

Unilever's comments on THE COMMISSION'S GREEN PAPER: "Promoting healthy diets and physical activity: a European dimension for the prevention of overweight, obesity and chronic diseases" – COM (2005) 637 final

BACKGROUND – ABOUT UNILEVER

Unilever is one of the world largest consumer goods companies with a turnover of 42 billion Euro in 2004 - 23 billion of this being accounted for by our food business. As a leading food company our mission is to add vitality to life by meeting the every day needs of people everywhere through branded products that make people enjoy food, enjoy health, enjoy life. We are a global leader in four major categories of food – savoury and dressings, spreads and cooking products, beverages and ice cream and frozen food. We also have established a global food service business, known as Unilever Foodsolutions, that provides meal solutions for professional chefs and caterers and fast food companies. Some of our leading food brands include:

Savoury & Dressings: ***Knorr, Hellmann's, Calvé, Amora and Bertolli***

Spreads and Cooking: ***Becel/Flora, Rama, Blue Band***

Beverages: ***PG Tips/Lipton Teas, Lipton Ice Tea***

Ice Cream & Frozen Food: ***Ben & Jerrys, Heart Brand ice creams including Solero, Cornetto and Magnum, Iglo, Findus.***

We build successful brands through consumer understanding, innovation and strong marketplace investment. In 2004, we invested 5.7 billion Euros in advertising and promotions globally and 1 billion in R&D.

In line with our Vitality Mission, Unilever is proactively taking steps to address many of the issues highlighted within the Green Paper. In particular, Unilever has:

- **Marketing & Advertising:** Unilever adopted internal 'Responsible Marketing Principles for Food and Beverages' in 2003 that include provisions regarding the promotion of food to children. These guidelines have recently been revised to include a voluntary restriction on marketing directly to children below 6 years of age. Unilever through our Lipton tea brand is also a signatory to the UNESDA voluntary commitments on marketing and advertising. We are actively supporting self-regulatory codes and relevant advertising bodies at international, European and national levels to encourage best practice in this area.
- **Product Re-Formulation:** Unilever undertook an extensive review of the nutrition composition of our food and beverages portfolio in 2005. Our 'Nutrition Enhancement Programme' reviewed levels of trans-fats, saturated fat, sodium and sugars and aims to bring about real changes in our food products without compromising safety, quality or taste. It

is our commitment to make healthy choice the enjoyable, tasty and convenient choice.

- The Unilever Food and Health Research Institute has translated dietary recommendations from International and National authorities into benchmarks for our individual foods brands. All brands are now undergoing some product reformulation changes under this programme. As a result, in 2005 we eliminated 15,000 tons of trans-fat, 10,000 tons of saturated fat, 2,000 tons of sodium and 10,000 tons of sugar from our products.
- **Nutrition Labelling, Information and Claims:** Unilever recognise that nutrition information, including nutrition labelling is a useful tool to help consumers make informed choices. Our brands provide extensive nutrition and health information on pack, through websites and via consumer care lines. Unilever has recently adopted a global policy on nutrition labelling which will require the provision of nutrition information on 8 nutrients (calories, protein, carbohydrates (of which sugars), fat (of which saturates), fibre and sodium) on back of pack where this is practicable. Where this is not possible (e.g., small packaging) we will provide information for 4 nutrients. In addition, we will start to provide information on Guideline Daily Amounts (GDAs) related to per serving or portion size on back of pack. This will provide the consumer with an indication of how much of a nutrient like fat and sugar will be in the food they eat. Lastly, as part of our drive to help make the healthy choice the easy choice and reduce consumer confusion about healthy diets, we are currently investigating the usefulness of putting additional information and a healthy indicator on front of pack.
- **Nutrition and Health Claims:** Unilever believe that it is important that claims related to nutrition can be proved and that products claiming nutrition benefits have a good all round nutritional composition. We have internal guidelines for making nutrition and health claims on all our products. All our communication about the benefits of our brands and products is science-based, so that we have a sound framework to ensure consumers can rely on the claims we make about our brands.
- **Nutrition Education:** For over 30 years Unilever has put significant resources into promoting nutrition and health education, notably through our Flora/Becel brand. We work in partnership with numerous public health organisations to educate both consumers and healthcare professionals about the benefit of diet particularly the differences between saturated and unsaturated fats, lifestyle and heart health.
- **Research:** For over four decades Unilever has put a large amount of our funds into research on nutrition and health. Approximately 20% of our current research programme in foods are spent on health and wellbeing. For instance, we have a major programme that aims to understand consumer perceptions of taste in savoury foods and to research how we can further reduce levels of sodium in our products.

