



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

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Response of
the Trading Standards Institute

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30 March 06

Dear Milena Stoimenova

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

Thank you for extending the deadline and giving us the opportunity to submit our comments on the Green Paper "Promoting healthy diets and physical activity: a European dimension for the prevention of overweight, obesity and chronic diseases".

The Trading Standards Institute (TSI) is the professional body representing the views of Trading Standards professionals in the UK and abroad. With members in both the public and private sectors, our aims are to promote excellence and enhance the professionalism of our members in support of informing consumers, encouraging honest business and tackling dishonest and unfair trading practices.

Trading Standards are responsible for the market surveillance authorities in the UK and in particular has some responsibility for food and health issues. We recognise the importance of encouraging both consumers and businesses to adopt healthier approaches to production, marketing and consumption of foods in the best interests of society generally.

In compiling this response, the Institute has sought the view of our Lead Officers on food issues. If you require clarification on any of the following points, please do not hesitate to contact David Pickering and Phil Thomas via email on lofood@tsi.org.uk or telephone on +44 870 872 9149.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Ron Gainsford', written over a faint circular stamp or watermark.

Ron Gainsford
Chief Executive

Q1. What are the concrete contributions which Community policies, if any, should make towards the promotion of healthy diets and physical activity, and towards creating environments which make healthy choices easy choices?

The health agenda should be a thread that runs throughout all Community policies including the Common Agricultural Policy and consumer protection. Through this awareness, concrete contributions can be formed at policy level to inform the legislation/policy direction that results.

Q2. Which kind of Community or national measures could contribute towards improving the attractiveness, availability, accessibility and affordability of fruits and vegetables?

TSI believe that there should be a greater focus and improvement towards establishing an awareness of the issues that influence the attractiveness, availability, accessibility and affordability of fruits and vegetables. Such improvement that should translate into improved intelligence could then be used to influence the markets and consumer choice through legislation, subsidies and other policy measures. TSI maintain that the issues of availability, accessibility and affordability are of paramount importance, especially in view of the direct link to food poverty.

Q3. On which areas related to nutrition, physical activity, the development of tools for the analysis of related disorders, and consumer behaviour is more research needed?

TSI directs the Commission to consider the innovative strides that have been made in respect to heart disease in Finland. In short, we believe that good practice should be harvested from both within and outside of the European Union, in order to provide a broader understanding of which measures could be effective.

Q4. 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?

TSI believes that other organisations are able to provide a more informed response to this question.

Q5. 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?

TSI believes that other organisations are able to provide a more informed response to this question.

Q6: Which are the most appropriate dissemination channels for the existing evidence?

TSI believes that other organisations are able to provide a more informed response to this question.

Q7: When providing nutrition information to the consumer, what are the major nutrients and categories of products to be considered and why?

TSI believe that sugar, fat and salt are the acknowledged nutrients that are related to health issues. In addition, consumers are interested and concerned about these nutrients (see Food Standards Agency Consumer Attitudes to Food Standards, 2005 p48). Consumers are also interested in saturated fats and trans fatty acids. We have noted that there appears to be confusion between the salt sodium relationship, which has resulted in a lot of food manufacturers now putting both on the label. TSI would strongly support the idea of publicising levels of salt rather than sodium. In conclusion, TSI believes that the initial concentration should be on everyday food staples as defined by individual Member State.

Q8: 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?

TSI maintains that the best place to start educating about health living is in schools based on in-depth and comprehensive food education. In addition, we believe that targeted information should be aimed at older consumers.

Q9: Are voluntary codes ("self-regulation") an adequate tool for limiting the advertising and marketing of energy-dense and micronutrient-poor foods?

It is our belief that voluntary codes are not an adequate tool for limiting the advertising and marketing of energy-dense and micronutrient-poor foods.

Q10: What would be the alternatives to be considered if self-regulation fails?

TSI believes that appropriate and proportionate legislation would be a suitable alternative to self-regulation.

Q11: How can effectiveness in self-regulation be defined, implemented and monitored?

TSI maintain that self-regulation should be subject to independent monitoring of the market place and consultation with affected parties.

Q12: 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?

TSI believe that in order to protect vulnerable consumers, measures such as the banning of advertising of certain foodstuffs that harm consumers should be endorsed.

Q13. How can consumers best be enabled to make informed choices and take effective action?

TSI maintain that by being provided with the appropriate information and skills concerning a healthy living, consumers will be in a better position to make informed choices.

Q.14 What contributions can public-private partnerships make toward consumer education?

TSI believe that there is potential in public-private partnerships although cautions that in order for such partnerships to retain credibility, there should be no product linkage.

Q15. 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?

In order to ensure that the key messages are disseminated to all consumers, an integrated approach delivered by a range of bodies including health and local authorities and schools should be endorsed. TSI believe that one of the key messages should be that health is not dependent on one factor alone.

