



## European Snacks Association

**ESA Response to the European Commission's Green Paper:**

***"Promoting healthy diets and physical activity: A European dimension for the prevention of overweight, obesity and chronic diseases"***

**15<sup>th</sup> March 2006**

The European Snacks Association (ESA) represents the interests of the savoury snacks sector. With over 200 members, made up of manufacturers, suppliers and national associations, ESA is the voice of the savoury snacks industry in Europe. Our industry directly employs around 35,000 people in Europe to support a stable market, which is currently worth about €8 billion at gross turnover level

European Snacks Association  
Rue Defacqz 1, B-1000 Brussels, +32 2 538 2039, [lisa@esa.org.uk](mailto:lisa@esa.org.uk)  
6 Catherine Street, London WC2B 5JJ, +44 20 7420 7220  
[www.esa.org.uk](http://www.esa.org.uk)

## **Introduction**

On 8 December 2005 the European Commission has published a Green Paper focusing ways to prevent obesity and other related chronic diseases: "*Promoting healthy diets and physical activity: a European dimension for the prevention of overweight, obesity and chronic diseases*". It launches a consultation process, requesting input from interested parties by 15 March 2006. ESA is pleased to have the opportunity to communicate the views of the European Savoury Snacks industry to the questions raised in the Green Paper.

Being a member of CIAA ESA had input into the CIAA's response to the Green Paper which ESA fully supports. The present ESA comments are a complementary response to the CIAA input, expressing additional or sector views on the questions raised by the Commission.

## **General Comments**

ESA recognises that the increasing prevalence of obesity is a challenge for society and is committed to working responsibly and constructively with other stakeholders to help find solutions to the complex issues surrounding obesity.

### **ESA welcomes that the Green Paper**

- Emphasizes the multicausal nature of obesity and other diseases linked to unhealthy lifestyles and that it stresses the need to consider both dietary habits and physical activity when seeking to find ways to limit negative health impacts of unhealthy lifestyles
- Calls for a multi-stakeholder response. In this context, ESA also supports the Commission's initiative on the European Platform for action on diet, physical activity and health as a forum for stakeholders to share best practice and develop action plans to tackle the increase of health problems

### **ESA believes that any Community strategy/measures and the way in which decisions are taken need to**

- Be transparent, consistent, evidence-based and non-discriminatory
- Be proportionate and give an additional value over and above measure developed at member state level
- Take into account dietary diversity and cultural identity in the Member States and regions of Europe
- Be based on a strong scientific basis
- Undergo a thorough impact evaluation regarding their ability to meet the goals set out for them and to avoid negative side-effects
- Respect the personal freedom for choice and the responsibility of the individual for consequences from such choices as they are an integral part of citizens' rights/responsibilities in a democratic system.

### **ESA also invites the Commission to consider that**

- Policies targeting the needs of specific disadvantaged groups may have to be radically different from those addressing all consumers. Target groups of policy options therefore need to be properly defined and the effect of policy options evaluated in order to avoid negative side effects on the whole population. Diet products for example are adequate for overweight/obese people but not for those with normal or specifically high needs in terms of calories.

- Many initiatives have already been launched by industry and other stakeholders, i.e. in the frame of the EU Platform for Action, which are likely to have an impact on lifestyle changes
- Shifts of consumer behaviour are already taking place. An analysis of such changes could help to better understand ways to further improve lifestyles. Our industry notes an increasing consumer acceptance of better-for-you alternatives. **We believe that changes of product choice by consumers take place *within* categories.** For example, a consumer may chose a fat reduced version of crisps or roasted nuts instead of original crisps
- Nutrition is an important part of a healthy lifestyle – but other factors such as physical activity are equally important. Responses to the problem should therefore come from all involves stakeholders, and in particular from **authorities with regard to education and the promotion of healthy eating and physical activity**, in particular targeting children (i.e. at school).

