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ENSA Response to the Green Paper on Healthy Diets and Physical Activity



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INTRODUCTION

ENSA – The European Natural Soyfoods Manufacturer Association – welcomes the European Commission's initiative to further bring obesity to the forefront of the European agenda with the publication of the Green Paper on "Promoting healthy diets and physical activity: a European dimension for the prevention of overweight, obesity and chronic diseases". ENSA sees the possibility of commenting on the Green Paper as an excellent opportunity for the industry and other key stakeholder to bring their contribution to the work of the Commission, notably building on the activities of the European Platform for Action on Diet, Physical Activity and Health.

ABOUT ENSA

Established in January 2003, ENSA represents the interests of Natural Soyfoods Manufacturers in Europe. The term "natural" refers to the production process used by ENSA Members to produce non-dairy food (organic and conventional, such as drinks, desserts, spreads, cream, yoghurts and meat alternatives,...) using whole soybeans - as opposed to soyfoods produced from isolates-, without any genetically modified material. ENSA is an association of internationally operating companies, ranging from multinationals to small family owned businesses. The founding principle of ENSA combines a belief in natural soy products and the use of sound science. ENSA seeks to raise the awareness of EU citizens and promote the consumption of natural soy products which fit perfectly in a healthy balanced lifestyle. For example, in Belgium soy drinks are part of the healthy food pyramid and in the Netherlands soy products appear on the "schijf van vijf".

A more consistent approach from the different EU Member States on healthy food guidelines should be put in place. In this context, given recent scientific data, The EU and Member States should include soyfood as part of a healthy nutrition.

The ENSA Membership is open to manufacturers located in Europe, producing natural soyfoods based on whole soybeans without the use of GM material or GM beans. The European soy products' market has experienced an unprecedented growth over the last decade. Indeed, 2004 saw an impressive growth of 10 per cent for soy-based drinks and desserts, as well as meat-free and tofu products. The ENSA membership reflects this trend with the organisation constantly growing in membership.

OVERARCHING PRINCIPLES

Obesity is clearly on the rise across the whole of Europe and particularly severe among children and adolescents. Obesity is a risk factor for many serious illnesses including cardiovascular diseases diabetes etc. European regulators have decided to tackle the issue head on, before obesity reaches more dramatic levels. However, there is only so much that the EU and Member States can achieve on their own, and in order to ensure that EU citizens are adequately informed and protected it is key that multi-stakeholder initiatives are launched and that industry plays its rightful role.



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ENSA members have informed consumers of the benefits of healthy alternatives for a number of years. The very ideology of the association's members is to ensure that healthy vegetable products are available and used as viable alternatives to animal products which are still used on a daily basis. Soy products have a beneficial fatty acid composition (low in saturated fatty acids) and contain no cholesterol. Natural soyfood products do, thus, already play a key role in ensuring healthy lifestyles and curbing obesity and wish to continue to do so in the future.

In addition, it is key that the EU starts to disseminate a positive message on obesity and health instead of suggesting healthy foods as a "solution" to a pandemic or a disease called "obesity". It is important that healthy products are marketed in an intelligent manner focusing on lifestyle and "fun" rather than only their nutritional benefits.

Clearly, there is no "one size fits all" solution to obesity. ENSA believes that multistakeholder initiatives on various levels of society could largely contribute to reducing and preventing obesity in the EU. In this context, education must play a key role. Healthy dietary alternatives should be promoted by European and national campaigns to ensure that consumers are aware of the large amount of possibilities existing to guarantee a varied and balanced diet.

These education campaigns should be directed towards obvious targets such as children, who are largely influenced by faulty health claims, as well as parents (who must accept their key role in the obesity rise), educators, regulators, teachers and health professionals.

However, a balanced diet is not sufficient by itself. It imperatively needs to be combined with a fair amount of physical activity. Again all stakeholders have to play their rightful role in the promotion of sports activities and exercise not only in schools but also within the families. Playing with your children, walking the dog or bicycling to work is part of this daily exercise. So citizens should be stimulated to introduce these activities in their daily routines. Adequate town planning could also be an area for improvement, "green corridors" should be promoted.

