

**The Danish Government's comments on
the European Commission's Green Paper
"Promoting healthy diets and physical activity: a European
dimension for the prevention of overweight, obesity and chronic
diseases"
(COM(2005)637 final)**

General observations

The Danish Government considers that the Green Paper represents a worthy and necessary initiative on the part of the European Commission and it wishes to support the work on developing an EU strategy in this field.

The Danish Government endorses the existing EU structures to promote healthy diets and physical activity as described in the Green Paper and considers that these structures form a sound starting point for the EU's future efforts in this field. Denmark believes it is important to focus on a healthy lifestyle in terms of both healthy eating habits and physical activity, and a future strategy should not focus exclusively on efforts relating solely to overweight.

The Danish Government acknowledges the mechanisms that the Commission has implemented to ensure that healthy eating habits and physical activity become established across the EU's various policy fields and calls for assessment of the impact on EU citizens' eating habits and physical activity to form part of all deliberations on new EU legislation. New legislation should not therefore counteract opportunities for EU citizens to observe official recommendations on a healthy diet and physical activity.

EU regulations that ensure the smooth running of the internal market should reinforce the Member States' common objective of promoting a healthy lifestyle. The EU's Common Agricultural Policy, together with a number of other areas that are regulated at EU level, should likewise support this objective.

An effective contribution to promoting a healthy diet and physical activity, thereby improving the health of EU citizens, would depend on action taken at international level, within the EU and in the individual Member States.

Many of the necessary initiatives could best be dealt with by the individual Member States and at local level, but there are also fields which the Danish Government believes require action at EU level. This should be seen in the light of the issue's crossborder character and the concern to secure equal terms for businesses in the internal market.

The EU today already plays and should continue to play an active role in the work on enhancing the knowledge base on nutrition and physical activity. Over the coming years the EU will need to make greater efforts to reinforce existing cooperation in the field of nutrition and physical activity through across national research structures. In the next few years there will be a further need to establish continuous monitoring together with additional knowledge of the effects of the various initiatives implemented to promote a healthy diet and physical activity. In general a link needs to be established between the effects of individual initiatives and the resources used.

In addition, the Danish Government would like to make the following more specific comments on the question raised by the Commission in the Green Paper.

IV.3. Health across EU policies

What are the concrete contributions which relevant other policies should make towards the promotion of healthy diets and physical activity, and towards creating environments which make healthy choices easy choices?

As mentioned in the general observations above, healthy eating habits and physical activity should be taken into account in all relevant EU policy fields. The Danish Government however believes that it is particularly important to assess the need for concrete measures within a number of specific areas of policy.

Denmark endorses the work taking place in the Platform for Action on Diet, Physical Activity and Health established by the Commission. The limitations which might come to light in self-regulation should, however, bring about concrete initiatives that ensure consumers obtain the best possible information and guidance in choosing foodstuffs. The Danish Government supports the European Commission's desire to stop all marketing of unhealthy foodstuffs targeting children and agrees with the Commission that lack of self-regulation in this area should result in greater EU regulation. Denmark considers that the need for increased regulation/self-regulation in this area should be viewed in a broader context and is difficult to narrow down to marketing directed at children. There is a general need for greater responsibility in the marketing of less healthy foodstuffs.

There is a need to reinforce the rules on nutritional labelling by making it compulsory and ensuring it covers the most relevant information for consumers. There is likewise a need to begin work at EU level on establishing a common and obligatory system of nutritional marking which, as a supplement to better nutritional labelling, will make it easier for consumers to make healthy decisions in their busy lives. Unless a common and obligatory European system of nutritional marking is established, provision should be made to implement compulsory schemes at national level. Moreover, Denmark is pleased to see that the proposal on voluntary claims for foodstuffs provides for the possibility of establishing national labelling schemes as long as no alternative has been established at EU level.

The EU's policy should also contribute to securing the development of physical frameworks that encourage EU citizens to undertake physical activity, just as support for the development and sale of foodstuffs should also make a positive contribution to promoting healthy eating habits in the Member States. For instance, there is an urgent need to increase the intake of fruit, vegetables and fish, *inter alia*, amongst EU citizens, while reducing the intake of saturated fats and added sugar. The EU's agricultural policy needs to make a positive contribution to the work on meeting these needs.

Furthermore, the EU needs to support national legislation on foodstuffs aimed at improving the possibilities for citizens to develop healthy eating habits. Examples include Denmark's rules on trans-fatty acids. The Danish Government would therefore call for a future EU strategy to eliminate trans-fatty acids from European foodstuffs, as not a single health-giving aspect has been identified, only effects that are damaging to health. Denmark's experience with eliminating trans-fatty acids has clearly shown that producers have not encountered any significant technical difficulties in reducing the content of trans-fatty acids to a level that is not damaging to health.

