



European Commission
DG Sanco
Unit C4
L-2920 Luxembourg

Brussels, 24 March 2006

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

EuroCommerce answer

GENERAL COMMENTS

EuroCommerce is the business representation of the retail, international trade and wholesale sectors to the European Union. It represents more than 100 members from national trade associations, companies, national and European sectoral trade associations in 28 countries.

Overall, the commerce sector represents the interface between the manufacturing sector and the 450 million consumers across Europe. Commerce is a large and dynamic sector in the European Union, representing 13% of the EU GDP, 5.3 million enterprises and providing jobs to over 26 million people from all parts of Society.

EuroCommerce welcomes the Commission's initiative to launch, through the present Green Paper, a broad and open consultation process in order to find the best ways to promote healthy diets and physical activity. Our organisation recognises the need for a global strategy on diet, physical activity and health as adopted in the WHO report in May 2004. In this context, EuroCommerce is confident that the EU Platform for Action on Diet, Physical Activity and Health launched by the Commission in March 2005 will contribute to raise awareness among the relevant European stakeholders and generate successful actions towards healthier lifestyles across Europe. European retailers have constantly increased their efforts since the launch of the Platform and report their activities to the Platform.

The commerce sector is pleased to see that the present Green Paper confirms the approach taken by the Commission, whereby a global strategy must follow a multi-stakeholder approach, where all relevant stakeholders work together and collectively take responsibility for the problem. Obesity is a multi-causal issue, and EuroCommerce members believe that physical activity and active lifestyle play as important a role as eating patterns in the fight against it.

Furthermore, EuroCommerce strongly supports the opinion that all foods have a place in a balanced and varied diet. One single food cannot be pointed out as not being part of a healthy diet, all the more so that a healthy diet will vary from one individual to another. It is a broad range of various foods that make up a healthy diet and a combination of a balanced diet with physical activity that make up a healthy lifestyle.

In the elaboration of its strategy, the EU Commission must also bear in mind that dietary habits and lifestyles are an integral part of the cultures and traditions of Member States. The basics of an EU Action Plan promoting healthier lifestyles must therefore take into account demographics, traditions, cultures, infrastructures and the relevant socio-economic aspects. Just as important is that any strategy must be based on evidence and scientifically sound.

Finally, EuroCommerce members acknowledge that diet is a matter of personal choice and that neither governments nor other stakeholders can force consumers to lead healthier lives. Ultimately, it is the consumer's own responsibility to make choices for a healthy diet and lifestyle. This is why it is primordial to understand what motivates individual consumption and purchasing decisions, and how to influence these factors to encourage behavioural change. Education certainly plays a role to entice consumers to lead a healthy lifestyle and it should be the prerequisite to any public policy intervention. Only when this is achieved would the necessary supportive environment be in place for citizens to change their behaviour and adopt healthier lifestyles.

COMMENTS ON SPECIFIC QUESTIONS

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?*

As highlighted in our general comments, dietary habits and lifestyles vary across Europe. Therefore, an EU Action Plan promoting healthier lifestyles will necessarily be very broad, giving recommendations for the promotion of healthy lifestyles but also allowing Member States and relevant stakeholders to adapt them to the specificity of the country/region. In fact, the EU can define global policy objectives, which need to be implemented on national level. In turn, the EU can also support national actions, notably in the area of education and physical activity.

We also believe there must be a consistent approach across all related policies (health, nutrition, agriculture, education, research, trade etc), with a focus on public health education. Public health education on nutrition and the importance of active lifestyles is indeed the prerequisite to enable consumers to lead healthier lives. This should start in the home and at school since living patterns are learned at an early stage of life. For other citizens, the right messages (coming from public authorities) should be conveyed by all relevant stakeholders (doctors, press/TV, public health authorities, sports associations, food industry, retailers, consumer associations...) through all available media.

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

EuroCommerce agrees with the European Commission that fruit and vegetables play an important role in a healthy and well-balanced diet and can make an important contribution to it. Although the question seems to imply that the attractiveness, the offer, the accessibility of the products and their price are obstacles to an adequate consumption of fruit and vegetables in Europe, the situation is quite different.