You can find more information about Unilever and our brands by visiting: www.unilever.com.

GREEN PAPER - GENERAL COMMENTS

Unilever welcome the Commission's initiative to launch a public consultation for the development of a European strategy for the prevention of overweight, obesity and chronic diseases. Improving the health of Europeans through better diets and greater physical activity is crucial to preventing a range of chronic diseases and improving the quality of life for millions of people. Unilever endorse the European Commission's view that any strategy and action plan must involve the food industry but just as importantly, other key stakeholders in society.

Unilever support the European Commission's initiative to establish a European Platform for Action on Diet, Physical Activity and Health as a forum for stakeholders to share experience and research and to develop joint action plans to change consumers' lifestyles. Unilever is also pleased to note the role given to the European Network on Nutrition and Physical Activity in analysing feedback from the Green paper since many of the issues on diet and health still fall primarily under the remit of the Member States (e.g. education and healthcare).

Advertising and Marketing

Unilever believe there is already a solid legal framework in place at both European and national level to ensure that the marketing or advertising of foods is 'legal, decent, honest and truthful' (e.g. Unfair Commercial Practices Directive, TWF Directive, etc). In addition, there are established self-regulatory systems and codes of conduct at international, European and national levels governing marketing and advertising practices.

Unilever believe that self-regulation should not be viewed as a replacement for statutory legislation but rather be seen as complementary to it. Self-regulation has several advantages; it is free to the taxpayer and consumer; it effectively reverses the burden of proof onto the code subscriber; it can be used to promote 'best practice'; and it can be adapted quickly to respond to changes in the marketplace.

This being said, Unilever also acknowledge that greater efforts have to be made to extend the self-regulatory systems across Europe; to strengthen levels of stakeholder engagement, particularly with regard to complaint handling and redress; and to improve monitoring and reporting of compliance with Codes of Conduct.

Nutrition Information, Labelling and Claims

Unilever support the adoption of mandatory EU legislation on nutrition labelling and information to consumers. This should require nutrition labelling for 8 nutrients where this is practicable – with some flexibility being provided for multi-lingual packs and smaller pack sizes. We believe

that information should be provided on per 100 grams/100mls in order to be able to make appropriate comparisons between foods. We would also favour the possibility of providing information on Guideline Daily Amounts related to per serving or per portion size on back of pack.

Furthermore, Unilever recognise the need to look into simplified ways to communicate nutrition information to the consumer and therefore supports the concept of nutrition labelling especially if it helps the consumer to choose a healthier diet. However, we believe that such a scheme needs to be European wide as we are concerned about the possible proliferation of a multitude of labelling schemes, which could ultimately undermine consumer trust as well as cause barriers to trade.

We also support the development of the EU Regulation on nutrition and health claims as we believe this will increase confidence in the internal market and for consumers. We support the development of nutrition profiles as long as EFSA first undertakes a feasibility study of the practicability of the criteria across Europe. We believe that nutrition and health claims should still be allowed even if one of the nutrients exceeds the nutrition profile, provided that supplementary factual and non-discriminating information is both visible and as close as possible to the claim.

Unilever support a simplified and speedy approval procedure for nutrition and health claims that takes into account the views of Member States. However, we believe that disease risk reduction claims should be subject to full authorisation that requires a rigorous independent scientific scrutiny by EFSA.