Finally, as mentioned in the introductory general observations, the Danish Government considers that research, innovation and monitoring should be among the central areas for future EU action on nutrition and physical activity. There is a need to substantially reinforce the knowledge base to ensure that effective initiatives are implemented at EU, national and local level to foster healthy eating habits and physical activity. There is thus also a need to guarantee a rational link between resources invested and results obtained.

Which kind of measures at EU or national level could contribute towards improving the attractiveness, availability, accessibility and affordability of fruits and vegetables?

To secure an increase in consumption of fruit and vegetables in the EU we need to continue reinforcing general information campaigns for the public and to increase the availability of fruit and vegetables in the places where individual citizens tend to move around. There is a need to strengthen product development so that fruit and vegetables stand out to a greater extent as an appealing alternative to products with high fat/sugar content and a low content of natural vitamins and minerals.

We consider that there is a role to be played by the EU, national and local authorities, and research institutes alike, not to mention private stakeholders in this area.

The Danish “6-om-dagen - spis mere frugt og grønt” (6-a-day – eat more fruit and vegetables) campaign is a partnership between authorities, private health organisations and private stakeholders. We believe that the campaign has, with comparatively limited resources, succeeded in increasing the intake of fruit and vegetables in Denmark and awareness of the need to eat fruit and vegetables.

In our view, raised awareness amongst the population of the need to eat fruit and vegetables is of itself by no means enough to make citizens increase their intake. Eating habits are formed early in life and are to a large extent determined by the food that is available and by the norms in the immediate environment. We therefore consider that general information campaigns need to be supplemented by efforts to increase the supply and accessibility of fruit and vegetables, particularly in schools and nurseries and workplaces.

Denmark is working on promoting the establishment of a meals and mealtimes policy in schools, nurseries and workplaces. These policies are intended, among other things, to help secure a higher intake of fruit and vegetables. We are also working on promoting consumption of fruit and vegetables in workplaces by publicising the benefits through, for example, *firmafrugtordninger* (company fruit deliveries) and greater use of vegetables in canteens.

Fruit deliveries have become established in a number of Denmark’s schools, child-care centres and workplaces. Experience in Denmark has shown that establishing fruit deliveries in such places can be difficult for various reasons. The Danish Government therefore thinks it would be an obvious idea for the EU to make efforts to gather experience and knowledge on how to set up fruit deliveries to schools and nurseries in the Member States, and then, using this as a starting point, reflect on whether the EU can help to set up fruit deliveries in schools and child-care centres – e.g. by providing financial assistance, as is familiar from subsidised school milk.

The European Commission could use the Platform to promote the idea of product development to increase sales of fruit and vegetables, and to increase the focus, in existing support schemes, on product developments involving more fruit and vegetables in convenience foods or guaranteeing the development of packaging concepts etc., thereby making it easier and more appealing to individuals to eat fruit and vegetables.

On which areas related to nutrition, physical activity, the development of tools for the analysis of related disorders, and consumer behaviour is more research needed?

Denmark considers that there is a need to step up research into nutrition and physical activity on a general and widespread basis. One of the main purposes of obtaining new knowledge is to establish higher-quality, more effective and better targeted initiatives, thereby making the most of the resources available.

In the following we therefore highlight only those areas we consider to be especially relevant.

There is a need to expand research into the effects that supply and prices have on eating habits and physical activity and the bearing that the physical conditions in local areas have on levels of physical activity. There is also a need to enhance the existing knowledge of how the marketing of foodstuffs affects, both positively and negatively, the public's eating habits. More research is required into the mechanisms underlying the social differences in dietary and exercising habits. We need studies into the consequences for health and health economics assessments to be conducted in both areas – including ones relating to the promotion of incentive structures for active transport.

Similarly, it may be useful to look into ways of increasing the availability of wholesome foods with a high natural nutrient content and high eating quality, and measures for fostering the motivation to develop healthy foods.

As regards monitoring, we would highlight the need to collect comparable data at regular intervals from Member States in order to provide reliable information on key parameters for health and consumption patterns. It is likewise important to gather objective data that can throw light on social differences, and trends, in dietary and exercising habits.

We would also highlight the need for research to lay the groundwork for conducting health cost assessments, not simply for the proposal to promote healthy diets and physical activity, but also for proposals for initiatives in other areas that have an indirect effect on the public's eating habits and levels of physical activity. Increased knowledge in this area could ensure better cost-benefit assessments and better assessments of best practices in various areas and throughout the EU Member States.