On the contrary, all kinds of fruit and vegetables are easily available for most of the citizens across the EU. Throughout the year, a wide majority of consumers are able to buy fresh fruit and vegetables regardless of the season and can choose from a wide and varied range of products. In particular, retailers make sure that consumers can rely on affordable prices for fruit and vegetables of the season. The small part of citizens not having access to fresh fruit and vegetables should not be ignored, but this is less a nutrition problem than a distribution of wealth across the different socio-economic levels of the population.

What is important to know is what triggers the motivation for consumers to eat fruit and vegetables. First of all they need to understand the benefits of their consumption to increase their intake of them. To this end, resources to promote their benefits should be allocated at both EU and national levels.

- *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?*

Obesity is caused by several factors and they must all be adequately researched. It is of the utmost importance that any strategy must be evidence-based and scientifically sound. Existing and future measures both in EU Member States and in other comparable societies must be evaluated from a cost benefit perspective to give an understanding of their effectiveness.

Research must also be conducted to analyse citizens' level of knowledge/understanding of the steps necessary to achieve a healthy lifestyle and their motivation (or lack thereof) to undertake these steps. We believe that greater attention needs to be put on understanding what motivates individual consumption and purchasing decisions, and how to influence these factors to encourage behavioural change. Changing lifestyles also play an important role in the rise of obesity and any future research should seek to understand the implications arising from them.

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?*

A set of indicators needs to be developed for use across the EU, using modern market research and sampling techniques, and reporting formats need to be standardized. The indicators should be both quantitative and qualitative/attitudinal. Areas covered should include obesity levels, food intake patterns and physical activity with appropriate segmentation by age, region, socio-economic group etc. Appropriate analysis should yield robust data which will provide empirical evidence on which policy can be based. Existing consumer surveys, focus groups, store panels and sales data should also be used.

- *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?*

First of all, relevant stakeholders must work together, building greater public awareness of the need for a balanced diet and more physical activity. The Community should also support more programmes aimed at the promotion of healthy lifestyles, including nutrition and physical activity and also encourage Member States to do likewise. The Community should also increase the number of public information campaigns, targeted at different consumer groups, which would deliver simple messages that are both easy to understand and put in practice. Member States should be able to adapt these messages to their national needs.

Employers are not to be neglected as actors who can help to raise the awareness on the benefits of living healthier lifestyles. They are well aware of the cost to them of absenteeism due to ill health and a special effort should be made to assist them in encouraging their employees to take exercise and follow a balanced diet.

- *Which are the most appropriate dissemination channels for the existing evidence?*

Channels will vary by age group, with most fundamental differences being between children and adults. Children can be best targeted via their parents, schools and children's television programmes.

Media (TV, magazines, radio, newspapers...) and health professionals are the key channels for adults. The media (TV, magazines, radio, newspapers...) play an important role in disseminating the information and therefore have a huge responsibility to inform citizens in a neutral and understandable way. Information must be based on scientific facts. There should be co-ordination between public authorities and media when it comes to public health. This can be supplemented by posters, billboards, mail shots, websites, handouts etc. As stressed above, employers can also play an important role in disseminating messages coming from public authorities to millions of citizens.

IV.5. European Food Safety Authority (EFSA)

- *The European Food Safety Authority can make an important contribution to underpinning proposed actions on nutrition (e. g. on recommended nutrient intakes, or on communication strategies aimed at health professionals, food chain operators and the general public on the impact of nutrition on health) with scientific advice and assistance.*

EuroCommerce is of the view that EFSA has a key role in the provision of scientific information and advice. All policies and measures must be based on scientific advice, hence EFSA has a crucial function.

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?*

EuroCommerce recognizes that providing consumers with accurate and useful information is essential to allow them to make an informed dietary choice. Today, nutrition labelling is mandatory only when a claim is made, but in practice more and more products have nutrition labelling provided on a voluntary basis. Some retailers even provide nutrition labelling for up to 80% of their own-brand products. Nutrients that are considered useful by consumers are energy, carbohydrates whereof sugars, fats whereof saturated fats and salt.

