



**Healthy Food for All**  
*access | availability | affordability*

**Healthy Food for All Initiative**

**Response to**

**"TOWARDS A POSSIBLE EUROPEAN SCHOOL FRUIT SCHEME  
- Revised Consultation Document for Impact Assessment"**

**29th February 2008**

## **Introduction**

Healthy Food for All (HFfA) is a multi-agency initiative seeking to promote access, availability and affordability of healthy food for low-income groups on the island of Ireland.<sup>1</sup> The initiative sets out to demonstrate the relationship between food poverty and other policy concerns such as health inequalities, welfare adequacy, education disadvantage, food production and distribution, retail planning and food safety. It seeks to identify and galvanise interest in, and commitment to, eliminating food poverty through raising public awareness, policy advocacy, promotion of best practice models and networking local initiatives with national structures.

In response to the invitation issued by the European Commission to contribute to the consultation process on a proposed School Fruit Scheme, HFfA held a round-table event with a wide range of stakeholders on 19th February 2008. Its purpose was to raise awareness about the public consultation process for the proposed Scheme; to explore issues which may arise in its implementation from an Irish perspective and to inform the HFfA response to the consultation document. The event was attended by representatives from a number of government departments, statutory agencies, private sector interests, professional associations and the community and voluntary sector. A full list of attendees is contained in Appendix 1. While the content of this submission was informed by the discussions at this event, the document represents the position of HFfA only. It should not be interpreted as representing the views of those who attended the round-table event or their organisations.

## **Background**

The case for action to increase consumption of fruit and vegetables as part of a healthy diet has been well rehearsed in a range of policy arenas. These include the EU White Paper on Nutrition, Overweight and Obesity, a succession of World Health Organisation Strategies and Action Plans,<sup>2</sup> and in the Irish context, the Cardiovascular Health Strategy (1999), the National Task Force on Obesity

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<sup>1</sup> Partnership Agencies: Armagh & Dungannon Health Action Zone, An Bord Bia, Combat Poverty Agency, Community Dietitian Service, Clondalkin Health Initiative, Crosscare, Department of Health & Children, Dublin City Council, Family Support Agency, Focus Ireland, Food Safety Authority Ireland, Limerick Food Partnership, Northern Ireland Public Health Alliance, Population Health (Health Services Executive), SafeFood, Society of St. Vincent de Paul, Tallaght Partnership, University College Dublin. HFfA is funded by Department of Social & Family Affairs, Population Health (Health Services Executive), Combat Poverty Agency, SafeFood, Food Safety Authority Ireland.

<sup>2</sup> See for example CEC (2007) White Paper on A Strategy for Europe on Nutrition, Overweight and Obesity related health issues, COM (2007) 279 final. Brussels; World Health Organization (2001) The First Action Plan for Food and Nutrition Policy, WHO European Region 2000-2005. Copenhagen: WHO Regional Office for Europe; World Health Organization (2006) Gaining health: the European strategy for the prevention and control of noncommunicable diseases (NCD). Copenhagen: WHO Regional Office for Europe; World Health Organization (2007) The Second Action Plan for Food and Nutrition Policy, WHO European Region 2007-2012. Copenhagen: WHO Regional Office for Europe.

(2005) and the forthcoming National Nutrition Policy, among others.<sup>3</sup> The prevalence of overweight and obesity among children in the EU population (estimated at 30% in 2006) and the ameliorating impacts of fruit and vegetable consumption in combating these developments are also important contextual factors.<sup>4</sup> In Ireland, the National Task Force on Obesity, which produced its report in 2005, stated that 300,000 children in Ireland were overweight or obese and projected an annual increase of 10,000 per year on this figure.<sup>5</sup> Recent studies suggest that consumption of fruit among school-aged children in Ireland is significantly below recommended levels of intake, with only 19% (or less than 1 in 5 ) of schoolchildren consuming fruit more than once a day. In addition, there is some evidence of a social gradient with children from higher socio-economic groups more likely to indicate higher levels of consumption.<sup>6</sup>