Research suggests that consumers are confused by the conflicting advice they see on nutrition in the media. Unilever therefore propose that the Commission and Member States lead the debate at a European and National level in order to provide reassurance and trust for the consumer.

Lastly, Unilever believe that in addition to providing nutrition information there is a need for Member States to develop evidence based community programmes that promote behaviour change on diet and physical activity. In order to assist Member States with the development of these programmes, we believe that the Commission should review the current evidence on how to effectively change the populations' diet and physical activity levels for a sustained period of time. This information should be widely shared with academics, non-government organisations, industry and Member States.

Consumer choice including product reformulation

With the current discussions on nutrition profiles in connection to nutrition labelling and nutrition and health claims, Unilever believe that any scheme that is developed should also help to promote innovation and should not be just about restricting choice. For instance, some of the models that have been developed by Member States such as the UK classify foods from the same category with very different fat and calorie levels as high

fat (80% fat versus 30% fat). Not only does this confuse the consumer but it does not provide incentives for manufacturers to produce foods which we know can make a difference to the overall diet. It is important that any models that are developed on nutrition profiling take this point into consideration.

Currently there are a number of Member States developing their own profiling schemes or targets for reformulation. We would urge the Commission to co-ordinate and develop one scheme or a common set of targets as a means of avoiding consumer confusion and barriers to the single market.

Nutrition-related policies should also consider where/how it might be possible to create economic incentives for innovation, especially in absence of clear consumer demand. Without clear consumer demand, producing healthier products does not offer a company a competitive advantage and it may in fact generate higher production costs. We suggest that the Commission focus on policies that create real incentives for developing, producing and marketing healthier products especially those targeted at lower socio-economic groups.

In addition, Unilever support the numerous Member States initiatives that encourage fruit and vegetables consumption and recommend that these continue. However, we believe that further emphasis should be placed on encouraging vegetable consumption as data from dietary surveys in Member States suggests that intakes of vegetables have not increased as much as fruit.

Research

Unilever believe that EU nutrition research still leans too heavily towards a focus on nutritional intake rather than on delivering healthy lifestyles. Consequently, Unilever has the following suggestions for the Commission to consider:

- EU-supported research applications should require a balanced risk assessment of feasibility for exploitation, and describe major impediments and realistic timeframes for implementation.
- Encouraging more research on promoting long-term behavioural changes to diet and physical activity.
- The outcome of research should help enhance the capability to alter diet and physical activity levels (i.e. lifestyles of consumers into healthy lifestyles). Ideally they should ensure that diet and physical activity are combined into one model in further research.
- The Green paper should include a section on encouraging scientific substantiation and reviewing scientific gaps in understanding. Unilever believe that the Food For Life Technology Platform provides an opportunity to address this need (see: <http://etp.ciaa.be>).

Unilever believe that public policy should be evidence based and that one positive role for the multi stakeholder platform is to be the generator of,

and mediator in, cross-border and cross-organisational research into the issue of overweight, obesity and chronic diseases.

In particular, scientific research should focus on developing successful evidence based strategies that help to change the populations' diet and lifestyle.

Evidence to date suggests that community based programmes that take a public health approach to diet and physical activity have the most success at reducing or preventing obesity, overweight and chronic diseases. We believe that the Commission and Member States should be encouraged to undertake more of these types of projects such as EPODE (www.epode.fr) and North Karelia (www.cvhpinstitute.org/links/northk.htm).

As the Green paper reveals, the EU lacks sufficient data in many areas that are crucial for monitoring how successful we are at reducing the burden of overweight, obesity and chronic diseases but also for developing successful strategies at preventing or reducing overweight, obesity and chronic diseases. There is a lack of consistency in the data on prevalence of overweight and obesity especially in children. In addition, in most Member States there is a lack of nutrition intake and physical activity data that ideally should be combined with anthropometric data.