#### **ESA believes that there is a need for**

- More research on how consumers can better understand nutrition information
- More research in order to better understand
  - all obesity related factors and their “part/weight” in impact
  - determinants affecting food choice and how consumers can be motivated to make changes in their lifestyles
  - what the obstacles are for obese people to loose weight and to adopt a healthier lifestyle
  - factors leading to insufficient physical exercise
- and make use of it in their daily life/food choices
- Better comparability of (obesity) data
- More treatment centres for already overweight/obese people

## Comments on Specific Sections and Paragraphs

### IV. STRUCTURES AND TOOLS AT COMMUNITY LEVEL

#### IV.3. Health across EU policies

***“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?”***

All policy actions should be set against clearly thought out objectives with prior consideration given to ways of measuring and evaluating their success.

Any community action that is taken should be based on credible scientific advice and be proportionate to the issue it is intended to address.

Promotion of healthy diets and physical activity should be carried out using positive messaging and without demonising any particular food.

Improved public health education on nutrition and healthy lifestyles (including in particular the important role of physical activity) as well as on how to understand product information is needed in order to solve current health problems. In this context, the promotion and support of public education, healthy lifestyles and physical activity programmes in the Community should be encouraged.

***“Which kind of Community or national measures could contribute towards improving the attractiveness, availability, accessibility and affordability of fruits and vegetables?”***

There is no evidence to suggest that there is a lack of supply of fruit and vegetables or indeed that this is why consumption is lower than desired.

The benefits of eating fruit and vegetables, either as foods in their own right or as part of composite foods/drinks, needs to be promoted at national and local levels. Education from school through to the workplace and into the home should encourage demand for these foods by consumers.

We would also ask that a more pragmatic approach be taken with respect to nuts – a food that is considered naturally healthy because of their high levels of antioxidants and fibre, yet health educators currently recommend limiting intake due to their energy density. We would draw the Commission’s attention to the WHO/FAO joint report Diet, Nutrition and Prevention of Chronic Disease (Geneva, 2003) which recommended that these nuts (including peanuts) should be made widely available to consumers.

***“On which areas related to nutrition and physical activity, the development of tools for the analysis of related disorders, and consumer behaviour is more research needed?”***

It is essential that reliable information on current nutrient intakes across the population are gathered at regular intervals. Access to robust, comprehensive data on the diets of the EU population along with some measure of the health status of the population is required. Only in this way can the inadequacies of current diets be identified and appropriate steps devised to address these. Furthermore the effectiveness of such programmes can then be measured.

Much still needs to be learned about the dietary habits of overweight/obese people. What behaviours and attitudes do these individuals have to food choices and consumption and how they can be helped to change these for the better?

#### **IV.4. The Public Health Action Programme**

***“How can the programme contribute to raising the awareness of the potential which healthy dietary habits and physical activity have for reducing the risk for chronic diseases amongst decision makers, health professionals, the media and the public at large?”***

By concentrating on providing clear and consistent messages in a way which does not demonise individual foods but which promotes positive, evidence based advice.

There is much mis-information out there about the causes of obesity and overweight which needs to be addressed using the latest (and sound) science and advice about the problem and how it can be tackled individual level right up to the whole community.

***“Which are the most appropriate dissemination channels for the existing evidence?”***

A multi-stakeholder approach must involve all available dissemination channels.

Industry’s role within the diet and health debate is to provide foods which make it possible for consumers to build healthy diets meeting their particular lifestyles. As well as providing very wide choice, industry also provides nutrition information and healthy lifestyle messaging on its packs in order to help consumers make an informed choice.

Industry has invested significant amounts of money and resource into new technology and ingredients in order to improve the nutrition status of their products and develop new ones meeting consumers changing needs. They must remain free to promote and advertise these ‘new’ products in a responsible way.

#### **V. AREAS FOR ACTION**

ESA has been actively involved with all relevant stakeholders in order to try and help find solutions to the obesity problem. As part of the food industry we realise that we have a role to play in promoting healthy lifestyles. We were one of the first sectors to officially submit our commitments for 2006 to the EU Platform for Action on Diet, Physical Activity and Health.

We share the Commission’s views that specific areas of action should be addressed, in particular ‘education’, ‘physical activity’, ‘consumer information’, the ‘obesogenic environment’ and the ‘socio-economic inequalities’.

We need to understand the behaviours associated with the incidence of overweight/obesity and look at how we can change these taking into account the reality that changing people’s behaviours is both a difficult and slow process. Trying to find “overnight solutions” to the problem are unlikely to be successful and a pragmatic step-wise approach is more likely to succeed.

