



Warsaw, 20 July 2022

POSITION OF THE GREEN REV INSTITUTE
REVIEW OF THE EU SCHOOL FRUIT, VEGETABLES AND MILK SCHEME

Dear Marc Tarabella, Member of the European Parliament,

Dear Mr. Tarabella,

Given the work carried out in the framework of the review of the EU school *fruit, vegetables, and milk scheme* and concerning the fact that the AGRI Committee is preparing an INI, the Green REV Institute Foundation presents recommendations and a call for the inclusion of plant-based substitutes for milk and milk products in this scheme. With this call, we hope to widen the possibilities to increase the contribution of the EU school *fruit, vegetables, and milk scheme* to sustainable food production and consumption in line with the new CAP 2023-2027.

In the preamble of Regulation (EU) No 1308/2013 of the European Parliament and of the Council (EU), which constitutes the normative basis for the EU school fruit, vegetables, and milk scheme, recital 24 indicates that the consumption of fruit and vegetables and milk and milk products by schoolchildren should be promoted to durably increase the share of those products in children's diets at the stage when their eating habits are being formed, thereby contributing to the achievement of the objectives of the CAP, in particular by stabilizing markets and ensuring the availability of both current and future supplies and that EU aid for financing or co-financing the distribution of such products to children in educational establishments should therefore be promoted.



The detailed legal arrangements are contained in Chapter II, Section 1, Subsections 1 and 2, where it is indicated that aid programs to improve children's eating habits and to improve the distribution of agricultural products and milk and milk products apply to children who regularly attend nurseries, kindergartens or primary or secondary schools. It can therefore be seen that the scheme applies to children and youth at every stage of physical and mental development and that the scheme aims to improve their eating habits. Member States have been obliged to select their products based on objective criteria, including health and environmental concerns, seasonality, variety, and availability of products.

Regulation 1308/2013 lists an enumerative list of specific categories of milk and dairy products that are covered by EU distribution aid. These are:

- Milk and cream, not concentrated nor containing added sugar or other sweetening matter;
- Buttermilk, curdled milk and cream, yogurt, kephir and other fermented or acidified milk and cream, whether or not concentrated or containing added sugar or other sweetening matter not flavoured nor containing added fruit, nuts or cocoa;
- Whey, whether or not concentrated or containing added sugar or other sweetening matter;
- Cheese and curd;
- Drinks based on soya, nuts, cereals and seeds.

In this respect, it should be noted that only a **narrow group of drinks** are covered by EU aid for products of plant origin. The current arrangements under the EU school *fruit, vegetables and milk scheme* do not take into account the possibility of subsidising plant-based dairy substitutes; animal-based products are placed in a privileged position. **This does not take into account the negative aspects associated with the production and consumption of animal products.** With these impacts in mind, it is particularly noteworthy that the impact assessment of the program regulations drawn up by the EU points to teaching children and youth healthy eating habits, facilitating the choice of a healthy and balanced diet, improving health promotion through access to a healthy diet and physical activity. At the same time, it points out a limited increase in costs



resulting from the epidemic of obesity and non-communicable diseases, as well as environmental damage and related repairs. **Subsidizing animal products while abandoning support for plant products is certainly not a step in this direction.** The change initiative should encourage sustainable production and consumption while respecting the reduction of the environmental impact of food and contributing to the development of environmentally friendly production and **real** animal welfare.

The subsidy system and the range of subsidized products need to change, and this is due to the aspects we outline below.

Health aspect:

EU aid for subsidizing the production and distribution of animal products at the expense of products of plant origin does not consider nutrition standards and health requirements. The EU legislator seems to be aware that nutrition is one of the fundamental factors responsible for health. **By subsidizing products of animal origin at the expense of products of plant origin, the EU legislator denies this awareness.**

As an example, we point out that excessive consumption of animal fats, which contain saturated fatty acids, is the cause of many diseases, above all cardiovascular diseases and certain cancers¹. Milk and its derivatives contain between 60 and 65% saturated fatty acids², and their consumption raises blood cholesterol levels and increases the risk of cardiovascular diseases such as atherosclerosis and heart attack. **Furthermore, animal milk and its derivatives have a different qualitative composition than human milk.** It is because it contains more than three times the amount of protein, most of which is unabsorbable by humans and highly allergenic.