There is also a limited amount of research on successful workplace interventions on diet and physical activity. Here the Commission could act as a conduit in bringing together the relevant players from Member States, industry and academia to develop a cross-border and cross-organisational research programme.

Additionally, the Commission and Member States could consider whether incentives might be provided to companies who undertook research into some of these key areas that need further research.

ANNEX

Unilever would also like to address some specific questions, as posed in the Green paper.

IV.3. Health across EU policies

– Question: 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?

Unilever would like to suggest that Community policies make the following contributions:

- Undertake an impact assessment of the various options being considered at a Community and local level in terms of feasibility, effectiveness and cost benefit analysis.
- Encourage EFSA to produce a European set of nutrition and physical activity guidelines in order to help underpin all the nutrition and health communication that goes out in the Community.
- Develop greater understanding at a European level of the determinants that affect food choice and factors that lead to insufficient physical activity in everyday life. It is essential to understand consumer motivations and barriers before researching approaches that empower consumers to adopt new behaviours as already proposed by the European Food For Life Technology Platform.
- Ensure alignment with other aspects of Community policies such as agriculture, transport, education and culture, etc.
- Work in conjunction with Member States to:
 - Encourage recruitment of additional numbers of registered nutritionists or dietitians.
 - Promote and encourage schemes that train health professionals including doctors in nutrition.
 - Encourage school policies and programmes that support healthy diets and physical activity.
 - Actively promote the chosen methods of nutrition labelling in consumer education material e.g. PR and advertisements.

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

Unilever would like to suggest focusing on the following measures:

- Ensuring that adequate communications resources are made available at a Community level to support Member States who wish to promote the consumption of fruit and vegetables in the diet.
- Assessing whether there is a need for additional fruit and vegetables to be produced within the Community. We need to better understand new technologies or whether increasing agricultural production could improve availability, accessibility and affordability of fruit and vegetables especially in remoter areas of the Community or within lower socio-economic groups. For example, under the North Karelia programme the farmers in Finland produced more berries that increased consumption of these fruits locally.
- Encouraging Member States to:
 - Develop partnerships between food producers and other bodies to promote fruit and vegetables including public health campaigns.
 - Assess whether successful programmes, such as the milk-at-school programme, could be extended to other healthy products which include fruit and vegetables.

- ***Question: 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?***

- Greater understanding/information is needed of what constitutes an effective health education programme that will encourage sustained behaviour change at a community level.
- We need better quality data about the diet and physical activity levels in many Member States. Ideally this should be collected in conjunction with anthropometric data.
- Consideration should be given to how health care professionals can effectively treat those who are already obese within the limits of current resources.

– These objectives have already been identified as part of the work plan of the European Food For Life Technology Platform.

IV.4. The Public Health Action Programme

Question: 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?

- Unilever believe that we need a comparable set of indicators on health status including data on dietary intake, physical activity and obesity which allows us to assess any differences by socio-economic groups.
- We need an agreement on the method of measuring BMI in adults and children so that data can be compared. Consideration could also be given to relevant types of adiposity such as waist to hip ratio and how this may relate to disease development.
- Evidence suggests that overweight may start in pre-school years. We need to ensure that children are measured during this period (and that interventions also occur during this time). As pre-school is defined differently throughout the Community the Commission may need to define at which age the data should be collected.

Question: 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?

- The programme should develop an information pack particularly about effective interventions and research gaps to share with decision makers, health care professionals and the media on:
 - Levels of obesity, overweight and chronic diseases in the Community plus costs to the Community (inclusive of details on children especially pre-school children).
 - Dietary and physical habits within the Community.
 - Evidence we have on how to achieve successful interventions within the Community. It may be useful to look at examples from other areas of health policy (e.g., wearing of seat belts) on how to run successful public health campaigns.
 - Information on research gaps that exist on reducing overweight, obesity and chronic diseases in the Community.

