

Comments in response to the Green Paper of the European Commission on “Promoting healthy diets and physical activity: Towards a European strategy for the prevention of overweight, obesity and chronic diseases”

The European Responsible Nutrition Alliance welcomes the green paper of the European Commission on “Promoting healthy diets and physical activity: Towards a European strategy for the prevention of overweight, obesity and chronic diseases” as a valuable initiative in the discussion on improving healthy dietary habits and addressing the concomitant rise in overweight, obesity and chronic diseases.

ERNA wishes to take the opportunity of the public consultation to highlight a number of reflections that are relevant in this discussion and that in our view have not received the necessary attention in the green paper:

- Awareness of undernutrition and selective nutritional deficiencies in certain regions and population groups.
- The importance of optimal nutrition.

- What are the concrete contributions which Community policies, if any, should make towards the promotion of healthy diets and physical activity, and towards creating environments which make healthy choices easy choices?

The European Community should be instrumental in raising awareness that undernutrition and selective nutritional deficiencies in certain regions and population groups are an important aspect to be considered in the actions undertaken to address the problem of obesity in the context of promoting healthy diets and physical activity.

The green paper highlights the rise in incidence of overweight and obesity and concomitant chronic diseases including cardio-vascular disease, hypertension, cancer, etc. These public health problems are serious but are only one aspect of the consequences of inadequate and unhealthy eating behaviour and lack of physical activity. Many data indicate that undernutrition is another aspect that may be considered as almost equally important and needs urgent attention¹. In Belgium, it is estimated that 30-40% of the hospital population is undernourished. It is acknowledged that this is not only the result of the underlying pathology and medical management practices but a situation that exists in the general population. It leads to higher incidence of complications, decreased resistance to infections, worsening of the physical and mental condition of the patients, longer hospital stay and higher mortality². This situation exists throughout Europe³. It may be even worse in

¹ Council of Europe (2004). Food and Nutritional Care in Hospitals: How to prevent undernutrition. Report and recommendations of the Committee of Experts on Nutrition, Food Safety and Consumer Protection. Council of Europe Publishing. ISBN 92-871-5053-2

² National Food and Health Plan - Belgium.

important subsections of the population, such as elderly people living alone or in institutions, because of their social isolation, immobility, inaccessibility of food supply, financial constraints, reduced appetite, dental problems, concomitant diseases, etc.

These aspects are already addressed by individual Member States in their public health measures and/or food and health programmes (e.g. Belgium², France⁴, etc).

Furthermore, a number of selective nutritional deficiencies can be observed, especially in children, adolescents and elderly (e.g. calcium, vitamin D, iron, etc)⁵. Finally data on urinary iodine excretion illustrates that in a substantial part of the European Union iodine status is still insufficient and calls for action⁶.

In the light of these findings, we believe it appropriate that the discussion on measures to tackle overweight and obesity is broadened to address nutritional imbalances in general, covering both over and undernutrition. Recommendations to the population to reduce food intake cannot be seen isolated and should also include advise on how to increase the nutritional quality of the diet. The use of food supplements is a useful and valuable tool to increase the nutritional quality of the diet, especially in cases where people reduce intake because of health considerations.

- How can the gaps between proposed nutrient targets and actual consumption patterns be overcome?

The European Community should adopt a policy to enable consumers to choose whatever sources of nutrients and other beneficial food components, not only to cover the gap between proposed nutrient targets and actual consumption, but also to allow consumers to choose an intake level to reach optimal nutrition.

Many substances that are important for the normal functioning of the body are present in our foods, especially in foods of vegetable origin, including fruits, vegetables, herbs and spices. Although not absolutely required to survive, they are increasingly recognised as valuable for the optimal functioning of the body. The same counts for the presence of vitamins and minerals in amounts that exceed those generally recognised as adequate from a nutritional point of view. Some have been specifically consumed for the purpose of improving health such as oranges, rosehip, garlic and many herbal infusions and food supplements. Unbalanced diets, both high and low in calories, are usually also poor in many of those food components.

³ Stratton RJ et al. Disease-related malnutrition : an evidence based approach to treatment. CABI publishing UK. ISBN 0 85199 648 5

⁴ Programme National Nutrition-Santé - France

⁵ Andersen R et al. Teenage girls and elderly women living in northern Europe have low winter vitamin D status. Eur J Clin Nutr 2005; 59: 533–541.

⁶ ICCIDD. Iodine deficiency in Europe. National reports on iodine status in West-Central European countries. First symposium of ICCIDD West-Central Europe. Goteborg, Sweden, September 7, 2002. J Endocrinol Invest. 2003;26(9 Suppl):1-62.



European Responsible Nutrition Alliance

International Organisation

Rue de l'Association 50, 1000 Brussels, Belgium

Phone: +32 2 2091150, Fax: +32 2 2233064

E-mail: secretariat@erna.be

Website: www.erna.org

Healthy eating advice promotes foremost the ingestion of adequate quantities of fruit and vegetables. Dietary surveys indicate that intake of these foods in the population does by far not reach the recommended five pieces a day. Lack of awareness of the importance of fruit and vegetables, but also reduced availability in our convenience society and financial considerations make an increase in the consumption of these foods not an easy target. While ideally a balanced and healthy diet contains sufficient vitamins, minerals and other beneficial substances, such an ideal diet is far from reality for most people in the EU member states. The typical European diet is therefore generally considered low in a number of essential nutrients, including calcium, vitamin D, iron, but also in those substances that are considered to be beneficial, such as dietary fibre, anti-oxidants, etc. The European Food Supplements Directive has created a harmonised framework for offering safe and beneficial products to the European Consumer. Food supplements containing vitamins and minerals but also a vast range of other substances, including anti-oxidants and various botanicals and botanical ingredients are recognised and available to the population. The upcoming health claims regulation will offer a framework to validate the scientific basis for the use of these substances and will help create confidence of the consumer towards food supplements as a useful tool to increase their nutritional status and general health. We advocate that such policy is continued by the European Community and trust that further harmonisation of the food supplements legislation will lead to a wider range of safe and trustful food supplements available to all European citizens.

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.