However, the label is only one means of providing information among others. It should remain complementary to general information given through other means, such as leaflets, websites, consumer information services etc.

EuroCommerce is of the opinion that nutrition labelling should remain voluntary and be left to the operator to decide upon. Retailers develop nutrition labelling on their own-brand products when there is a market demand, and this demand varies from one market to another. In practice, commercial pressure and competition most often lead producers and retailers to provide nutrition labelling.

Moreover, providing nutrition labelling is sometimes not possible for technical reasons:

- on small packages, because of the lack of space;
- for fresh produce, because of the variability of the composition of nutrients, e.g. fat content in meat, which means that a "typical" fat declaration could be misleading;
- for processed food products prepared in-store, because of the variability of recipes and because it represents only a small volume;
- for mixed products (e.g. a box of assorted biscuits), where each variety is significantly different in its nutritional content;

- for food products from SMEs, who do not have the financial resources to hire additional specialised staff to prepare accurate nutritional statements. This is especially the case when only small quantities are produced; when there is a large variety of products; or for home produced products;
- for seasonal lines: at Christmas, Easter or other occasions, some products are on sale for less than 6 weeks. The cost of providing nutrition information for such a short season would be prohibitive. Furthermore, these products are often also used as presents or treats, when the buyers are less keen on knowing the amount of fat or calories consumed.

Some consumer groups are pushing for mandatory nutrition labelling as a way to help consumers to make an informed choice, but are simultaneously avoiding the issue of how the average consumer understands the information and makes use of it. If not preceded by appropriate education, labelling has little chance of being helpful in making dietary choices. Proper consumer education is vital; without it the consumer cannot understand or use any information given by manufacturers/retailers.

The United States has the longest existing and most comprehensive labelling regulations in the world. However, these do not seem to be effective, because obesity levels there have steadily increased over past years and are among the world's highest. This can be used as proof that labelling alone cannot improve consumers' eating patterns or their lifestyles.

- *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?*

As just highlighted above, labelling in itself cannot improve consumers' eating patterns or their lifestyles. Therefore, prior to giving any information through labels, it is of the utmost importance to lay the necessary foundations for a healthy and balanced diet through education, which is primarily the responsibility of public authorities.

Recent research shows that dietary patterns and lifestyle habits are formed early in life – i.e. in childhood. Therefore, it is essential to start nutrition education at this stage by means of adequate educational tools for both children and parents such as, for instance, the introduction of nutrition education as a school subject and provision of nutrition information for parents of children of school going age. Schools and the home are the appropriate places to provide the basic knowledge about a healthy diet and physical activity. Later, this will enable pupils, the adults of tomorrow, to understand the nutrition information given by manufacturers and retailers.

Industry is assuming its share of responsibility in this educational process, for example by voluntarily displaying additional information on many products (beyond the legally mandatory labelling requirements), by offering customers nutrition information at the point of sale or over the phone through hotlines as well as by making such information available to their customers on the Internet. In fact, in recent months many companies have extended their commitment in this respect.

- *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?*

Self-regulation must be given priority because what is agreed voluntarily by operators has a greater chance of success. In several countries, retailers have co-signed with other stakeholders voluntary codes of conducts for specific areas of advertising. However, effective monitoring and control tools must also be in place.

At European level, the European Advertising Standards Alliance (EASA) published in 2004 an Advertising Self-Regulation Charter (available on www.easa-alliance.org). In the Charter – signed by EASA in the presence of representatives of the various European self-regulation organisations as well as representatives of the advertising industry, the media and the European Commission – the fundamental principles of independence, transparency and efficiency were laid down for the first time. According to these principles, consumers are entitled, e.g., to lodge complaints free of charge and non-bureaucratically. On the national level, self-regulation of advertising also provides for complaints to be dealt with quickly, effectively and with flexibility.

EuroCommerce believes that the existing legal provisions, combined with well-functioning mechanisms of voluntary self-regulation, are adequate to protect consumers' interests.

