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EVA's comments
on the European Commission's Green Paper

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



Introduction

The European Vending Association represents the whole of the vending industry: machine, machine component and accessories manufacturers, ingredient suppliers and operators. The primary aim of the EVA is to optimise the industry's commercial interests within the EU legislation, serve as a forum of discussion and exchange of ideas and experience for its members as well as draft standards for the industry. The EVA members are 15 national associations and 52 companies.

The EVA supports the Commission's initiative to launch a public consultation related to the prevention of overweight, obesity and chronic diseases. The EVA is a founding member of the EU platform for Diet, Physical Activity and Health and as such brings its contribution to the Green Paper debate.

The European vending industry represents more than 6.000 companies, 3,5 million food and drink machines (of which 70% are coffee machines). Vending operating firms are mainly small and medium sized, or even micro enterprises, which on average employ 4 to 5 persons, with varying degrees of qualification. They provide a convenient, hygienic and secure distribution channel, operating around the clock where the products are needed by the European consumers.

Important points

Obesity is affecting all countries in the world. We want to do our part and help curve the obesity rates. To that end, we appreciate the opportunity given by the Green paper to express our views. We want to focus on the vending part of the issue and trust the CIAA to comment on the general questions.

The Green paper provides a valuable opportunity to reassess the importance of the dialogue between the industry, the public services and the NGOs. The European Union should emphasize the importance of negotiation and consensus building. Legislation is not always the most appropriate policy instrument and, consequently, alternative instruments should systematically be considered at the start of the process. An effort to conduct thorough impact assessments should be pursued in order to find the right and effective solution without harming the European economy.

The Green Paper covers many important areas that could help reverse obesity rates. Volens nolens, it is a fact that obesity rates have been increasing. Fundamentally, it is essential to consider the following key factors before taking measures be they legal or self regulatory measures:

- Consistency
- Necessity
- Pertinence
- Proportionality : effectiveness, necessity , stricto sensus proportionate
- Effectiveness
- Efficiency
- Practicability
- Transparency
- Cost/benefits analysis
- Measure gaps between objectives and reality
- Measure own effects, desired and non desired effects, direct and indirect

The EVA encourages national and European public services to have a consistent approach. We support a target specific approach with no ostracism of a product, a company, an industry and the overweight or obese people.

In this mindset, we regret the ban of the vending machines in France, with no consideration to vending as a flexible retail channel. We would recommend ex ante evaluations. Necessity and pertinence are crucial.

0.5% of the Total energy intake from children Aged 2 to 18 years (1994 to 1996) come from vending machines; (1.2% for Age 19 to 39 years; *Trends in Energy Intake in U.S. between 1977 and 1996: Similar Shifts Seen across Age Groups- Samara Joy Nielsen, Anna Maria Siega-Riz, and Barry M. Popkin-*)

A ban does not prevent children from bringing food to school or buy the products from elsewhere. Bans hold no educative value. If the above mentioned key factors were considered, measures would reach their objectives without destroying businesses at a time when European growth is at stake.

We support a proportionate approach to the issue. It is important to put the person at the centre of the reflection process, individual responsibility is a key element. People have nutritional, physiological and psychological needs, they live in different environments (home, work, leisure, transport, holidays etc), with different social and cultural background. The global environment creates new living and consumption patterns. Therefore is it crucial to take the body hexis and doxa in consideration to address specific targets?

The importance of considering fighting obesity vertically, across all environments people are living in (home, school, urbanism etc), should be taken into account. We support actions towards energy balance: healthful eating behaviours and regular physical activity to achieve a healthy weight.

We definitely want to put the emphasis on the environment in which we are living nowadays: products correspond to new needs. The paradigms of the family and working life changed. Global approach against obesity should take it into account and adapt its solutions to the current European environment. Proposals should be seen through the prism of today's lifestyle.

The Commission's recommendations must be built around this framework if it is to succeed in reducing obesity rates without affecting all sectors of the economy that are contributing to Europe's wealth and competitiveness.

If there is a risk, it cannot be hypothetical. If sectors or companies are incriminated, their direct influence must be measured so that they do not serve as scapegoat for a much broader problem where everyone's responsibility is engaged. It is essential to provide sufficient scientific and sociologic proofs of elements that are being used to substantiate policies or decisions.

