

9th July 2021

ICOS Submission to the European Commission Inception Impact Assessment on the Review of the EU school fruit, vegetable and milk schemes.

The Irish Co-operative Organisation Society (ICOS) is the umbrella body for over 130 co-operatives in Ireland – including Irish dairy processing & milk purchasing co-operatives, livestock marts and other rural based enterprises – whose associated businesses have a combined turnover in the region of €14 billion, with some 150,000 individual members, employing 12,000 people in Ireland, and a further 24,000 people overseas.

Irish dairy cooperatives participate in the current EU school milk scheme, through the provision of subsidised fresh milk and other dairy products to local schools, with organisation and coordination managed by the National Dairy Council. ICOS therefore welcomes this opportunity to comment on the upcoming review of the EU school schemes, with a particular focus on the milk scheme.

The EU school schemes are an essential tool to help children to develop healthy dietary habits and to generally promote the consumption of nutritious local products. This is a central objective of recent Commission initiatives under the Farm to Fork strategy. ICOS therefore highlights the importance of maintaining funding for the milk scheme which contributes towards this objective, as eligible products such as fresh milk, cheese and yogurt, are important sources of protein, calcium and vitamins.

However, it is for this reason, we do not support the suggestion that the scope of the scheme be opened to plant-based drinks, particularly not with a view to encourage them as a substitution or alternative to fresh milk. Plant based drink are not nutritionally equivalent to milk and their inclusion within this scheme would incorrectly suggest that they are. They lack many of the important nutrition naturally and uniquely provided by milk, such as bioavailable calcium and iodine, have a lower protein content and often contain added sugar or sweeteners. It is for these reasons that international dietary guidelines advise against their consumption by young children, and it is important that these health and nutritional considerations are not overlooked.

We support the Commission's aim to ensure the school schemes better promote sustainable production and consumption and that a greater focus is directed towards raising awareness of the environmental dimension of food. However, we reject the Commission's single-minded focus on organic farming being the one and only form of sustainable agriculture. There are other production methods which provide other or additional benefits from the perspective of animal welfare, sustainability and human nutrition, for example pasture-based livestock farming for dairy production. These methods must also be equally promoted, through for example eligibility criteria or conditions and educational tools which provide information on these other types of production and the benefits they provide.

In this regard we are fully in line with the Commission's view that educational measures are an important aspect of the schemes and we support them being strengthened further under this review. Raising awareness about the food chain from farm yard to school yard increases children's interest in nutrition, their awareness of the value of food and the work farmers do to provide it, ideally leading to more conscious eating and a reduction of food waste.