The EU can and should play a key role in the promotion of balanced diets and physical activity. Various actions can be undertaken at pan-European level:

- EU sponsored campaigns on healthy alternatives to less healthy products (the soy industry would gladly contribute to these);
- EU educational campaigns aimed at children, parents, teachers and health professionals (e.g. educate on fat, saturated and unsaturated fat);
- The continuous support of the Obesity Platform to ensure that commitments taken in this forum translate into concrete actions (ENSA has submitted a dossier to become a member of the platform);
- Incentives for industry self-regulation aiming to curb obesity;
- Further research into the concrete causes of obesity, this research should however be turned to defining the solutions not the problem; and
- The continuous support of exchange of best practices for physical activity and healthy nutrition in Member States (the Obesity Platform is only one of the solutions here).



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ENSA'S RESPONSE TO THE GREEN PAPER

IV.3. Health across EU policies

Intelligent and well-thought European campaigns on tobacco and road safety have proven beneficial over the last decade at EU level. It is key that the EU supports and finances (even partially) pan-European campaigns highlighting the multitude of alternatives to less healthy products. Obviously this is not a simple task, given that in some EU regions the food culture is deeply rooted. Furthermore, for the European youth the impact of snack or out of home food advertisement and lifestyle is clear. It is, therefore, key for the EU to base itself on national measures/campaigns which have proven their worth and adapt these to pan-European activities.

ENSA believes in a varied and balanced diet composed of food stemming from a range of origins and geographies. The European citizens are often fortunate enough to have access to foods from global markets with fruits and vegetables available nearly all year around. Some foods once considered as exotic are now part of the daily diets of EU citizens. Here, it is key that the Commission allows new players on the market to develop and grow. The current protective measures existing for some products (such as olive oil) is not viable in the long run and does not enable healthier alternatives to compete on a level playing field in the food sector.

IV.4. The Public Health Action Programme

Further research on obesity is needed. However, this research must now attempt to provide concrete solutions rather than defining the problem. Additional research funding in the area of nutrition and physical activity is thus important. The EU should define gaps and help develop recommendations.

Impact assessments are needed to ensure that campaigns and actions successful at Member State level are transposed to the EU level. Here the use of internationally developed criteria for the assessment of obesity is imperative to guarantee the collect of adequate comparative data. The activities undertaken by the Childhood Obesity Working Group of the International Task Force (IOTF) could serve as an example of best practices.

V.1. Consumer information, advertising and marketing

Nutrition information is key to ensure that consumers are able to make healthy choices. It is thus imperative that this information is clear, understandable and accurate. This is particularly interesting in the context of the current legislative process on health and nutrition claims and the review of nutritional labelling. A nutrition claim such as cholesterol free, widely used across Europe, is being unjustifiably criticised by regulators since for example soy it is naturally free of cholesterol. Clearly, the industry and national authorities have invested time and effort in educating consumers on the dangers linked to cholesterol. Should this type of information suddenly be banned, European citizens will be faced with a void and be highly confused by finding products, which in the past were clearly marked as healthy, no longer bearing these key claims.



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This example serves only to highlight the importance of consistency across the EU in terms of nutrition information. Products which are clearly healthy should be able to bear scientifically substantiated claims for the benefit of consumers. ENSA members have a high level of expertise in educating consumers and health professionals through campaigns, newsletters, consumer brochures, etc.

As regards health and nutrition claims, the EU has rightfully decided to harmonise European legislation. However, in the wider context of the obesity debate self-regulation still has an important role to play. As the Commission highlights in the Green Paper, self-regulation has key advantages in terms of speed and flexibility (adaptability to consumers' needs). However, any self-regulation, to be efficient, needs to involve a complete sector, which sometimes can be fairly difficult. The Commission has thus still a role to play by showing its support for self-regulation initiatives and thus confirming their value.

V.2. Consumer education

When consumers are faced with dietary choices they rely on a number of influencers: their family, the media, advertisement, the packaging, their personal experiences as well as the on-line world and health professionals. When addressing consumer education the Commission should foremost identify these key means of influencing European citizens.