## V.1. Consumer information, advertising and marketing

V.1.1. ESA fully shares the Commission's view that "**information about the nutritional content of products is an important element**" empowering consumers to make informed choices regarding their diets. And that "**clear and consistent nutrition information about foods can, along with relevant consumer education, act as the foundation of informed dietary choice.**"

Nutrition information is one of many approaches that can help consumers select foods that are appropriate to their needs and lifestyle preferences. Nutrition education is essential to help consumers and, in particular children, to understand the scientifically proven messages accompanying the nutrition facts provided. Any initiative that is focused on better nutrition information must also be accompanied by equally strong initiatives on consumer education. This needs to begin at an early age where the basics about food and drink are learnt along with the relationship with nutrition and health. Whilst consumer education is primarily the responsibility of public health authorities, the savoury snacks industry as part of the food industry is prepared to contribute to this effort, where appropriate and feasible.

The savoury snack industry already provides voluntary nutrition labelling on about 90% of packs sold in Europe and has committed to extend its nutrition labelling further. In the ESA commitments to the EU Platform for Action on Diet, Physical Activity and Health ESA recommends its members to:

- provide full nutrition information on pack even where this is not legally necessary
- indicate on packs including more than a single portion, either the number of portions, or that they are intended for sharing or use at several eating occasions
- further invest in the area of consumer information.

In its Green Paper, the Commission mentions its proposal for a regulation to harmonise the rules on nutrition and health claims. In this context the Green Paper states: "**This includes the principle of setting nutrient profiles, in order to prevent foods high in certain nutrients (such as salt, fat, saturated fat and sugars) making claims about their potential nutrition or health benefits.**"

ESA welcomes the Commission's initiative [COM(2003)424] to harmonise the rules on nutrition and health claims. But we do not support the concept of prohibiting the use of claims on certain foods on the basis of their "nutritional profile" as currently foreseen in article 4 of the proposal, as this contrary to the basic principle in nutrition that there are no "good" and "bad" foods but rather "good" and "bad" diets. Banning certain foods from making claims would lead to the unjustified discrimination between food categories. We are convinced that it would be more appropriate to seek practical ways to ensure that nutrition and health claims are made in the context of accepted nutrition and health principles and good dietary practice than pursuing the nutrient profiling approach proposed in article 4.

Limiting the scope of products that can carry nutrition and health claims would severely **slow down industry investment in new product development and improvement** and thus be counterproductive with regard to an improvement of European diets. We suggest that an incentive to further improve the nutritional value of manufactured products should be provided that allows all products to bear nutrition and health claims as long as they are scientifically substantiated.

**V.1.2.** ESA welcomes the Commissions' recognition that self-regulation in the area of marketing/advertising is likely to be the most effective and fastest way forward.

ESA members advertise for competitive reasons, for example in order to communicate on new product developments and improvements. Indeed, the savoury snack industry already complies with all relevant EU and national legislation or codes of conduct in this respect. In addition, our members have agreed on "ESA guidelines on commercial communication" in December 2005, committing to i.e.

- not directly advertise to children under 6 years of age
- not undertake any direct commercial activities in primary schools.

We provide consumers a wide range of product choice and continue to develop lower fat, lower saturate, and lower salt versions of our products in line with expert nutrition advice. To raise consumer awareness of these new products and encourage trial we need to be able to communicate with our consumers. Any restrictions on the advertising and promotion of our products will present a serious obstacle to changing consumers over to these better-for-you versions. It would also stop further investment in this area to the detriment of all.

According to the UK government's own data, our products contribute very little to overall average dietary intake in the UK, amounting to less than 2% salt, and less than 3%fat/saturates/calories.<sup>1</sup> The UK accounts for about 40% of the total EU consumption of savoury snacks and therefore the contribution to dietary intakes in other EU Member States is even lower still. Considering these facts, and that savoury snacks are consumed in small quantities, any attempts to restrict advertising or promotion of these products would be disproportionate to any risk that this might cause.

In general, an analysis of the source of the nutrients such as salt, fat, saturated fat and sugar, which, consumed in an excessive way can have adverse effects on health, would be required in order to better understand in which area behaviour changes as well as product reformulation would be most efficient to contribute to an improvement of the health of the European population.

