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CONTRIBUTION OF THE MINISTRY OF HEALTH OF THE REPUBLIC OF SLOVENIA TO THE CONSULTATION

on the Green Paper "Promoting healthy diets and physical activity: a European dimension for the prevention of overweight, obesity and chronic diseases"

The Republic of Slovenia supports the endeavours of the European Commission to form a single strategic document in the area of healthy and well-balanced nutrition, regular physical activity for health promotion, and the resulting reduction of the over-nutrition and obesity of the population.

Within the framework of over-nutrition and obesity reduction plans, the Republic of Slovenia has already developed a National Food and Nutrition Action Plan, which was adopted by the National Assembly of the Republic of Slovenia in March 2005, and a National Health Enhancing Physical Activity Programme, which is in process of being adopted by the Government of the Republic of Slovenia. The measures that should be taken into consideration in both Community policies and individual national policies, are designed to increase primarily the intake and accessibility of fruits and vegetables, subsidise health enhancing food in the school and work environment, reduce taxation for selected (health-friendly) foods, prepare financial schemes and ensure a regular inflow of financial resources, stimulate the working and school environment so as to provide possibilities and conditions for choosing and consuming healthy meals, as well as keeping physically active.

With regard to the reduction of chronic non-communicable diseases, Slovenia has also been preparing other national programmes that will regulate the areas of individual chronic non-communicable diseases.

From the range of questions contained in the Green Paper, Slovenia proposes to the European Commission the following answers and suggestions:

Chapter IV.3: Health across EU policies

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

They should provide:

- health promoting public policies;
- development of joint indicators and monitoring;
- appropriate personnel and personnel norms to allow professional services in the area of nutrition and healthy lifestyle;

- allocation of required financial resources;
- support to research activities;
- urban measures (possibilities) that facilitate health enhancing physical activities;
- adjustment of work, school and childcare activities to allow a healthy diet and physical activities;
- introduction of a healthy diet and a healthy lifestyle subject matter into the curricula of educational institutions at all levels;
- accessibility to a choice of healthy food for all population groups, especially for the socio-economically vulnerable (adequate taxation and pricing policies);
- involvement of local communities in promoting and integrating a healthy lifestyle;
- promotion of locally sustainable food supplies;
- transformation of health services (emphasis on the prevention and promotion of health, and counselling);
- networking by involving non-governmental organisations in the implementation of national measures.

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

Each country should encourage and develop systems of local food production and, by doing so, contribute to the socio-economic development of rural areas, reduce transportation distances in food supply and, consequently, influence the preservation of more protective substances and the optimal ripeness of locally produced fruits or vegetables, as well as their greater biodiversity in dietary habits. One of the ways and measures is to encourage policy makers to establish a local and sustainable food supply system, including its promotion, as well as adopting specific criteria for public procurement procedures that would facilitate an optimal choice of locally produced and processed foods.

Other measures:

- increasing national production of fruits and vegetables;
- improving inter-sectoral co-operation regarding the production of fruits and vegetables, or all food;
- taking advantage of the production of high-quality, ecologically grown fruits and vegetables;
- withdrawing fruit and vegetable production surpluses from the market only when excessive local and seasonal surpluses occur; it is furthermore recommended that in such cases the surpluses are used as food for humans (e.g. supplying schools etc.);
- reducing or abolishing taxes on fruits and vegetables;
- directing the measures of the Common Agricultural Policy in the EU (rural development) towards the promotion of local food production, produced and processed in a sustainable manner (eco-farming, integrated farming);
- fostering the intake of vegetables and fruits in kindergartens, schools and other environments (working organisations, hospitals, health resorts);
- making available possibilities for subsidising vegetables and fruits for socio-economically vulnerable groups of the population (e.g. by food coupons);
- supporting research activities.

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

- in the area of dietary habits of various groups of population, with an emphasis on the intake of nutrients and the level of physical activity;
- in the area of the development of tools and mechanisms for subsidising food for socio-economically vulnerable groups of population;
- in the area of communication approaches to various target groups of the population;
- in the area of consumer behaviour and consumer perception;
- in the area of validation of indicators.

Chapter IV.4: The Public Health Action Programme

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?

- through research on communication approaches to various target groups of the population;
- through the development of research instruments;
- through regular information dissemination, communication and awareness raising of all involved;
- through the development and implementation of legislative provisions on food advertisement restrictions.

