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Kraft is pleased to submit this paper to the European Commission in response to its request for comments on the Green Paper "Promoting Healthy Diets and Physical Activity: Towards a European dimension for the Prevention of Overweight, Obesity and Chronic Diseases."

## INTRODUCTION

As a food manufacturer that sells products in every Member State in the European Union and beyond, Kraft has a role to play in this important public policy debate. Kraft has supported initiatives to promote the health and wellbeing of our consumers for many years. As concerns about diet and health have grown, so too has Kraft's commitment to act. We have increasingly focused on providing the wide choice of products that our consumers want, as well as on providing the supporting information that consumers need to adopt healthier lifestyles.

Kraft's commitment to health and wellness was first publicly set out in the 2003 announcement of our Global Health and Wellness Programme. As part of the Programme, Kraft publicly announced our intention to:

- improve the nutritional profile of many of our products;
- adjust our marketing practices and policies;
- provide consumers with more information on healthy diet and lifestyle choices; and
- advocate for constructive public policy changes.

At the same time, Kraft established a Global Advisory Council made up of recognized experts to help guide our actions.

In 2005, Kraft further extended its commitment to Health and Wellness by developing "better-for-you" nutrition criteria for our portfolio of products with the exception of coffee (<http://kraftfoods.com/kf/HealthyLiving/sensiblesolutions>). Kraft has used those criteria within the EU to guide the way that we market and advertise our products. Kraft has shifted the mix of products that we advertise in television, radio and print media viewed primarily by children aged 6-11 to only those products that meet those "better-for-you" nutritional criteria. Kraft does not advertise any of its products in media primarily viewed by children under 6.

Kraft's Health and Wellness Policies are guided by the Kraft Healthy Living Principles. These principles express our basic belief about nutrition, physical activity and healthy lifestyles; guide the development, commercialisation and marketing of Kraft products and services; and underlie our communications to consumers, customers, employees, suppliers and policymakers. They state:

- A nutritionally balanced diet along with physical activity is critical to maintaining optimal body weight and good health;
- Different foods have different roles in the diet. It is important to select foods each day from the major food groups - grains, vegetables, fruits, dairy and meat, fish and alternative source of protein - along with fluids for adequate hydration;
- Consumption of foods high in sugar, sodium and fat, especially saturated or trans fat, should be limited;
- For most people, any food can fit into a balanced diet in appropriate portion sizes and with appropriate frequency. However, an individual's health status and lifestyle are important considerations in making suitable food choices, and for certain individuals, some foods may not be suitable;

- The relationship between the calories we take in and the calories we burn off each day is critical to achieving or maintaining optimal body weight. The amount of calories each person needs varies considerably from person to person. However, regularly consuming more calories than we burn off each day can lead to weight gain, obesity and related health issues; and
- When done appropriately, fortification of selected foods can be an important way to help people reach recommended vitamin, mineral and nutrient levels for an adequate diet.

The Healthy Living Principles underlie a dialogue that Kraft is currently conducting with a wide range of stakeholders, including consumer organizations, media, and policymakers. Our remarks in response to the Green Paper are part of that engagement process. We invest time and resources in establishing and maintaining links with leaders in public health, nutrition, physical activity, government, and in consumer and industry groups. That is why we are offering our comments in this consultation exercise.

Our response is organised in a “question and answer” format. Kraft has excerpted from the Green Paper the questions on which we wish to share our point of view, and we provide the answer beneath the question. Since Kraft has not answered all of the questions contained in the Green Paper, the numbering is not consecutive.

## RESPONSES

### 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?**

Community policies should promote healthy diets and physical activity, and such policies should be focused on children. From an early age, children must embrace the notion that a healthy diet and physical activity are essential to a long and healthy life. If children learn and follow those principles at school, Kraft believes that children can adopt appropriate behaviours and that parents will learn from their children.