***"When providing nutrition information to the consumer, what are the major nutrients, and categories of products, to be considered and why?"***

Many manufactured products, and including about 90% of savoury snack packs in the market of the European Union bear nutrition information that enable consumers to readily identify the nutrients and the amounts in which they are included in the product both per 100g and per portion.

If the main concern is about energy intake then the most important information to provide on-pack is calories per portion/pack. They are also, according to recent consumer surveys<sup>2</sup>, the nutrient best understood by a majority of consumers.

Peanuts and other nuts have usually been grouped for dietary guideline purposes with animal protein sources. This is unhelpful to the consumer. Peanuts and nuts deserve to be seen positively rather than as an "alternative" to meat or suitable only for those who adopt elements of a vegetarian diet.

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1 National Diet and Nutrition Survey: Adults aged 19-64, Vol. 2, 2003 (p.71/19) and Vol. 3, 2003 (p.100).

2 I.e. EUFIC consumer survey - official publication expected at [www.eufic.org](http://www.eufic.org) in April 2006.

Most consumers know which products should make up the main part of their diet and understand that foods such as confectionery, soft drinks, and savoury snacks for example should be consumed in moderation. Where they find difficulty is in assessing composite foods like ready meals, pizzas, pies, etc., which are eaten in relatively large portion sizes. This is where provision of nutrition information and portion sizes would be most helpful.

In addition it should be stated that labelling cannot be used as a substitute for consumer education about how to eat a balanced diet.

***“Which kind of education is required in order to enable consumers to fully understand the information given on food labels, and who should provide it?”***

Education on how to understand and use nutrition information to construct a balanced diet should come from all sectors. However whilst industry has a role to play in providing product choice and appropriate and clear labelling, national governments have the ultimate responsibility for education.

Education about food and drink should start from an early age and be linked to advice about nutrition and healthy diets and lifestyles.

Most ESA members already provide nutrition information on their packs and support this with more detailed information via Carelines, and websites, etc...

***“Are voluntary codes (“self-regulation”) an adequate tool for limiting the advertising and marketing of energy-dense and micronutrient-poor foods? What would be the alternatives to be considered if self-regulation fails?”***

It is a great pity that this question is based on the notion that the advertising and marketing of energy-dense and micronutrient-poor foods should be *limited*. This also implies that less advertising for these foods would help in preventing obesity. As it happens, there is no sound evidence to back this. Furthermore, what is considered to be a micronutrient poor food?<sup>3</sup> Many energy-dense foods, i.e. nuts, are also *rich* in (micro) nutrients<sup>4</sup>.

We believe that there should be no discrimination of any product or food category with regard to their possibility to market and advertise, as long as the advertising/marketing is done in a responsible and non-misleading way.

We do not consider “self-regulation” as a tool to “limit” advertising/ marketing, but to ensure this is done in a responsible manner, also taking into account more vulnerable groups such as children.

However, ESA recognises that advertising food and beverages to children must be careful not to exploit the relative inexperience of children, rather it must be conducted with special sensitivity. Advertising to children, in particular, is regulated by national

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<sup>3</sup> A 25g portion of standard crisps for example may provide around 138 kcal, but they also provide almost 2,7g of fibre (15% of recommended intake), 2,7g of polyunsaturated fat, 265mg of potassium (around 8% of recommended intake), 8,7mg of vitamin C (20% of adult RNI), 1,5mg vitamin E (around 30% of adult RNI).

<sup>4</sup> Nuts are high in fibre, magnesium, iron, folate, vitamin B1 and B6 and vitamin E (see Alper CM, Mattes RD. Peanut consumption improves indices of cardiovascular risk in healthy adults. *Journal of the American College of Nutrition* 2003; 22(2):133-141.



and European legislation. In addition it is also governed by extensive industry wide self-regulatory systems.

ESA members advertise for competitive reasons and in order to communicate on new product developments/improvements, including healthier options e.g. lower in fat or salt.

In December 2005 ESA adopted a set of guidelines on commercial communication, sales in schools and vending, designed to ensure that commercial communication on savoury snacks is conveyed responsibly, by for example not undermining the role of parents and other appropriate adult role models in providing valuable dietary guidance. And also not to undermine the promotion of healthy, balanced diets and active lifestyles.