In addition, the EU should consider supporting a few major cross-border programmes aimed at promoting healthy eating and physical activity, involving other stakeholders where possible. This should be matched by similar initiatives at Member State level. It is critical however, that these campaigns run over many years with messages being refined according

to the status of the programme.

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

- Unilever believe that it is important to use a variety of channels such as mass media (i.e. newspapers, magazines, television and radio) as well as schools, community centres and health centres. However, evidence suggests that the information must be given by 'trusted' sources such as doctors and health care professionals. A key issue is that many health care professionals and doctors do not have sufficient training in nutrition. Therefore nutritionists from Public Health Institutes should lead on providing information to the public.

IV.5. European Food Safety Authority (EFSA)

Unilever believe the European Food Safety Authority can make an important contribution to underpinning proposed actions on nutrition by providing authoritative scientific advice for the Commission (e.g., on recommended nutrient intakes) and evidence on best communication strategies aimed at health professionals and the general public.

We believe that EFSA should develop dietary guidelines to underpin the current discussion on nutrition profiles in relation to nutrition and health claims. In the development of these guidelines EFSA should consider how they would be affected by patterns of consumption which vary from country to country.

V.1. Consumer information, advertising and marketing

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

- Unilever recognise that nutrition information, including nutrition labelling is a useful tool to help consumers make informed choices. Our brands provide extensive nutrition and health information on pack, through websites and via consumer carelines. Unilever has recently adopted global policy on nutrition labelling which will require the provision of nutrition information on 8 nutrients (calories, protein, carbohydrates (including sugars), fat (including saturates), fibre and sodium) on back of pack where this is practicable. Where this is not possible (e.g., small packaging) we will provide information for 4 nutrients.
- In addition, we believe that it is important to start to provide information on Guideline Daily Amounts (GDAs) related to per serving or portion size on back of pack. This will provide the consumer with an indication of how much of a nutrient like fat and sugar will be in the food they eat. EFSA should be encouraged to develop an international set of reference values.

Question: 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?

- Unilever believe that food 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).
- We recognise however, that an appropriate balance needs to be found as there is some evidence that too much information is also a barrier for consumers. They want something simpler, such as the health indicator. When adapted by all food producers and across borders, this will make a healthy choice of products easier for consumers.
- Available research should therefore be reviewed and new research commissioned to find out how the European consumer best understands nutrition labelling and how the various components interact with lifestyles to lead to better health.
- Much of the work done on nutrition labelling has concentrated on information rather than action. Some companies including Unilever have run supermarket tours as a way of educating the consumer about nutrition and health as well as nutrition labelling.

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–Question: 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?

- Unilever believe there is already a solid legal framework in place at both European and national level to ensure that the marketing or advertising of foods is ‘legal, decent, honest and truthful’ (e.g. Unfair Commercial Practices Directive, TWF Directive, etc). In addition, there are established self-regulatory systems and codes of conduct at international, European and national levels governing marketing and advertising practices.
- Unilever believe that self-regulation should not be viewed as a replacement for statutory legislation but rather serve to complement it. Self-regulation offers several advantages; it is free to the taxpayer and consumer; it effectively reverses the burden of proof onto the code subscriber; it can be used to promote ‘best practice’; and it can be adapted quickly to respond to changes in the marketplace.

Question: 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?

- Unilever acknowledge that greater efforts have to be made to extend self-regulatory systems across Europe; to strengthen levels of stakeholder engagement, particularly with regard to complaint handling and redress; and to improve monitoring and reporting of compliance with Codes of Conduct. As a result, the advertising industry is currently investing much effort and resources in achieving these goals.
- With regard to 'vulnerable consumers', we would point out that there are provisions included within the TV without Frontiers Directive, Misleading Advertising Directive and, more importantly, the recently adopted Unfair Commercial Practices Directive.
- This legal framework is underpinned at international level by the ICC Principles for Responsible Food and Beverage Communications. The ICC Principles form the basis for national standards, many of which go further than the ICC requirements. The principles include provisions to ensure that advertisers do not undermine healthy, balanced diets and promote (where possible) healthy active lifestyles; do not encourage or condone excessive consumption; do not represent snacks as alternatives for meals; and do not undermine the authority of parents.
- Many companies, such as Unilever, have also adopted and adapted the Principles in corporate policies and principles. In July 2003, Unilever adopted its own global internal principles for Responsible Marketing of Food and Beverages. We recently revised these Principles to include a voluntary restriction on marketing directly to children below six years of age. We see this as an important way to drive best practice within our business.
- With respect to media literacy, we would like to point out the support given by the Media Smart campaign in developing media literacy programmes, particularly for children (focused on 6-11 years). These programmes are currently being rolled out in several EU countries including UK, Belgium, Germany and the Netherlands.