It is essential to consider that the main point is the safety of the products.

Against this general background, the EVA would like to answer the more direct questions, which are directly relevant to its area of work.

IV 3.2.

- 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?

We encourage the Community policies to focus on a European wide consistent promotion of healthy diets and physical activity. We strongly support the EC to encourage proportionality in the local policies. Ex ante and ex post evaluation should be encouraged and sponsored by the Commission to assess the effectiveness and efficiency of the measures.

Vending is a flexible and easy to install retail channel. It can be used to create environments which make healthy choices easy choices, by providing on site a broad variety of snacks and drinks. The consumers can thus easily make their choice.

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

We want to put the emphasis on the need for an ex ante evaluation of the impact on obesity of measures relating to the attractiveness, availability, accessibility and affordability of fruits and vegetables. An ex ante assessment of the attractiveness, availability, accessibility and affordability of fruits and vegetables as such is also needed as it might not be a problem, from what we observe overproduction in agriculture is an issue and fruits are cheaper than other dessert (yoghourts, ice-creams, pies etc).

Any measures to push fruits and vegetables on the market without taking into account the expectations of the consumers should be avoided. Fresh fruits can be vended where throughput is appropriate. The economy of such ad hoc measures should be assessed. Measures should carefully chose a target group and work with all stakeholders, taking into account the proportionality principle, to have a sustainable distribution of fruits and vegetables.

Vending is a flexible distribution channel and can help improve the availability of fruits and vegetables. Vending offers chilled machines to preserve fruits and vegetables. Vending is adapted to retail fruit juices, stewed fruits and dried fruits. However we want to stress the fact that fruits and vegetables sell in a sustainable manner only if they are included in a machine with other products. Furthermore, in order to make the offer sustainable and to abide by rules regarding hygiene and safety, the fruits and vegetables need to be processed to a certain extent. This also makes the shelf life longer and increases the attractiveness and ease of consumption on the go.

- 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?

Current studies mostly deal with food analysis. Consumer behaviour research would be interesting to understand the mechanism of consumption. It would be very relevant to have research to understand the mechanisms that make people have a regular physical activity. The research should look into cultural differences and the different representations related to sports, physical activity and body.

"A strong negative association was found between BMI and participation in team sports or exercise programs for both males and females" -" *The role of beverage consumption, physical activity, sedentary behavior, and demographics on body mass index of adolescents*" Richard A. Forshee, Patricia A. Anderson and Maureen L. Storey *International Journal of Food Sciences and Nutrition*, Volume 55, Number 6 (September 2004) 463_/478)

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

We would recommend that all products be concerned. Products have to be treated equally. One product should not be discriminated against and serve a political purpose instead of a societal and scientifically based one.

- 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?

We support a global and effective approach where education reaches every citizen whatever their ages and socio-economic background. This approach has to be consistent across all products and in all member states. Public media are probably the most far reaching support. We want to underline that the social side of food should not be forgotten: changing each child into a budding nutritionist may create future problems having people with nutritionist approach to food and forgetting the convivial side of eating. Information on food labels should be discussed with all stakeholders to be sure to get all implications.

- 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 is indeed an adequate tool. Industries know their customers. They can therefore develop self regulation schemes that will ensure their needs are satisfied. It also seeks to meet the demands of the public authorities and NGOs. Self regulation is a process whereby trade associations and their members agree to act along common guidelines. The development and dynamic of the process itself are very important. It is therefore a much more positive move than imposed legislation. Whilst it is not realistic to demand immediate compliance, the EVA strongly agrees that enforcement must be transparent and measurable to the other stakeholders.

- 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?

We support that with any piece of self regulation would come a note outlining how and when enforcement is measured and how this measurement is communicated to the stakeholders concerned. Precise objectives must be fixed and timelines provided so that implementation can be quantified.

With respect to media literacy, we believe that this should be addressed in the home and at school. We support initiatives to educate children to better understand the world and the society they live in.

- 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?

We want to question the scientific data substantiating this point. We would recommend that an ex ante evaluation be put in place to assess the link between obesity and the intake of energy-dense snacks and sugar-sweetened soft-drinks.

The notion of "excessive intake" is vague and very subjective, and it is unclear how it impacts directly on the BMI, and we know it cannot be the only factor. The other side of the equation (energy out) very much determines if the intake is excessive or not.