More research should likewise be started to discover the link between individuals' genetic potential and nutrient intake with a view to optimising the recommendations for diet, nutrients and physical activity for individuals or groups.

Finally, more research should also be conducted into the nutritional effects of obligatory and voluntary fortification of foodstuffs with special emphasis on particularly exposed sections of the population. Positive and any negative effects on food intake of the introduction of nutrient profiles in connection with marking, fortification and claims require more detailed investigation.

IV.4. The Public Health Action Programme

How can the availability and comparability of data on obesity be improved, in particular with a view to determining the precise geographical and socio-economic distribution of this condition?

The Nordic Council of Ministers has, with a view to a forthcoming common Nordic action plan for better health and improved quality of life through diet and exercise, placed great importance on reinforcing the collection of more accessible and comparable data on overweight, dietary habits and physical activity. This common Nordic action plan is expected to be drawn up by summer 2006.

In the Danish Government's opinion, the work on increasing the accessibility and comparability of data should be undertaken in a number of stages, so that the different EU countries can progressively work towards obtaining more comparable data. The work could start by selecting a number of headline indicators plus a few individual background variables, and use simplified but nonetheless comparable collection methods.

How can the programme contribute to raising the awareness of the potential which healthy dietary habits and physical activity have for reducing the risk for chronic diseases amongst decision-makers, health professionals, the media and the public at large?

The programme contributes to raising awareness in the field, an awareness which is channelled through the national authorities and research institutes to the national and local decision-makers, health professionals, the media and the general public.

As mentioned in Section IV.3, there are a number of areas in which there is a need to step up research. An improved knowledge base promoted by the EU's public health action programme will contribute, through national authorities and research institutes, to finding out more about how healthy eating habits and physical activity can reduce the risk of chronic diseases.

Which are the most appropriate dissemination channels for the existing evidence?

In the Danish Government's view, the existing knowledge on nutrition and physical activity should be disseminated through the competent national authorities in collaboration or partnership with stakeholders such as private health organisations, professional associations etc.

The actual channels that are best suited to disseminating the existing knowledge will vary from country to country. This will also depend to a large extent on the specific target groups that the knowledge is to be passed on to, or the nature of the knowledge etc.

IV. 5. European Food Safety Authority (EFSA)

As regards the section on the European Food Safety Authority, the Danish Government wishes to stress that the EFSA should play a much greater role in the field of nutrition.

The EFSA should give particularly high priority to the following:

- on-going evaluation and updating of the maximum safe levels of added vitamins and minerals;
- establishing a validated model to assess the total intake of vitamins and minerals with a view to avoiding overdosing on an overall intake of naturally-occurring and added vitamins and minerals from foodstuffs plus food supplements;
- risk assessments of “other substances” and devising a positive list of these in connection with the proposal for fortifying foodstuffs;
- establishing nutrient profiles in connection with the proposal for claims;
- assessment of scientific documentation for claims.

V.1. Consumer information, advertising and marketing

When providing nutrition information to the consumer, what are the major nutrients, and categories of products, to be considered and why?

There is a general need to stress that the path to good eating habits is through a varied selection of foodstuffs. This is the safest way to a balanced diet that contains the nutrients, vitamins and minerals that the individual needs.

In Denmark, the common Nordic nutrient recommendations have been converted to official dietary advice for the general public. In May 2005 the Danish authorities issued the eight official dietary guidelines. It is also important to spread awareness of the special dietary needs of certain sections of the public with particular needs (the overweight, the elderly, pregnant women etc.).

In addition, importance should be given to nutrients as a starting point for nutritional information targeting consumers. Although sweets, fizzy drinks, cakes etc. must be regarded as foodstuffs that should be consumed in smaller quantities, developments in the field of foodstuffs are such that the differences between the various food groups are becoming increasingly blurred. For example, there are breakfast and dairy products that are equivalent to sweets in terms of nutritional value.

Knowledge of nutrients is difficult to disseminate, which is why the Danish Government, as mentioned above, sees a need to supplement nutrition labelling with simple guidelines in the form of a common EU nutrition label.

The nutrients that should primarily be focused on and are considered to be common to the EU as a whole regardless of the existing differences in national eating habits are fat, saturated fat, added sugar, the natural dietary fibre content of bread and sodium (salt).

Which kind of education is required in order to enable consumers to fully understand the information given on food labels, and who should provide it?

Most surveys in this field show that many consumers have difficulties in fully understanding the information given on food labels and that many also experience difficulties in using the information in an everyday context.

It is thought that general public information campaigns for consumers and education initiatives in schools could enhance the public's capacity for understanding and using the information on food labels.