Many feel that advertising and in particular that of food/drink considered high in fat, salt or sugar, has a negative impact on children's diets, and would like such advertising banned.

In a recent review of all relevant evidence by the independent UK advertising regulator (OFCOM) they came to the conclusion that advertising has a modest impact on children's food consumption. However, the significance of this is small when compared to other factors potentially linked to childhood obesity such as exercise, trends in family eating habits inside and outside the home, parents' demographics, school policy, public understanding of nutrition, food labelling and other forms of food promotion.<sup>5</sup> A total ban on advertising to children would therefore be both ineffective and disproportionate to the risk posed.<sup>6</sup>

The examples of Sweden and Quebec (Canada) support that there is no evidence that banning advertising to children would have an impact on overweight. Both countries do have a ban on all advertising to children; however, there is still a 1 in 5 prevalence of overweight/obesity in Sweden and 1 in 4 prevalence of overweight in Canada.<sup>7</sup>

Studies also show that children at the age of 4 years can already distinguish commercials from other programmes, and that by the age of 8 most children know that commercials intend to sell products.<sup>8</sup>

Nevertheless, parents have a key role in helping children understand what commercial messages are and in learning how to deal with them and what to spend their money on. Advertising controls cannot replace parental controls, in particular as a lot of children also watch programmes that are not intended for children.

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5 "Child obesity - food advertising in context", published on 22.07.2003 by OFCOM (regulator for UK communications industries, with responsibilities across television, radio, telecommunications and wireless communications services); Young (1999) The role of advertising in the life of a child: a review of some empirical findings. International Journal of advertising no 9, 1-12.

6 "Child obesity - food advertising in context", report published by OFCOM on 22 July 2003.

7 Canada figures taken from a study of children between the ages of seven and 13, using data from the 1981 Canada Fitness Survey and the 1996 National Longitudinal Survey of Children and Youth. The results were published on 12<sup>th</sup> May 2004 in the journal Obesity Research. Sweden figures taken from Clinical Outcome Indicators Report, produced by the UK National Health Service Quality Improvement Scotland, November 2003.

8 Advertising education forum (2000) Parental perceptions of key influences in children's lives. Research summary May 2000.

Whilst there is no obvious benefit in banning advertising to children there may well be a dis-benefit. Commercial TV programming is funded by advertising and a withdrawal of that revenue would lead to a reduction in the quality of programming and, in turn, in its value as entertainer and educator.

***“How can effectiveness in self-regulation be defined, implemented and monitored? Which measures should be taken towards ensuring that the credulity and lacking media literacy of vulnerable consumers are not exploited by advertising, marketing and promotion activities?”***

Self-regulation is a misunderstood term, as in reality it does not mean that an industry is left to regulate itself. Advertising self-regulation does not replace or substitute statutory regulation, but complements an existing framework of law to provide robust and proportionate consumer protection: while regulation sets the broad framework, defining what is legal, truthful, not misleading etc, self-regulation sets down the more detailed rules. The symbiosis between framework legislation and self-regulation in the field of advertising is also being increasingly recognised at EU level.

Industry is currently investing much effort and resources into strengthening self-regulatory systems across Europe with regard in particular to increasing the level of stakeholder involvement and providing a legal backstop where necessary. In addition, industry is actively monitoring compliance with its codes of conduct, with a view to achieving the highest possible level.

Advertising, particularly advertising to children, is already strictly regulated, at EU level and at national level. The European Commission's own research on the effectiveness of the EU broadcasting Directive has concluded that the provisions on the protection of minors are effective in ensuring a high level of protection.

## **V.2. Consumer education**

***“How can consumers best be enabled to make informed choices and take effective action?”***

Individuals should be encouraged to take responsibility for their own health, but to do so they need to have appropriate skills and ready access to inform and wide range of food and health choices.

Nutrition Education plays an important role in helping European consumers to meet their physical activity needs and dietary requirements in a safe and responsible manner. It is also important to learn more about the consumers motivations and barriers to adopting healthy behaviours in order to encourage the consumer to make use of his/her knowledge about healthy lifestyles in their daily lives.