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

- statutory forms determined for compulsory curricula within the system of education, along with compulsory health care education provided for individual population groups;
- public conferences, tribunes, round tables, expert meetings, and similar, on various special days (World Food Day, Move for Health Day, Breast-feeding Day, and similar) and simultaneous use of all forms of available media (TV, Internet, Radio, school environment, etc.), as well as the distribution of promotion material through the existing networks of public health, school and other institutions.
- national establishments (ministries and institutes) and NGOs for consumer protection, who have at their disposal professionally verified epidemiological evidence. It is important for them that they maintain absolute transparency of financing.

Chapter 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?

We propose that when providing information on nutrients and other substances, foodstuffs are

labelled with information on all relevant nutrients that could have impact on human health (beside of energy content and macronutrients, the content of added sugars, groups of fatty acids including trans-fatty acids, essential fatty acids, vitamins, minerals including trace elements, amino-acids, fibre). Nutritional labelling must be obligatory for all categories of processed foodstuffs.

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?

Use of the national language and compulsory primary school education.

Are voluntary codes (“self-regulation”) an adequate tool for limiting the advertising and marketing of energy-dense and micronutrient-poor foods? What would be the alternatives to be considered if self-regulation fails?

No, but they could be an appropriate tool for other groups of foods. Clear criteria are needed regarding the code of misleading advertisement, and this must be defined in the legislation. We suggest a total ban on advertising children’s foods.

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

We are not in favour of self-regulation in advertising and marketing of energy-dense and micronutrient-poor foods.

Chapter V.2. Consumer education

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

- labelling foodstuffs with suitable labelling that leads to recognition of foodstuffs which are beneficial for health, production of clear standards for labelling foodstuffs and consumer educating;
- providing funds to consumer organisations and non-governmental organisations for providing awareness to the public or specific target groups;
- open telephone, web site, professional publications for informing consumers about healthy choice, promotional material, media support;
- carrying out continuous national promotional campaigns on healthy diet and the importance of physical activity for health, in all environments, and simultaneous activity of experts in the field of public health, NGOs and other interest associations on national, regional and local levels.

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

The public sector provides professional support and guidelines to the private partners. It is important in this to maintain transparent financing of investments.

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 key message to consumers is that they should follow the professionally checked information. The key messages should be created by expert services and non-governmental organisations. Messages should follow public policies in the sphere of protecting and promoting health. Key messages in the field of nutrition and physical activity should include:

- encouraging the eating of vegetables and fruit,
- reducing the intake of total and saturated fats,
- reducing the salt intake,
- reducing the intake of soft drinks,
- encouraging physical activity for health,
- encouraging breast feeding,
- limiting the alcohol intake,
- encouraging non-smoking,
- messages about the health risks connected with unhealthy nutrition and insufficient physical activity.

Chapter 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 informed on how to improve the nutritional value of home meals?

- implementation of national guidelines for healthy nutrition in childcare and educational institutions, encouraging the preparation of dishes from raw foods, respecting documents advising against foodstuffs and the use of school vending machines, and creating recommendations for healthier foodstuffs;
- organisation of the school diet, which should provide all the necessary meals during the period of care or lessons;
- training within the school environment for professionals who plan and prepare meals, administrative staff, teachers, pupils and parents;
- including housekeeping as a subject in the curricula of primary schools;
- providing adequate staff and determining staff norms;
- providing adequate funds;
- encouraging subsidised food;
- providing suitable spatial and technical conditions in the school environment.

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

- encouraging school and non-school physical activity, active breaks, adapting timetables, arranging all the conditions for carry out physical activities;
- Including physical activities in the timetable at all levels.

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

- providing a support network: parents, teachers, professional staff, representatives of children,
- ensuring research on the increased extent of healthy choices, with the inclusion of children,

- documents advising against foodstuffs in national guidelines on healthy nutrition in care and education institutions;
- advising against the food and drink vending machines in the school environment,
- continuous informing and educating of outside caterers about providing healthy food.

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?

- a public-private partnership is possible if professional solutions are harmonised with recommendations for healthy food and the transparency of cooperation is fully guaranteed,
- continuously stressing and encouraging the importance of including contents concerning food and healthy activity in the school environment;
- transparent financial support for education and advertisements that are in compliance with policies in the sphere of public health.