Work could be done on developing the actual graphic form of food labelling so as to make them easier to understand and increase the usefulness of the information they contain. In this way, the actual design and presentation of food labelling could incorporate information. This aspect of the effort to provide information should be established at EU level in connection with new rules drafted for the use of food labelling.

Finally, we would stress the need for simpler guidance for consumers when out shopping than is provided by food labelling. We believe that information and education alone cannot ensure that all consumers will be able, or feel they have time to convert the contents of food labelling into action. Denmark's desire for a common, simple EU food-labelling scheme needs to be viewed in this light.

Are voluntary codes ("self-regulation") an adequate tool for limiting the advertising and marketing of energy-dense and micronutrient-poor foods? Which measures should be considered if self-regulation fails?

The Danish Government believes that the marketing of unhealthy foods and beverages directed at children should stop.

As already mentioned above, the Danish Government endorses the European Commission's approach in which it is left to the food industry and the media to provide the necessary self-regulation at EU level, but where failure to meet the need for self-regulation should be followed up by a proper proposal from the Commission for EU legislation.

Regardless of whether established through a voluntary agreements or by legislation, regulation should ideally take place at EU level in order to guarantee the broadest possible protection and identical competitive conditions for businesses.

How can effectiveness in self-regulation be defined, implemented and monitored? Which measures should be taken towards ensuring that the credulity and lack of media literacy amongst children is not exploited by advertising, marketing and promotion activities?

Denmark believes that the Commission could work together with private stakeholders in the context of the EU Platform to define more precisely the requirements that should be placed on them in the form of self-regulation. This should be followed up by the organisations and associations concerned establishing a formal code of ethics that individual members would have to comply with. It must be up to the individual organisations and associations to ensure that members comply with the established voluntary set of rules and to report to the Commission. European consumer organisations would of course keep an eye on compliance with the voluntary agreements and inform the food industry, the Commission and the general public of any cases of non-compliance.

All the media today are cross-border in nature and for this reason any measures should, as far as possible, be taken at EU level. Denmark considers that the EU Platform for Action on Diet, Physical Activity and Health, could be a forum for establishing a common understanding of the voluntary measures that are required, in addition to the existing protection of consumers against misleading advertising, to ensure that the credulity and limited media literacy of vulnerable consumers are not exploited in advertising, marketing and promotion activities. The measures that were considered necessary would be included in the abovementioned voluntary code of ethics for marketing.

V.2. Consumer education

How can consumers best be enabled to make informed choices and take effective action?

If the majority of consumers are to be given the possibility of making informed choices and taking effective action, this will require a combination of various initiatives.

There is a need to reinforce information and education on nutrition and physical activity. We need obligatory food labelling that is accessible to consumers, and nutrition marking to help busy consumers or those who despite all possible improvements still find it difficult to use food labelling when choosing foodstuffs. There is a need to regulate information on claims and fortification in order to provide consumers with real information instead of creating confusion as to how healthy certain foodstuffs are. Regulation or self-regulation of foodstuff marketing is required to ensure that marketing does not undermine the efforts to prevent overweight and to promote healthier eating habits. Finally, there is a need to enhance the competencies regarding healthy dietary habits and lifestyles amongst local protagonists who are close to individual citizens, families and children, and who could provide individuals with advice and guidance on healthy lifestyle choices (school teachers, school nurses, general practitioners etc.).

What contributions can public-private partnerships make toward consumer education?

Partnerships between public and private stakeholders can make a substantial contribution to the effort to provide citizens with information on healthy foods and an active lifestyle.

Dietary advice must be based on scientific evidence and should primarily be disseminated by public authorities to gain the necessary credibility vis-à-vis the general public. Such dissemination is best achieved, however, in collaboration or partnership with stakeholders in the same field, such as organisations to combat diseases, professional associations etc. Partnerships can expand the scope of the action taken and help to ensure that the same messages are being disseminated to citizens/consumers. In Denmark our experience of partnerships in this field is generally positive, and includes targeted campaigns and intervention.

In the field of nutrition and physical activity, which should be the key messages to give to consumers, how and by whom should they be delivered?

The Nordic countries have developed common recommendations concerning nutrition and physical activity.

Culinary traditions and physical activity patterns vary in the Nordic countries, yet this is not viewed as a hindrance to forming common recommendations on nutrition and physical activity. Such variations are similarly not considered to be a barrier to establishing the basic common European recommendations.

As with the Nordic recommendations, it is possible to transpose common European recommendations at national level as advice for action on diet, so that existing differences in culinary culture and traditions concerning physical activity can be taken into account, just as national dietary advice has to take as its starting point the existing knowledge of food consumption patterns in the country in question.