- *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?*

EuroCommerce understands the Commission's aim that especially vulnerable groups of consumers – such as minors and certain groups of older consumers – should be protected by special regulations. However, existing European and national laws already provide sufficient opportunities and regulatory instruments to tackle this objective and/or fulfil it.

In addition, voluntary codes of practices have been developed (both at national and international level) and they are implemented and controlled at national level (see above). Monitoring systems for self-regulation codes can take various forms and should be devised by each Member State to suit local circumstances.

Furthermore, EuroCommerce would like to recall the notion of a well-informed and responsible consumer, which the European Court of Justice has established and developed in its case law. This concept should form the basis of all discussions and policymaking, including measures at European level. Ultimately it is the consumer who will choose and consume his/her food. The freedom and independence of the consumer should be fostered, rather than restricted through disproportionate legal requirements.

V.2. Consumer education

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

As mentioned earlier, education is central in order to enable consumers to make healthy food choices (although it may not necessarily trigger a change in consumer behaviour). Only a well-informed and educated consumer will be able to understand the nutrition information provided by the food manufacturer, and will be likely to know how to use it in the context of his/her personal diet.

We would like to repeat the importance of public health campaigns developed by public authorities. Simple messages on nutrition and physical activity need to be developed by the competent authorities and then be backed up by all relevant stakeholders (retailers, manufacturers, health organisations etc.).

The information disseminated needs to be easy to understand, factual and scientifically sound. However, the communication process implied in these principles is not the sole, or even the primary, responsibility of industry. It can only be successful if all social actors are involved. The media, educational authorities, social institutions of all types – particularly nursery schools, day-care centres, schools and higher education institutions – as well as health insurance providers, medical doctors, employers and the family, all play an equally important role.

Retailers' responsibilities also entail that they provide consumers with a wide choice of food products together with accurate and useful information to allow consumers to make appropriate dietary choices. Provision of information can be done through the labels, but can also take other forms, such as websites, customer hotlines, customer magazines, posters, leaflets etc.

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

Multi-stakeholder initiatives bringing together public authorities and other relevant stakeholders must be developed because they focus the attention of the whole of society on the global issue of obesity and how to counteract it. Common messages can be worked out as well as common projects at different levels of society involving both the public and private sectors.

- *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?*

Because the subject of nutrition and physical activity is so complex and multi-factorial – depending on individual (physiological, psychological, genetic) as well as cultural parameters – EuroCommerce believes that it should always be addressed and communicated with an integrative approach.

There are nevertheless some commonly agreed messages, such as increasing the consumption of fruit and vegetables and taking more physical exercise. However, there is an urgent need to conduct further consumer research to identify which messages are understood, and which are more likely to make consumers change their behaviour.

These messages must come from public authorities and credible bodies. They must then be backed up by other stakeholders (media, food industry, retailers...). Messages also need to be adapted to local living patterns, because it is unlikely that they would be understood in the same manner across Europe (independently of the language issue of course).

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?*

Improving the nutritional value of meals is one thing, but pupils at schools and children at home must first be sensitised on healthier types of food, otherwise they are likely to reject it and ask for what they tend to like most (sodas, fried chicken, pizza...). Here again education plays a key role and should start both at home and at school.

Providing healthier school meals will cost money. Public funds have to be made available for this. Where school meals are not provided (e.g. Ireland), guidelines and advice on the content of packed lunches brought to school must be provided.

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

There should be more mandatory physical activity at school and the insurance that the facilities exist. Again the messages promoting a healthy lifestyle are important to give an incentive to pupils to do more sport or other healthy exercise. It is very important that the children who are not interested in sports are not left out.

- *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?*

There must be a favorable school environment: educational messages regarding the importance of a balanced diet and physical activity; providing healthy school meals; making healthy food options available for snacking...

- *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?*

National multi-stakeholder platforms can play a very useful role in agreeing on joint actions to fight against obesity. Parents and children need to be educated and encouraged.

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?*

If the importance of a balanced diet is emphasised by all parts of the society, it will encourage all employers to provide healthy choices at workplace canteens. Employers can play an important role in disseminating and amplifying health messages coming from public authorities, further making this choice easier by offering healthy options in workplace canteens. Public authorities can help by offering awards for workplace canteens and guidance on healthy options to companies.