¹ Narodowy Instytut Zdrowia Publicznego, Piramida Zdrowego Żywienia i Stylu Życia Dzieci i Młodzieży, <https://ncez.pzh.gov.pl/dzieci-i-mlodziej/piramida-zdrowego-zywienia-i-stylu-zycia-dzieci-i-mlodziezy-2/>

² G. Cichosz, H. Czeczot: Kwasy tłuszczowe izomerii trans w diecie człowieka. Bromat. Chem. Toksykol., 2012.



Studies show that cow's milk allergy (CMA) is one of childhood's most common food allergies³. It leads to the skin (atopic dermatitis, urticaria, angioedema), respiratory (rhinitis, asthma, cough), and gastrointestinal (vomiting, diarrhea, colic, gastro-oesophageal reflux) reactions and, in some cases, anaphylactic shock⁴.

The consumption of dairy products contributes to the development of atherosclerosis.

Cholesterol oxidation products (oxysterols) formed in milk and dairy products during the technological processes they undergo are detrimental to human health and are a significant cause of atherosclerosis. Products of plant origin are better for human health - for example, clinical studies have found a beneficial effect of soya, especially in young patients with markedly elevated cholesterol levels. It is also worth bearing in mind that a plant-based diet significantly reduces healthcare costs by eliminating factors that lead to the development of diseases caused by the consumption of animal products - in particular, milk and dairy.

We are aware, however, that studies are pointing to the benefits of milk and its derivatives, but their authors fail to consider that the products available on the mass market are not natural. These products are highly processed⁵ and may contain pesticides and heavy metals residues. The milk is pasteurized to remove these micro-organisms, resulting in a complete loss or reduction of vitamin content from the unprocessed animal milk. The result is a product of low nutritional value and little use to humans.

The above shows that the health aspects and their effects are impossible to ignore.

³ Monaci, L., Tregoeat, V., van Hengel, A.J. & Anklam, E. 2006. Milk allergens, their characteristics and their detection in food: A review. *Eur. Food Res. Technol.*, 223(2): 149–179.

⁴ Basnet, S., Schneider, M., Gazit, A., Mander, G. & Doctor, A. 2010. Fresh goat's milk for infants: Myths and realities a review. *Pediatrics*, 125(4): e973–e977.

⁵ NHS (2019): Eating processed foods: <https://www.nhs.uk/live-well/eat-well/what-are-processed-foods/#what-counts-as-processed-food>



Environmental aspects:

Turning to the environmental aspect, it must be recognised, first and foremost, that a switch to a plant-based diet is a key condition for the decarbonisation of the European economy and will fully respect the objectives of the European Green Deal and the “*Farm to Fork*” strategy. All of this is aimed at positioning the EU as a leader and achieving climate neutrality as soon as possible by shifting the food model to a truly **sustainable** one.

It should again be pointed out that **subsidizing products of animal origin (and thus creating demand for such products) nullifies the possibility of achieving these objectives.**

Dairy production systems constitute a significant source of greenhouse gas emissions, predominantly methane (CH₄), nitrous oxide (N₂O), and carbon dioxide (CO₂). Globally, milk production, processing, and transport accounted for 2.7% of anthropogenic GHG emissions⁶. CH₄ emissions have by far the largest share, accounting for around 52 percent of the total from the sector, followed by N₂O and CO₂. Other problems are an inefficient use of resources and high levels of environmental damage. The animal production sector, therefore, contributes to climate change, which will impose high costs on society - particularly concerning water resources and the spread of parasite-borne diseases⁷.

In comparison, a plant-based diet prevents biodiversity loss. Research indicates that active international efforts to increase crop yields, minimize land clearing and habitat fragmentation, and protect natural lands can increase food security in developing countries and preserve much

⁶ FAO. 2010. Greenhouse gas emissions from the dairy sector: a life cycle assessment. Rome. www.fao.org/docrep/012/k7930e/k7930e00.pdf.

⁷ FAO. 2009. The state of food and agriculture 2009: Livestock in the balance.



of the Earth's remaining biodiversity⁸. It is also scientifically proven that a plant-based diet produces fewer greenhouse gases⁹.