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

**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?**

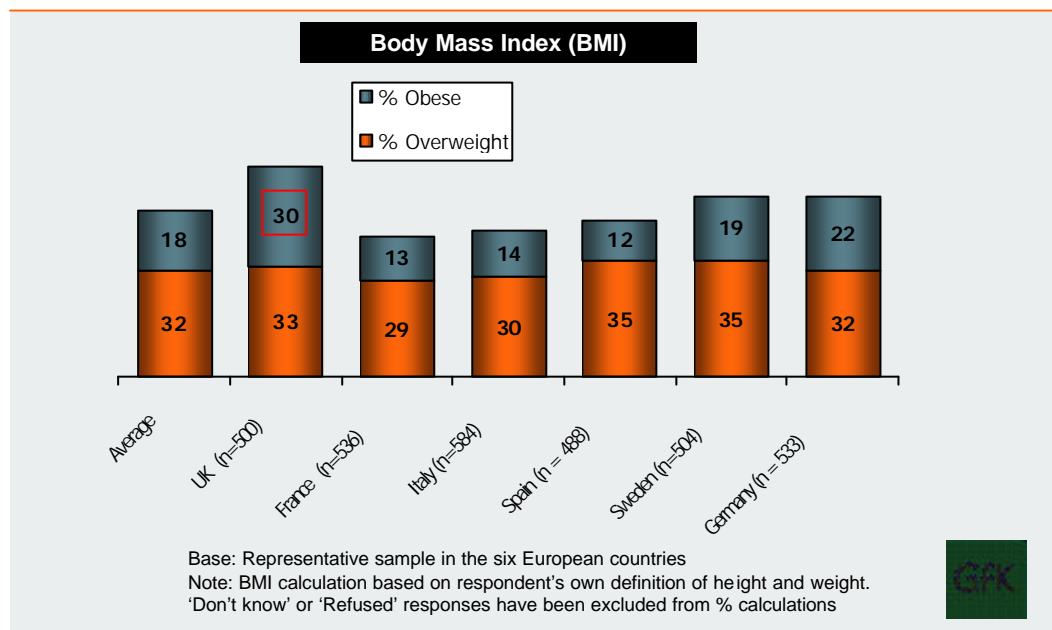
Kraft has recently considered this question in its capacity as a founding sponsor of market research company GfK NOP's Global Food, Diet & Wellbeing Monitor (“Monitor”). The Monitor is a population-based study that is conducted every six months amongst a representative sample of 500 adults aged 18-71 in 18 countries around the world (or 18-60 in less developed markets outside of Europe). Each country's sample is quota'd in terms of age/sex, work status, presence of children, income, region and personal values in order to ensure that a representative picture of that individual country emerges. In addition, a boost sample of mothers with children aged 3-16 living at home is interviewed, to provide a robust base of approximately 150 mothers in each country.

The Monitor is intended to spotlight the factors that contribute to health and wellbeing, and to identify consumer trends as they emerge. The Monitor addresses more than 25 major topics, such as eating patterns, ease of eating healthily, foodstuffs being avoided/targeted, weight management, obesity, relaxation, exercise, disease concerns and individuals' confidence in their general health and that of their children. The Monitor provides opportunities to analyse and compare attitudes and actions amongst different demographic, regional, attitudinal and BMI groups.

Kraft and GfK NOP have recently published the EU data from The Monitor into a report entitled "Understanding the Health Gap." "Understanding the Health Gap" contains data from Wave 1 of the Monitor, the collection<sup>1</sup> of which occurred in May/June 2005, from the United Kingdom, France, Spain, Italy, Sweden and Germany.

The data shows that obesity is a problem, as one in two people across Europe is either overweight or obese. While the extent of this problem differs from country to country, in all six countries observed, obesity rates were high. This finding is consistent with WHO data. Of the countries surveyed, the data shows that more than half of the combined populations of the six countries studied were either obese or overweight. France has the lowest levels at 42%. The British have the biggest problem with 63% of people either overweight or obese. An excerpt of the data from The Monitor is below.

### The UK has the highest percentage of obese people in the European countries



Source: Understanding the Health Gap. Data copyright © GfK NOP 2006

While there are ways to improve the precision and accuracy with which this data is collected, and while that goal is laudable, it may not be necessary. The fact is that obesity is a widespread problem in every country in Europe, and it requires action.

Some of the other conclusions that Kraft has derived from The Monitor also suggest that action needs to be taken, and may give some guidance on how to do so. The following conclusions derived from the research are relevant:

<sup>1</sup> Interviewing is conducted using a methodology that is relevant to each country. In each of the European markets except Spain interviewing is conducted online; in Spain it is conducted face to face (the reason for the different methodology in Spain is the lower incidence of internet usage in that country). Online methodology is also employed in US, Canada and Australia, whereas fieldwork in countries such as China, Philippines, Mexico, Brazil, Russia, Egypt and Saudi Arabia is conducted face to face. For those countries in which interviewing is conducted online, GfK NOP weights the data in terms of personal values - a proprietary weighting solution developed by GfK NOP - in order to ensure that personal values, as well as demographics, match those of the true offline population.

1) *Obesity is not considered a strong threat to personal health.* It is clear that the European population is getting heavier. Yet while Europeans rate health and wellbeing as important, they rank obesity lower than other diseases (such as cancer and heart disease) on their list of personal health concerns.

2) *While Europeans understand the need to exercise and eat a healthy diet, there is a clear gap between their knowledge and behaviour.* Many Europeans candidly state that they do not get enough exercise. Further, when it comes to losing weight, Europeans are not sufficiently focused on limiting calories.

3) *A "single European consumer" approach to public health and wellbeing education campaigns may be challenging.* All of the countries surveyed in The Monitor approach diet and health issues differently. Some countries know the benefits of exercise and diet, to others it does not resonate as strongly. While there are some common themes such as limiting fat in the diet and increasing fruits and vegetables, agreement on what other actions are needed varies widely. Therefore, a "one size fits all" approach to a broad health and wellness education campaigns may not be effective.

