



DA(06)58L1/RF/mb

M. Robert MADELIN
Director General
European Commission
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Brussels, 31 March 2006

Re: COPA-COGECA contribution to the Commission Green Paper "Promoting healthy diets and physical activity: a European dimension for the prevention of overweight, obesity and chronic diseases" (COM(2005)637final)

Dear M. Madelin,

On 8 December 2005, the Commission adopted a Green Paper on the promotion of healthy diets and physical activity to begin an extensive public consultation on how to reduce obesity levels and the prevalence of associated chronic diseases in the EU.

The Commission's Green Paper aims to stimulate discussion about effective initiatives to promote healthy diets and physical activities so best practice can be replicated across Europe.

The European umbrella organization for farmers and their cooperatives, COPA and COGECA welcome this initiative and are willing to bring a concrete contribution to this debate, which is of main important to society and to European agriculture.

Notwithstanding the policy statement adopted by COPA and COGECA as their commitment for 2006 and beyond to the European Platform for action Diet, Physical activity and Health launched by Commissioner Kyprianou on 15 March 2005, COPA and COGECA would like to react to the current Commission Green paper.

GENERAL REACTION

Overall, COPA and COGECA support a common European initiative to prevent overweight, obesity and chronic diseases if based on updated and well-documented knowledge on the role of food in relation to prevention and treatment of overweight and common diseases.

COPA and COGECA find it crucial that the Green Paper focuses on healthy lifestyles, including a healthy and balanced diet - not by banning specific products - as well as physical activities, not exclusively approach obesity.

SPECIFIC COMMENTS

1. Health across EU policies (Ad IV.3.)

COPA and COGECA believe that it is important to provide consumers with the options of making healthy choices regarding their diet. The options may include education and campaigns with a simple message, like “six a day keeps the doctor away”. To improve supply of and access to fruits and vegetables we suggest the launching of a discussion in the frame of the up-coming CMO reform of the Fruit and Vegetable sector.

We also suggest a number of research activities, which can contribute to improve common knowledge on the significance of a healthy diet including factors that influence our dietary habits. It is important to apply the available knowledge in order to promote healthy lifestyles.

Finally, we suggest the launching of a discussion with other socio-economic actors so as to find ideas on how to make primary products more available to the consumer (ie vending machine companies, retailers,).

2. The Public Health Action Programme (Ad IV.4.)

COPA and COGECA find it crucial for the future discussions on the Green Paper to determine which institution should be responsible for health and nutrition issues at EU level.

The key responsibility of the European Food Safety Authority (EFSA) is food and feed safety, although EFSA also performs certain nutrition related tasks, according to its mandate.

However, as EFSA is running on a low staff, with a low budget and a heavy work programme, it seems unlikely that EFSA, under the present condition, has sufficient resources to undertake a leading role within the field of nutrition and diet.

3. Areas for Action (Ad V.)

COPA and COGECA can see various problems related to obesity in the EU-15 as compared with the new EU Member States. A uniform nutrition labelling scheme seems an obvious possibility enabling consumers to choose between different kinds of food. COPA and COGECA consider the current framework for nutrition labelling on fat, sugar, protein and energy to be a relevant way of/basis for giving consumer the opportunity to choose a healthy diet.

Health claims can also be applied to unprocessed foods, e.g.: “This fish contains Omega 3 fat acid” or: “This meat contains xx mg of iron.” We do not believe that the most important food categories should be singled out as a healthy diet is composed of different kinds of food.

In any case health claims have to be approach in such a manner that they are based on sound science and that they do not single out one foodstuff versus another.

In our opinion, education and information of consumers could be set up in a public-private partnership. COPA and COGECA also suggest that implementation and monitoring of the efficiency of “self regulation” should be undertaken by a European agency.

4. Consumer education (Ad V.2.)

Education and information are key factors if consumers shall be able to make informed choices. Both the public and the private sector should disseminate relevant information that is simple and clear and the messages must be coordinated and coherent. It is also essential that young consumers get access to relevant information and that they understand it.

COPA and COGECA encourage the idea of establishing partnerships and see this idea as fundamental for developing the consumer's understanding and concept of a healthy diet.

The basic messages on nutrition and physical activities must be simple and action-oriented and should be in the form of dietary advice describing a complete diet including drinks. Consumers should also be aware that the quality of a food product is essentially based on the quality of the raw material.