Member States should be encouraged to pursue and strengthen nutrition education programmes in order to help consumers make informed choices regarding healthy diets and lifestyles.

ESA believes that guidelines, backed by a strategy for implementation including effective health promotion and education programmes for healthy eating and healthy lifestyles could make a significant contribution towards promoting better health for all citizens of Europe.

In addition we would like to highlight the following issues:

- Nutrition information should be directed at the final consumer, not at nutrition professionals. It should reflect consumer needs, be familiar to them and be sufficiently clear and simple to avoid information overload, and most important to be useable in daily life.
- Conduct community programmes for the promotion of healthy diets, healthy lifestyles and physical activity.
- The full spectrum of communication channels should be considered when evaluating how best to provide consumers with information about diet, nutrition and health: for example on-pack labelling, in-store posters and scanners, the Internet, consumer carelines.
- Nutrition education in schools could help to make children learn about healthy lifestyles from an early age on

***“What contributions can public-private partnerships make toward consumer education?”***

ESA values collaboration with public authorities to establish partnerships for the formulation of consensual solutions to diet- and physical activity-related issues.

Of particular importance are multi-stakeholders initiatives that bring together public authorities, industry, consumer organizations and other relevant stakeholders in a single forum. Recent examples include: The German Platform on Nutrition and Physical Activity, The Spanish Strategy for nutrition, Physical Activity and Prevention of Obesity (NAOS), The Dutch Obesity Covenant, the Irish Nutrition and Health Foundation. In this context, ESA has also welcomed and supported the creation of the EU Platform for action on diet, physical activity and health.

The food and drink industry, both at national federation and company level, has developed and supported a wide range of health and nutrition education and promotion programmes.

CIAA (of which ESA is a member) has, as part of its commitments to the EU Platform for Action on Diet, Physical Activity and Health, proposed to work on several joint commitments to promote healthy eating and physical activity (i.e. the support of the EPODE and the Shape-Up programmes, a healthy lifestyles public information and advertising campaign). As part of CIAA ESA is willing to contribute to the know-how and expertises of its members in a collaborative effort to improve further the health and well being of Europe’s consumers.

***“In the field of nutrition and physical activity, which should be the key messages to give to consumers, how and by whom should they be delivered?”***

Messages on food and health need to be positive, easily understood and consistent with messages from other responsible stakeholders. Again, we would like to stress the importance of education which should mainly come from authorities and other trusted source such as health councils.

ESA currently promotes (i.e. via our fact sheet brochures a number of “tips for healthy eating and living”, based on recommendations used in various European countries:

- eat regularly
- base your meals on starchy foods
- eat at least 5 fruit and vegetables every day

- drink plenty of fluids, especially water
- be active in your daily life
- take pleasure in active leisure
- balance your food intake and your activity to maintain a healthy body weight
- balance your salt intake
- check out labels to better understand what you eat

ESA believes that there is a need for scientific studies to improve the understanding of what kind of educational messages promoting balanced diets and healthy lifestyles might be most effective in influencing consumer behaviour so as to maintain/restore a balanced diet and lifestyle, as well as research on how best they can be communicated.

Under the framework of the EU Platform for Action on Diet, Physical Activity and Health, the food and drink industry has committed to promote consumer research to improve the understanding of what kind of educational messages will best promote balanced diets and healthy lifestyles.

### **V.3. A focus on children and young people**

***“What are good examples for improving the nutritional value of school meals, and how can parents be informed on how to improve the nutritional value of home meals?”***

Government's should be the main driver for this and try to instil good nutritional habits into children from an early age. They have the responsibility for and control of school meal nutrition standards and other school food. We would support the idea of taking a 'whole school approach' to this issue taking into consideration not just the main meal of the day, i.e. school lunch, but also consumption via vending machines, tuck-shops, and breakfast clubs etc.. However changing children's eating behaviours is only likely to occur slowly and the food on offer must continue to be attractive to and satisfy their needs. A pragmatic approach which recognises the need to engage the children and encourage them to try alternatives to their current choices needs to be taken. Industry has a significant role to play in this respect in terms of providing better-for-you alternatives which will help to move their choices – both in and out of school – at a pace which is consistent with their changing needs.