The afore-mentioned round-table event organised by HFfA represented the first opportunity for many of the stakeholders to debate issues relevant to the proposed Scheme. Some of the key discussion points were as follows

- There was a consensus that the consultation process around this issue is to be welcomed. A School Fruit Scheme provides an excellent and unique opportunity to effect positive change on dietary habits and to reduce health inequalities. Schools can act as key settings for influencing behaviour and for reinforcing healthy eating messages from the wider community.
- Against the current background outlined above, there is an urgent need for a pro-active approach by the EU on this matter.
- There is a need for a coherent approach with commitment at societal, community and government levels. Any scheme must be integrated within the education system and this will require input from a number of different government departments, teachers, teachers unions, parents, suppliers and community dietician services - among others. In view of the range of stakeholders involved, there is a need for clear guidance from EU level to ensure policy coherence.
- Concerns were expressed about the potential administrative burden which may be placed on schools. While considerable goodwill exists towards such a scheme, schools involved need to be supported and funding needs to be directed towards appropriate promotional and development measures. In addition, primary and second level schools represent very different settings and this factor needs to be considered in the

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<sup>3</sup> See [http://www.dohc.ie/publications/building\\_healthier\\_hearts.html](http://www.dohc.ie/publications/building_healthier_hearts.html) and [http://www.dohc.ie/publications/report\\_taskforce\\_on\\_obesity.html](http://www.dohc.ie/publications/report_taskforce_on_obesity.html)

<sup>4</sup> See [http://ec.europa.eu/health/ph\\_determinants/life\\_style/nutrition/documents/nutrition\\_wp\\_en.pdf](http://ec.europa.eu/health/ph_determinants/life_style/nutrition/documents/nutrition_wp_en.pdf)

<sup>5</sup> See [http://www.dohc.ie/publications/pdf/report\\_taskforce\\_on\\_obesity.pdf?direct=1](http://www.dohc.ie/publications/pdf/report_taskforce_on_obesity.pdf?direct=1)

<sup>6</sup> See [http://www.dohc.ie/publications/hbhc\\_study\\_2006.html](http://www.dohc.ie/publications/hbhc_study_2006.html)

design/implementation of the Scheme. The importance of intervention at an early age in order to have a long-term effect was also stressed.

- The issue of whether such a Scheme should adopt a targeted or a universal approach generated considerable debate. While it is acknowledged that a targeted approach, in particular circumstances, makes efficient use of limited resources, the view of HFfA is that any Scheme should take a universal approach. While fruit consumption among school-aged children does exhibit a social gradient, it remains below recommended intake levels for all socio-economic groups. In addition, universal provision would eliminate any stigma attached to the uptake of such a scheme.
- Existing models such as the EU Milk Scheme should be used in the design of a School Fruit Scheme in terms of sourcing suppliers and the organisation of logistics. It is important that any Scheme would recognise the need for flexibility in implementation given the different needs of schools in different regions and local situations. While recognising the fact that no discrimination on basis of country of origin can be allowed under any Scheme, it may provide an opportunity to source local produce, ensuring additional routes to market for producers and contributing to the environmental sustainability agenda.
- It was agreed that a School Fruit Scheme could add value to the existing School Food Programme in Ireland. The current Programme is not mainstreamed and targets resources towards children in designated disadvantaged schools. Healthy eating guidelines for the School Food Programme exist but are not mandatory. While many schools implement excellent school food policies there is no national framework within which these are supported.
- There are excellent examples of good practice internationally and nationally, emanating with both public sector and private sector involvement. The proposal from the EU to create a forum to share information and best practice was welcomed. Projects must be evaluated and the learning disseminated to a broad audience.

## **Analysis of Options from the Consultation Document**

### **Option 1 - Status Quo**

HFfA does not support the maintenance of the status quo as an option. Clearly, in the light of the background and context outlined earlier, existing initiatives at EU level are insufficient to reverse the ongoing decline in fruit and vegetable consumption. In view of the fact that World Health Organisation attributed 4% of the disease burden in developed countries to low fruit and vegetable consumption, and the growing incidence of overweight and obesity among

children, there are clearly high and rising costs associated with inaction.<sup>7</sup> Given the complexity of the issue and the range of policy domains across which it intersects, there is a need for the EU to provide coherence and guidance on this urgent matter.