4) *Government nutrition guidelines are not regularly used or relied upon.* Most Europeans rank nutrition information from local and national government guidelines relatively low, questioning the confidence in or accessibility to information from governmental agencies.

**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?**

There is not enough public health education that links proper dietary habits and physical activity to avoiding specific disease endpoints. This avenue needs to be explored.

According to the data in The Monitor, consumers are interested in their health and wellbeing and, in particular, in preventing cancer and heart disease. However, consumers do not appear to connect a good diet and physical activity to avoiding cancer and heart disease. In fact, according to The Monitor, "overweight" ranked 5th place and "obesity" in 9th of 15 health concerns rated by Europeans. The desire to prevent cancer and heart disease ranked the highest. This data suggest that consumers do not recognise the link between obesity and the onset of the diseases they are more concerned about. This is illustrated by the data below.

## Being Overweight and Obesity are not leading personal health concerns across the European countries

**Regardless of whether or not you suffer from any of the following, to what extent is each of the following a concern for you personally?**

15 concerns were asked about, as follows:

Being overweight	Food allergies	Obesity
Being underweight	Gastrointestinal disorders	Osteoporosis/brittle bones
Cancer	Heart disease/stroke	Stress
Diabetes	High blood pressure	Tiredness/lack of energy
Eating disorders	High cholesterol	Vitamin/mineral deficiency

Top 2 concerns across five European countries (excluding Sweden)



Cancer  
Heart disease/stroke

**Ranking amongst  
15 concerns**

	Average	UK	France	Italy	Spain	Germany
Being overweight	5	5	7	5	11	4
Obesity	9	9	11	9	10	7

Ranking based on mean score, from a 5-point response scale  
Base: Representative sample in five European countries



Source: *Understanding the Health Gap*. Data copyright © GfK NOP 2006

Yet obesity is not seen as a major personal concern by Europeans relative to other concerns. While consumers see obesity as a problem for the general population in their countries, they do not rank it as a major health concern for themselves relative to other health issues. This includes the British, who have the highest levels of self-reported obese or overweight people.

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

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

Kraft is committed to providing consumers with useful information to help them make the most appropriate nutrition and lifestyle choices. This involves providing relevant information on packaging, as well as supporting information and advice via a range of different media, including websites.

In 2003 Kraft announced our global commitment on voluntary nutrition labelling. To make it easier for consumers to make informed food choices, Kraft will provide nutrition labelling on our products in all EU markets. This means:

- We will provide nutrition labelling on all packs except single-ingredient products (e.g., pure coffee), where space is available
- On smaller packs the 'big 4' (energy, protein, carbohydrate and fat) information will be provided per 100 grams. Where space permits 'big 8' (energy, protein, carbohydrate, fat, sodium, sugar, saturated fat and fibre) information will be provided. Energy, fat, saturated fat, sugar and salt are the most relevant nutrients regarding nutrition and their effect on overweight, obesity and chronic diseases
- Where appropriate voluntary national Guideline Daily Amount (GDA) targets have been developed such information will be provided
- The information will be set out in a standard format, so that it is easy to read

Today, in all European markets the majority of Kraft's products already provide 'big 4' nutrition information and an increasing number provide 'big 8' labelling. All our products will have nutrition labelling by the end of 2006.

Kraft also supports the notion of "at-a-glance" front-of-pack signposting. Currently, many Member States have developed or are developing new front-of-pack labelling schemes, including:

- **Sweden**, which has an existing, voluntary scheme for "healthier" food (the keyhole);
- **Netherlands**, where industry has launched a voluntary energy logo and are in discussions with government about developing a "healthier" logo;
- **UK**, where industry has voluntarily announced its commitment to front of pack "GDA" labelling and where government is strongly considering traffic lights; and
- **France, Denmark and Norway**, where discussions with government are underway about "front of pack" labelling generally.

Kraft believes that different approaches in different Member States by different groups of stakeholders are not optimal. Kraft does believe that there is a need for clarity and consistency Europe-wide.

Kraft's vision for front-of-pack nutrition labelling, or "signposting," is based on the following principles:

- It is applicable to all markets in the EU (internal market)
- It is supported by science
- It is effective in changing consumer behaviour
- It is category-specific and does not exclude any categories (e.g., oils and fat, cheese, etc.)
- It is supported by the vast majority of manufacturers and retailers
- It is positive (e.g., Swedish keyhole) and not negative (e.g., red traffic lights)
- It is supported by government and consumer organisations

Kraft supports these criteria because it seems that:

- consumers are most likely to select foods and drinks within product ranges, rather than among food categories, so nutritional criteria should be category-specific.
- signposting should help consumers select better-for-you options within product categories and not serve to exclude or give negative signals about some food categories that have an important role to play in nutrition (e.g. cheese, low-fat spreads, dressings).
- consumers respond better to positive on-pack messages (i.e. flagging 'better-for-you' options) rather than negative ones (i.e. flagging foods 'red', thus signalling them being inherent 'unhealthy') (Research from The Monitor - see response under IV.4.)

