can be considered as coherent with relevant international policies and obligations,** such as the **UN Sustainable Development Goals** (particularly Goal 2 Zero Hunger, Goal 3 Good Health, and Goal 4 Quality Education). The Scheme is also coherent with the objectives of the **Global Action Plan for the Prevention and Control of NCDs** in regards to the reduction of modifiable risk factors pushing forward healthy food instead of unhealthy snacks among children and educating them about the importance of good nutrition and the benefits of healthy eating.

4.1.3. Effectiveness

In terms of the objectives of the EU School Fruit, Vegetables and Milk Scheme being achieved as a result of its implementation, the **limited amount of quantitative data available** due to the novelty of the Scheme and the related impossibility to judge the long-term effects at this point in time needs to be emphasised as a limitation to the analysis in this section. However, it is known that the distribution of products aspect of the Scheme reached 19.1 million pupils out of total 76.2 million

EU pupils in the school year 2019/2020, with the interviewed stakeholders being convinced **the Scheme does in fact stimulate healthy eating among children** especially when the frequency of distribution is high and there are accompanying educational measures conducted. Some stakeholders believe that distributing the products for free adds even more benefits to the Scheme in terms of an equalizing effect and that greater variety of products has the potential to attract more participation. The Scheme also has a significant **positive effect on suppliers and farmers**.

On the other hand, some stakeholders believe the **budget of the Scheme to be too low to be effective** in achieving the objective of long-term improvement of children's diet and that the discretion of Member States to exempt some less healthy products goes directly against this objective of the Scheme. In terms of literature, there is only limited backing of the Scheme being effective in influencing children's diet, however, there seems to be an increase in children's awareness of the importance of healthy eating proved by older studies highlighting the importance of the accompanying educational measures. Here even the stakeholders agree on the need to expand the educational measures to ensure participation of parents for even better effectiveness.

In regard to the effectiveness related to the different administrative procedures used, the implementation of the Scheme varies among Member States in the administrative procedures used to select suppliers, to publicise the Scheme, to perform administrative checks and the monitoring and evaluation. **In terms of the suppliers' selection, the most widely used is the centralised system**, but there are also Member States in which a de-centralised or a mixed system is used. The biggest benefit of the centralised system seems to be the **alleviation of the administrative burden from schools** when the supplier contracts the school, the school not having to be responsible for the public procurement. The de-centralised system, although offering for higher flexibility, puts this administrative burden on schools and has a lower reach, while in the mixed system schools prefer to go the easier route and give up some flexibility for lower administrative burden. In the procurement of the educational measures, Member States can either use the same procedure as for the products supplier selection or a different one, this resulting in the schools being responsible for the selection of either or. In terms of the administrative checks and monitoring and evaluation practices, there are no heavy differences among the Member States while when it comes to publicity of the Scheme, all Member States have posters at schools, designated websites and a social media presence, but only some go the extra mile to provide souvenirs, create TV advertisements, or organise promotional events.

Lastly, the unexpected effects on the effectiveness of the Scheme can be seen in the context of the Covid-19 caused closures of school, the price fluctuations and the war in Ukraine. The Covid-19 closures of schools having affected the distribution of products, the Scheme had to be suspended in some Member States where no alternative ways of distribution were found. Due to the uncertain situation, Covid-19 has also led to lowered numbers in participation. At the time being, several Member States reporting signs of recovery, **the pandemic has highlighted the need to increase flexibility in the implementation measures**, to ensure the continuation of the Scheme without losing its effectiveness and to give guarantees to suppliers. Similarly, the current prognoses of price fluctuations warning before further increase in food prices, **the budget of the Scheme will need to be re-assessed** for the Scheme to be able to cover the same number of participants with the same frequency/duration of distribution. On the same note, the large number of refugee children fleeing the war in Ukraine have to be considered when looking at the budget, as with the current budgetary restrictions including more children would be very challenging.

4.1.1. Impacts

The EU Scheme has different impacts on a range of stakeholders, including children, schools, farmers, suppliers, and national and local competent authorities. It is important to mention the difficulty of measuring concrete impacts of the Scheme alone, as positive effects on children's diet are possibly attributable to a broad range of activities beyond the scope of the Scheme. Additionally,

there is no specific data available regarding the impacts of the current Scheme yet, and, as the baseline changes every year, it is challenging to make an accurate evaluation.