Finally, we support the view that there is no such thing as a good or bad food, it all is a matter of appropriate quantities.

Study conclusions : There was no relationship between RCSD consumption from all sources and BMI in either the CSFII or the NHANES data. The risk assessment showed no impact on BMI by removing RCSD consumption in school. These findings suggest that focusing adolescent overweight prevention programs on RCSD in schools will not have a significant impact on BMI. *See Risk Analysis, Vol. 25, No. 5, 2005 : " A Risk Analysis Model of the Relationship Between Beverage Consumption from School Vending Machines and Risk of Adolescent Overweight" Forshee RA, Storey ML, Ginevan ME.*

The far ahead majority of calories intake come from home consumption, 64.5 % of energy intake from all Americans come from home. *See OBESITY RESEARCH Vol. 10 No. 5 May 20 -v "Trends in Energy Intake in U.S. between 1977 and 1996: Similar Shifts Seen across Age Groups" Samara Joy Nielsen, Anna Maria Siega-Riz, and Barry M. Popkin-*

Parents play a preponderant role in fostering the lifestyle of their kids. Habits are taken at home long before children join school. If they have proper habits at home, they make healthy dietary choices at school. What is more, appropriate dietary habits do not change children into budding nutritionist, they eat healthily without having developed a bookish approach on food which could create future eating aversions and disorders.

V4.1

- How can employers succeed in offering healthy choices at workplace canteens, and in improving the nutritional value of canteen meals?
- What measures would encourage and facilitate the practice of physical activity during breaks, and on the way to and from work?

Although this is not directly relevant to our area of work, we would like to suggest that the following elements would encourage physical activity: having secure areas, cycle lanes, proper lightning of areas, clean walking paths, nice lightened stairs, and attractive environments.

Research shows that "urban environments are deemed walk able for utilitarian purposes if they are more compact, mixed use, and have inter-connected street network" *Canadian Journal of Dietetic Practice and Research, Summer 2004 by Frank, Lawrence D.*

In some preliminary results, Dr. Rundle from the Mailman School of Public Health found that people who live in neighborhoods that have a mixture of residential and commercial uses have lower levels of obesity than people who live in neighborhoods that are closer to being 100 percent residential. (<http://www.mailman.hs.columbia.edu/news/rundle-nyc-obesity.html>)

With respect to facilitating physical activity on the way to and from work, it must be taken into account that the priority for people when they go to work is to minimise the time needed. Spending calories is probably not their priority at that time.

Vending sells water and drinks (hot and cold) to help re-hydration during the day. Hydration is important for the productivity and health of the employees. In addition to the traditional range of products, vending machines sell anything that consumers can expect, including dried or processed fruits, salads, plated meals, (cereal) bars, juices and many more products. Vending machines are the most convenient distribution channel in an office environment.

Any recommendations from employers to their employees on how they should eat and move should be used with utmost care, as it may be interpreted as interference with their personal decision-making, as well as ostracism against overweight or obese people.

V8.1

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

We suggest always taking the following elements in consideration as advised in the introduction :

Consistency , Necessity, Pertinence

Proportionality : effectiveness, necessity , stricto sensus proportionate

Effectiveness, Efficiency, Practicability, Transparency

Cost/benefits analysis

Measure gaps between objectives and reality

Measure own effects, desired and non desired effects, direct and indirect

- Which role at national and at Community level?

The Community should encourage the Member States to have an approach based on the proportionality principle when tackling the obesity issue and share best practices. Member States should communicate with the stakeholders to find reasonable, proportionate, efficient and scientifically based measures to find a global solution.

V9.3.

- How can dietary guidelines be communicated to consumers?

Television is the most powerful media and can be used to communicate directly to consumers. Dietary guidelines should be presented as a healthy balanced diet. However ex ante evaluation should be done to assess the efficiency, economy and pertinence of such an action. On pack information is also a way to communicate to consumer and household brands are already doing much in this respect.

V11

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

The Community should encourage Member States to have a consistent approach based on facts. It should promote proportionate measures and global measures, the obesity issue can be solved only with the cooperation of parents, education, sport education, health services, town planning services, craftsman, industry etc. It should be made clear that it is an effort by all stakeholders against overweight and not be treated as a fight against specific companies.

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