Therefore, it is not possible to discuss the decarbonization of the European economy and the implementation of the European Green Deal and the “*Farm to Fork*” strategy while at the same time subsidizing the purchase of environmentally damaging products. This approach must change.

Social aspect:

The social aspect is also impossible to ignore. Equal treatment of animal dairy and plant-based products will demonstrate a fair approach to producers (a system of equal opportunities) and, above all, to children and youth as consumers. Only by treating plant products equally will we be able to speak of creating a favorable food environment that facilitates the choice of a healthy and balanced diet. Incorporating the proposals set out in this position paper will ensure that the program complies with the European Charter of Fundamental Rights, in particular Article 24(2) thereof, which states that in all actions relating to children, whether taken by public authorities or private institutions, the child's best interests must be a primary consideration. **It will serve to implement the right to choose.**

It is crucial to underline that access to plant-based products within the framework of the EU school fruit, vegetables and milk scheme will also allow children and youth with chicken protein and cow's milk protein allergies access to healthy and balanced meals. **It meets the requirements of equity and is an expression of equal opportunities.** Furthermore, it will promote healthy eating habits and foster pro-environmental and pro-health attitudes - the

⁸ Tilman D, Clark M, Williams DR, Kimmel K, Polasky S, Packer C. Future threats to biodiversity and pathways to their prevention. *Nature*. 2017;546(7656):73–81. doi:10.1038/nature22900.

⁹ Springmann M, Clark M, Mason-D’Croz D, Wiebe K, Bodirsky BL, Lassaletta L et al. Options for keeping the food system within environmental limits. *Nature*. 2018;562(7728):519–25. doi:10.1038/s41586-018-0594-0.



availability of plant-based, unprocessed products is in line with the knowledge imparted to children and young people in schools and is in line with sound nutritional recommendations.

Expanding the catalog of subsidized plant-based products will go against discrimination.

On its initiative, Green REV Institute, in cooperation with Parents for Future PL and Akcja Demokracja, conducted a survey in April/May 2022 called '*Survey on the availability of plant-based meals in schools*'. The research group (660 people) was characterized as learners in Poland's private and public primary and secondary schools from all types of localities divided by size. The survey shows that almost half of the respondents ultimately limit or exclude specific animal products, **with more than 10% of the learners (10.2%) on a vegan and flexi-vegan diet**. At the same time, only 6.5% of people can have a vegan meal, with this type of meal most often available mainly by eliminating part of the meal elements, e.g., excluding meat from the meal and buying only vegetables, e.g., chips, salad, boiled potatoes, pasta. Research shows that the number of vegans is steadily increasing, particularly in the 16-24 age group. **Including plant-based products instead of animal-based products in the subsidy scheme will respect the rights of these people and provide clear evidence that the scheme is inclusive - not exclusive.**

Conclusion:

With all of the above in mind, the Green REV Institute is calling for changes (including a broadening of the catalogs of plant-based substitutes) in the subsidy system for products covered by the EU school fruit, vegetables and milk scheme that will realistically enable and encourage the use of plant-based products (other than a narrow group of drinks) covered by EU aid for distribution in educational establishments.

Moving away from the current scheme is necessary as it does not consider all health, environmental, social, and animal welfare aspects. Legislation adopted at the EU level should allow (and even facilitate) the extensive use of plant-based alternatives to traditional animal-



based dairy products. **It is, therefore, necessary to broaden the catalog of plant products subsidized under the scheme while reducing the subsidy for animal products.**

About Green REV Institute:

The mission of the Green REV Institute is to change and build the world with respect for humans, animals, and the climate. We note that modern agriculture is no longer the agriculture we knew. It has become an industry that affects the human quality of life and health, climate change, and the objectification of animals. There is a concentration of food production, the scale of industrial agriculture is increasing, and the number of small family farms is decreasing. Concern for the health and quality of products has been replaced by profit and loss accounts and a struggle for the lowest possible production costs. Industrial agriculture is changing the climate, making people lose their right to live in a clean environment. So we point out that the law must follow our needs and social changes. It must protect us effectively - that is why we are taking action in the spirit of changing it.