In terms of the impacts on children's health, some studies suggest **positive impacts on changing children's eating habits – particularly related to fruit consumption**. Similarly, both the majority of schools and parents agree that there is a positive impact present as children pay more attention to healthy diets. Stakeholders also perceive a positive impact of the fruit and vegetables part of the Scheme on the health of children, but are slightly less positive when it comes to the milk part of the Scheme. **For real long-lasting impact, however, holistic and interdisciplinary approach is deemed necessary, with attention given to the creation of healthy school environments rather than just to the provision of healthy products**. In this regard, accompanying educational measures play a crucial role emphasising the impacts of the Scheme. Looking at the impacts on children's consumption, statistical data from numerous Member States suggest positive effects on the consumption – consumption of healthy products being higher among the children participating to the Scheme in comparison to children not participating and healthy snacks shaping consumption habits of children.

Schools mostly welcome the initiative, which can be also demonstrated through the increased rates of participation in the Scheme by schools in some Member States. Whilst they acknowledge the positive impact on children and their health, **in many cases schools find the Scheme burdensome from an administrative perspective**, often lacking the time and resources to implement it in an effective manner. In addition to the administrative burden, in some Member States insufficient infrastructure for provision of school meals also restricts the schools in provision of products to children.

The Scheme allows farmers and suppliers of products, through prioritising local purchasing and short supply chains, to have direct access to consumers to establish and develop long-term relationships. Additionally, the Scheme can be also seen as an additional form of income for many of them. Farmers and suppliers in some procurement systems also have to deal with excessive administrative burden.

In some Member States, national authorities experience disproportionate administrative burden. In addition to the administrative burden related to the distribution of products, several Member States have indicated the need for simplification of the evaluation and monitoring procedures. Lastly, in Member States where it is not customary to provide food in school canteens and the distribution equipment is therefore lacking, the Member States are prevented from exhausting the assigned budget for the Scheme.

4.1.2. Efficiency

The Scheme's overall combined annual budget amounting to €250 million (€220.8 million after the withdrawal of UK) it is divided among the Member States based on the number of children and the level of regional development. **Not all of the EU budget, however, is used every year** and even in the year with the highest absorption rate (2018-2019) only 11 out of 26 Member States (fruit and vegetable part of the Scheme) and 11 out of 28 Member States (milk part of the Scheme) used more than 90% of the budget. **The stakeholders believe the main obstacle to the efficient use of the budget to be the complex procedures for implementing the Scheme at national level**. In terms of national funding, many Western European Member States contribute to the Scheme with only very limited or no funds at all while Central and Eastern European Member States tend to top up the Scheme more with national budgets. Even in these Member States, however, the national aid seems to be decreasing over the years.

The amount of aid allocated towards the accompanying educational measures varies across Member States, with some Member States providing national aid towards these measures higher than the EU one. There are still Member States, however, that **indicated that the budget is**

insufficient to fully realise a comprehensive programme of educational measures. There is also a practical issue identified regarding the dependency of the educational measures budget on the level of distribution – if the distribution is lowered, the aid for accompanying measures is lowered too making it challenging to plan educational measures at national level as they require same amount of work regardless of the level of uptake in the distribution element of the Scheme.

Stakeholders seem to be generally positive about the benefits of the Scheme and about its efficiency, Member States indicating that similar results and scope of implementation would be difficult to achieve without EU funding. Whilst the input costs of the Scheme (in regards to EU aid) do contribute somewhat towards the achievement of the goals of the Scheme, the budget is however generally considered to be insufficient to be far reaching and make a significant and wide-reaching impact. Even now, under the current conditions, in many cases the budget is too low to include all institutions that want to participate in the school programme. Some Member States also have concerns regarding rising costs of prices for food over the coming period, which would potentially reduce the scope (and therefore impact) of the Scheme. Accordingly, to achieve sufficient impact regarding children developing healthy eating habits, it would be ideal to have an increased budget to subsidize a whole year of more frequent distribution of fruit, vegetables and/or milk.

Regarding the identified inefficiencies of the Scheme, **administrative burden seems to be the main obstacle, with national authorities and stakeholders in most Member States indicating that the Scheme places a burden on them in regards to the time and resources required to implement it**, but there is no information on the costs associated with administrative burden and on the benefits of the Scheme and their ratio to costs in the literature. Many Member States are however currently carrying out evaluations of the Scheme, which could provide more information in this regard.

