



*The voice of the Irish
food and drink industry*

Confederation House
84/86 Lr Baggot St
Dublin 2

Phone + 353 1 6051500

**FDII comments on the Commission's Green Paper:
Promoting healthy diets and physical activity: towards a
European strategy for the prevention of overweight, obesity
and chronic disease's**

COMMENTS ON SPECIFIC SECTIONS AND PARAGRAPHS

(Please note that FDII comments are in blue colour).

IV.3. Health across EU policies

Questions on which the Commission invites contributions include:

- 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?

Nutritional needs differ depending on individual parameters. These needs, both physiological and psychological, are influenced by a variety of factors: genetic characteristics, age, gender, race, size, activity level, sensory preferences etc. And these will change over time. These needs can be met by an infinite number of different food combinations. Furthermore, dietary traditions vary between Member States. Any European action on establishment of dietary advice must not undermine these traditions.

If Community policies are to benefit the whole of the EU Community, and take account of the principles outlined above, any recommendations developed at Community level will necessarily have to be very broad, with guidelines designed to promote a healthy balanced diet and lifestyle rather than the attainment of specific quantitative targets.

FDII strongly believes that improved public health education on nutrition and healthy lifestyles is urgently needed in order to solve current health problems. This would enable consumers to take responsibility for making healthy choices. It will also be the basis for understanding and making use of product information provided by the industry. Education should also include information on the role of physical activity in the context of a healthy lifestyle. In this context, the promotion and support of public education, healthy lifestyles and physical activity programmes in the Community should be encouraged.

In addition, there is a need for greater understanding of all the obesity-related factors, the determinants that affect food choice, factors leading to insufficient physical activity in every-day life, and what are the effective solutions.

The availability of playgrounds and physical activity spaces, traffic control for safe areas for children to walk or play, changes in school curricula which have eliminated physical education or nutrition education, etc... are some of the interventions to be considered at Community level.

- Which kind of Community or national measures could contribute

towards improving the attractiveness, availability, accessibility and affordability of fruits and vegetables?

FDII believes that there is a scientific consensus to support the statement to encourage consumption of fruit and vegetables. Resources to promote the benefits of eating fruits and vegetables should be supported at community level. In Ireland, fruit and vegetables are not widely available in some food areas where food availability is low. Many are located in suburban/ urban areas and there are limited shopping facilities nearby. FDII believes that public policies in the area of travel infrastructure and proper town planning could significantly contribute to improving the availability and affordability of fruits and vegetables. Furthermore, the food and drink industry aims to satisfy consumer needs and expectations by supplying a wide variety of safe, tasty and nutritious foods at affordable prices.

- 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?

FDII considers obesity as a complex multifactorial condition, and therefore research into all contributing factors is required e.g. genetics, behaviour, psychological issues. Evaluation of interventions already in place is essential in order to gather evidence of the effectiveness of such measures.

Additionally, recent Irish research (Nutrition and Health Foundation, 2005) shows that the majority of consumers are aware of steps required to achieve a healthy lifestyle, therefore, we believe overcoming the lack of motivation to follow such steps is a major challenge in combating overweight, obesity and related health concerns.

IV.4. The Public Health Action Programme

Questions on which the Commission invites contributions include:

- How can the availability and comparability of data on obesity be improved, in particular with a view to determining the precise geographical and socio-economic distribution of this condition?

FDII supports the activities taken under the Public Health Programme, and agrees that a comparable set of indicators for health status are required. The prevalence of obesity varies between population subgroups. Monitoring of food intake, physical activity and obesity rates among all EU citizens and appropriate data analysis, provides evidence-based information which can assist in the development and implementation of appropriate intervention in specific areas.

We strongly believe that public health interventions should be supported by evidence-based information, and should include an effective evaluation to determine the efficacy of such programmes.

- 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?

Research shows that health professionals and the media are major sources of health information for consumers (Nutrition and Health Foundation, 2005). Hence, it is essential that information provided by such sources is evidence-based and scientifically sound. FDII supports initiatives which contribute to the provision of scientifically-sound information via these channels.

Direct intervention among the public is a potential means for creating awareness of the benefits of healthy lifestyles. Implementation of wellbeing programmes in the workplace, schools etc. may be effective in improving lifestyles. Again evaluation of such initiatives is essential.

