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## EU Commission Green Paper on promoting healthy diets and physical activity

The Danish Brewers' Association has received the EU Green Paper from the Danish Veterinary and Food Administration for comments, which we hereby forward

The Danish Brewers' Association finds it positive that the Green Paper provides an opportunity for a hearing process with the purpose of disclosing how a healthy diet and physical activity can be promoted by an effort on EU level.

The Danish Brewers' Association generally finds that it is necessary to stress the importance of physical activity in the future effort against overweight and obesity, as the tendency so far has been to focus solely on dietary problems. This is very important as long as the dietary research shows that the level of overweight and obesity is increasing in spite of a lower intake of energy.

## Consumer information, advertising and marketing

In the Green Paper the Commission describes how consumer policy is aimed at enabling the consumer to make qualified choices regarding their diet. The Danish Brewers' Association agrees with this and finds that it stands to reason to implement initiatives to improve the consumers' general knowledge of food and diet, as many consumers are unaware of the composition of food, the production methods and dietary recommendations, etc. However, this kind of consumer information requires more than labelling of food and should also take place through more suitable information channels which can improve the consumers' ability to understand information posted in lists of ingredients, nutrition information etc.

The Danish Brewers' Association is positive towards using nutrition declarations on pre-packed food. However, a number of circumstances should be considered in connection with the elaboration of a new set of rules on nutrition labelling in connection with the EU modernisation of the labelling regulation. For instance more flexible rules regarding demands for which selected nutritional substances should be declared on various types of food should be considered.

The Green Paper refers to the fact that in trade and industry self regulation could be the preferred method in relation to marketing of food, as self regulation, as opposed to law, gives a long line of advantages with regard to speed and flexibility. The Danish Brewers' Association agrees that self regulation is preferred as opposed to law as:

- o Self regulation is more flexible and can therefore follow a changing market
- By self regulation the industry is included and obligated to play an active part and to observe the regulations and agreements made.

In spring 2005, by request to the industry from the Danish Minister of Consumer Affairs and EU Commissioner Markos Kyprianou to make rules for self regulation on marketing, the members of The Danish Brewers' Association agreed to a set of principles for labelling and marketing of soft drinks.



The most important elements in these principles are:

- o no marketing directly towards young children
- o no commercials in connection with children's programmes on television
- o no active marketing at elementary schools
- o marketing must not be inconsistent with a healthy and varied diet and an active lifestyle
- o voluntary nutritional labelling of soft drinks

Furthermore, we can add that the industry for a number of years have had very good experience with self regulation in connection with the marketing of alcoholic beverages in the so-called "The Committee on the Danish Common Standards for Commercial Communications" of which The Danish Brewers 'Association is a member. The Committee ensures that the rules are being observed, and recently the system was praised in several reports, for instance in "Marketing and price information" (2005) by the Danish Ministry of Consumer Affairs. On page 203 of the report it says "So far the experience with this type of self-regulation has been excellent".

The Danish Brewers' Association will be at your disposal for further information on the policy of the industry regarding labelling and marketing of beer, soft drinks and mineral water.

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