Chapter V 4: Food availability, physical activity and health education at the work place

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

In this context it is necessary to:

- produce and implement guidelines for a healthy diet for workers in working organisations, in accordance with how demanding the work place is.
- encourage employers to provide nutritious meals at the work place, adapted to their energy needs;
- carry out promotion at the work place of a healthy lifestyle;
- adapt the organisation of work to healthy dietary habits;
- provide suitable staff and determine norms for staff that prepare food in working organisations and catering for working organisations;
- provide suitable funds for educating employers and workers about the importance of a healthy life style on health;
- encourage the subsidy of nutritious food at the work place;
- provide suitable special and technical conditions in working organisations (kitchens, dining rooms, etc.).

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

- educating health workers,
- inclusion of preventive healthcare, as well as systemic measures, with transparent financing,
- suitable urban planning solutions and well organised transport routes,
- promotion of a healthy life style.

Chapter V 5: Building overweight and obesity prevention and treatment into health services

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

- up-dating of health education programmes at the primary level within the framework of regular systematic and other examinations;
- information availability and possibility of counselling.

Chapter V 6: Addressing the obesogenic environment

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

- policies in the area of sports that support Health enhancing physical activity
- suitable urban planning solutions and well-organised transport routes and recreational areas,
- promotion of a healthy life style in all public policies.

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

- inclusion of physical activity in the school curriculum, both written and unwritten,
- inclusion of physical activity at the work place

Chapter V 7: Socio-economic inequalities

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

- subsidising nutritious food for socially vulnerable groups of the population and the possibility of access to organised forms of active enjoyment of leisure time;
- changed tax policies for encouraging healthy nutrition;
- local sustainable food supplies;
- development of programmes and creating activities for promoting healthy lifestyles (e.g., workshops, for the socio-economically disadvantaged, etc.)

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

- Creation of national nutrition policies adapted to the specificities of individual countries.

Chapter 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?

- ensuring equality among different socio-economic groups;
- availability of healthy supply and choice of healthy food and the possibility of physical activity for all groups of the population, especially for the socio-economically vulnerable (suitable tax and price policies).

Which role at national and at Community level?

- education, healthcare (national level)
- urban planning, transport policies (intermediate level)
- common agricultural policy (Community level)

Article 52 of the Amsterdam Treaty must be taken into account at all levels.

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

In which way could social and cultural variations and different regional and national dietary habits be taken into account in food-based dietary guidelines at a European level?

- Guidelines on a healthy diet should include social, cultural and regional characteristics and the inclusion of locally supplied foodstuffs.
- Forming key groups of foodstuffs common to all social, cultural and regional characteristics. Individual groups of foods should include various foods typical of individual member states.

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

By a combination of qualitative and quantitative research, involving biomedical and sociological sciences, on the basis of which action and implementation plans are produced, which include concurrent evaluation of the effects on the basis of monitoring with groups of indicators, and with dietary recommendations, involving various partners in the food chain (work must be coordinated at all levels) etc. Programmes should be implemented gradually, in steps.

How can dietary guidelines be communicated to consumers?

Dietary guidelines can be communicated to consumers:

- by adapting recommendations to consumers and showing practical examples (user friendly approach), with cooperation with consumer associations and by awarding a recognisable label to healthier foods;
- through national promotional campaigns.

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

A system of points could have a positive impact on awareness and give consumers a better chance of making healthy choices.

Chapter V.10.: Cooperation beyond the European Union

Are there issues not addressed in the present Green paper which need consideration when looking at the European dimension of the promotion of diet, physical activity and health?

The Green paper should give more attention to:

- marketing of foods to children and young people;
- other chronic diseases (cardiovascular diseases, cancer, diabetes etc.), which are closely connected with unhealthy diet and irregular physical activity;
- measures of the Common Agricultural Policy, which often have a negative impact on the public health of members countries, consumers' movements, market regulation;
- obesity prevention and programmes of limiting obesity because of the existence of the negative phenomena of irregular eating and under-nourishment;
- promotion of breast feeding;
- exaggerated use of alcohol and use of tobacco and tobacco products;
- and education of educators.

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

- adequate human and financial resources,
- ensuring systemic access for education (kindergartens, schools),
- intensive cooperation with the media (producing a strategy of cooperation with common aims, respecting regulations on food marketing).

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