V.2. Consumer education

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

- Unilever believe while it is important to provide consumers with nutrition information and education, evidence suggests it is also important to focus on programmes that promote behavioural change.
- For example, Unilever recently conducted research to promote behavioural change in a deprived area of London where the community was given the opportunity to change their diet and lifestyle. We are currently writing up the results of this year long pilot but first indications are positive. Ideally larger and longer-term studies such as these should be completed. Including an action based behavioural change module to a programme can be seen as the distinction between passively and actively trying to change consumers' lifestyles. Unilever would be willing to share the outcomes of this research with key stakeholders.
- To create this active awareness and understanding of the relationship between diet, physical activity and health, consumers need to be targeted both at an individual and at a societal level. To get the process going, information should actively and passively be made available at different social settings (through media, family, school, sport clubs, supermarkets, bars, etc.).

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– *Question: What contributions can public-private partnerships make toward consumer education?*

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- Unilever values collaboration with public authorities and non-governmental organisations to establish multi-stakeholder partnerships for the formulation of solutions to diet- and physical activity-related issues.
- However, it is important that the relationship is open and transparent. Public private partnerships in our experience are a good way for both parties to understand what is achievable. We have often found that the final solution/programme is improved by the efforts of both parties. Partnerships are not always easy and it is important to be clear from the outset about what is trying to be achieved. Unilever has much experience in partnerships not only in food (e.g., World Heart Federation) as well as in other areas such as sustainability, HIV Aids, etc. We would be happy to share our experience further with the Commission.
- Partnerships with the private sector offer an additional means of reaching the consumer. Private enterprises (can) play an important

role in helping influence consumer behaviour through the products they offer and the way they are marketed, but also in terms of policies towards their own employees.

- Support and endorsement for particular types of products by recognised third parties can play an important part in encouraging positive changes in consumer lifestyles. For example, the Dutch insurance company VGZ has recently subsidised the use of Becel pro.activ products by consumers as part of a preventative heart disease reduction programme.
- *Question: 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?*
- Unilever recognise that key health and nutrition messages should be kept simple. However sometimes the messages have been simplified too much. For example, in the UK, the “eat less fat” message has encouraged people to eat less fat but not specifically saturated fat which is key for public health. Public health related messages should therefore be reviewed on a regular basis to ensure that they are having the desired effect.
- There is a lack of scientific knowledge on how health education programmes can generate desired behavioural change. Research has thus far been patchy and lacking a strong scientific underpinning. Member States who are implementing health education programmes should be encouraged to evaluate what effect the programme is having on diet and lifestyle. In terms of who should deliver this see section IV on dissemination. Industry can help produce the programme and the messages, but an independent and trusted (government) party must be the final arbiter and communicator of public health messages.

V.3. A focus on children and young people

- *Question: 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?*
- *What is good practice for the provision of physical activity in schools on a regular basis?*
- *What is good practice for fostering healthy dietary choices at schools, especially with regard the excessive intake of energy-dense snacks and sugar-sweetened soft drinks?*
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- Unilever has limited experience in this area but believe that the Commission should also consider pre-school children as well as school age children. Unilever undertook some research at Bangor University, Wales and found that preference and eating habits particularly of vegetables were developed before school age. We also know from work with consumers that parents (of new children) are very receptive to making improvements to their health during this

crucial period.