Ideally, Kraft recommends that any effective, credible labelling system contain the following elements:

- A back of pack nutrition table setting out 8 nutrients (where feasible)
- Nutrients disclosed on a per portion and per 100g basis
- A back of pack disclosure Guideline Daily Amount
- A front of pack signpost using a "healthier choice" logo based on credible, category-specific nutritional criteria

Any such signpost system that is developed must be accompanied by an educational campaign so that consumers understand its meaning.

**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?**

Kraft believes that industry, government, public health authorities and NGOs have a role in educating consumers about the information on food labels. Kraft also believes that such nutrition education should be led by and directed through government and school education programmes.

Schools need to take a leading role in educating children about the importance of food labels. Schools should provide practical education about how to put a meal together, which nutrients are important in the composition of a meal, and what a good meal consists of. In Finland, nutrition education is already part of the school curriculum.

School programmes need to be supplemented by public health campaigns sponsored by the government aimed at adults. Governments in Member States should sponsor educational campaigns that remind consumers of what information is contained on labels and where consumers should focus. Governments should also focus on a "calories in, calories out" campaign to address obesity head-on.

Industry also has a role in educating consumers about food labels. In the United Kingdom, for example, Kraft along with four other companies (Danone, PepsiCo, Kellogg's and Nestlé) has declared its intention to launch GDA signpost labelling in the UK. The signpost is modeled on a system that Tesco, a retail chain, has introduced, and highlights five of the most important nutritional elements for consumers to emphasize their importance. An example of this scheme appears below.

The image shows a vibrant blue background for a Kraft DairyLea product label. At the top left, a yellow sun is partially obscured by a red oval with the word "KRAFT" in white. The word "DairyLea" is written in large, bubbly yellow letters with a blue outline, curving across the top. Below it, a green grassy path leads to a cartoon cow character on the right. The cow is white with black spots, wearing glasses and a black vest, and is waving. To the left of the cow, the text "8 slices" is written in large yellow letters, with "thick" in smaller yellow letters above it. Below this, a blue checkmark icon is followed by the text "1/3 kids recommended daily calcium intake\* per serving". At the bottom left, a table lists nutritional information for each 25g slice, with percentages of an adult's guideline daily amount.

Each 25g slice contains				
Calories	Sugar	Fat	Saturates	Salt
69	1.8g	5.2g	3.4g	0.5g
3%	2%	7%	17%	8%

of an adult's guideline daily amount

In addition to the front-of-pack voluntary signposting in the UK, Kraft uses its product labels to provide other messages to consumers. Kraft supplements the ingredient information contained on its labels with other healthy living messages where we can on packs. For example, in the UK simplified healthy living messages appear on products consumed primarily by children (e.g. on *Dairylea Lunchables*: “Munch 5 pieces of fruit or veg a day”, “get moovin’! -Do some exercise like football or cycling”). In Belgium, Kraft includes the food pyramid on *Miracoli* packaging. The food pyramid is the key reference tool in Belgium to help promote a balanced diet to consumers.

To further educate consumers, Kraft makes scientifically justified functional and nutrition claims on its products to highlight the presence or function of a certain nutrient. For example, a claim about calcium educates the consumer about the function of this nutrient related to bone health. Kraft considers that such claims are useful for consumers.

Kraft also uses websites and a number of printed publications to reach consumers. Kraft has already launched new dedicated Healthy Living websites in the UK ([www.healthyliving.co.uk](http://www.healthyliving.co.uk)) and Germany ([www.kraftaktivleben.de](http://www.kraftaktivleben.de)) to provide consumers with information about how to balance healthy diets and active lifestyles. The web address for these Healthy Living sites appears on 50% of Kraft UK food products and is a prominent feature in all German advertising. Kraft Healthy Living websites are planned for all other European countries.

Kraft businesses throughout Europe are also incorporating healthy lifestyle elements into more of their promotional activities. Individual businesses select the most appropriate activities for their local markets, but three examples are the UK DAIRYLEA “Get Moovin’” website focuses on an active play; MILKA promotions in France and the Netherlands encourage physical activity; and consumers of SUSANNA cheese received a pack of materials about healthy eating.

The Kraft businesses in Europe also provide consumers with nutritional information through a wide range of brochures and feature articles. These offer healthy lifestyle tips as well as practical advice on preparing healthy meals. For example, in Greece, we have launched a bi-monthly Health and Wellness newsletter for consumers, opinion formers and the media. It is sent to working women and offers time-saving tips, healthy recipes and exercise plans designed for a healthy lifestyle.

Kraft also supports campaigns to educate consumers through its trade associations. Kraft has supported CIAA (Confederation of EU food and drink industries) work on the development of a common framework, suitable for further adaptation at national level, for an informative/educational brochure aimed at informing consumers on how to interpret and understand nutrition information and nutrient claims. Kraft also supports CIAA’s social marketing campaign on healthy lifestyles in Europe, which is a CIAA commitment in the framework of the EU Platform on Diet, Physical Activity and health. In addition, Kraft has supported research done by EUFIC (European Food Information Council) on nutrition labelling in order to contribute to raising consumers’ awareness of the active role they play in safe food handling and choosing a well-balanced, healthy diet.