It is clear that again "one size fits all" education will not achieve concrete results. In order to be efficient the education will have to be adapted to all the stakeholders.

ENSA believes focus should be increasingly on:

- Specific training for school teachers on healthy diet;
- Large focus on children and youth;
- Include healthy diet into the scholar curriculum;
- Further education of health professionals;
- Further education for adults; and
- Focus on naturally healthy foods (e.g. soyfoods) instead of highly processed "functional foods".

Finally, media have a key role to play not to discourage people from integrating healthy foods in their diet by conveying negative messages. On the contrary, media should stimulate people of any age to actively prevent obesity.

V.6. Addressing the obesogenic environment

Public authorities should be more active and dynamic in tackling the obesogenic environment. The current situation in some of the Member States is critical: physical education is less and less important at schools, at times children do not have access at all to sporting facilities.



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Therefore, ENSA calls on the following steps to be taken in order to ensure that physical activity is “built into” daily routines of children and adults:

- Physical education should be further promoted to children and teenagers in their daily life (physical exercises once a day as a minimum);
- Access to sporting facilities should be equally guaranteed for all children (public authorities should always keep a part of their budget for constant improving of playgrounds, cycle lanes and sporting places to render them attractive for children); and
- Exchange of best practices between the public authorities of the 25 Member States to make physical education more attractive for children than other less physical activities such as computers games and movies.

Again, it is very much the case for the EU to be able to clearly explain that an adequate balance should be struck between in-door and out-door activities.

ENSA believes that the question how to tackle the obesogenic environment cannot be addressed only by public authorities. The issue must be treated in more general context where a multiplicity of actors is involved: national public authorities, European institutions and international organisations.

V.7. Socio-economic inequalities

Unfortunately, diets based on “less healthy foods” are often known to be cheaper. On the contrary, balanced diets composed healthy food remains expensive and therefore not accessible for certain socio-economic groups. In some cases, such as soy products, healthy products are not able to be marketed cheaper as a specific VAT rate is applied to them, whilst other alternatives in the dairy market containing a high level of animal fat benefit from low VAT rates. Furthermore, soy is not subsidised in EU in contrast to others (such as meat, olive,..) in frame of common agricultural policy. The EU should consider reviewing its legislation in these areas to incorporate the integration of healthy products as part of a varied diet. Indeed, it is clear that obesity is a cross sectoral issue and should be addressed not only from a SANCO perspective but also in terms competition and enterprise legislations. Finally, some products might be more expensive because of the fact that they are organic.

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

There exist various ways of promoting of healthy diets and physical activity across Europe, there is no “one size fits all” solution. ENSA believes that the actions undertaken at EU level and involving all interested stakeholders should be continued. For instance, ENSA strongly supports establishment of EU Obesity Platform which is the best example of an integrated and comprehensive action against obesity. The members of the platform by exchanging their best practices in tackling obesity, contribute to establishment of a harmonised but diverse approach to this global problem.



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Any action should be driven at both levels, the Community and national one and involve a multitude of stakeholders. Firm commitments are required for practical implementations

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

Even though, each of the 25 Member States has its own health culture, similar steps could be undertaken in all Member States in order to increase adequate communication of dietary guidelines to citizens. ENSA believes that the gaps existing between the actual consumption and the recommended nutrient targets could be surmounted by appropriate information. The issue should be tackled as soon as possible at EU level in order to create a harmonised system taking into account consumers needs. ENSA recommends following action for better information of consumers of dietary guidelines:

- nutrition information in schools together with education of parents who are also somewhat responsible for the lifestyle of their children;
- posters in waiting rooms of health professionals;
- An increase in on-line information to consumers; and
- Appropriate info media TV, radio and newspapers, magazines etc.

V.10. Cooperation beyond the European Union

The EU should definitely engage with international stakeholders as the obesity issue is not limited to our frontiers. The Commission should continue to cooperate with the WHO, the FAO and the Codex Alimentarius Commission.

This should be done from an EU perspective as well as from an industry perspective. Indeed, various food multinationals that operate in the EU are global actors. These companies can thus provide relevant and useful information to the European Commission. This will enable a global exchange of best practices.

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.