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

The same goes for physical activity: employers should be given financial incentives to put in place adequate infrastructures (e.g. showers, bicycle shelters) so that healthy lifestyle and physical activity can more easily become part of daily life for their employees.

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

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

Health spending needs to focus more on prevention of obesity; the current emphasis is disproportionately on the cure of the symptoms of obesity.

Health services representation should be included in discussions taking place on national level between stakeholders and aimed at promoting healthy diets and physical activity (multi-stakeholder platforms). The right messages should be defined within these platforms for discussion and adapted to the needs of each specific stakeholder in the context of its target group. There may be different target groups for one same category of stakeholders (e.g. doctors, pediatricians, geriatricians, etc, will have to adapt their messages to the specificity of patients under their care).

V.6. Addressing the obesogenic environment

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

Public authorities should commit resources to combating the problem of obesity and lack of physical activity.

- *Which measures are needed to foster the development of environments that are conducive to physical activity?*

See comment above. Make public funds available and conduct market research to ensure that the projects chosen are cost effective and likely to succeed.

V.7. Socio-economic inequalities

- *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?*

Research needs to be undertaken into the link between diet and socio-economic status and education levels. The results can be used to help refine and target appropriate messages for each sub group in the population.

It is difficult for people to change their habits; it is not always just a matter of socio-economic categories (other factors such as family structure, age, geographic location etc may also be significant barriers). Tackling the problem at school level would ensure that education is received by pupils from all types of socio-economic categories. It is more difficult to address this issue with adults.

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

Simplify the message and use the technique for constant repetition.

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

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

Education and information first, then make sure that citizens are able to carry out physical activity (infrastructures need to be made available by regions, employers etc.), and that consumers are able to make healthy food choices (food industry and retailers to provide this choice).

- *Which role at national and at Community level?*

Community action may help to identify and disseminate good practice (notably through the work of the EU Platform for Action), which would then be implemented on national or even regional level.

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

- *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?*

There are considerable national and regional differences in dietary habits across Europe. In our opinion, diet must always be considered in a cultural and national context. Therefore, any European dietary guidelines should take into account these differences, must allow for local conditions and need to be checked in advance using market research.

- *How can the gaps between proposed nutrient targets and actual consumption patterns be overcome?*

There is a need for more studies on obstacles preventing consumers from following nutritional guidelines. Consumers need to be encouraged to follow a healthy balanced diet and not just the attainment of some specific target isolation.

- *How can dietary guidelines be communicated to consumers?*

They must be made easy to understand for consumers (e.g. pyramid model, food plate model etc.). It is the responsibility of all relevant stakeholders to communicate them. One option would be to send every adult citizen a card with simple information, and distribute a junior version of the card in schools.

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

Any scoring system or any system which highlights a certain food item through a symbol is based on the categorisation of foods and therefore contradicts the principle that, in nutrition, there are neither good nor bad foods but only good and bad diets.

For this reason, EuroCommerce members reject any form of categorisation of food items. It seems to us that it is much more important to provide consumers with integrative, objective information which – combined with early education – will enable them to choose their diet and lifestyle accordingly.

V.10. Cooperation beyond the European Union

- *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?*

The Community could work through the WHO to identify where success has been achieved in similar advanced societies and then share information and learning experiences.

V.11. Other issues

- *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?*

There should be a discussion on media and their responsibilities. Media have a big impact on the attitude of citizens.

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

In our opinion, improving the effectiveness and financing of public health education on healthy lifestyles is the prerequisite to any other action. It is the basis for prompting citizens to change their eating and living patterns. It would also enable them to understand the nutrition information given by food manufacturers and retailers. The reason for the lack of motivation of consumers in not following healthier lifestyles needs to be understood and addressed.

This paper represents the views of its author on the subject. These views have not been adopted or in any way approved by the Commission and should not be relied upon as a statement of the Commission's or Health & Consumer Protection DG's views. The European Commission does not guarantee the accuracy of the data included in this paper, nor does it accept responsibility for any use made thereof.