**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?**

Kraft believes that self-regulation, including meaningful enforcement, is the most appropriate tool to address concerns about the advertising and marketing of energy-dense and micro-nutrient poor foods. We believe voluntary codes are the most effective means of initiating responsible, effective and timely action, rather than waiting for the lengthy process of legislative change to bring results. Self-regulation is also a sensible complement to current regulations that require that advertising and marketing not mislead consumers.



At Kraft, self-regulation applied to our own advertising and marketing has become part of the way we do business. We maintain high standards in advertising and marketing to ensure that our practices are consistent with our Healthy Living Principles and recognise the unique status of children. For all audiences, we ensure that our advertising and marketing materials depict appropriate serving sizes, and we avoid suggestions of over-consumption. We also discourage sedentary behaviour and, where appropriate, encourage an active lifestyle.

We recognise that marketing to children is a concern to regulators and the public alike. We share these concerns and wish to act responsibly. We have therefore developed policies which go beyond existing codes and regulations on marketing to children.

For some time we have been committed not to advertise in TV / radio / press in programme airtime aimed at children under 6 years old. In 2003, we eliminated all in-school marketing and set specific nutrition criteria for products sold in school vending machines. In 2005 we announced a further extension to our policies. We stated:

- Only products meeting Kraft's own category-specific "better for you" nutrition standards ('Sensible Solution' products) can be advertised to children aged 6-11 years.
- Restrictions also apply to websites aimed at children under 12 years. By end of 2006 these will show only products meeting our "better for you" nutrition standards and healthy lifestyle advice must be included on the site.
- Kraft businesses are encouraged to include healthy lifestyle messages and activities in more of their promotions - especially for products consumed by children.

Kraft's advertising and marketing policy is regularly reviewed and modified as appropriate.

In addition to our own policy we are working through our trade associations with other members of the food industry to develop voluntary codes of practice on advertising. These will establish minimum standards to ensure an industry wide approach to responsible advertising, especially to children.

Kraft contributes to industry self regulation in a number of ways, including:

- Kraft has supported the implementation of the International Chamber of Commerce (ICC) framework for responsible food and beverage communication and complies with its provisions. We also support the World Federation of Advertisers (WFA)'s efforts to have the framework fully implemented in 23 out of 25 Member States by the end of 2006
- Kraft was actively involved in developing the food industry marketing communication principles which were delivered as a CIAA commitment to the EU Platform on Diet, Physical Activity and Health. These principles update and extend the ICC framework, addressing concerns about marketing media other than advertising. Kraft supports WFA's commitment to have these new provisions implemented in 20 Member States by the end of 2007
- We have played an active role and supported WFA in the implementation of the European Advertising Standards Alliance (EASA) Self-Regulation Charter which sets out 10 principles for effective advertising self-regulation
- Kraft further supports the efforts of the WFA to establish self-regulation more widely in the EU and the commitment that WFA has made to the EU Platform on Diet, Physical Activity and Health to establish by the end of 2006 Self-Regulatory Organizations in 4 of the 7 Member States where they do not currently exist. In particular Kraft has played a leading role in setting up Self Regulatory Organizations in Poland & Lithuania.

Kraft currently holds the Presidency of the WFA and contributes actively to the association's work, including as one of 9 companies funding a further Platform commitment of WFA to monitor the compliance of TV food and beverage advertisements against national self-regulatory codes of practice in 14 EU Member States to ascertain whether self-regulation standards are adhered to. Kraft's advertising will be scrutinized as part of this exercise. Such monitoring exercises are important in reassuring all stakeholders that the industry is complying with the standards it has set. WFA has committed to sharing with the EU Platform members the results by Member State surveyed.

In conclusion, Kraft believes the current legal provisions set out in the Unfair Commercial Practices Directive, the Television Without Frontiers Directive and the Misleading Advertising Directive, combined with the range of complementary self-regulation measures in place, provide adequate assurance that advertising and marketing of foods are undertaken responsibly, taking into account consumer concerns, especially as regards children.

This said, there should be further efforts to extend self-regulation in the EU and to implement the EASA vision of effective advertising self regulation, coupled with regular monitoring of compliance with the standards set.

**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?**

Voluntary codes need to be monitored to ensure compliance. Kraft has rigorous internal procedures and processes set up to ensure compliance with our own standards.

Where there are industry-wide codes at national level, these are implemented and enforced by national Self-Regulatory bodies. Independent assessment of compliance with national codes, such as the proactive monitoring compliance exercise WFA and its member companies are undertaking as an EU Platform commitment, is essential in monitoring whether the codes are effective.

