



Dole Food Company, Inc., with 2004 revenues of \$5.3 billion, is the world's largest producer and marketer of high-quality fresh fruit, fresh vegetables and fresh-cut flowers. Dole markets a growing line of packaged and frozen foods and is a produce industry leader in nutrition education and research.

In the United States, Dole is a leader in nutrition education through its participation in the 5to9aDay programme and more recently through the opening of the Dole Nutrition Institute. The Dole Nutrition Institute was founded to provide the public with easy access to information on nutrition and health, through research and education. Other projects include the construction of a Dole wellness centre and a Dole nutrition research centre.

In Europe, Dole is actively working to implement a complimentary programme. Using both our resources in the United States and building a Europe specific knowledge base Dole Europe aims to educate our European consumers on healthy lifestyles and well-being by promoting the benefits of a balanced diet rich in fruit and vegetables, together with regular exercise.

Dole Europe's answer to 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

Dole Europe endorses **all** the responses that the Commission has received from **Freshfel Europe**, of which Dole Europe is a member of the Working Group on Promotion.

In addition to those responses, Dole Europe includes further information to certain questions below:

Answers to specific sections and questions raised in the Green Paper

IV. Structures and Tools at Community Level

- 1. 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?**
- 2. Which kind of Community or national measures could contribute towards improving the attractiveness, availability, accessibility and affordability of fruits and vegetables?**
- 3. On which areas relating to nutrition, physical activity, the development of tools for the analysis of related disorders, and consumer behaviour is more research needed?**

More research is needed on how to make fruits and vegetables more attractive to consumers, not necessarily relating to nutrition, physical activity etc. The priority should be to gain a deeper understanding of consumer behaviour, specifically current perceptions of fruit and vegetables and what would make consumers eat more fruit and vegetables. In addition there should be a focus on the dissemination of existing research, and how it can be used as a tool to promote consumption. Fruit and vegetables need to be promoted as contemporary and attractive ("cool" through changing times), and tools to market this message need to be developed.

- 4. 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?**

Socioeconomic distribution is a widely used method of segmenting populations and as such the WHO Europe Report on Food and Health in Europe¹ could be accessed to improve the understanding of the

link between socioeconomic status and education, and manifestation of obesity. Socioeconomic distribution could be used as the proxy for geographically mapping the occurrence of obesity, and further, cultural comparisons can then be drawn to increase the knowledge and understanding.

The WHO report cites research which has identified a relationship of income to consumption of fresh fruit and vegetables and the share on income spent on food. '...low-income householders are usually very efficient in obtaining sufficient food for the little money they have, they may spend less on food to protect health, such as fruit and vegetables, and relatively more on energy-dense foods... In contrast, higher-income families eat more fruit and vegetables, and spend a smaller share of their total income on food.' Further, 'The growth of younger children is a traditional indicator of nutritional wellbeing in a population... In the United Kingdom, for example, children in wealthier families are 10cm taller on average than those in poorer families.'

5. How can the programme (Public Health Action 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?

6. Which are the most appropriate dissemination channels for the existing evidence?

No single channel will be sufficient. However retailers and 'sellers' of fruit and vegetables should be enforced to play a role in actively educating consumers. They have the best platform for influencing and educating consumers as they make their purchase decision. No where else is there direct contact with the consumer at the precise moment they are deciding what to buy to feed themselves and their family.

V.1. Consumer information, advertising and marketing

When considering rules that refer to the way information on nutrition or nutritional value of foods is advertised or marketed to the consumer, Dole Europe believes that the sector of fresh fruits and vegetables should not be bound to any restrictive conditions. Scientific research clearly demonstrates the health benefits of a diet rich in fresh fruits and vegetables. It is therefore essential that the sector can continue to promote without restriction the unique nutritional health benefits of consuming more fresh fruits and vegetables without any burdens.

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

8. 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?

It could be argued that when consumers want to know more about what they are eating they would make contact with the manufacturer. Therefore in addition to an EU Government (EFSA) approved leaflet, food producers and manufactures could provide additional information to educate consumers, this could be provided on their websites and/or similar platforms. This information would require monitoring to ensure it is consistent in with that of the Government leaflets.

Good examples are the Dole Nutrition Institute website www.dolenutrition.com, (Food Facts A-Z) and the www.dolesuperfoods.com website which serve to educate consumers about the nutritional values of the fruit and vegetable products Dole sells worldwide. (Although world-wide accessible, presently these websites are aimed at educating consumers in North America, but a similar programme will be rolled out by Dole in Europe). These websites help consumers to understand what nutrients are, what they are important for, in which product consumers can find them and overall how to include them in their daily lives. In addition Dole fruit carries, where applicable, a 'superfood' sticker, this encourages consumers to access the website which educates them on the extraordinary nutritional benefits of the fruit they have consumed.

9. Are voluntary codes ("self-regulation") an adequate tool for limiting the advertising and marketing of energy-dense and micronutrient-poor foods? What measures should be considered if self-regulation fails?

10. 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 children is not exploited by advertising, marketing and promotion activities?

V.2. Consumer education

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

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

13. 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?

The message should be timeless, simple and easy to action, i.e. incorporate and keep-up (maintain) in one's life. Each player should be obliged to continually repeat the exact same message.

Message delivery can be via manufacturers and producers, in addition to other channels. Again reference is made to the Dole website www.dolenutrition.com, which provides easy to understand and applicable nutrition information, this is combined with the importance of regular exercise for a healthy lifestyle. Also there is a free bi-monthly newsletter 'Dole Nutrition News' (diet, fitness, nutrition and natural beauty), and other free health and wellness brochures to download.

V.3. A focus on children and young people

14. 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?

15. 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?

16. 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?

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

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

18. 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

19. Which measures are needed to ensure a stronger integration of interventions aiming at promoting healthy diets and physical activity into health services?

V.6. Addressing the obesogenic environment

20. In which ways can physical activity be "built into" daily routines?

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

V.7. Socio-economic inequalities

22. Which measures 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?

23. How can the “clustering of unhealthy habits” that has frequently been demonstrated for lower socio-economic groups be addressed?

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

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

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

25. In which way can food-based dietary guidelines at a European level take the different regional and national dietary habits, as well as social and cultural variations into account?

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

27. How can dietary guidelines be communicated to consumers?

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

V.10. Cooperation beyond the European Union

29. Which are the best means of exchanging experience and identifying best practice between the EU and non-EU countries?

V.11. Other issues

30. Are there issues not addressed in the present Green paper which need consideration when developing a Community strategy on diet, physical activity and health?

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

¹ World Health Organisation. *Food and Health in Europe: a new basis for action; summary*. Copenhagen: World Health Organisation, 2002.

Please note that Dole Europe does not object to having its responses, or parts thereof, published on the Commission's website and/or in reports. However this should only be done WITHOUT reference to Dole or any of its entities.

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