<https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12970-Review-of-the-EU-school-fruit-vegetables-and-milk-scheme/public-consultation_en>

<https://ec.europa.eu/eusurvey/runner/49e5790e-6727-4868-98c3-dd0c0224b4e6>

**FRUCOM POSITION PAPER ON THE CONSULTATION ON THE REVIEW OF THE EU SCHOOL FRUIT, VEGETABLES AND MILK SCHEME**

FRUCOM welcomes this public consultation and the opportunity to provide comments on the review of the EU school fruit, vegetables and milk scheme.

FRUCOM represents the interests of European traders in dried fruits, edible nuts, processed fruits & vegetables, and processed fishery products.

We fully support the EU school scheme as a tool to promote healthy habits among the younger generations. Overweight and obesity levels in children are alarming: according to the WHO obesity report 2022, 1 out of 3 European children is overweight or obese. Unhealthy diets are among the risk factors. According to the 2021 Global Nutrition Report, fruit and vegetable consumption in Europe is around 40% lower, while nuts consumption is 70% lower if compared to the EAT-Lancet Commission recommendation for a sustainable and healthy diet.

In this context, the scheme is a great educational opportunity for children who not only can transfer healthy eating habits to their friends and family, but also instil positive behaviours which will pave the way to a healthier generation, capable of choosing healthy and sustainable nutrition for themselves and for their families.

Currently, the EU school scheme finances the distribution of fruit, vegetables, milk and certain milk products to schoolchildren, from nursery to secondary school, generally outside school meals.

Nevertheless, we think that the products should also be provided during school meals. It is exactly during the meals that children share that they are more encouraged to try new foods, following other children’s behaviour.

Giving the children the possibility of eating the food together is also a reason why the products should always be ready-to-eat (e.g., already washed, cut, peeled). This makes both distribution and consumption easier for teachers and students while guaranteeing the appropriate levels of hygiene.

Among FRUCOM products are dried fruit, nuts and processed fruit and vegetables.

Dried fruit and nuts are ready to eat, easy to transport and do not need to be refrigerated. Dried fruits are generally very much appreciated by children due to their sweet taste. Respecting the recommended portions, dried fruit and nuts can constitute a healthy and balanced snack. Despite having a high sugar content, dried fruit is also included in the 400g/5 portion of fruit and vegetables a day recommended by WHO, it provides minerals, vitamins, dietary fibre and antioxidants such as anthocyanins. Therefore, it has a significant nutritional value. Comment: In France, the recommendation is as follows: "Dried fruits can participate in fruit consumption. However, their consumption should be limited. "

I would therefore state that dried fruits are a good alternative to propose occasionally to offer diversity and vary the pleasures,

Should we add the reference to existing health claim on prunes?

Nuts are recommended by most dietary guidelines as well, providing mono and polyunsaturated fats, vitamins, minerals, plant-based protein, dietary fibre and flavonoids. They are an excellent alternative to animal proteins. I would delete these part. Nuts protein quantity & quality is often lower. I would rather valorize nuts by their other nutritional value (fats, fibers…) The health benefits of consuming nuts as a part of a healthy lifestyle are shown by a number of scientific piecesI would add more references.

From the Frucom paper on nuts nutrition & health benefits maybe

Maybe add the reference to authorized health claim on walnut? of evidence such as the PREDIMED study (PREvención con DIeta MEDIterránea), which suggests their protective role against cardiovascular diseases. This may be due to the fact that the unsaturated fats they contain can help lower LDL cholesterol and raise HDL cholesterol. Other studies suggest that nuts may be helpful in the prevention and/or treatment of some chronic disease-related risk factors, having a positive impact on glycaemic and lipid metabolism, oxidative stress, and inflammation. Both nuts and dried fruits (particularly, prunes) may help prevent osteoporosis.

The distribution of nut drinks Only if fortified in calcium./ Nuts drinks are not part of FRUCOM scope. I would delete this part. through the EU school scheme should be considered as well. Nut drinks should be possibly chosen with low/no sugar added and fortified, to represent a good plant-based source of vitamins and minerals such as calcium. It is fundamental to take their allergenicity into consideration when distributing nuts to children. For this reason, it could be advisable to avoid distributing nuts and nut drinks to children younger than 3 or 4 years old.Not only for this reason!!!there is also suffocation risk. FRUCOM should not take the responsibility to advise regarding young children below three.

Plant-based drinks are not recommended by the pediatric body for infant and young children because they expose them to serious nutritional complications. They can only be used in children over three years old, **occasionally**, as an alternative.

As far as the distribution of canned fruit and vegetables is concerned, it could be a good opportunity for children to increase the quantity and the variety of the fruit and vegetables in their diet. Furthermore, canned fruit and vegetables have a nutritional value which is comparable to fresh products, if not higher in some cases. Many products on the market have a reduced content of sugar and salt (e.g., fruit packed in juice instead of syrup, vegetables packed in water instead of brine) and preservatives and additives are absent in many cases.

Finally, dried fruit, nuts and processed fruit and vegetables help manage supply out-of-season and of produce not grown in colder climates. Moreover, they are also easy to store and distribute and do not generate food waste.