4.1.3. EU added value

Member States indicate the **positive added value of the EU intervention and an inability to achieve the objectives and impacts of the Scheme alone.** No Member State or stakeholder consulted advocates for the discontinuation of the Scheme. Only in three Member States was there a previously existing Scheme with similar goals and objectives. Therefore, the EU Scheme has an equalising effect among all the Member States and provides for a greater scope, scale, budget and results as the Schemes functioning without the EU funding.

For Member States heavily reliant on EU funding and only supplementing the Scheme's budget by national funding, the EU intervention can be seen as forming financial basis for supplying the educational institutions with fruit, vegetables and milk and at the same time serves as a vehicle for the topic of nutrition. The previous national efforts in this regard are intensified by the EU intervention. However, it has been also noted by some stakeholders that the EU funding alone is not able to leverage the desired impact and fully achieve the objectives of the Scheme.

No Member State or stakeholder consulted advocated for the discontinuation of the Scheme, and some stakeholders even indicated that the discontinuation of the Scheme would stop the provision of fruit, vegetables and milk products to children in schools altogether, emphasising the added value of the EU Scheme.

4.2. Recommendations

4.2.1. EU level recommendations

➤ **Continue with the Scheme following the 2022/2023 school year**

Given that the Scheme contributes towards a number of EU objectives, and contributes towards health eating in schools, it is recommended that the Scheme continues in some form over the coming years. Given that in some cases, national authorities indicated that discontinuation of the Scheme would stop the provision of fruit, vegetables and milk products in schools altogether, abandoning the programme could be counterproductive in this regard.

➤ **Do not decrease but possibly increase the available budget for the Scheme**

Although some Member States do not make use of full budget available, the Commission should not decrease the budget. In many cases, the EU budget received by some Member States is insufficient to reach all target groups and to have the desired impacts at national level. In order to increase the effectiveness and ensure further participation in the Scheme (including the option for Member States to ensure coverage of all target groups), it is recommended to increase the total budget envelope for the Scheme. In many cases, this would allow for increased frequency of distribution per week, as well as duration of distribution throughout the school year. Additional budget should also be made available for education measures, given that these measures are deemed to be effective in terms of realising the goals of the Scheme.

➤ **Streamlining the implementation of the Scheme**

The EU could encourage the streamlining of the management, control, monitoring and evaluation requirements, both for Member States competent authorities and for beneficiaries of the EU school Scheme. The EU should also create a forum to encourage Member States to share best practices as means to further identify successful ways of streamlining the implementation of the Scheme.

➤ **Encourage Member States to reduce the administrative burden associated with the Scheme**

Administrative burden has been identified by stakeholders as one of the key bottlenecks in the achievement of the objectives of the Scheme. The EU should encourage Member States to reduce and simplify administrative procedures in order to ensure participation in the Scheme, and further increase the amount of budget that is utilised by the Member States. The EU should encourage Member States to reduce and simplify the level of documentation required for beneficiaries of the Scheme in order to reduce burden.

➤ **Increased emphasis on accompanying educational and information measures**

The accompanying measures as part of the Scheme have proven to be particularly effective in the context of contributing to the objectives of the Scheme. There have been calls (within the context of the consultation run for the purposes of this research project) to ensure a larger portion of the budget to be devoted to educational measures in particular. Therefore, it is recommended that an amendment to the existing legislation is included that introduces a minimum share of the EU budget that Member States would be requested to devote to the implementation of educational measures, which should also be more frequent and widespread. The EU should provide more guidance regarding the content of the measures, such as focus on healthy eating habits, agriculture in general or more specifically on sustainable agriculture, including organic farming. Additionally, measures should target other stakeholders, including parents and teachers, on a mandatory basis.

➤ **Costs for accompanying measures could be fixed**

It is recommended that whilst aid provided for distribution should continue to be variable, other costs associated with accompanying measures and the monitoring and evaluation of the Scheme should be fixed for the sake of consistency and planning at the Member State level. Implementing a programme of measures at national level and conducting monitoring and evaluation requires a fixed level of costs which does not alter to such a large extent depending on the uptake of the Scheme, therefore these costs should not be tied to the distribution of products.