Further suggestions:

- Introducing children to fruit and vegetables as part of their education about nutrition and health is a necessary action for schools to carry out. Provision of free fruit or vegetables during the school day helps to encourage trial and acceptance of these as an essential part of everyday eating.
- Children need to be taught the basics about food and drink and how these are used to build a balanced diet. Tasting and cooking at school is one way to get children engaged in this and to encourage them to try new and different foods.
- Nutrition education (or really life style education) should be part of the 'growing up' scheme. Programmes should be devised to follow children's progress for the first three or four years with regular medical check/ups, and advice about diet and health.
- Parents also need to learn about how best to feed their children and to encourage balanced eating habits, as they are probably the key influencers of children's diets and developing habits.

***“What is good practice for the provision of physical activity in schools on a regular basis?”***

- Ensuring that facilities exist, or are re-established
- Ensuring that the built environment is conducive to activity.
- Making physical activity a fun time, less emphasis on professional or competitive sports and more on moving for pleasure and health.
- Part of the curriculum: daily physical activity for example a minimum of one hour during school times.

***“What is good practice for fostering healthy dietary choices at schools, especially with regard to the excessive intake of energy-dense snacks and sugar-sweetened soft drinks?”***

There is no evidence to suggest that overweight/obese children over-consume savoury snacks compared to children who are of normal weight. Indeed the evidence that does exist suggests just the opposite.<sup>9</sup>

Children who do consume certain products excessively are unlikely to be dissuaded by banning or restriction of these products within the school environment since this cannot be totally controlled or extended beyond the school gate.

ESA believes that taking broader measures at school level, such as nutritional education and promoting physical activity, as well as encouraging balanced eating habits is more likely to deliver improvements.

Schools should adopt a consistent approach including aiming for the widest possible choice in choosing the products on offer, regardless of the channel through which these are sold: canteen, vending machines or other means.

Nutrition education at school should NOT exclude any nutrients foods from being considered/eaten. What is important is to make children understand that food with a high energy, fat and/or sugar/salt content should be eaten in moderation. In this context it is also important that

- School meals are planned carefully with concerns about nutrition being high priority
- A variety of foods including healthy choices are on offer along with the provision of free fruit and vegetables

***“How can the media, health services, civil society and relevant sectors of industry support health education efforts made by schools? What role can public-private partnerships play in this regard?”***

By applying a cohesive, evidence based strategy, led by government and involving all relevant stakeholders.

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<sup>9</sup> “Snack food intake does not predict weight change among children and adolescents”, International Journal of Obesity (2004)28, 1210-1216.  
Also: UK National diet and nutrition survey, young people aged 4-18, Vo. 1, 2002.

#### **V.4. Food availability, physical activity and health education at the work place**

***“How can employers succeed in offering healthy choices at workplace canteens, and in improving the nutritional value of canteen meals?”***

The workplace is an important setting for the development of initiatives to promote healthy lifestyles and balanced nutrition. The effect of these initiatives is multiplied when transmitted through families and friends.

Many companies choose to take a proactive role in encouraging their employees to stay fit and eat well, providing them with exercise opportunities and information on maintaining a healthy lifestyle.

***“What measures would encourage and facilitate the practice of physical activity during breaks, and on the way to and from work?”***

Some suggestions (as already practices by some companies) include:

- The presence of a fitness facilities, including showers, or alternatively, subsidising external fitness subscriptions.
- Employees could be invited to take part in an overall check-up of blood pressure, cholesterol, glucose, smoking habits, BMI etc. And be coached in measures to be taken to improve their health situation if necessary.
- Challenges could be offered. The building wants to lose 'X kilograms by Christmas' or competitively - ' Department Y will achieve their desired weight before Department Z.
- Seminars on nutrition physical activity and healthy lifestyle could be offered.
- Prompting messages strategically placed for example a 'take the stairs' message place by the elevators, or a 'don't forget the fruit' message at the canteen could be helpful. Better lighting in the stairwells, greater distances from the employee car park, a periodic ban on email, would all make small contributions to physical activity.