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- *Question: 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?*
- See comments on public private partnership. We believe that school programmes should not end at the school gate but must be extended into the community. One such recent programme includes Fleurbaix Laventine.

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

- *Question: How can employers succeed in offering healthy choices at workplace canteens, and in improving the nutritional value of canteen meals?*
- Making the workplace healthier requires leadership. For example, within our UK business the national board took such a role for our UK employees. Nutrition training sessions were provided for all staff, lunchtime sessions on a number of health related topics were undertaken and health messages were placed throughout the offices.
- We have found that training the workplace canteen staff in nutrition is important – ideally this should be interactive training in order for them to understand nutrition and health. There is still much misinformation about diet and health and therefore training sessions allowed staff to question and understand for themselves.
- Another way that employers can increase the healthy offerings provided at work is to include nutrition specifications into the caterers contracts. Additionally the workplace can use the marketing techniques used by retailers by offering “healthy meal deals”, for instance if employees choose a between a variety of healthy cooked meals, followed by fruit and a drink they would get a slightly reduced price over purchasing all those items separately.
- What measures would encourage and facilitate the practice of physical activity during breaks, and on the way to and from work.

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

- *Question: 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?*
- No comments.

V.6. Addressing the obesogenic environment

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

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- As a major employer throughout the EU Unilever would welcome greater understanding on how we can contribute to “built into” daily routines on physical activity. Currently a number of our local companies provide facilities for exercise on site whereas others encourage employees to take more exercise through physical activity sessions either in the morning, lunchtime, after work or out of work.

V.7. Socio-economic inequalities

– *Question: 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?*

- Unilever would like to propose that the Commission consider the following:
 - Encourage schemes that subsidise healthy products like fruit and vegetables (or product thereof) in schools and even those in lower socioeconomic groups.
 - Assess whether it is cost effective to prescribe increased physical activity to all parts of the Community. Certain schemes have been run and evaluated in the UK.
 - Request Member States to evaluate the cost of subsidising healthy food in canteens in schools, workplace and prisons. In the past this was believed to be an effective intervention and is still used by certain countries such as Italy. It might be useful for the Commission to understand what role subsidising healthy food might play in the overall policy options available to their Member States.
 - Evaluate to what extent malnutrition and lack of mobility is a problem to the elderly and consider what further measures need to be taken to assist this important but often forgotten group in the Community. Maintaining the health of the increasingly elderly population is a crucial factor in reducing demand for, and cost of, health services.

Question: How can the "clustering of unhealthy habits" that has frequently been demonstrated for lower socio-economic groups be addressed?

- Encourage Member States to develop schemes in which populations in deprived areas participate. For example, Unilever has supported a trial project in inner city London that allowed participants to have a health check and then follow their individual health programme.

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

– Question: Which are the most important elements of an integrated and comprehensive approach towards the promotion of healthy diets and physical activity?

- Unilever believe that leadership, co-ordination and clarity is important. This is both from a European but also a Member State level.
- We have already highlighted a number of areas which are key;
 - Ensuring that all stakeholders are involved in the debate, encouraging and fostering the relevant science (both fundamental and health promotion research);
 - Ensuring that nutrition data, physical activity data and anthropometric measures are evaluated in a consistent fashion, providing clarity on the messages regarding diet and health;
 - Encouraging the sharing of cross-border and cross organisation information;
 - Encouraging Member States and others to evaluate the programmes they undertake and develop scientific criteria for dietary guidelines, nutrition profiles and reformulation that also take into account cultural differences.

Question: What is the role at national and at Community level?

- Many of the points made above still apply to Member States. The Commission should set the framework but implementation will still be the responsibility of Member States. What we should avoid is Member States developing different reformulation schemes, different profiling schemes and different signposting schemes otherwise this will detract from all the other work that needs to be done.