Kraft supports WFA's commitments, as enshrined in the EASA Charter, to undertake efficient compliance work and monitoring of self-regulatory codes.

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

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

Kraft believes that the single most important action that will best enable consumers to make informed choices is to implement a consistent, front-of-pack labelling ("signpost") scheme across the EU.

Labelling is an area where the industry can voluntarily and collectively act to bring about change quickly and effectively. A good model for quick and effective industry collaboration occurred in the United States in the 1960s at the direction of the Motion Picture Association of America. The motion picture industry was able to agree a rating system that alerts moviegoers, especially parents, whether a movie is suitable for younger children, only for children over age 12, or only for adults. It is probably the most successful example of a signposting system to date, and is widely relied upon by American consumers. The same kind of cooperative action could make a difference with food in the EU. In addition, where there is industry consensus in other regions, Kraft will also work collectively with other companies to find labelling solutions.

Kraft is convinced by consumer research that increasingly shows that consumers want 'signposting' information which they can see 'at a glance' on front of pack (Research from The Monitor - see response under IV.4.). Signposting provides consumers with the simplicity they want to help them make individual dietary choices. Any scheme must be demonstrated to be effective in helping consumers select "better-for-you" choices.

Kraft believes that, to be effective, a signposting scheme must be based on category specific, credible nutritional criteria and would also need the support of governments and key consumer groups to achieve and sustain credibility. Any scheme developed would be voluntary - thus optimizing the chances of its wide and speedy uptake. Also, by having a positive signposting scheme, industry is encouraged to innovate and develop more products meeting the nutritional criteria so that they can qualify as better-for-you options.

All schemes can be contrasted with traffic light labelling which apply, on front of pack, a red/amber/green symbol. The symbol identifies those nutrients, which should be eaten sparingly (red dot); those to be eaten in moderation (amber) and those which can be eaten without restriction (green). In the UK a number of traffic light options are proposed by the Food Standards Agency. Whilst traffic light labelling is simple to understand, the red designation tends to negatively portray whole categories of foods. Research shows that consumers prefer the more positive approach of the schemes described above.

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

Kraft believes that public-private partnerships are very effective in educating consumers. In Europe, we are developing a number of partnerships to help encourage healthy lifestyles in children, with particular emphasis on the school environment. Each programme is designed to respond to the specific needs and opportunities presented by the local communities.

Examples of country projects:

- In the Baltic region, Kraft has donated € 20,000 to a new Food Bank project which targets larger families in five major cities in Lithuania, and will eventually be extended to Latvia. The project will provide 1,500 families with monthly, nutritionally balanced food parcels, together with advice on how to prepare balanced meals.
- In Belgium, Kraft supports 'A Step for Every Bite'. Run by the Flemish Parents Association, the programme brings children and their parents together on a Sunday morning to enjoy a healthy, balanced breakfast, with dieticians on hand to give advice on healthy eating, followed by a physical activity session. This will eventually involve 8,750 parents and children. Kraft also supports 'Clever Breakfast', a similar initiative which is reaching nearly 28,000 parents and children.
- In the Czech Republic, Kraft is preparing to distribute a booklet to schools containing advice and information on following a nutritionally balanced and active lifestyle.
- In France, Kraft supports 'Eat to Compete' in partnership with the French National Handball Association and endorsed by the Ministry for Sport. This is the first nutritional programme in France to be taught as part of sports training. It provides handball coaches with materials to help encourage healthy eating habits in youngsters in their clubs. It has already reached 15,000 13-15 year olds. In addition Kraft has supported 'Feeding and Integration', the national nutrition programme, in which 10,000 volunteers help distribute food parcels provided by the Food Bank. The volunteers have been trained to help recipients learn to eat healthily within their means.
- In Germany, Kraft has launched its 'Healthy Living Programme', in collaboration with the German Foundation for School Sports. It provides a comprehensive teaching pack of educational materials designed to engage schoolchildren's enthusiasm in regular exercise and healthy eating. By the end of 2005 all interested schools in Germany will have the pack which is also being used by the German premier league soccer club, Werder Bremen, in its parallel '100 School - 100 Clubs' programme.

