



“Promoting healthy diets and Physical activity: a European dimension for the prevention of overweight, obesity and chronic diseases”

GlaxoSmithKline Consumer Healthcare, Nutritional Healthcare Division, U.K. response to the Commission Green Paper (COM (2005) 637 final)

GlaxoSmithKline is one of the world's leading research-based pharmaceutical and health care companies. We develop and manufacture prescription medicines, vaccines, over-the-counter medicines and oral care and nutritional health care products under the brands Horlicks, Lucozade and Ribena. Our headquarters are in the UK and we employ people right across the EU.

GlaxoSmithKline has already contributed to the consultation responses submitted by the European Food Industry; therefore this response concentrates on those areas where we are able to provide additional, specific material to address the Commission's questions.

V.1 Consumer information, advertising and marketing

- *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?*

GlaxoSmithKline believes that voluntary codes of practice are an effective measure for addressing concerns about marketing of certain products, particularly to vulnerable population groups such as children. We are proud to have led the soft drinks industry by producing marketing to Children guidelines in 2004. These guidelines define a child as less than 13 years and set stringent standards for promotion of our products to children, including:

- not to make advertising that targets children
- guidelines on the use of sports stars and other celebrities
- a commitment not to place vending machines in primary schools
- to offer low calorie choices in vending machines and coolers
- to remove all branded vending machines from schools
- ensuring that all products display comprehensive nutrition information
- prohibition of promotional activity aimed at driving consumption in schools.

More recently GlaxoSmithKline has supported the development of a Marketing to Children code of practice by the European Soft Drinks Association UNESDA.

V.3 A focus on children and young people

- *What are 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?*

GlaxoSmithKline supports the drive to improve the nutritional value of school meals and has contributed to the current UK Government consultations on this issue. We believe that simple bans of so called “unhealthy” foods does not lead to teaching children to make informed choices or educating parents how to improve the nutritional value of home meals. GlaxoSmithKline believes specifying groups of foods or drinks are not appropriate. Rather we feel that offering appropriate, healthier alternatives, such as low calorie drinks, may help to educate children towards choosing a balanced diet. We also believe that it is important to educate children on diet and physical activity. In 2005 we launched in the UK “The Balance of Life” – a free teaching resource pack explaining the importance of exercise in balancing ‘energy in’ and ‘energy out’ in the human body.

For parents, we feel that clear, comprehensive food labelling is of value in enabling informed food choice and we are pleased that the Commission have published a discussion document on this area.

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

GlaxoSmithKline endorses the need to encourage both the participation and enjoyment of physical activity in and outside of schools. Over the past 2 years GlaxoSmithKline has developed a partnership with British Cycling to encourage physical activity among children and families. The Go-Ride cycling initiative was set up to teach children basic cycling skills and to enable children to cycle with more confidence. The scheme reached 35,000 children across the UK by the end of 2005 and we plan to continue this activity for 2006.

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

We believe that all foods and drinks can be enjoyed appropriately within a healthy, well balanced diet. However, GlaxoSmithKline believes that offering palatable lower calorie alternatives, such as reduced and low calorie, no-added-sugar drinks, is appropriate good practice and, for example, we ensure that in vending machines and coolers we always offer a low calorie product choice.

In addition to this, GlaxoSmithKline leads the field not only in funding and supporting research on diet and dental erosion, but in manufacturing the only soft drinks which have been scientifically proven to minimise the risks of both dental decay and dental erosion.

Whilst dentists and other health professionals agree that the best drinks for children's teeth are water and milk, most recognise the fact that children will not consume just these drinks, and that the provision of an appropriate alternative product is a practical way to have a significant impact on children's dental health.

In response to a call from the UK Government in the 1990's for the food industry to develop products which had minimal effect on tooth decay and erosion, GlaxoSmithKline developed Ribena ToothKind, which was launched in 1998 as a tooth friendly alternative to standard soft drinks. In 2005 the brand was relaunched as Ribena Really Light, to appeal to a broader audience.

Containing no added sugar (only sugar from the fruit juice at 0.5 to 0.8 g per 100ml) and with a carefully controlled level of acidity (both pH and titrateable acidity) Ribena Really Light uses patented technology to produce a unique soft drink. A raft of scientific studies has clearly demonstrated that Ribena Really Light is kind to teeth and poses minimal risk of both tooth decay and tooth erosion.

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

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

GlaxoSmithKline's Employee Health Management teams support the workforce in making physical activity a part of their everyday lives. Initiatives are focussed at site level and include:

- lunch time walking clubs
- support of cycling to work, through the provision of changing facilities and equipment vouchers for regular cyclists
- support for corporate, reduced costs membership rates at local leisure centres and gyms
- most recently in the UK a "site to site challenge", where staff have been challenged to increase their walking towards 10,000 steps each day, by completing a virtual walk between all UK GlaxoSmithKline sites over 12 weeks.

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

- *Which are the most important elements of an integrated and comprehensive approach towards the promotion of healthy diets and physical activity?*

GlaxoSmithKline believes that in order to promote physical activity and healthy diets, we need to better understand the barriers that stop adults and children achieving these. Since 2004, we have commissioned two in-depth research reports which have helped pinpoint the barriers to physical exercise for parents and children, and identified potential solutions to the activity conundrum, which have generated considerable Ministerial interest in the UK. The "Let's Get Physical" report found that to be effective, projects promoting behaviour change need to follow 5 key principles:

- Don't preach
- Meet people at their own starting point
- Make exercise a shared activity
- Hold conversations and use informal information networks
- Doing and seeing is more effective than being told

In July 2005, we held a free family cycling festival in Manchester to test the findings of the research. It attracted 2000 people and research following it showed nearly half of attendees had taken up cycling or were cycling more following it.

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