

Joint Plant-based Foods Associations Position Paper – Inclusion of Plant-Based Dairy Alternatives in the EU School Scheme

May 2023

Introduction

The [EU School fruit, vegetables and milk scheme](#) supports the supply of fruit, vegetables, milk, and certain milk products to children. Plant-based alternatives have existed for many years and provide important solutions to families who cannot or do not want to consume milk and dairy products.

As the European Plant-Based Association (ENSA), we believe that the EU should respond to public demand and provide school children with a wider choice of products. Children would benefit from the inclusion of plant-based alternatives to milk and yoghurt in the Scheme, either by the creation of new pillars in the Scheme or under the exclusion clause.

The inclusion of fortified plant-based alternatives in the Scheme is being requested by thousands of EU citizens. In 2022, 74.640 citizens who signed a plant-based school milk petition¹ and 72% of the respondents to the European Commission's public consultation² urged the inclusion of plant-based milk alternatives to be included in the Scheme.

Therefore, we urge the European Parliament to encourage the broadening of the range of eligible products in the EU School Scheme, to include fortified plant-based alternatives to milk and yoghurt. This would ensure the EU's recognition of the needs and preference of all children, including those who cannot or do not want to consume dairy products, allowing them the right to choose.

This position paper highlights the key reasons why the inclusion of plant-based alternatives to milk and yoghurt under the EU School Scheme would benefit EU children, farmers, and promote the transition towards healthy, sustainable and resilient food systems.

1. Providing fortified plant-based dairy alternatives to enhance inclusivity and education among children

The inclusion of alternative plant-based products in the EU School Scheme offers greater choice to children who are unable, or unwilling, to consume dairy products due to health/medical, environmental, ethical or taste reasons. Moreover, the provision of plant-based alternatives to milk and yoghurt through the EU School Scheme would be a powerful way to provide all school children

with the opportunity to discover a variety of products and start building behaviour change towards more sustainable diets. Schools are powerful agents of change and have an important role to play in educating young people about the impact of their food choices on their health and the environment. Offering a variety of nutritional products beyond milk in schools can be a powerful tool in helping children discover new tastes and products that may not be readily available in their own households due to cultural or economic reasons.

2. Fortified plant-based dairy alternatives are necessary to meet the nutritional needs of children who do not consume dairy products

There is a strong body of scientific evidence that highlights the benefits of transitioning to more plant-based diets.³⁴ This is reflected in the EU through various policy frameworks, including the Farm to Fork Strategy⁵ and the [EU Beating Cancer Plan](#)⁶, as well as national initiatives to include more plant-based alternatives in sustainable dietary guidelines. These policies/initiatives emphasise the benefits of shifting to more plant-based diets in order to achieve healthy and sustainable dietary habits. For example, the Finnish food-based dietary guidelines state that plant-based foods “which have been fortified with calcium and vitamin D, as soya- or oat-based drinks”⁷ can replace dairy products. Similarly, the Swedish guidelines recommend consuming plant-based drinks which are fortified with vitamins and minerals.⁸ The European Food Safety Agency (EFSA) also classifies plant-based drinks as a “core food”, alongside unflavoured dairy milk.⁹

The healthiness of foods that can be consumed as part of a nutritious and balanced diet is linked to their nutritional makeup, such as the presence of vitamins, minerals (such as calcium, which is crucial for the growth and development of children), fibre, and beneficial fat composition. Fortified plant-based dairy alternatives like soy, oat or almond drinks or alternatives to yoghurt¹⁰ are great examples of this nutritional composition.

Certain plant-based dairy alternatives made of protein-rich crops, such as soy drinks, contain levels of protein equivalent to milk. However, from a nutritional and public health point of view, placing emphasis only on the protein content of plant-based drinks, which in other cases may be lower than their dairy counterparts, is not justified. This is because the protein intake of EU children, as in the adult population, is often too high, due to most families following a flexitarian diet which enables a sufficient protein intake from a variety of sources (both animal and plant-based).^{11 12} On the other hand, it is important to acknowledge the nutrient deficiencies that exist in the EU population, such as fibre deficiency. Recent research shows that people who consume more dietary fiber, found in some plant-based products, have a lower risk of heart disease, stroke, type 2 diabetes, and colorectal cancer¹³. In the EU, there are several grain-based plant-based products that are high in fiber, such as barley and oat. Studies suggest that these products can lower blood cholesterol, which may help prevent heart disease.¹⁴¹⁵

Additionally, plant-based alternatives offer health benefits due to their unsaturated fats content. The World Health Organisation recommends reducing the intake of saturated fats and shifting towards consuming more unsaturated fats¹⁶ Substituting saturated fats with monounsaturated fats and omega-3 fatty acids can lower the risk of total and cardiovascular mortality^{17 18 19 20}.