Q16. 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?

The work of the School Food Trust (UK initiative) is a good example of how to influence the content of school meal provision. Parents need to be provided with the appropriate information to make informed choices. Information should be disseminated at both the national and local level.

Q17. What is good practice for the provision of physical activity in schools on a regular basis?

TSI believes that other organisations will be able to provide a more informed response to this question.

Q18. 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?

TSI believe that good practice for fostering healthy dietary choices in schools could include the banning of products from vending machines and implementation of school policy that does not permit energy-dense snacks and sugar-sweetened soft drinks onto the school premises. Some schools in England already operate such policies.

Q19. How can the media, health services, civil society and relevant sectors of industry support health education efforts made by schools?

The media, health services, civil society and relevant sectors of industry can all support the health education efforts made by schools by setting a responsible example in outwardly supporting such policies.

Q20. What role can public-private partnerships play in this regard?

As aforementioned, TSI believe that there is potential in public-private partnerships although cautions that in order for such partnerships to retain credibility, there should be no product linkage.

Q21. How can employers succeed in offering healthy choices at workplace canteens, and in improving the nutritional value of canteen meals?

TSI maintain that employers may succeed provided they consult with the appropriate bodies and catering suppliers and gradually change the food menus so that healthier options predominate.

Q22. What measures would encourage and facilitate the practice of physical activity during breaks, and on the way to and from work?

TSI believes that other organisations are able to provide a more informed response to this question.

Q23. Which measures, and at what level, are needed to ensure a stronger integration aiming at promoting healthy diets and physical activity into health services?

TSI believes that other organisations are able to provide a more informed response to this question.

Q24. In which ways can public policies contribute to ensure that physical activity be "built into" daily routines?

TSI believes that other organisations are able to provide a more informed response to this question.

Q25. Which measures are needed to foster the development of environments that are conducive to physical activity?

TSI believes that other organisations are able to provide a more informed response to this question.

Q26. Which measures, and at what level, would promote healthy diets and physical activity towards population groups and households belonging to certain socio-economic categories, and enable these groups to adopt healthier lifestyles?

TSI suggests that measures could include targeted programmes positioned at the local level yet supported by central government/EU funding. TSI also recommends that research and a consultative process should precede such targeted programmes.

Q27. How can the "clustering of unhealthy habits" that has frequently been demonstrated for certain socio-economic groups be addressed?

As aforementioned, TSI suggests that targeted programmes positioned at the local level yet supported by central government/EU funding could be one measure in which to address certain socio-economic groups. As previously stated, TSI recommends that research and a consultative process should precede such targeted programmes.

Q28. Which are the most important elements of an integrated and comprehensive approach towards the promotion of healthy diets and physical activity?

TSI believe that the most important elements of an integrated and comprehensive approach should be a partnership working between bodies and consultation with affected parties, to ensure effective and proportionate measures are taken.

Q29. Which role at national and at Community level?

Community level should set policy and direction supported by targeted measures at national level, appropriate to the Member States needs.

Q30. In which way could social and cultural variations and different regional and national dietary habits be taken into account in food-based dietary guidelines at a European level?

Social and cultural variations and different regional and national dietary habits could be taken into account by consulting with the Member States and being transparent about the differences between them. This could result in the sharing of good practices as well as highlighting bad practices.

Q31. How can the gaps between proposed nutrient targets and actual consumption patterns be overcome?

TSI believe that the gaps between proposed nutrient targets and actual consumption could be overcome by giving consumers the information to make informed lifestyle choices, as well as encouraging healthier production of food (i.e. gradually reducing salt levels in food).

Q32. How can dietary guidelines be communicated to consumers?

Dietary guidelines could be communicated to consumers through both local and national campaigns.

Q33. In which way could nutrient profile scoring systems such as developed recently in UK contribute to such developments?

Nutrient profile scoring systems could contribute to such developments by prohibiting products from highlighting the healthier aspects of the products but not mentioning the less healthy. If manufacturers want to emphasise the healthier aspect they should be made to give equal prominence to the less healthy aspect.

Q34. Under which conditions should the Community engage in exchanging experience and identifying best practice between the EU and non-EU countries?

It is the TSI belief that the EU and non-EU countries should engage with each other and exchange experiences.

Q35. If so, through which means?

We believe that engagement should take place through national food enforcement bodies, for example the Food Standards Agency, who should then disseminate information to the respective local authorities and stakeholder groups.

Q36. 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?

TSI believe that the Green Paper has addressed all the key issues concerning the promotion of diet, physical activity and health.

Q37. Which of the issues addressed in the present Green Paper should receive first priority, and which may be considered less pressing?

TSI maintain that an integrated approach towards meeting the outcomes of the Green Paper is vital. That said, we consider that the issue of the over-consumption of foods that contain poor nutrient profiles requires immediate attention.

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