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

- *Question: In which way could social and cultural variations and different regional and national dietary habits be taken into account in food-based dietary guidelines (FBDG) a European level?*
- Unilever believe that one European FBDG could be based on all commonalities of the existing FDDG of the various EU countries (this information is available in research done by Unilever, October 2005). The approach should be food groups based (big six or eight). Having absorbed the commonalities, FBDG could then be absorbed in to the unique eating patterns per country and still describe the food in a common way.
- *Question: How can the gaps between proposed nutrient targets and actual consumption patterns be overcome?*
- Certainly product reformulation must play a part in helping these changes because evidence suggests that consumers find it difficult to change their diet and lifestyle. However, some of these changes will not be possible for all foods therefore we need to develop a society that encourages us to make healthy choices the easy choice. Whether it is at nursery school, in hospitals, at work, in the community or at home – prevention is everyone’s business and not just that of the food industry.
- Certainly the workplace is an underdeveloped area where more work could be done. Many of us spend a large part of our day at work and therefore this should contribute to improving our diet and lifestyle. Research suggests that if workplace projects are also extended to the family the outcomes regarding diet and physical activity can be much improved.
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- *Question: How can dietary guidelines be communicated to consumers?*
- Unilever believe that dietary guidelines should be widely available (e.g., websites, on pack information, in schools, workplaces, supermarkets, etc.) when consumers decide to actively look for guidelines.
- All communication channels should be utilised (e.g., radio, television, written press, etc). The communications should include clear-cut positive messages, such as: “choose steamed, grilled or boiled dishes, instead of deep fried.”
- However, they will only provide a broad base of what is healthy and less healthy to the consumer. Ideally individuals need some tailored information for themselves. Research in USA shows that interactive individually based internet based nutrition education can be a useful adjunct to other forms of education.
- *Question: In which way could nutrient profile scoring systems such as developed recently in UK contribute to such developments¹?*

- Unilever support the concept of nutrition profiling scoring systems for nutrition and health claims and potentially for signposting healthier choices. However, we believe that an International set of reference values should be developed by EFSA before nutrition profiles can be established. Ideally we would like to see one scheme for the whole of EU rather than have to work with different schemes in different countries. Once such schemes are developed they should be tested.
- Moreover, the favourable nutrients should not ‘neutralise’ the unfavourable nutrients. The applied system should be applicable for the whole diet and not just be developed for certain categories of foods otherwise this will cause consumer confusion. Additionally the scheme should enable and motivate the food industry to innovate in a healthy way.
- Nutrition profiling schemes can be used to assist in the development of labelling schemes such as health logos or for determining which foods can receive nutrition and health claims. However, Unilever does not support the use of nutrition profiles to decide which foods can be advertised and marketed.

V.10. Cooperation beyond the European Union

– Question: Under which conditions should the Community engage in exchanging experience and identifying best practice between the EU and non-EU countries? If so, through which means?

- It might be useful for the EU to understand the evidence base that exists in other parts of the world. For instance, good experience exists from USA, Canada and Australia. In the States they have run many large and successful programmes on diet, physical activity and health such as Pawtucket, Stanford and Minnesota (references to these projects can be under a google search “**heart health projects**”).

V.11. Other issues

Question: 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?

- Unilever believe that in certain countries malnutrition and mobility are still a problem in the elderly. The Commission should further investigate the extent of this problem and consider what measures need to taken to assist this important but often forgotten group in the Community.

Question: Which of the issues addressed in the present Green

paper should receive first priority, and which may be considered less pressing?

- Unilever believe that the priorities should be the following:
 - Ensuring that Member States monitor and evaluate both the cost benefits as well as each component of the programmes/projects. It is important that in five years time we understand what has worked or not worked.
 - Ensuring that the Community co-ordinates the efforts of the Member States.
 - Understanding (based on scientific research and evidence) the interplay between diet and physical activity and the effects it has on obesity. In particular, the EU needs to develop an International set of reference values on diet and health.
 - Better understand how to change consumer behaviour.
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