Common EU recommendations on nutrition and physical activity will make a major contribution to policy-making at EU level, and are needed to underpin the efforts of individual countries to promote healthy eating habits and physical activity.

Although the messages concerning nutrition and physical activity should primarily be disseminated at national level, key messages will indirectly be communicated through the necessary common EU policy. For example, regulation of foodstuffs through food labelling, claims, fortification, nutrition labels and profiles indirectly embody key messages on nutrition.

A wide range of instruments should be used in connection with dissemination, involving a wide range of national and local operators. Action taken could include conventional national information campaigns, and the transfer of knowledge, practical advice and experience through partnerships

between public and private stakeholders. Efforts at local level could also involve specifically offering personal guidance to individual citizens or individual families etc.

V.3. A focus on children and young people

What are good examples for improving the nutritional value of school meals, and how can parents be motivated to improve the nutritional value of home meals?

School meals are not widespread in Denmark, where it is traditional for children to take a packed lunch to school. Schools often have a shop at which children can buy food.

Healthy food for children and young people is a high priority in the Danish Government's efforts in the field of nutrition. The Danish authorities are trying to improve children's eating habits by working towards getting individual children's centres, schools and after-school clubs for children to introduce a meals and mealtimes policy. For schools that have a meals scheme or school shop, a meals and mealtimes policy will concern the nutritional value of the food on offer and may also pave the way for a common understanding between schools, parents and children about the food that parents give to their children to take to school. A locally-based mobile unit has been established as part of the "Alt om kost" (All about food) project. The mobile unit offers help and assistance with developing a meals and mealtimes policy in individual institutions. Denmark's *Fødevareforskning* (Danish Institute for Food and Veterinary Research) has produced a proposal with guidelines for healthy meals in schools and is in the process of conducting a survey into the nutritional quality of existing school meals.

In collaboration with a number of private health organisations the Danish authorities have founded the "Sundhedstegnet" (health symbol) scheme. *Sundhedstegnet* is a tool for a healthier everyday life in nurseries, child day-care centres, schools, after-school clubs, after-school recreational centres, and sports centres for children and young people. The scheme enables such institutions to qualify for receiving the health symbol by following a number of guidelines on diet and physical activity.

The efforts to increase the nutritional quality of meals at home take place at several levels, the primary field of action being the general public information campaigns on official dietary advice. This is supplemented by initiatives to promote healthy food at workplaces, in the expectation that healthier eating habits in the workplace will have a knock-on effect on food at home. Lastly, public institutions are forming partnerships with private stakeholders with the aim of extending the supply and availability of healthy convenience foods and meals.

What is good practice for the provision of physical activity in schools on a regular basis?

Danish schools offer a minimum of two hours of sport per week, and free periods and the physical environment of schools also provide ample possibilities for physical exertion during the course of the school day.

As mentioned above, the Danish authorities have, in collaboration with private health organisations, established the “*Sundhedstegnet*” scheme as a tool for creating a healthier everyday life in schools, day-care centres and sports centres for children and young people. The first part of the *Sundhedstegnet* was launched in January 2005, so it is still too early to assess the results of this scheme.

Owing to insufficient evidence it is difficult to point to examples of good practice when it comes to physical activity in schools. Evidence is, however, in the process of being gathered, specifically through the experience gained from a series of locally-based projects and school approaches under investigation. These are projects and approaches focused on, among other things, one or more of the following: increasing the number of sports periods, reinforcing the link between general education and physical activity, improving the opportunities for physical activity in the immediate vicinity of schools, promoting physical activity in connection with after-school recreational activities, and improving opportunities for physical activity in connection with transport to and from school.

What is good practice for fostering healthy dietary choices at schools, especially with regard to avoiding the excessive intake of energy-dense snacks and sugar-sweetened soft drinks?

As far as the efforts made by Denmark to create a healthy choice of foods in schools are concerned, we would refer to the answer given to the Commission’s question above “*What are good examples for improving the nutritional value of school meals, and how can parents be motivated to improve the nutritional value of home meals?*”

As is the case of physical activity, there is not enough reliable documentation available to unequivocally point to examples of good practice on the basis of Danish experience.

Moreover, the considerable amount of public debate on, for example, the sale of unhealthy products in school shops or access to soft-drink vending machines has meant that the most recent figures show that such vending machines now only feature in under 1% of schools.

How can the media, health services, civil society and relevant sectors of industry support health education efforts made by schools? What role can public-private partnerships play in this regard?