5. A focus on children and young people (Ad V.3.)

COPA and COGECA recommend that primary schools set up truck shops where children can buy healthy food and learn about health and nutrition. The children could be introduced to ordering and preparation of food, nutrition contents and food safety in connection with the daily operation of the truck shop. The schools may also attach a dietitian or a health professional who could guide the children and their parents. Packaging of primary products could include special gadgets, figurines so as to catch the children's eye.

When looking at the undertaking of physical activities at schools in general these activities are linked to the physical environment. Also qualified and competent staff is needed to guide and inspire the schoolchildren. All schools should have a nutrition and health policy with guidelines on how often and how much the children should be out.

Recommendations on healthy diets should also include drinks and physical activities and the messages must be unambiguous and coherent. COPA and COGECA find it important that schools and industry cooperate and communicate on increasing schoolchildren's knowledge on food and its origins and on providing children with nutritional information.

6. Food availability, physical activity and health education at the work place (Ad V.4.)

The work place should foster environments which facilitate the practice of physical activities, e.g. provision of bike parking facilities, showers, work-out facilities, canteen meals and vending machines which could include a variety of foods (fresh, processed, canned...).

7. Addressing the obesogenic environment (Ad V.6.)

Official nutritional recommendations and dietary advice are important measures to promote healthy living. It is likewise essential that societal infrastructure fosters and encourages physical activities, e.g. cycling paths, playgrounds, access to open green spaces, forests, beaches, and the open land, etc.

8. Socio-economic inequalities (Ad V.7.)

COPA and COGECA believe that it is important to communicate knowledge and information on nutrition and health to parents and children and that communication should address various groups in society, taking into account their different cultural and socio-economic background.

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

Again, education and information are key factors in an integrated and comprehensive approach. COPA and COGECA support clear and unambiguous information from the EU which can be used in all 25 EU member states. It should also be considered how to take preventive measures, like physical activities, available to a large majority of people (public fitness centers?). What could also be achieved is better sharing of best practice, success stories, and experiences so Member States, local and regional authorities, can learn from each other and be inspired by each other, rather than reinventing the wheel.

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

COPA and COGECA believe that an overall body or agency should be responsible for providing recommendations on nutrient intake. These recommendations should allow for social and cultural differences and include various regional and national dietary habits.

Obviously there are other reasons for overweight and obesity, such as personal income, attitudes, supply of food, school, friends, family etc. As one cannot, and should not, control consumer habits we believe that the only way is to ensure that consumers get adequate and unbiased information on nutritional issues so that they can make informed choices. Common dietary advice must be disseminated by means of both public and private initiatives.

11. Cooperation beyond the European Union (Ad V.10.)

COPA and COGECA are of the opinion that opinion Codex Alimentarius should not be directly involved in the discussion of nutrition, including recommendations for nutrient intake as the agenda for Codex Alimentarius seems to be more complex.

COPA and COGECA support the WHO strategy but believe that the EU can make a useful contribution to exchange of experience if all expertise and technical know-how are collected and disseminated at EU-level. General dietary advice will be needed, but also regional advice that take cultural factors and dietary habits into account.

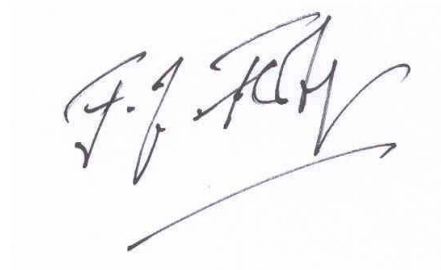
CONCLUSION

COPA and COGECA support the intentions of the Green Paper of promoting healthy lifestyles, including prevention of obesity and overweight and believe that the EU has a crucial role to play in terms of legislation but also in the communication of nutrition messages to consumers.

COPA and COGECA suggest that a thorough discussion takes place on which agency or body at EU-level would be most qualified to assume the task of disseminating information and knowledge. One option could be to upgrade EFSA so that it can deal with dietary and nutritional issues. Another option could be to establish a new institution with a targeted mandate.

COPA and COGECA thank you in advance for considering the above reflections and proposals and look forward to have further opportunities to actively contribute to the ongoing debate concerning the prevention of obesity in the EU.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'F. J. Feiter', with a long horizontal flourish extending to the right.

Franz Josef FEITER
Secretary General

This paper represents the views of its author on the subject. These views have not been adopted or in any way approved by the Commission and should not be relied upon as a statement of the Commission's or Health & Consumer Protection DG's views. The European Commission does not guarantee the accuracy of the data included in this paper, nor does it accept responsibility for any use made thereof.