



European Commission
Shadow Rapporteurs
Committee on Agriculture and Rural Development

29 January 2015

Dear Sirs,

The European Federation of the Associations of Dietitians (EFAD) wishes to comment on the draft report on the 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)0032 – C7-0025/2014 – 2014/0014(COD))

EFAD is the only European professional organisation representing only dietitians. It is a federation of thirty-three (33) National Dietetic Associations from twenty-six (26) EU countries, representing approximately 32,000 dietitians, which is half the dietetic workforce in Europe (personal correspondence, EFAD 2012). Education Associate Membership is also open to Higher Education Institutes that have education programmes for dietitians, creating a wide network of professionals with an expertise in nutrition and dietetics. One of the aims of EFAD is to support Member Associations in developing the role that dietitians have in reducing inequalities and improving nutritional health in Europe. By embedding dietetic education, professional practice and research activity throughout Europe, we enable high quality engagement at all levels, thereby addressing health determinants and creating supportive environments for healthy lifestyles and prevention of disease through nutrition. EFAD communicates its aims and objectives by fostering exchange of knowledge and best practice. Quality, patient and public safety and health promotion feature highly in EFAD's Strategic Plan 2011-2016, in line with the European Commission Health Programme 2014 - 2020.

EFAD fully supports the EU initiatives to supply fruit and vegetables, bananas and milk in educational establishments. However, on the recommendation of the members of the EFAD Specialist Dietetic Network (ESDN) for Public Health EFAD wishes to comment on the following proposals:

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Proposal for a regulation. Recital 4.

Amendment -Rapporteur: Marc Tarabella

"(...) However, in order to follow nutritional recommendations on calcium absorption, and given the increase in problems associated with intolerance of lactose in milk, provision should be made for a derogation so that certain other milk products, such as yoghurt and cheese, can also continue to be distributed under specific conditions"

EFAD comment

Milk and other dairy products contribute significantly to calcium intake. Many school age children have poor calcium intakes below those recommended for health. However given that there are some children who may be lactose intolerant it is important that lactose free alternatives are available in these cases. Whilst yoghurt and cheese have lower lactose contents and may thus be more acceptable, there are also lactose free milk products now available on the market which still have the same level of calcium. For some children who have a lactose intolerance they may be able to manage a certain amount of ordinary milk without symptoms developing but individual guidance from a dietitian or other health care professional is recommended.

Proposal for a regulation. Recital 5

Amendment -Rapporteur: Marc Tarabella

"(...) Member States should be allowed to include in their thematic measures a wider variety of agricultural products, such as products derived from fruit and vegetables processed without the addition of sugar, salt, fat or sweeteners, and other local, regional or national specialities like honey and olive oil. However, so as to promote healthy eating habits, the national health authorities should be involved in this process and approve the list of these products, as well as the two groups of products eligible for the distribution, and decide on their nutritional aspects.

EFAD comment

There could be nutritional benefits from the inclusion of a wider variety of agricultural products alongside fruit, vegetables and milk – for example certain cereals and pulses. However we strongly agree that so as to promote healthy eating habits, the national health authorities should be involved in this process and approve the list of these products, as well as the two groups of products eligible for the distribution, and decide on their nutritional aspects.

We do have some concerns about the suggestion of honey given that this inclusion would provide additional energy with very little additional nutritional benefit, but this reinforces the role of the various authorities in endorsing local agricultural products.

Proposal for a regulation Recital 6

Amendment -Rapporteur: Marc Tarabella

We are agreed that aid-per-portion system would be complicated because it would be hard to check that the quantities distributed actually corresponded to pre-determined portions.

EFAD comment

We recommend that national authorities should provide guidance on portion sizes for the different age groups and allowing for different cultural habits. Children should also eat at least five portions of a variety of fruit and vegetables a day. The amount of food a child needs varies with age, body size and levels of physical activity¹. As a rough guide, one portion is the amount they can fit in the palm of their hand².

Proposal for a regulation Article 1 – paragraph 1 – point 3. Regulation (EU) No 1308/2013. Article 23 – paragraph 7

Amendment -Rapporteur: Marc Tarabella

7. Member States shall, in order to promote healthy eating habits, to be followed also by children with lactose intolerance, ensure that their competent health authorities endorse the list of all the products supplied under the school scheme and decide on their nutritional aspects in line with Annexes V and Va.

EFAD comment

We would agree that competent health authorities endorse the list of appropriate lactose free products that can be used as alternatives to milk. Besides being lactose free they should not have higher levels of sugars, fat and salt. Indeed any product distributed through the wider scheme should have acceptable levels of added sugars, fat and salt.

Proposal for a regulation Article 1 – paragraph 1 – point 4 Regulation (EU) No 1308/2013

Article 23 a – paragraph 2 a (new)

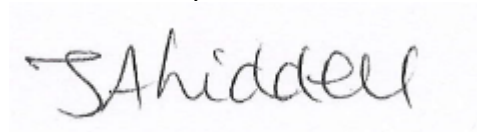
Amendment -Rapporteur: Marc Tarabella

EFAD comment

We agree that nutritional education is a very important component of the scheme and indeed it would be preferred if an even higher content could be included to maximize the benefits.

EFAD would welcome the opportunity to work with the relevant bodies in addressing the issues raised and in taking forward the health promotion in schools agenda.

Yours faithfully



Judith Liddell
EFAD Secretary General

¹ <http://www.nhs.uk/Livewell/fitness/Pages/physical-activity-guidelines-for-young-people.aspx>

² <http://www.nhs.uk/Livewell/5ADAY/Pages/Portionsizes.aspx>