As an organisation committed to alleviating hunger and malnutrition in Europe through the delivery of food assistance, the European Food Banks Federation (FEBA) welcomes the support provided by the FEAD in continuation of the previous Program for European Aid to the most Deprived.

FEBA also welcomes the recent launch of the FEAD Network, as a platform where national Managing Authorities (MA) and Partner Organizations (PO) implementing the FEAD can share experiences and exchange best practices.

However, in view of the forthcoming mid-term evaluation of FEAD and based on our experiences, FEBA recommends to the European Commission the following measures in order to increase its future effectiveness:

1. To continue to focus the FEAD on the provision of food assistance to the most deprived to reduce hunger and malnutrition
   - Food is the most basic of all needs and a precondition for social inclusion. Unfortunately, hunger and malnutrition are still a reality in Europe: in 2014 out of the 122 million people (24,4%) that were at risk of poverty or social exclusion in the EU, 48 million (9,6%) were not able to afford a quality meal every second day.
   - The provision of food assistance has a great impact on the lives of the most vulnerable, and it is readily measurable: in 2015 FEBA member food banks distributed 532.000 tonnes of food of which 175.000 tonnes were collected from the FEAD, the equivalent of 2,9 million meals every day, helping a total of 5,7 million people.
   - The quality and the diversity of products originating from the FEAD contribute to balance the nutritional value of the overall food redistributed to the most deprived persons. For this reason it is essential that MAs consult more effectively with POs for the choice of food articles to be distributed.

2. To continue to use the FEAD as a separate EU fund dedicated to the alleviation of the worst forms of poverty
   - FEAD contributes efficiently to the eradication of the worst forms of poverty, alleviating mainly hunger and malnutrition, while the European Social Fund (ESF) addresses different needs and different kinds of beneficiaries/participants in a complementary way.
   - The current provisions in place allow alleviation of hunger through the FEAD as a first step out of poverty and social exclusion, as well as to cover basic needs, while establishing a first contact with the social life. In parallel, ESF provides other types of assistance in a more targeted way, for the most vulnerable to fully re-integrate in the society.

3. To reinforce the participation of partner organizations directly distributing food to people in need and allow them some flexibility.
Given their valuable expertise and their willingness to be more involved in the management of the Fund, the EU Commission could encourage Member States to better involve POs in the definition of the target group.

Also, it should be agreed that a partner organization can qualify by itself a certain percentage of the eligible beneficiaries on other criteria than those existing in the FEAD regulation.

4. To clarify article 27.4 of Regulation (EU) No 223/2014 on the FEAD
Funds to cover “technical assistance” and “capacity building” of POs are planned under article 27.4, last sentence of FEAD Regulation. FEBA encourages the European Commission to develop a list of possible activities financed under these 2 categories to clarify the provision. We believe that costs like IT, hygiene and food safety training, addition of employees in order to cope in a professional way with larger quantities of food should enter these two categories.

5. To encourage Member States to use FEAD funding dedicated to food recovery activities (collection, transport, storage and distribution) and to adopt a simple method to determine the costs related to these activities.

➢ Article 26 (d) of Regulation No 223/2014 mentions the possibility to use FEAD funding to cover the actual costs incurred by FEAD implementing organizations for recovering donated food. Given that for each Euro spent for such activity, organizations like food banks can distribute food which is worth 10 times more approximately, then food recovery activities should be more considered.

➢ Organizations like food banks distribute FEAD products and donated products from and to many locations. The recent proposal for amendment adopted by the EU to add a sub paragraph(e) “rules for the application of corresponding unit costs, lump sums and flat rates applicable in Union policies for a similar type of operation and beneficiary”, does not bring considerable added value to the existing provisions. We suggest that splitting the actual costs incurred for distributing each kind of products for reimbursement purpose should be done using a simple method such as a flat rate of x €/kg of product delivered.

6. To simplify the implementation of the FEAD for distributing organisations

➢ Food banks and their partner organisations distributing the food to the beneficiaries have little financial resources and administrative capacity and are mainly run by volunteers; therefore the administrative requirements should be simplified and limited to those in Regulation (EU) No 223/2014, (e.g. simplification of requirements for reporting).

➢ As it is common fact in any food business operators, it should be accepted for distributing partner organisations that a small percentage of food can be lost without being obliged to replace the lost food or incurring financial penalties.

➢ More generally, it should be admitted that financial penalties attributed for any reason (e.g. delay in distributing food) are proportional to the value of the food.

7. To ensure the future efficiency of FEAD through clear distribution of roles between all the actors involved in the implementation process.
Given the high number of food distributing organisations in the EU, it is more efficient and easily measurable to centralise the distribution of FEAD products through large professional
organisations such as foodbanks. In addition, we recommend leaving the purchasing of food to the MAs authorities to avoid possible conflict of interest.

About FEBA
The European Food Banks Federation (FEBA) is a European umbrella non-profit organization and works in collaboration with 24 members and 4 projects in European countries. For more than 30 years, FEBA mission has consisted in representing its membership at European and international level, supporting and strengthening food banks in Europe by providing training, sharing best practice and knowledge, and developing partnerships, and fostering the creation of new food banks.
FEBA brings together 388 food banks and branches which are committed to fight against food waste and to feed the most deprived. Our members provide 4.1 million meals each day to 8.1 million most deprived people through 44,700 charitable organizations thanks to the professionalism of 23,500 co-workers (88% volunteers). In addition to surplus food from the food supply chain, FEBA members also redistribute food from the Fund for European Aid to the Most Deprived (FEAD) and the Fruits and Vegetables withdrawal scheme, as well as from individual donations.

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