- In Greece, Kraft's educational programme 'My Favourite Sport' hosted by Athens' Museum of Greek Art for Children, raised awareness of the importance of regular exercise in children aged 8-10 years. In total, 3,500 children took part in the one year programme which included taking part in physical activity and painting pictures of their favourite sports stars to inspire them into action. The company also sponsored tennis equipment for 100 students of an elementary school in north Athens and paid for the renovation of the school's grounds to provide an environment for active play.
- In Italy, Kraft's new Health and Wellness education programme is being delivered in 2005-6 in partnership with Italian parents' association MOIGE. Initially 2,000 pupils aged 6-11 years will take part in the school-based programme of lessons, activities and a lively interactive puppet show which puts across healthy eating messages and has the children jumping, stretching and doing other simple exercises. A teachers guide containing nutritional information is also provided.
- In the Nordic countries, Kraft is supporting 'Get Moving!', an innovative programme of practical and fun activities and projects which introduces children to the positive benefits of physical activity and a healthy diet and lifestyle, including the opportunity to design and create their own ideal playground. Kraft provides a comprehensive package of hands-on support plus funding of €1,400 per school. 2000 children from 10 Swedish schools have taken part with further schools in both Sweden and Norway soon to be involved.
- In Spain, Kraft has contributed €36,000 to two health and wellness initiatives supervised by the IUVE Foundation and Red Cross. 'One Kilo of Help' provides after school centres in Madrid, Barcelona and Valencia for immigrant children from Latin America. So far 80 children have had the opportunity to participate in fun physical activities, eat a balanced snack and learn about healthy eating habits. The Red Cross programme, which runs in 11 schools in Leon, Zamora and on Majorca, aims to encourage 900 children aged 6-11 years to follow a healthier diet through weekly clubs.
- In the UK, the "health4schools" programme encourages 6-11 year olds to grow their own food, plan and cook healthy meals, appreciate the benefits of breakfast and engage in active play. Each school receives €7,000, a resource pack and teacher support. The award winning programme is underway in 50 Gloucestershire schools and will extend to 100 schools in future years. The programme was developed in partnership with the Local Education Authority, Business in the Community and is governed by an independent steering group. The 'Get Moving!' programme has been introduced to 25 schools helping 3,000 children make more of their playground activities.

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

Research carried out by KRC Research in 2005 for CIAA and funded by Kraft, together with other CIAA member companies, asked consumers in Europe a number of questions including on what national governments and the EU should focus in the obesity debate.

- 71% responded unprompted that national governments should educate and encourage (specifically, consumers said national governments should: educate about healthy lifestyles, invest in sport/exercise, run information campaigns, promote healthy lifestyles and change eating culture)
- 48% responded unprompted that the EU should run education campaigns and finance/promote physical activity.

This would seem to suggest acceptance of a role in education for national governments and the EU.

The key messages to give to consumers are: watch your weight, control your calorie intake, and increase physical activity.

The Monitor (see response under IV.4.) shows that limiting calories and taking regular exercise are not top priority actions for those people who are trying to lose weight. It also shows that most Europeans feel that they do not get enough exercise. However, there is greater focus on eating healthily than on getting regular exercise, such as walking. More consumer research is needed to improve understanding on how these key messages can be delivered.

### **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?**

Kraft Foods fully supports efforts to improve children's diets. We believe that food manufacturers have a role alongside Government, parents and schools in this mission and we are committed to playing our part in promoting healthy lifestyles. Specifically:

- Kraft fully supports national governments in their drive to improve the standards of school meals. It is right that Government should be the driver to try and instill good nutritional habits at an early age.
- Kraft supports the introduction of nutritional and quality standards for school lunches. However, the actions taken must be effective in encouraging and securing a better nutritional balance as part of a wider healthy balanced lifestyle initiative within schools.
- National governments have a duty to specify the nutritional standards that they wish to deliver for school lunches. Food manufacturers such as Kraft, as suppliers of these foods, will meet the prescribed specification, in the same way as they do for their retail customers.
- Kraft believes that school menus should exemplify and encourage the eating of a balanced diet; balance should not mean that certain foods are characterised negatively and banned. On the contrary, such practice sets a dangerous example for children.
- Finally, Kraft strongly supports the idea of a 'whole school approach'. Only by teaching children about diet and health, including cooking skills, and by enhancing knowledge of the production and the physiological and social aspects of food, can changes in pupils' behaviour, especially in building their diets, really start to happen. In the UK Kraft, in partnership with Gloucestershire County Council's Local Education Authority and Business in the Community, developed a programme 'health4schools' which encourages 6-11 year olds to grow their own food, plan and cook healthy meals, appreciate the benefits of breakfast and engage in active play.

#### **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?**

Schools should be providing a variety of well prepared and nutritionally balanced meals from which students can choose. Students should be educated about the composition of a meal and the different roles of different foods in the diet. They should know that it is important to select foods each day from the major food groups (grains, vegetables, fruits, dairy, meat and fish or alternative sources of protein) along with fluids for adequate hydration. Snacks are also important for children and help prevent between meal hunger. Snacks can be part of a balanced diet, but should not replace the five main food groups.

Moreover, students should be given enough time to enjoy their meals and to socialise during the meal.

#### **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?**

Kraft believes that public-private partnerships are very effective in supporting health education efforts made by schools.

Our most recent and far reaching initiative, announced in January 2006, is our support of and partnership with *Shape Up*, a new 3-year school-community project that aims to address the determinants of childhood obesity through child participation, giving children a sense of ownership over the decisions affecting their wellbeing. Developed by leading European education specialists as a direct response to the EU Platform on Diet, Physical Activity and Health call for action on rising obesity levels in children, *Shape Up* reaches all 25 Member States and will develop, test and evaluate practical in-school and community activities in 26 cities across the region to help children learn about food, nutrition and physical activity and develop actions to impact those factors contributing to their health and well-being. The only program of its kind to receive EU funding, *Shape Up* is a European project supported by the European Commission Directorate General for Health and Consumer affairs. Kraft Foods is a supporting partner of *Shape Up* through its Kraft Cares community partnership programme as part of its ongoing commitment to help communities encourage healthy lifestyles in children and their families, with particular emphasis on the school environment.

