



Just Eat More
(fruit & veg)



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**Response to Consultation on the Commission Nutrition and Physical Activity
Green Paper**
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Promoting healthy diets and physical activity: a European dimension for the prevention of overweight, obesity and chronic diseases

The School Fruit and Vegetable Team, part of the Public Health Team, Government Office NW welcome the actions of the Commission and wish to make the following comments:

Contribution to Community Policies -CAP

The group feels that the Common Agricultural Policy is the Policy that will have the most significant impact on rising levels of obesity in the EU, and until subsidies on high-saturated fat beef and dairy products are removed, little will be achieved by nutritionists in promoting healthier diets, particularly in the area of health inequalities. CAP directly undermines these efforts. High fat subsidised products are widely available at low cost. Those households living on the lowest incomes do not always have the choice of higher cost healthier food. The high fat diet and low fruit and vegetable intake contribute to ill health and, as a consequence, the loss of contribution to the economy.

Research/Public Health Action

More research is needed in developing indicators for dietary change. Large scale dietary surveys are too expensive for local communities to commission to identify outcomes of dietary programmes. Research would be welcomed in increasing the understanding of public awareness of food and nutrition as this would enable nutritionists to understand food choices and apply this knowledge to interventions. Nutrition programmes are built on the principles that dietary change will occur if people are aware of the health messages and have access to affordable fruit and vegetables, wholegrain cereals and lower fat dairy produce. These secondary indicators can be measured relatively easily. The research evidence is needed to understand the relationship between these secondary indicators and dietary change so that these proxy indicators become a sound basis for judging effective programmes.

The EU should play a role in bringing together existing research and dissemination of results, as well as creating an environment for consistent baseline data collection.

Consumer information and choice

The Team believes that currently the food industry are giving poor messages to consumers and consider that in light of the need for consumer protection in this area self regulation or voluntary codes are inadequate for limiting advertising. Regulatory actions are necessary in this area especially to protect consumers from being exploited by misleading advertising and marketing activities. Food advertising aimed



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directly at children needs to be particularly tightly controlled. Tighter regulation is needed around the promotion of the properties of functional foods.

Nutrition information to the consumer

The consumer needs to be informed on the nutritional value of the product (s)he is buying and be able to put that into the context of a whole day's food intake. Nutrient profiles should include fat, carbohydrate, NSP, and sodium on an easy read chart. Additional detail of the full nutrient profile should be available on the pack including type of fat, sugar(s)(see comment below), iron, calcium.

There needs to be common agreement on whether sugar (sucrose) or sugars (sucrose, maltose, lactose etc) are to be listed.

The commission should consider actions that prevent the food industry being able to thwart actions to promote healthier food choice e.g by promoting a single 'healthy' nutrient in a product that is also high in a 'unhealthy' nutrient or include misleading messaging about the nutrient content e.g 90% fat free.

Key messages

The key messages about a healthy diet should be:

Increase consumption of a variety of fruit and vegetable – at least 5 a day

A healthy diet is one based on fruit and vegetables, wholegrain cereals and lower fat dairy produce and lean meat

Lower fat dairy produce are important for bone health

Eating freshly cooked unprocessed foods will lower sodium intakes

The Team consider that these messages should be linked to a social marketing campaign promoted by Government, and Charitable and food NGOs not supported by the food industry.

Public Private Partnerships

These partnerships must undertake a health needs assessment to identify the impact of their policies on health of the community.

Local Procurement

Increased provision of locally sourced food is made difficult and expensive by current retailer choices and regulations including EU policies. This affects the quality and sustainability of food chains for not only populations but also on public bodies wishing to increase the quality of food in prisons, hospitals and public sector catering.

Children

School meals standards in the UK are about to be tightened with the introduction of new regulations from Sept 05. The Team consider that the new regulations offer an opportunity to dramatically change the food habits of children. Local procurement and relaxation of the procurement law to enable local produce to be supplied to schools could help to re engage children with the seasonality of food and the food chain. It is important that large food industries can not find ways of re introducing sweet drinks and energy dense foods into schools

Data

Currently data is confused on what is considered to be an obese child and other important baseline indicators. It would also be beneficial to consider the effect of migration on food choices and behaviours to isolate trigger points and situational change in dietary habits. The team recommends that the Commission reflect upon



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the UK National Institute of Health and Clinical Excellence (NIHCE) guidelines on obesity that are expected to be launched in the next few months.

The European Charter of Fundamental Rights identifies health as a right of all EU citizens; access to good quality healthy food is a core element for health and a healthy lifestyle, and therefore the Commission has a mandate to ensure this. Current EU practices including the Common Agricultural Policy and competition rules surrounding local procurement are hindering the delivery of healthy food at affordable prices to EU populations, and this needs to be redressed urgently.

Health Services

Health service employees need to be role models for their clients. Work place health offers opportunities not yet fully explored with the purpose of increasing physical activity. This includes physical activity during working time and breaks as well as travel to and from work. Other issues that are important in nutrition include breastfeeding as well as the European Commission leading by example with interventions to improve the nutrition and physical activity of its employees and procurement practices.

It is important to bear in mind the mental health aspects of these issues, not only negative impact of obesity on mental health, but also the positive benefits that are brought about by physical activity.

In conclusion we would like to stress the following points:

- We welcome and support the Commission in its work in this area, and would encourage reform in several of its Policy areas currently having a major impact on the increase in obesity such as the Common Agricultural Policy
- We call for an increase in the possibilities for research particularly around factors governing consumer choice of food and physical activity.
- We strongly urge that the Commission pursues its actions in this field with a strong focus on consumer protection, including the EU's most vulnerable consumers. This applies to advertising, food availability and food production.
- We strongly urge the Commission to favour regulation with regards to the food industry, as self-regulation has not been successfully achieved in any area in the past and this process is lengthy and will not bring about good changes in obesity levels and subsequent population health issues and costs.

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