### **Option 2 - Networking - Limited New EU Involvement based on Existing Framework**

As outlined previously, HFfA acknowledges that there are excellent examples of good practice internationally and nationally around this issue emanating from both public sector and private sector involvement. The proposal from the EU to create a forum to share information and best practice is a welcome one and is essential for the effective dissemination of good practice on the provision of fruit and vegetables in schools. There are existing networks which could be developed under this option.

However, the view of HFfA is that, of itself, the option is not sufficient to meet the stated objectives of such a Scheme, which include "long-term consumption of fruit and vegetables among children" and a "lasting improvement in health and a decline in obesity". Additional funds are needed to ensure the implementation of a successful scheme.

### **Option 3 - Supporting Initiatives - Increased EU Involvement Building on Existing Council Legislation**

Under this option, the emphasis is primarily on targeted promotional activities under the CMO for fruit and vegetables set within a very specific legislative and financing framework. HFfA acknowledges that in the Irish context, models such as the Food Dudes programme have played an important role in educating children on the importance and benefits of fruit consumption and in introducing them to the wide range of fruits available. However, as a model for an EU-wide School Fruit Scheme, the complexities associated with compulsory co-financing at three levels (EU, national and proposing organisations) could prove to be a significant disincentive.

### **Option 4 Driving Initiatives**

This is the preferred option for HFfA. Against the background outlined earlier and in view of the range of stakeholders involved and the need for policy coherence, this option provides the best opportunity to achieve the long-term objectives of the Scheme and to support it with the requisite legal and financial framework necessary for its implementation. HFfA recommends combining option 2 and option 4 to maximise the potential of this scheme.

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<sup>7</sup> World Health Organization (2002) The World Health Report 2002. Reducing Risks, Promoting Healthy Life. Geneva. World Health Organization

## **Re the preferred option:**

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

A successful initiative needs to be set within a national framework which will ensure policy coherence. A steering committee should comprise all stakeholders including, *inter alia*, relevant government departments (education, health, agriculture, environment, social and family affairs), statutory bodies, farming organisations, teachers' unions, suppliers and community/voluntary organisations. The opportunities for synergies with other areas of policy will be lost if the Scheme is housed within a government department with a narrow sectoral focus.

A successful initiative will need to be flexible and adaptive to local conditions. For example, given the prevalence of schools in Ireland which are in remote areas and/or have small numbers, there should be scope to develop schemes for co-ordination of supply and distribution at local and regional levels. Some existing models in Ireland (such as the Limerick School Food Project and a pilot project by the Health Services Executive (HSE) North East) could provide useful insights in this regard.<sup>8</sup>

In view of the strong influence of domestic consumption patterns on young people's food choices, there needs to be significant engagement parents' representative organisations at national and local level. Parental support will be vital if any Scheme is to bring about long-term and sustained change in children's consumption patterns.

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

The absence of an appropriate national framework within which to drive this initiative could serve as a barrier to implementation. However, this could be overcome using the multi-stakeholder "steering committee" approach outlined above.

Failure to adequately resource the initiative would severely compromise its success. In addition to the food costs involved, there will be significant distribution/administrative costs attached to any Scheme. For example, at school level, additional funding will be required to address issues such as storage, hygiene, disposal, record maintenance and liaison activities, among others.

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<sup>8</sup> See (<http://www.healthyfoodforall.com/content/view/13/15/>) and <http://www.healthyfoodforall.com/content/blogsection/4/12/>

Adequate training will also need to be provided to support those directly involved in administering/implementing any Scheme.