Acknowledging that plant-based alternatives vary in taste and nutritional benefits depending on the crop they are derived from, it is crucial to consider the overall nutritional value of these alternatives to milk and yoghurt, and to provide a diverse range of fortified plant-based options in schools.

We would also take the opportunity to reiterate that ENSA supports the EU's ambition to increase the production of organic foods. Nonetheless, current regulations for organic production in the EU do not allow for the fortification of vitamins and minerals in organic plant-based foods. This is a missed opportunity since fortification of organic plant-based drinks and foods would allow the promotion of both the transition to more sustainable plant-based diets, and support the goals outlined in the EU Organic Action Plan.

3. The role of fortified plant-based dairy alternatives in reducing our climate footprint

The current global food system is unsustainable, as it accounts for a third of global greenhouse gas emissions²¹. The shift to more plant-based diets is, therefore, crucial in achieving environmentally sustainable food systems, as it can significantly contribute to climate mitigation²². Against this background, plant-based milk and yoghurt alternatives can be an important contributor to reducing the climate footprint of the food system, given their lower impact on land use, greenhouse gas emissions, freshwater use, and eutrophication compared to dairy. By including plant-based alternatives to milk and yoghurt in the school scheme, children can get educated about the opportunities of behaviour change towards more sustainable diets that protect our planet's resources^{23 24 25}.

As a result of medical, health, environmental, and ethical considerations, there is a growing trend among young people towards adopting plant-based diets. The EU School scheme should acknowledge and support this shift by expanding the scope of eligible products to include sustainable and nutritious plant-based alternatives.

4. Opportunities for the EU market and farmers

Although the plant-based alternatives food sector is relatively new, it has already shown exponential growth in recent years, showcasing a growth of 49% between 2018-2020 and an expected growth of 7.5 billion by 2025 and €16.7 billion by 2029.²⁶

The EU School Scheme, by excluding plant-based alternatives, creates an uneven playing field and unfavorable market conditions for the plant-based alternative sector. This not only affects producers but also farmers who grow crops for plant-based alternatives. For a successful transition to more plant-

based diets, it is essential to eliminate any unjustified legal barriers and market distortions. Such barriers can pose structural hurdles to the competitiveness of the plant-based alternative sector, hindering its growth and expansion. To enable a level playing field, it is crucial to create an environment that supports the production and distribution of nutritious and sustainable plant-based foods such as fortified plant-based drinks. By removing structural hurdles, we can support the shift towards a more diverse and plant-based diet, in line with the EU's broader environmental and public health goals. It is only through eliminating such hurdles that we can make plant-based alternatives accessible to all, including children who cannot or choose not to consume milk and dairy products, and make plant-based diets a viable and attractive option for all.

ENSA's primary suppliers of crops are located within the EU, for instance most of the oats and soybeans used by our members are sourced from Sweden, France and Italy. The transition towards higher production of crops for direct human consumption has untapped potential for farmers in the EU, especially in the face of increasing environmental constraints that are becoming a major threat to traditional farming livelihoods. As we navigate the transition towards more sustainable practices, farmers have an important role to play in adopting and promoting these practices. By expanding the range of EU products offered under the EU School Scheme to include plant-based options, we can facilitate the shift towards a more sustainable food system and empower farmers to be key drivers of change.

About us:

European Plant-Based Foods Association (ENSA)



The [European Plant-based Foods Association](#) (ENSA) represents the interests of plant-based food manufacturers in Europe. ENSA is an association of internationally operating companies, ranging from large corporations to small, family-owned businesses with an annual turnover of around €1.8 billion. ENSA members produce high-quality plant-based alternatives to dairy and meat products. Since its establishment in 2003, ENSA has been raising awareness about the role of plant-based diet in moving towards more sustainable and healthier food consumption patterns.

Växtbaserat Sverige (Plant-food Sweden)



[Plant-food Sweden](#) is an industry organisation whose goal and purpose is to promote increased production and consumption of plant-based foods. Our members include both small startup companies and large international companies.

Plantebranchen (Danish plant-based business association)



[Plantebranchen](#) is a business association for the plant-based industry in Denmark – working for a sustainable food system and representing a broad part of the voices in the field working with the same vision and values. Our members are progressive, brave and understand how important our food markets and food habits are as a part of a greener world in the future, and we are very proud to be a place for connecting those people. Our purpose is to represent our members’ shared interest within plant-based foods in relation to authorities, organizations, companies and markets, consumers, each other, the media and other relevant actors nationally and globally.