- Which are the most appropriate dissemination channels for the existing evidence?

Irish research shows that sources of information on healthy lifestyles include GPs, television, magazines, news papers, family/ friends, internet, sports trainer/ coach, diet books, weight watchers, dietician and school/ college (Nutrition and Health Foundation, 2005). It is important that scientific-based information is disseminated through these channels to assist the public in making informed healthy lifestyle choices.

IV.5. European Food Safety Authority (EFSA)

- The European Food Safety Authority can make an important contribution to underpinning proposed actions on nutrition (e.g. on recommended nutrient intakes, or on communication strategies aimed at health professionals, food chain operators and the general public on the impact of nutrition on health) with scientific advice and assistance (*on the role of EFSA in the establishment of food-based dietary guidelines, cf section V.9 below*).

FDII recognises and welcomes the role given to the European Food Safety Authority in providing scientific advice and assistance. We believe that scientific evidence and knowledge are key to any proposals to address initiatives to promote healthy lifestyles.

Questions on which the Commission invites contributions include:

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

FDII recognises that nutrition information can be a useful tool for consumers to make an informed choice. Since 1990 legislation in the European Union has covered this area (Nutrition Labelling Directive - 90/496/EC). At present, nutrition labelling is voluntary unless a claim is being made. In the case of nutrition claims appearing on labelling, in presentation or in advertising, information becomes mandatory. The legislation also lays down the format and the nutrients that have to be declared.

Nutrition information should continue to be provided on voluntary basis, except when a claim is made. The list of nutrients should be limited to **energy, protein, carbohydrate and fat**, plus any **nutrient for which a nutrition or health claim is made**.

There are no categories of products which are more or less deserving of focus for nutrition labelling. Labelling should continue to be on a voluntary basis unless a claim is being made and should apply to all pre-packed foods. Most of the pre-packed products manufactured in Ireland already contain nutrition information on pack.

It is important to note that extensive nutrition labelling has not been shown to be effective. The system with the longest history (more than 10 years) and the most extensive one is found in the US where a wide list of nutrients is mandated. In spite of this, obesity has steadily increased to reach among the highest levels in the world.

In addition it should be stated that labels cannot be used as a substitute for consumer education. Labels can only be used to highlight some aspects of nutritional properties in a brief manner (e.g. nutritional amount, short messages in form of claims). There is simply not enough space for longer explanations on nutritional quality that may also be difficult to define. Therefore consumer nutrition education needs to use other tools than labelling.

- 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 nutrition information should come from all sectors. The most effective route is to teach children the basics of nutrition and labelling through schools. It should be noted that recent Irish research (Nutrition and Health Foundation, 2005) shows that Irish consumers, of various socio economic backgrounds, are already reasonably well educated regarding food labels and have a broad understanding of the messages they convey. The food industry may also be in a position to help educate through the use of product websites, however on a population basis, information and education must be disseminated from an independent stakeholder.

- 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?

FDII would like to reiterate that there is no evidence that neither specific nutrient are the cause of weight gain nor than the intake of energy dense foods are the cause of obesity. Instead of narrowly addressing the obesity issues with nutrition-related measures and, in particular, measures related to specific nutrients and/or foods, the main focus should be put on nutrition education and physical activity. Advertising to children, in particular, is extensively regulated by national and European legislation. In addition to extensive regulation, advertising is also governed by extensive industry self-regulatory systems.

Advertising stimulates brand competition and awareness, and FDII and its members work to ensure that all advertising is conducted responsibly. Nevertheless, FDII recognises that advertising must be careful not to exploit the relative inexperience of children; rather it must be conducted with special sensitivity.

- 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, but that a group of industries exercises joint oversight. Advertising self-regulation does not replace statutory regulation, but complements an existing framework of law to provide robust and proportionate consumer protection.

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 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

Questions on which the Commission invites contributions include:

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

Promoting a healthy lifestyle is a complex challenge, and therefore relies on

contributions from numerous stakeholders. The Nutrition and Health Foundation (NHF) is an Irish platform, which bring scientists, industry members, health professionals and other relevant stakeholders together to address the health challenges in Ireland.