#### **V.6. Addressing the obesogenic environment**

***“In which ways can public policies contribute to ensure that physical activity be ‘built into’ daily routines?”***

It is estimated that over the last decade the average intake of calories has fallen by over 20%. However, over the same period the level of physical activity amongst the population has fallen even more so that today, about 70% of the populations in westernised countries are insufficiently active for optimal health and energy balance.<sup>10</sup>

ESA fully supports appropriate efforts to facilitate greater levels of daily moderate physical activity where needed. The promotion of physical activity in daily life has to be encouraged and promoted at national, regional and local level. Programmes pursuing such as aim have to be supported by public policies, for example:

- Policies involving urban planning (availability of playgrounds and physical activity spaces) and transport.
- Traffic control for safe areas for children to walk or play.

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<sup>10</sup> Sports Council/Health Education Authority, 1992; US Department of Health and Human Services, 1996.

- Changes in school curricula that have eliminated physical education, etc.

***“Which measures are needed to foster the development of environments that are conducive to physical activity?”***

See comments above.

## **V.7. Socio-economic inequalities**

***“Which measures, and at what level, would promote healthy diets and physical activity towards population groups and households belonging to lower socio-economic categories, and enable these groups to adopt healthier lifestyles?”***

Measures to raise education knowledge and awareness about the detrimental effects of obesity and lack of physical activity along with appropriate, targeted and tangible initiatives are needed.

Creating a culture where exercise is desirable and healthy lifestyles are attractive will ultimately yield the biggest improvement.

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

***“In which way could social and cultural variations and different regional and national dietary habits be taken into account in food-based dietary guidelines a European level?”***

It is not appropriate to develop a set of food based ‘community’ dietary guidelines – these would need to be flexible enough to be adapted to the differing needs of local communities.

However it is possible to establish a simple scheme based on balancing diets and taking sufficient physical activity, such as the Food Pyramid. Such a framework would allow different foods from different cultures to be included within the various segments which make up the pyramid. The basis of a balanced diet would remain across all communities but the food which made up that diet would differ across different cultures.

***“How can the gaps between proposed nutrient targets and actual consumption patterns be overcome?”***

A change in the nutrient content of the diet cannot be made on the basis of scientific guidelines alone. Although it is clear that each country should develop scientific guidelines suitable for its population, it must also develop effective food-based dietary guidelines to achieve the goal of effectively solving health problems. This is best done by integrating health considerations and dietary goals when forming such scientific guidelines and by developing effective partnerships among the many sectors that influence food supply and food selection.

Guidelines need to promote a healthy balanced diet for all rather than the attainment of specific target goals by populations as a whole.

***“In which way could nutrient profile scoring systems such as developed recently in UK contribute to such developments?”***

ESA believes that the concept of universal nutrition profiling is fundamentally flawed. As an example, the UK scheme is scientifically unsound and does not help consumers to understand how to build a balanced diet.

It is difficult to see how such one-size-fits-all model can credibly address the nutritional needs the UK let alone such a diverse population as that of the EU.

Such a scheme makes no consideration of individual nutrient requirements and does not take into account either the portion size eaten or it's frequency of consumption

ESA believes that any attempt to assess the nutritional worth of a food using a nutrition profile scoring system, conflicts with the basic nutritional principle that it is the combination of foods eaten and the amounts consumed that is important, not the nutrient content of those individual foods.

## **V.11. Other issues**

***“Are there issues not addressed in the present Green paper which need consideration when looking at the European dimension of the promotion of diet, physical activity and health?”***

- The influence of television, computers, video games etc; holistic attitude to communities and families.
- The influence of alcohol on diets/obesity
- Increased attention should be given to the whole obesogenic environment, and in consequence i.e. to the creation of safe cycling paths in major cities, enjoyable walking routes, safe street crossings for children on the way to school,...

***“Which of the issues addressed in the present Green paper should receive first priority, and which may be considered less pressing?”***

ESA strongly believes that further research on the factors determining obesity, on the determinants of food choices, on the sources of certain nutrients, on the consumer understanding of nutrition information and ways to best communicate, on specific disadvantaged groups and their obstacles in changing lifestyles, etc. is urgently needed in order to get a thorough understanding of the problem. This will help to determine actions in the fields that show to be most influential/promising.

At the same time, consumer education on healthy lifestyles (including nutrition and physical activity) should be extended – including in particular children as knowledge about healthy lifestyles is the pre-condition for change – which we can not expect to happen in the very short term.



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