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

The costs associated with the implementation of the Scheme must be set in the context of the high and rising costs of inaction and the benefits that will accrue from making a lasting positive contribution to the health and welfare of children. While detailed costings of any Scheme have not been provided to date, they must be viewed in the context of the costs associated with the global disease burden referred to above. In Ireland, the economics costs associated with obesity have been estimated at 4 billion euro per year.<sup>9</sup>

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

This initiative has the potential to generate significant synergies with existing initiatives in different spheres and to contribute positively to broader EU policy objectives. As detailed earlier, this initiative has the potential to add considerable value to the existing School Food Programme in Ireland. Aspects of an initiative could be integrated into existing educational programmes within schools such as Home Economics courses and the Social, Personal and Health Education (SPHE) programme in Ireland. HFfA recognises that community nutrition services are well established nationally and these provide a very useful framework to link in with. There are now a number of healthy school lunch programmes established and we would encourage all schools who receive fruit to develop healthy schools policies

There should also be opportunities to link this initiative with broader social interventions – for example programmes to increase physical activity among young people by investment in youth sports and recreational facilities in schools and in the broader community. As detailed earlier, while HFfA is mindful of the “non-discrimination” condition with respect to country of origin for fruit used in the Scheme, there may be opportunities to support initiatives such as community growing schemes, food co-operatives and local producer groups which would have positive rural development impacts as well as contributing to the environmental sustainability agenda.

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

In recognition of the social gradient which exists with regard to fruit intake among children, the possibility of introducing a two-tier approach should be investigated. A possible mechanism might be to provide all children with one item of fruit per day and to increase it to two or three items per day in schools which have

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<sup>9</sup> See [http://www.dohc.ie/publications/pdf/report\\_taskforce\\_on\\_obesity.pdf?direct=1](http://www.dohc.ie/publications/pdf/report_taskforce_on_obesity.pdf?direct=1)

significant numbers of disadvantaged students. It may be possible to utilise existing school food initiatives to target disadvantaged children, thereby maximising synergies across the various initiatives.

The proposed scheme could encourage the development of local food links and producer led cooperatives, including public/private sector partnerships, thus benefiting the local economy.

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

HFfA recognise the complexities involved in the design and implementation of this Scheme. Therefore it is essential that it is rolled out on a manageable scale. One appropriate model would be to introduce it on a pilot basis using “clusters” of schools in targeted areas to reduce the financial and logistical burden associated with its implementation.

The provision of fruit and vegetables in schools should be accompanied by a cross-curricular education programme to teach children about the importance of healthy eating and where their food comes from. Teachers must be facilitated with resources to implement this education programme.

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

In the Irish context, the aforementioned initiatives by the Limerick Food Partnership, HSE North East and the Food Dudes programme all have elements of best practice which could usefully inform the development of an EU-wide Scheme.

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

For the reasons outlined above, the HFfA view is that Option 4 combined with Option 2 is the only viable approach to meet the stated objectives of the initiative.

**Appendix 1: Participants HFfA Roundtable Event, 19th February 2008, Dublin**

<b>Name</b>	<b>Organisation</b>
Audrey Hochart	Institute for Public Health
Dr. Brian Redahan	Food Safety Authority Ireland (FSAI)
Carolyn Hillery	Irish Nutrition & Dietetic Institute (INDI)
Christine Gurnett	Limerick Food Partnership
Deirdre O'Connor	University College Dublin
Derbhile NicCraith	Irish National Teachers Organisation
Donal O'Brien	Carambola Kidz
Edel McNamara	Community Dietitian (Health Services Executive)
Hubert Loftus	Department of Education & Science
Jack Dunphy	Crosscare
Janis Morrissey	Irish Heart Foundation
Jim Walsh	Combat Poverty Agency
Karen Byrne	Department of Social & Family Affairs
Liam Kelly	An Bord Bia
Liz Dowler	University of Warwick/University College Dublin
Marian Faughnan	<b>safefood</b>
Mary Sherry	Irish Farmers Association
Moira Leydon	Association of Secondary Teachers of Ireland
Nola O'Neill	Community Dietitian (Health Services Executive)
Olive Carolan	Community Dietitian (Health Services Executive)
PJ Jones	Irish Farmers Association
Sarah Burke	Food Safety Authority Ireland (FSAI)
Sarah Fleming	Tallaght Partnership
Sinéad Keenan	Healthy Food for All
Tommy O'Brien	Carambola Kidz
Ursula O'Dwyer	Department of Health & Children