References:

- ¹ Proveg (2022), EU citizens want plant-based milk on offer in schools, [link](#).
- ² Review of the EU school fruit, vegetables and milk scheme, Have your say portal, [link](#).
- ³ Poore, J., & Nemecek, T. (2018). Reducing food’s environmental impacts through producers and consumers. *Science*, 360(6392), 987-992, [link](#).
- ⁴ Clark MA, Springmann M, Hill J, Tilman D. (2019). Multiple health and environmental impacts of foods. *Proc Natl Acad Sci U S A*. 2019 Nov 12;116(46):23357-23362. doi: 10.1073/pnas.1906908116. Epub 2019 Oct 28. PMID: 31659030; PMCID: PMC6859310.
- ⁵ European Commission (2020). Farm to Fork Strategy – For a fair, healthy and environmentally-friendly food system, [link](#).
- ⁶ European Commission (2021), Europe’s Beating Cancer Plan – Communicayion form the Commission to the European Parliament and the Council, [link](#).
- ⁷ Finska näringsrekommendationer 2014, [link](#).
- ⁸ Dairy products - advice (livsmedelsverket.se), [link](#).
- ⁹ EFSA (2021), Tolerable upper intake level for dietary sugars, [link](#).
- ¹⁰ Moore, J. B., et al (2018). Evaluation of the nutrient content of yogurts: a comprehensive survey of yogurt products in the major UK supermarkets. *BMJ open*, 8(8), e021387.
- ¹¹ Escobar-Sáez D et al (2022). Plant-based drinks for vegetarian or vegan toddlers: Nutritional evaluation of commercial products, and review of health benefits and potential concerns. *Food Res Int*. 2022 Oct;160:111646. doi: 10.1016/j.foodres.2022.111646. Epub 2022 Jul 9. PMID: 36076378.
- ¹² Madrigal C, et al (2020). Energy Intake, Macronutrient Profile and Food Sources of Spanish Children Aged One to <10 Years-Results from the EsNuPI Study. *Nutrients*. 2020 Mar 25;12(4):893. doi: 10.3390/nu12040893. PMID: 32218330; PMCID: PMC7231217
- ¹³ Reynolds A, et al (2019). Carbohydrate quality and human health: a series of systematic reviews and meta-analyses. *Lancet*. Feb 2;393(10170):434-445. doi: 10.1016/S0140-6736(18)31809-9. Epub 2019 Jan 10.
- ¹⁴ EFSA (2011), Scientific Opinion on the substantiation of health claims related to beta-glucans from oats and barley and maintenance of normal blood LDL-cholesterol concentrations (ID 1236, 1299), increase in satiety leading to a reduction in energy intake (ID 851, 852), reduction of post-prandial glycaemic responses (ID 821, 824), and “digestive function” (ID 850) pursuant to Article 13(1) of Regulation (EC) No 1924/2006, [link](#).
- ¹⁵ Harland, J. (2014), Authorised EU health claims for barley and oat beta-glucans, [link](#).
- ¹⁶ WHO (2020), Key facts for a healthy diet, [link](#).
- ¹⁷ Wang et al (2016), Association of Specific Dietary Fats With Total and Cause-Specific Mortality. *JAMA Intern Med*. Aug 1;176(8):1134-45.
- ¹⁸ Sacks et al (2017). Dietary Fats and Cardiovascular Disease: A Presidential Advisory From the American Heart Association. *Circulation*. Jul 18;136(3):e1-e23.
- ¹⁹ Zhuang et al (2019). Dietary Fats in Relation to Total and Cause-Specific Mortality in a Prospective Cohort of 521 120 Individuals With 16 Years of Follow-Up. *Circ Res*. Mar;124(5):757-768.
- ²⁰ Naghshi S, et al (2021). Dietary intake and biomarkers of alpha linolenic acid and risk of all cause, cardiovascular, and cancer mortality: systematic review and dose-response meta-analysis of cohort studies. *BMJ*. Oct 13;375:n2213.
- ²¹ Climate impact of the EU agrifood system (2023), European Parliament Reserch Service, [link](#).
- ²² M. Driscoll et al (2022), The role of plant-based diets in creating a fair, healthy and sustainable food systems, [link](#).
- ²³ Roe, S., et al (2019). Contribution of the land sector to a 1.5 °C world. *Nat. Clim. Chang*. 9, 817–828 (2019). <https://doi.org/10.1038/s41558-019-0591-9>.
- ²⁴ J. Poore T. Nemecek, Reducing food’s environmental impacts through producers and consumers. *Science*360,987-992(2018).DOI:10.1126/science.aag0216.
- ²⁵ Springmann M, et al (2018). Health and nutritional aspects of sustainable diet strategies and their association with environmental impacts: a global modelling analysis with country-level detail. *Lancet Planet Health*. 2018 Oct;2(10):e451-e461. doi: 10.1016/S2542-5196(18)30206-7. PMID: 30318102; PMCID: PMC6182055.
- ²⁶ Europe Plant-Based Food Market Worth \$16.7 Billion by 2029, Meticulous Research, March 2022, [link](#).