➤ **The EU could play a greater role in the communication of the Scheme**

In order to increase consumption, greater focus could be put on communication in relation to distribution of products. The EU could address this need in terms of developing and providing more uniform material to Member States to increase awareness and information relating to the Scheme. The level of information could be comparable to what has been done by the EU in relation to promoting organic farming. The EU could also develop and provide materials that can assist Member States in developing their programme of educational measures. This would allow Member States that have not developed some form of minimum guidance material to have a reference point that can be used by schools alongside distributing products.

➤ **Reconsider the scope and the quality of the products provided under the Scheme**

In line with sustainability objectives, food based dietary guidelines and national and global nutritional recommendations, as set under the Farm to Fork strategy, Beating Cancer Plan and Organic Action plan, the EU could consider revising the scope of the Scheme, in relation to the products eligible for distribution. Therefore, certain eligibility criteria or conditions can be included in order to achieve certain policy goals such as a minimum share of fresh and organic products. In addition, the possibility of allowing Member States the discretion to include plant-based drinks within the Scheme as an alternative to regular cow milk could be explored, given feedback from stakeholders and current debates taking place within society. Exceptions allowing for the distribution of certain types of products with limited sugar and fat content could be removed or mandatory targets set, in order for the Scheme to remain aligned to the objectives and wider EU policy goals. The EU could also take measures to ensure Member States guarantee certain levels of quality of products, which also could be taken into account alongside the absorption of the budget and meeting national targets regarding participation.

➤ **Develop new reporting rules to guarantee comparable data amongst Member States**

The EU could take measures to ensure that data relating to the Scheme is comparable amongst Member States, and is complete in order to be able to aggregate data and learn more about the Scheme across Europe. Currently, Member States have some difference in terms of how they report on the Scheme, which makes it difficult to make sufficient comparisons across the EU.

➤ **Explore the possible introduction of indicators which would serve as a basis for the evaluation of the implementation of the post-2023 scheme**

One such possible recommendation could be for the EU to explore the possible introduction of indicators which would serve as a basis for the evaluation of the implementation of the post-2023 scheme. The database for the development of such indicators is already available in the national strategies, and should be utilised in any successor Scheme.

4.2.2. Member State level recommendations

➤ **Reduce the level of administrative burden for applicants**

The administrative burden that accompanies the implementation of the Scheme, particularly in the context of distribution measures could be lowered in order to increase participation rates and the

absorption of national budgets. This could involve simplified procurement procedures, whereby the burden is not put on schools who wish to participate in the Scheme. The option for schools to have longer contracts could be explored, as this would reduce the need for an extensive amount of documentation.

➤ Increase communication activities in Member States with low participation rates

In cases where Member States have low levels of participation, it is recommended (in parallel to reducing the levels of administrative burden) to develop an enhanced communication strategy, to try to increase the levels of participation from schools. EU material can also be used to further encourage schools to participate.

Annex 1: Technical Annex

This section provides a description of the methodology employed in the context of carrying out this research paper.

Desk research

The evaluation started with desk research. Key administrative documents relating to the implementation of the Scheme were reviewed, along with relevant academic literature. In addition to the national strategies and monitoring reports provided by each Member State, available data at the EU Scheme Data Portal²⁵³ was analysed. The Portal provides data such as the degree of participation of number of schools; the percentage of participating children; the percentage of children involved in accompanying educational measures; an increased level of percentage in the number of pupils participating in the Scheme, consuming more fruit, vegetables, and milk or being involved in the educational measures. Analysis of the information provided through the public consultation carried out by the EC for the ongoing Impact Assessment for the Scheme also took place²⁵⁴.

Interviews

Scoping interviews were conducted at both the European and national level, in particular the European Commission Directorate-General for Agriculture and Rural Development (DG AGRI), representatives from one EU Member State, as well as several relevant experts and representatives of stakeholder organisations.

A 'Data protection notice and participant consent form' was developed and provided to all interviewees prior to their interviews.

In addition, the main interview programme that was carried out looked at the impact on other target groups (farmers/distributors and other relevant organisations identified, including national organisations), and where relevant an authorisation has been given, these have been identified within the research paper. These stakeholders were consulted as they were not included in the context of the two surveys launched (please see below).