The general content of health education should be laid down by the competent public authorities. Denmark believes that the media, the health service, civil society and the relevant branches of industry can contribute to enhancing the substance of education and make it more dynamic.

The public service media can provide audio-visual presentations as part of their information activities, thereby helping to make health education more stimulating and varied for pupils. Local health services and civil society can supply real-life accounts of the benefits of healthy living and the consequences of an unhealthy lifestyle. The relevant branches of industry can assist efforts by setting up partnerships with public authorities to produce educational materials, or by contributing financially to investment in sports facilities etc. However, industry must comply with Danish legislation and avoid exploiting supportive campaigns to market their own products in schools.

What role can public-private partnerships play in this regard?

As mentioned above, we see a possible role for partnerships between public and private stakeholders in devising educational materials or similar. At the same time it is, however, crucial that this kind of cooperation does not result in seeds of doubt being sown as to the credibility of the competent authority.

V.4. Food availability, physical activity and health education at the workplace

How can employers succeed in offering healthy choices at workplace canteens, and in improving the nutritional value of canteen meals?

The workplace is an important area of focus in the Denmark's campaign to promote healthy eating habits and physical activity.

Employers can promote healthy choices in canteens by imposing requirements on the food served in canteens. The Danish authorities have, in collaboration with the trade union 3F, devised an *idémappe* (ideas folder) to give inspiration on how to promote healthy meals at the workplace. Further information can be found at: www.mad-paa-arbejde.dk.

What measures would encourage and facilitate the practice of physical activity during breaks, and on the way to and from work?

Physical activity at work does not necessarily need to be restricted to the above. It can, for example, also involve the actual work itself, encouraging initiatives to increase physical activity and mobility and thereby also avoiding damage caused by inappropriate work postures. Workplaces can also

benefit by focusing on healthy exercising habits, e.g. a weekly campaign on exercise in everyday life.

There are also a series of voluntary sports associations in Denmark, including one in particular – the *Dansk Firmaidrætsforbund* (Danish Company Sports Confederation) – which specifically targets workplaces.

The provision of proper pavements, cycle paths etc. is considered to play a major role in the desire to be physically active on the way to and from work. Denmark has implemented, among other things, a number of successful urban cycling projects, which have proved to be both useful in changing citizens' behaviour and cost-effective.

In addition, we consider that there is a need to broaden the general public's awareness of the importance in terms of health of taking moderate physical exercise on an everyday basis. The Danish information campaigns focus on positive messages and on how much better you feel during your working day, for example, if you choose to cycle to work or to walk part of the way, or to get off the bus several stops before reaching the workplace.

Companies can promote physical activity by, for example, providing an exercising room, encouraging the establishment of a company sports club, subsidising membership of a fitness centre and sports association, ensuring that staircases are pleasant to use, and urging employees to make less use of the telephone and e-mail when they want to speak to their colleagues etc.

V.5. Building overweight and obesity prevention and treatment into health services

Which measures are needed to ensure a stronger integration of interventions aiming at promoting healthy diets and physical activity into health services?

The health service is a central operator in preventing and dealing with overweight and obesity. Amongst the areas requiring particular focus we would highlight the development of methods for the early identification of risk factors, the training of health staff and increased cooperation between different types of health professionals (doctor in private practice, physiotherapists, dieticians etc.).

In the last few years Denmark has conducted a series of initiatives and surveys in this field, including trials with “*motion på recept*” (exercise on prescription), special schemes for pregnant women etc. The surveys are designed, among other things, to throw light on whether an individual's risk profile can be changed through exercise, irrespective of weight loss.

V.6. Addressing the obesogenic environment

In which ways can public action help to ensure that physical activity be “built into” daily routines?

As highlighted above, the government can help to ensure that physical activity is "built into" daily routines by establishing access to proper facilities for physical exertion in the environment (pavements, cycle paths, recreational areas etc.), and by generally working towards increasing public awareness of the major short- and long-term benefits associated with daily physical activity.

Denmark believes that it is imperative to lay the foundations for a healthy and active lifestyle as early as in childhood, which is why government action to promote physical activity amongst children and young people, including in schools and other child-care centres, is of the greatest importance. The Danish authorities have, in collaboration with a private health organisation, produced an “inspiration” catalogue containing ideas on how schools, child-care centres, sports associations, local activists and other operators can create activities for sedentary children so that they have the desire to be active. Once this desire and enjoyment is established, the chances of children continuing to lead an active life are much greater.

We also believe it is important that the public sector contributes to increasing awareness at the workplace of the benefits that can be associated with efforts to promote physical activity and a healthy lifestyle amongst staff.

Which measures are needed to foster the development of environments that are conducive to physical activity?

