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Memo

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*To:*

European Commission  
Health and Consumer Protection DG  
Unit C4 – Health Determinants  
Luxembourg

**Subject:       Comments on the EU's Green Paper "Promoting healthy diets and physical activity: a European dimension for the prevention of overweight, obesity and chronic diseases"**

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## **Background**

These comments have been drawn up on the basis of the Green Paper on promoting healthy diets and physical activity having been sent to the most relevant authorities and organisations in Sweden. After an initial summary of the Swedish standpoints, the individual points are set out in the same order as in the Green Paper.

## **Summary and general points**

Sweden welcomes the Commission's initiative in its Green Paper to move forward on issues where there is added value at EU level. In the fields concerned, the EU can play a major role in helping to tackle overweight and obesity. We agree that the work at EU level should be based on work being done at international level in the WHO and other organisations, as well as at national level.

In order to achieve the greatest impact, it is essential that further work on the Green Paper should deal only with areas of activity and proposals which create added value for initiatives at EU level. In other areas, the greatest impact is achieved through work at national level.

The issue is a wide-ranging one and it is important that all relevant policy areas are involved and coordinated. Work on the Green Paper should tie in with other ongoing initiatives at EU level, e.g. the intended action plan for sustainable consumption and production patterns. The new health programme (2007-2013) may also create added value as regards collaboration

between the Member States through the exchange of information and experience in the field concerned.

EU policy should focus solely on fields in which there is a clear added value to be gained from collaboration. Obvious areas are agriculture, transport, research and consumer policy, given that decisions at EU level in these areas have a very direct bearing on diet and physical activity.

Many measures connected with healthy eating habits and effective communication on public health issues are at national level, and such issues should therefore not be priority areas for Community policies.

Up to now, there has not been any clear European dimension in the work to prevent overweight and obesity at EU level. It is important to have a clear structure setting out what the EU can do and what it will not do, what the Member States can do, what is expected of each party involved, and how the EU and the Member States can best complement each other.

It is a good idea to draw up national action plans in line with the WHO's global strategy on eating habits, physical activity and health, to carry out measures in different sectors of society, and to coordinate and evaluate the results.

Sweden would emphasise the importance of a holistic approach and integrated strategy in work to promote healthy diet and physical activity. The increase in problems of overweight and obesity is an intersectoral problem. Action should be taken in good time and be specifically aimed at the upcoming generation.

Sweden considers that socio-economic factors are of crucial importance. There is a need to focus on measures aimed at risk groups. It should be borne in mind that, first and foremost, information currently reaches those who are more educated, since a greater proportion of them are already making healthy choices. It is thus important that a supportive, health-promoting environment be created at all levels of society, and that information be tailored to the target groups.

Strategies which stress the importance of promoting healthy diet and physical exercise should include a "life-cycle component" and also encompass all age-groups, with a particular focus on children and young people in view of the worrying increase in obesity in this age-group.

One aspect which is missing from the Green Paper is the importance of public procurement. The high volume of tenders is such that stipulated requirements can get producers to assume more social responsibility with a view to encouraging better eating habits. However, the anticipated benefits should be weighed against the risk that more detailed control will lead to prices becoming less important in public procurement procedures, and thus to higher costs for consumers. This may ultimately work against a shift to a healthier diet.

## **Urgent need for change, and challenges in the fields of action set out in the Green Paper**

### **Health across EU policies**

The aim of an EU strategy should be to complement the measures which can be taken at national level, or where an EU-level initiative should reinforce national measures, as provided for in Articles 152 and 153 of the Treaty of Amsterdam.

## **Public Health Action Programme**

Information on obesity (BMI) is already included in European Community health indicators and therefore will very probably be reported on by all Member States. Data concerning geographical and socio-economic differences as regards the incidence of obesity must be provided by individual Member States where the registration information is kept.

## **European Food Safety Authority (EFSA)**

We agree that the EFSA has an important role to play in providing scientific advice on nutrition. However, advice concerning particular foods should be handled at national level while taking account of cultural aspects of meals and appropriate forms of communication, and thus should not be covered by the Green Paper.

## **Consumer information, advertising and marketing**

It is particularly important to protect children and young people against misleading marketing information and advertising. Most advertising targeted at children is for high-energy foods with little nutritional value. It has been shown that advertising clearly has an effect on children's eating habits. This being the case, the possibility of introducing rules on the marketing of high-calorie foods with little nutritional value which is aimed at children and young people should be considered if the business sector's measures to tackle this problem prove ineffective. In this connection, rules designed to protect children and young people against advertising of high-energy foods with little nutritional value might be considered in connection with the revision of the TWF Directive.

It should be made easy for consumers to choose healthy food in shops, restaurants and canteens. Nutrition labelling should obviously be scientifically based, but the information should also be presented in such a way that it is easy for consumers to assimilate it and not be misled. We therefore welcome the Commission's initiative to review the rules on nutrition labelling.