Stakeholder surveys

To carry out primary desk research in all Member States and the UK, two types of stakeholder surveys were carried out:

- **Survey of national competent authorities responsible for implementing the Scheme**
- **Survey of schools, which allowed to directors, teachers and parents and 'other' (such as school administrators and other school staff) roles to reply**

²⁵³ For more information, please see:

<https://agridata.ec.europa.eu/extensions/SchoolSchemeMonitoring/SchoolSchemeMonitoring.html>.

²⁵⁴ The feedback collected concerns in particular the combined evaluation roadmap/impact assessment published by the Commission on 29 June 2021 and open for stakeholders' feedback from 29 June to 27 July 2021, which prepares the ground for a revision of the Scheme for the post-2023 implementation period. The Commission proposal is expected in Q4 of 2023.

National competent authorities survey

In order to ensure an effective and useful consultation with national competent authorities responsible for implementing the Scheme, a survey was carried out and all 27 EU Member States and the UK were approached to contribute. National authorities were provided two options to complete the survey:

- **A written questionnaire that was submitted at same time as the request for national competent authorities to distribute the survey to schools; or**
- **An in-depth interviews (held virtually)**

In total, ten national competent authorities responded to the survey, in addition to eleven German Federal Provinces, one Belgian Region, as well as eleven Romanian County Councils. This means that feedback was received by the authorities - central or regional - of thirteen Member States in total.

Schools survey (including teachers and parents)

A short online survey for schoolsdirectors, teachers,parents and 'other' school roles in the EU (including the UK) was developed and distributed. The reason behind this survey was that these stakeholders have closest contact with children and were therefore able to make an assessment of the impact of the Scheme.

In order to reach out to this target group, a 'snowball' approach was taken. Therefore, national and local authorities, European and national umbrella organisations representing school directors, teachers and parents were requested to distribute the link amongst their members to ensure that as much coverage as possible is obtained. The following types of contacts have been included in the list (with the request to distribute amongst members/relevant contacts where necessary):

- **National authorities responsible for implementing the Scheme will be requested to distribute amongst participating schools.**
- **European and national education associations.**
- **European and national parents associations.**
- **Academics specialised in research relating to the subject of the EU School Scheme (taken from publications indicated in the literature list).**
- **Municipalities.**

In order to facilitate respondents, the survey was programmed in six languages (EN, FR, DE, PL, ES & IT), and translation was be carried out by Panteia.

Throughout the report, survey results are provided where necessary, mostly in the case of reference to one Member State. Due to the fact that Member States have a great deal of flexibility to implement the Scheme, making comparisons between Member States would not provide meaningful conclusions regarding the overall effectiveness of the Scheme.

Several limitations should be outlined in relation to the online School survey. It was not to be possible to receive contact details of schools directly, and therefore link to the survey had to be distributed to organisations and relevant authorities involved in the Scheme. It should be acknowledged that due to this, a representative sample across all Member States was unable to be collected. However, this approach allowed some indicative data to be collected that provides examples of trends across Member States. A significant number of responses was collected from stakeholders in Germany, Poland, Romania, Luxembourg, Portugal and Croatia, all of which have been the subject of further study in this report, given the fact that this selection represents Member States with both high and low absorption rates of EU budget, a good geographical spread, as well as including both smaller and larger Member States. However, it is also important to state that the samples cannot be considered representative.

Additionally, the main priorities of schools and teachers are the education of children. Due to this commitment, it was the case that many who received the link to the survey did not have sufficient time to develop responses. A further limitation is the fact that a similar activity is taking place in the context of the European Commission Impact Assessment supporting the review of the Scheme expected in the second half of 2023. The public consultation in the context of the European Commission Impact Assessment has started and stakeholders already have had the opportunity to react on the roadmap of the IA, of which the public feedback has been utilised in the context of this report. The public consultation commenced during the second quarter of 2022.

Within the very short timeframe of the research project, full coverage of all official EU languages was not possible.

The following tables provides an overview of the response rate of the survey for schools, which has been broken down by Member State on the basis of the types of stakeholders who completed the survey, as well as the level of schooling represented. In addition to school directors, teachers and parents, other persons responsible for implementing the Scheme also completed the survey. The most frequent types of stakeholder who made up the 'other' category included school administrators, school management, school accountants, school secretariat, school/municipal nutritionists, health coordinators, restaurant coordinators, caterers, representatives of municipalities and school counsellors. Additionally, in the breakdown of the level of schooling represented by the stakeholder, larger figures can be seen here as in many cases, as some stakeholders represented institutions that covered several levels of education, hence the larger number of responses in this regard.