On 1 January 2007, Denmark is to introduce a new government structure with fewer and larger administrative districts – that is, 98 district authorities (*kommuner*). This reform means that responsibility for health promotion and disease prevention and competence for schools, child-care centres, and development of the local physical structures etc. are based in one place at district authority level. Hospitals will come under the authority of five new regions, with the district authorities from now on covering part of the expenditure for hospital treatment.

Denmark considers that the collective placing of competence for health promotion activities at district authority level within the given context will step up and enhance joint reflection on preventive action across various sectors.

We would note that there is a well-established tradition in Denmark of sports associations etc. putting a great deal of effort into arranging gymnastics and sports classes specially for children and young people.

Association activities will continue to play an important role in taking new initiatives for healthy-living projects targeting citizens' habits and lifestyles. Placing responsibility for health promotion and disease prevention with the district authorities also means that sports associations etc. may be included in efforts to secure proper facilities and a range of activities.

The national authorities need to support the district authorities' new competence for health promotion by providing guidance, advice etc. The Danish authorities have decided, among other things, that a mobile unit should be set up to travel around the country giving advice on how the district authorities, as the owners of schools, child-care centres, urban areas, leisure activities and the infrastructure, can establish plans for citizens to have access to physical activities from the cradle to the grave.

V.7. Socio-economic inequalities

Which measures would promote healthy diets and physical activity towards population groups and households belonging to lower socio-economic categories, and enable these groups to adopt healthier lifestyles?

Denmark believes that there is an urgent need, in the efforts to promote healthy foods and physical activity, to focus on socially disadvantaged groups. Experience shows that these groups find it particularly difficult to fulfil the official recommendations concerning diet and physical activity.

Measures to promote healthy eating habits and physical activity amongst especially vulnerable groups should primarily be locally-based and close to individual citizens and families. Local health services, schools, and child-care centres should all become actively involved, so that they can contribute to ensuring that the needs of families and individuals who have particular difficulties in meeting the recommendations concerning diet and physical activity are addressed at local level. Individual advice and guidance will presumably have to be made available to a certain extent if a marked change in lifestyle is to be brought about. However, at present Denmark has only minimal experience of this area.

There is also a need for information initiatives to specifically target social groups experiencing special problems. We also need to make a healthy choice the easiest option in all contexts wherever possible, e.g. in schools and child-care centres and at workplaces.

The Danish Government has established a financing pool to promote local initiatives to combat overweight amongst, for example, children from vulnerable families and extend the range of experience in this field.

How can the “clustering of unhealthy habits” that has frequently been demonstrated for lower socio-economic groups be addressed?

Please see the answer to the preceding question.

V.8. Fostering an integrated and comprehensive approach towards the promotion of healthy diets and physical activity

Which are the most important elements of an integrated and comprehensive approach towards the promotion of healthy diets and physical activity?

There is no adequate empirical basis available to unequivocally point out the most important elements in an integrated and comprehensive approach towards the promotion of healthy diets and physical activity.

The Danish Government shares the WHO’s opinion that this is a multifaceted issue that requires efforts at many different levels and across various sectors.

We can however give particular emphasis to the following.

It is important that official recommendations on both diet and physical activity are put forward, disseminated to the public at large, and integrated into the education of children and young people.

It is also regarded as important to ensure a sensible balance between the accessibility of healthy and of less healthy foods. Healthy foods should be at least as easy and appealing to eat as unhealthy foods, regardless of whether you are at work or school, or travelling etc.

There is also a need to secure an adequate and attractive supply of opportunities for physical exercise in the immediate environment.

Finally, it is important that official messages and action to promote healthy eating habits and an active lifestyle are given the necessary support of the relevant private stakeholders through their behaviour on the foodstuffs and leisure activities market. The EU should regulate these matters to an appropriate extent.

How should the roles be divided up at national and at EU level?

Efforts taken at EU level should focus on product-related initiatives for consumers, that is, the regulation of claims, fortification, marking, marketing and similar aspects. EU action should also serve to step up cooperation between the EU Member States, through joint efforts on research, monitoring, developing best practices etc. In addition, the EU could influence eating habits by supporting campaigns for foodstuffs for which we want consumption to increase, e.g. fruit, vegetables and fish. The EU could likewise work together with support schemes such as fruit deliveries to schools and child-care centres and remove elements in existing EU legislation promoting the consumption of products that are contrary to the targets of nutrition policy.

Information campaigns and specific initiatives aimed at citizens who encounter difficulties in meeting the recommendations on nutrition and physical activity should be conducted at national and local level, preferably in partnerships with the relevant private operators.