*Shape Up* will not focus solely on obesity, but rather will focus on a positive and critical view of food and body movement. Through the child and the school, *Shape Up* aims to involve the whole community in shared reflections and actions about healthy living conditions and lifestyles. The project will develop a participatory framework to have the school and surrounding community start a constructive dialogue to look at diet and nutrition, aesthetics and taste of food, food availability (including availability of fresh fruits and vegetables), social relationships and societal image. The dialogue will also cover body movement, considering physical exercise as well as play, body image, and environmental conditions affecting mobility. This IVAC-framework (Investigation-Vision-Action-Change) will be used to facilitate health promoting actions with regards to determinants of obesity. When children, schools and communities work with the IVAC approach they will collaborate on Investigating health issues related to food, body and movement, developing shared Visions and taking joint Action to Change the determinants of obesity. A comprehensive network of 26 cities has been created to test and evaluate the framework in participating schools involving children aged 4 to 16, and will culminate in dedicated local *Shape Up* weeks during the summer of 2007 and 2008. This European network of cities will further facilitate the exchange of best practices initiated by children, twinning and other agreements based on specific activities. *Shape Up* experiences, achievements and results will be shared and disseminated European-wide as research papers and a book on the *Shape Up* story, which will be presented at the closing conference in December 2008 where policy makers can discuss children's proposals.

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

At Kraft, our long term goal is to help our employees *live better* and *live well* - physically, financially and personally. Our commitment to employee health and wellness is global and we recognise that there is no one programme or solution that meets the diverse needs and cultures of our workforce. Our businesses are therefore encouraged to identify, by closely involving their employees, the most appropriate initiatives to implement locally.

Generally, actions will fall under three main headings:

- Information: giving employees the opportunity to learn more about health and wellbeing, through internet bulletins and other resources
- Ongoing activities: supporting activities that promote wellbeing such as the provision of salads, fruit and reduced-fat or calorie choices in canteens; organising sports clubs and exercise classes, and offering free health checks.
- Special events: supporting employees participating in local/national events (such as charity 'fun runs') and holding interdepartmental sports competitions

Kraft provides financial support and other resources to encourage these activities. A number of actions have been, and are being, introduced across the Kraft European business. Some recent examples are:

- Benelux: sports activities and a special health and Wellness event have been organised; a dedicated intranet site encourages healthy living.
- France: nutrition courses held as well as Health and Wellness days for employees and their families; a Health and Wellness expert is available on site to offer advice, information leaflets and increased healthy meal options.
- Germany: a Healthy Living week was held in 2005; comprising a week with healthy food in the canteen, presentations, health checks, and physical exercise classes to encourage people to be more health conscious. On an ongoing basis a variety of exercise and relaxation activities, including team sports, are organised.
- Greece: a two week Health and Wellness programme took place and has been followed by regular sports activities
- Italy: more healthy meal options have been introduced, and information on healthy living communicated through the intranet and company magazines.
- Hungary: a monthly health consultancy is provided and there are opportunities for weekly sport activities (eg basketball and football).
- Sweden: a variety of sports activities have been introduced and information on healthy living is communicated through the intranet and company magazines.
- UK: a Health and Wellness week was held in the summer of 2005; ongoing activities include intranet briefings, displays and posters, healthy meal options, health checks and a wide range of sports activities.

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

Kraft supports the development of appropriate science-based dietary guidelines and will be participating at the EFSA Scientific Colloquium N°5: Development of Food-based Dietary Guidelines that will be held on 21-22 March 2006 in Parma.

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

Kraft believes that nutrient profiling

- should encourage and promote new product development and increased consumer choices
- needs to signpost at a glance “better for you” products within categories of foods
- can help guide nutrition and health claims within product categories
- can help guide responsible marketing and advertising to children and shift the balance towards “better for you” choices within product categories

Kraft does not believe that the UK nutrient profile scoring system, based on cross category comparisons, is a good example. The FSA scoring model applied across all foods results in entire food groups (such as cheese, fats, oils) attracting a “less healthy” score and no distinction between standard and “better for you” products.

Category based threshold models (such as Kraft’s ‘Sensible Solution’ and the Swedish Keyhole) clearly distinguish “Better for you” products within different categories.

Kraft believes that the standards should be tied to recommendations established by authoritative bodies, using a science-based approach and that, as guidance is updated, the profiling standards must follow the science.

## **Next Steps/Contact Information**

We hope that our responses to these questions have been useful and we look forward to further discussion of this Green Paper with the European Commission and other stakeholders.

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