Since its launch in January 2005, the NHF has achieved severable tangible outputs. The first project completed was a consumer based research project investigating ‘Health and Lifestyle’ Behaviours. This provided evidence-based information which allowed the NHF to identify the areas that needed to be tackled in order to promote healthier lifestyles in Ireland. Subsequently, the NHF developed a Workplace Wellbeing Programme which aims to encourage good nutrition and promote physical activity in the workplace. The results of this research have enabled the NHF to draw up a clearly defined workplan.

Additionally, other member state platforms demonstrate that this approach is effective e.g. German Platform on Nutrition and Physical Activity, The Spanish Strategy for Nutrition, Physical Activity and Prevention of Obesity and the Dutch Obesity Covenant.

- 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?

There is a need for scientific input to establish clear consistent nutrition and physical activity messages to promote healthy balance lifestyles. Such messages should be easily understood by the public, so as they can make the appropriate lifestyle changes. The effectiveness of health promotion messages should be evaluated. GPs and the media are major sources of health information. This information must be evidence-based and scientifically sound.

V.5. **Building overweight and obesity prevention and treatment into health services**

Questions on which the Commission invites contributions include:

- Which measures, and at what level, are needed to ensure a stronger integration of interventions aiming at promoting healthy diets and physical activity into health services?

Socio-economic status influence dietary habits. Research into the understanding of healthy lifestyles and habitual habits among this population is required. Subsequently, using this information, appropriate education/ training aimed at improving nutrition and physical activity behaviours can be developed specifically for this population subgroup.

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

Questions on which the Commission invites contributions include:

- 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?

Socio-economic status influence dietary habits. Research into the understanding of healthy lifestyles and habitual habits among this population is required. Subsequently, using this information, appropriate education/ training aimed at improving nutrition and physical activity behaviours can be developed specifically for this population subgroup.

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

Questions on which the Commission invites contributions include:

- 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?

Dietary guidelines should take into account the cultural context of the population for which they are developed. Patterns of food consumption vary considerably from one country to another and a “one size fits all” approach is not feasible.

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.

- 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. For example the salt reduction strategies in foods ongoing in several European countries, while achieving the effect of reducing population salt intake, do not promote the need for a healthy balanced diet which should be the ultimate goal.

- How can dietary guidelines be communicated to consumers?

Labelling can be an effective way to help communicate dietary guidelines to consumers. Many food businesses have carried out research in this area. An increasing number of food manufacturers are placing Guideline Daily Amount information on pack, often in pictorial or symbol format which seems to be an effective way to communicate. Consumers find these are easily understandable. They also provide information to allow consumers to make informed choice as part of an overall diet rather than trying to discourage them from consuming individual foods.

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

FDII 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 as part of the diet as a whole and the amounts consumed that is important, not the nutrient content of those individual foods. The anomalies in the UK model have shown the extreme difficulties in achieving a system, especially one that is readily understandable by the consumer. There are simply too many exceptions to any rule relating to a scoring system.

It is completely unscientific to recommend any model to help people to choose a healthier diet and FDII strongly oppose any such system. FDII therefore feel that nutrient profile scoring systems can in no way contribute to such developments.

V.11. Other issues

Questions on which the Commission invites contributions include:

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

Education to-date has been effective in informing consumers on the basis of a healthy diet. Unfortunately, consumers are not following such advice, so the lack of motivation to pursue healthy lifestyles needs to be addressed.

Converting this education into motivating behavioural change appears to be the next logical step in achieving healthier diets and promoting physical activity.

Additionally, we recognise that the public feel that their exercise habits require more attention than dietary habits in order to achieve a healthy balance lifestyle. Therefore, perhaps an increased focus on physical activity will prove useful in promoting healthier lifestyles.

Food and Drink Industry Ireland (FDII) is the representative body for the Irish food and drink industry. The sector plays a vital role in the Irish economy, supporting 50,000 jobs directly, 60,000 jobs in distribution and the livelihoods of 120,000 farmers. The gross output of the Irish food and drink industry is valued at €17 billion, accounting for over 20% of manufacturing output and 9% of GDP.

FDII is a sector within the Irish Business and Employers Confederation



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