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Dear Sir / Madam,

Consultation on the review of the CAP School Milk and Fruit schemes.

Relevance

The UK has a strong tradition of drinking liquid milk. National Nursery Milk schemes operate across the UK specifically as a health benefit to small children. The UK makes the EU School Milk Scheme (SMS) available to all schools from Nursery through to Secondary school level. At primary school level the EU SMS is topped-up by additional national funding (to maintain the original subsidy level following a cut of 19% by the EU in 2001). In Northern Ireland this national funding also extends to secondary school level.

Since 2000, there has been a successful school fruit scheme in England of greater value and efficiency than the EU School Fruit Scheme (SFS) would provide for the UK, whilst other parts of the UK have their own health initiatives. Consequently, the UK does not take part in the EU SFS and has historic reservations about the justification for an EU-funded school fruit scheme within CAP. Such an initiative should be funded by Member States themselves to respond to their particular circumstances.

The aim of getting children to eat and drink more healthily is clearly good, but needs to be specifically assessed over time. A greater influence on long term impacts may be the quality and presentation of food and drink at the point of consumption.

These were originally CAP schemes intended to boost consumption of specific EU agricultural produce, but if the intended focus is now more about health, then consideration could be given to transferring EU competence and funding to DG SANCO. This could reduce burdens by removing a tier of Government (agriculture) from policy decisions specific to health and/or education.

Any changes should be achieved without causing additional costs or burdens and wherever possible should reduce these whilst improving effectiveness and long-term benefits.

Timing

The timing of this consultation is unusual because there is no legislative certainty whilst the CAP 2020 negotiations continue. It would be helpful if the Commission could explain how this exercise fits with the SFS changes already planned as part of the CAP reform (i.e. increased budgets to enhance accompanying measures and a higher level of co-financing) and the evaluation of the SMS which is yet to be published.

Once the CAP 2020 negotiations are concluded and there is more clarity, The Commission and all Member States will be better placed to consider the issues raised in the consultation in greater depth. However, we do have some initial observations to offer at this stage.

General observations

EU funds must be used most effectively. Simply increasing funding will not necessarily increase the effectiveness of any schemes, particularly when there is insufficient evidence to justify such increases and current budgets are not fully utilised.

However, enabling Member States to decide upon specific strategies and in particular potential targeting of funding appears to be a sensible consideration since this would be done in any case with National schemes. Care needs to be taken in all cases to minimise administrative burdens and costs which may be disproportionate against subsidy level.

With respect to the possibility of merging the Milk and Fruit schemes, whilst there may be benefits (for example in terms of reduction in overall administrative burdens), a larger and more financially demanding scheme could increase the problems for Member States to obtain national funding. We understand this has been a problem which has hindered uptake of the school fruit scheme to date. A merger would also be difficult given the different products and logistics involved with the two schemes.

The UK has concerns about the current practice of allocating unspent School Fruit Scheme budget from low or nil spending Member States to others who participate more fully. The risk is that participating Member States become dependent upon this additional funding and then have to withdraw aspects of their programmes if behaviours changed elsewhere.

The Commission itself acknowledges the administrative burdens placed upon individual schools and the administrative hierarchy. Where possible, burdens upon competent authorities and participants should be minimised, although the UK recognises the clear need for close monitoring of the proper use of EU funds which requires certain records and auditing procedures.

Three options have been proposed in the consultation, but others may surface following responses. Once CAP 2020 negotiations are concluded proper consideration of all possibilities may be given by the Commission alongside all Member States in the normal manner.

Department for Environment, Food and Rural Affairs

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