V.9. Recommendations for nutrient intakes and for the development of food-based dietary guidelines

In which way can food-based dietary guidelines at a European level take the different regional and national dietary habits, as well as social and cultural variations into account?

Information campaigns to promote healthy eating habits and physical activity should be conducted at national and local level to take best account of social and cultural variations, in addition to national and local differences.

As mentioned above, Denmark considers that there is a need for common European nutritional recommendations. On the other hand, the translation of nutritional recommendations into food-based dietary guidelines should take place at national and local level.

How can the gaps between proposed nutrient targets and actual consumption patterns be overcome?

We believe that these major differences can be overcome through clear and unambiguous dissemination of simple messages to the general public.

There is likewise a need to establish better, simple and proper training and information for consumers when making purchases. The forthcoming EU rules on claims will help to minimise the misleading of consumers. Moreover, as already mentioned, compulsory nutritional labelling should be introduced in the EU by creating a foodstuffs label that is simple, relevant and easy to understand. The future rules on fortification and claims need to be backed up by establishing

nutritional profiles and, as mentioned above, a common EU nutritional labelling scheme needs to be set up.

How can dietary guidelines be communicated to consumers?

The Nordic countries have extensive experience of disseminating dietary advice to consumers. We would refer you to the answer to the preceding question, and to the answer to the question “In the field of nutrition and physical activity, which should be the key messages to give to consumers, how and by whom should they be delivered?”

In which way could nutrient profile scoring systems such as developed recently in UK contribute to such developments?

The Danish Government considers that a great deal of useful work has been done in the UK to develop nutrition profiles.

This work should be combined with the experiences of other EU Member States, including the use of nutrition profiles to develop nutrition labelling, and incorporated into future EU work on developing nutrition profiles and a common European nutrition label.

The Danish Government believes it is inappropriate at the present time to become locked into the issue of whether nutrition profiles developed in the EU should be based on a points system as in the UK, or whether other methods should be laid down.

V.10. Cooperation beyond the European Union

Which are the best means of exchanging experience and identifying best practice between the EU and non-EU countries?

Denmark is of the opinion that the Community, in collaboration with the EFSA (European Food Safety Authority), should play a key role in both collecting and exchanging experience and surveying best practices.

The Nordic Council of Ministers has, with a view to a future common action plan to promote health and quality of life through diet and physical activity, called for a proposal for strengthening the exchange of experience between the Nordic countries, and on how to establish common Nordic cooperation on best practices.

The Nordic action plan is expected to be adopted in summer 2006, and the Commission will be able to draw on this to define in more detail the role the EU can play in this field and the specific tools that can be used.

V.11. Other issues

Are there issues not addressed in the present Green paper which need consideration when developing a Community strategy on diet, physical activity and health?

In general, the Danish Government feels that the Commission's Green Paper has done a very good job of covering the issues that can be considered as part of the European dimension to the common effort to promote healthy eating habits, physical activity and health.

Beyond the issues that the Commission itself has brought up, we consider it relevant to highlight the nutrition of infants and young children as a topic that should be given particular priority in research. There is a need for more knowledge on the significance of nutrition in early childhood, both for health and for eating habits later in life. It is important for the EU to support the WHO's recommendations on breastfeeding – including through relevant legislation in this field. Similarly, priority should be given to promoting more information campaigns targeting pregnant women in order to take account of the worrying rise in the number of overweight pregnant women and the associated risks for birth-related complications.

Which of the issues addressed in the present Green Paper should be given first priority, and which may be considered less pressing?

The Danish Government considers it important for the Commission to give high priority to work on introducing common EU rules on compulsory food labelling and on developing a common European nutrition label. The Government also considers it important for the Commission to take rapid steps to establish common European foodstuffs recommendations and, taking this as a starting point, to address the task of establishing nutrition profiles. These nutrition profiles should, in the Danish Government's opinion, be laid down for a forthcoming common nutrition label, to regulate both nutrition and health claims and the fortification of foodstuffs.

The Danish Government considers it important for the Commission to stick to the ultimatum it has given to the foodstuffs industry to ensure, on a voluntary basis, that it stops all marketing of unhealthy foods directed at children. If the foodstuffs industry fails to meet the requirements laid down, the Danish Government will support a proposal for EU regulation in this area.

Denmark also considers it important for comparable data to be compiled in all EU Member States in the form of reliable information on key parameters for health and consumption patterns.

Denmark endorses the Commission's previous efforts to step up research into nutrition and physical activity, and would be pleased to see greater priority given to such action where possible.

On behalf of the Ambassador
by order

Lene Breum Larsen
Adviser (consumption and food safety)

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