Table 11: Overview of the results of the schools survey based on role of respondent conducted April-May 2022.

Member State	School Heads/Directors	Teachers	Parents	Other	Total
Austria	0	0	2	1	3
Belgium	11	16	13	5	45
Bulgaria	3	0	0	0	3
Croatia	174	24	10	133	341
Cyprus	1	5	0	1	7
Czechia	0	0	0	1	1
Denmark	2	1	1	6	10
Estonia	4	1	0	5	10
Finland	0	0	1	0	1
France	20	5	70	43	138
Germany	1191	493	432	3899	6015
Greece	15	7	0	0	22
Hungary	2	0	0	0	2
Ireland	54	10	44	5	113
Italy	2	0	5	1	8
Latvia	2	0	2	1	5
Lithuania	3	2	1	3	9
Luxembourg	23	290	560	29	902

Member State	School Heads/Directors	Teachers	Parents	Other	Total
Malta	1	1	0	0	2
Netherlands	2	1	10	0	13
Poland	2028	727	269	554	3578
Portugal	76	181	5	142	404
Romania	903	470	846	383	2602
Slovakia	9	2	4	1	16
Slovenia	1	5	2	2	10
Spain	0	0	7	2	9
Sweden	2	1	1	8	12
United Kingdom	2	0	0	2	4
Totals	4531	2242	2285	5227	14285

Source: Schools survey, Panteia, 2022.

Table 12: Overview of the results of the schools survey based on type of school, conducted April-May 2022.

Member State	Nurseries	Pre-school	Primary school	Secondary school	Total
Austria	0	0	0	3	3
Belgium	1	14	36	3	54
Bulgaria	1	0	1	1	3
Croatia	0	1	276	68	345
Cyprus	0	1	0	6	7
Czechia	0	0	0	1	1
Denmark	2	1	6	2	11
Estonia	2	5	3	4	14
Finland	0	0	0	1	1
France	6	38	102	27	173
Germany	3762	399	2270	275	6706
Greece	0	3	10	8	21
Hungary	0	1	1	0	2
Ireland	2	112	36	9	159
Italy	0	2	6	4	12
Latvia	1	2	1	4	8
Lithuania	1	2	8	3	14
Luxembourg	85	187	515	326	1113
Malta	2	2	1	0	5
Netherlands	1	0	9	5	15

Member State	Nurseries	Pre-school	Primary school	Secondary school	Total
Poland	2	214	3576	6	3798
Portugal	9	192	316	118	635
Romania	38	684	1363	1329	3414
Slovakia	0	2	16	2	20
Slovenia	1	1	3	6	11
Spain	2	5	8	3	18
Sweden	4	5	8	9	26
United Kingdom	2	4	4	1	11
Totals	3924	1877	8575	2224	16600

Source: Schools survey, Panteia, 2022.

Identification of sufficient and insufficient practices

Based on the literature review, an analysis of the national strategies, the stakeholder surveys and interviews conducted, a long list of practices was developed. More detailed descriptions of the practices were developed on the basis of desk research. In some cases, further questions were posed to stakeholders involved in the practice as appropriate, in the form of email contact.

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Starting with milk in the 1970s, the EU has a long history of supplying agricultural products to school children. With a dedicated EU school scheme for the 2017-2023 period, the EU is currently funding the distribution of fruit, vegetables, milk and milk products, and also educational and information measures. The main policy objective is to ensure that children's nutritional needs are met and healthy eating habits and lifestyles are established.

The European Parliament is scrutinising the implementation of the school scheme with a report on the subject that will be considered by its Committee on Agriculture and Rural Development in the autumn of 2022. This European implementation assessment (EIA), produced by EPRS in support of the committee's work, shows that despite a significant level of flexibility in terms of national-level implementation, schools and suppliers face a good deal of red tape, and this is seen as the main factor reducing the scheme's effectiveness.

The EPRS findings were based partly on a purpose-made school survey. It collected more than 14 000 individual contributions from schools (including directors, teachers and parents) located in all Member States. The good response clearly demonstrates the importance the school community attributes to the EU school scheme.

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