There are considerable difficulties involved in self-regulation, arising from the fact that the business sector would have to refrain from what is currently a very profitable exercise, such as conspicuous marketing exposure for goods which are to a large extent purchased on impulse. The Commission sets out the advantages of voluntary agreements and self-regulation, but also enquires about points which are adequately covered. Generally speaking, the business sector's own measures may be an important adjunct to legislation. Public/private-sector partnerships may be of interest in generating added value and should be encouraged.

## **Consumer education**

Consumer education should be handled at local and national level, where schools are a very important forum. It therefore should not be dealt with in the Green Paper.

## **Focus on children and young people**

We agree that there is an especially urgent need to focus on children and young people, given the worrying increase in obesity within this age-group. Current data from various sources indicate that the number of overweight young people has increased. Eating habits and the taking of physical exercise become ingrained at an early age, and there is a significant risk that children and young people who are overweight/obese will remain so into adulthood. Research should focus on certain stages in life which are more crucial in shaping and determining behaviour and dietary habits, such as pre-birth, infancy and pre-school age. Decisions and initiatives within the schools sector are taken at Member-State level or lower, and should therefore not be covered by the Green Paper.

See also the above comments, in the section on consumer information, advertising and marketing, concerning marketing activities aimed at children and young people.

### **Food availability, physical activity and health education in the workplace**

The authorities must take action to achieve a balance whereby growth, employment, safety, a healthy environment and good health are on an equal footing. The workplace can be an important setting within which to promote health, good eating habits and physical activity. Lifestyle issues may be major factors in an employer's health strategy. Good health not only reduces human suffering, but also has a favourable effect on the labour supply and the economy.

It is important to create workplaces which are attractive, make employees take pleasure in their work, and offer jobs which are tenable up to retirement age. There is a link between working conditions, poor health and absence owing to sickness. The key players here are the labour-market partners, and this issue should not be covered by the Green Paper.

### **Building overweight and obesity prevention and treatment into health services**

The traditional care- and treatment-based approach should be linked up with the health-promoting and preventive approach to a greater extent than is currently the case. Both approaches would benefit from being more clearly integrated into healthcare policy and into practical measures within this field. The healthcare costs argument may benefit healthcare provision through a long-term focus on preventive work relating to dietary habits and physical activity. This area is a matter for the national authorities and should not be covered by the Green Paper.

### **Addressing the obesogenic environment**

This issue is of crucial importance for the entire Green Paper. Activities which encourage physical exercise make for better health and, in the long term, a lower cost to society as a whole. Eating habits should also be dealt with under this heading.

An important factor in a person's eating habits is availability, which is in turn highly dependent on agricultural policy, marketing and prices.

Among other things, the EU's transport policy, regional development policy, etc. should be analysed in relation to the possible promotion of physical activity. All policy areas with a bearing on physical exercise should be thoroughly examined. Determining environmental factors need to be identified and indicators developed which decision-makers can use as references.

The prerequisites for retaining freedom of choice and the ability to determine one's own eating habits and physical activity are, among other things, dependent on access to food shops, the nearness of safe green areas, premises for particular activities, and safe cycling and walking paths.

### **Socio-economic inequalities**

Social groups which are most neglected from the health viewpoint should be given particular attention. Sweden considers that socio-economic factors are of crucial importance. There needs to be a focus on measures targeted at vulnerable groups. It should be borne in mind that, first and foremost, information currently reaches those who are more educated, since a greater proportion of them are already making healthy choices. It is thus important that a supportive, health-promoting environment be created at all levels of society, and that information be tailored to the target groups.

## **Fostering an integrated and comprehensive approach towards the promotion of healthy diets and physical activity**

The establishment of an integrated and comprehensive strategy for promoting healthy eating habits and physical activity is crucial, and should be a key paragraph of the entire Green Paper. Activities at national and EU level should complement each other.

## **Recommendations for nutrient intakes and for the development of food-based dietary guidelines**

In view of cultural differences between the Member States concerning food, food-based dietary advice should be provided at national level. The cultural aspects of food choice and meals should be taken into consideration. This area should not be covered by the Green Paper.

## **Cooperation beyond the European Union**

The EU's common agricultural policy (CAP) regulates production and thus the price of fruit and vegetables. The price of fruit and vegetables is supported by means of, among other things, a repurchase mechanism and tariffs on products from third countries. Sweden considers that the forthcoming reform of the EU's market organisation for fruit and vegetables in 2007 will mean that market forces are allowed to work, thus leading to lower consumer prices. Countries outside the EU should gain better access to the market.

## **Other issues**

Only EU-level issues should be covered by the Green Paper, since these are precisely the ones where the Member States cannot act independently, such as agricultural policy.

Older people are a vulnerable group which it is important to reach in order to encourage healthy eating and physical activity. The Green Paper should therefore be supplemented by a focus on older people in order to take particular account of their needs. It should be borne in mind that older people do not have the same access to information on the Internet as young and middle-aged people.