



GREEN PAPER OF THE EUROPEAN COMMISSION

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

ANSWERS TO THE QUESTIONS OF THE COMMISSION

UNION DES GROUPEMENTS DE DETAILLANTS INDEPENDANTS
DE L'EUROPE

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SUMMARY

→ *Promoting healthy diets and physical activity for the prevention of overweight, obesity and chronic diseases* requires, on the one hand, an increase in wealth which must necessarily be evenly spread among the different levels of the population and, on the other, the educational and health systems which must be very efficient !

This calls for medium- or long-term actions at the Community level which are sustainable and support national actions. The definition of global political objectives can be achieved in the framework of the European Union.

As awareness and action vary from country to country, it will be very difficult to define a standard approach because the differences between countries must be taken into account and educational campaigns should integrate the cultural and national character of good and bad eating habits.

This contradicts the idea that there might be key messages applicable in the same way in all EU countries !

→ Priority should be given to choosing actions which work, yield results, and induce the consumer to effectively modify his/her habits. The more urgent the action, the more one should avoid embarking on costly and unnecessary actions which only serve to defer the implementation of truly effective measures. The key to success lies in the exact comprehension of the best method to **motivate** the individual consumer to adopt a new life style.

To do so, it is not compulsion that is required but persuasion and much more consideration of psychological factors without concentrating on the food factor.

→ In terms of communication, particular attention should be paid to messages broadcast via the channels most adapted to the most credible information sources, i.e. those which inspire the most trust among consumers. Education on the subject as a whole has to occur before informing consumers and is absolutely indispensable and should be based on scientific facts. But moreover, general education not aimed at strengthening motivation would only lead to recognising the problem without really modifying behaviour.

As to foodstuff information, given that quality is more important than quantity one should not jump hastily to definitive conclusions.

→ It should be recalled that diet is not THE factor responsible for obesity, but one of many causes. Therefore, messages aiming at making consumers feel guilty and reducing the "pleasure" dimension of food should be avoided !

→ The most significant message for the consumer, and the most promising in terms of change in behavioural pattern, is probably a "multidisciplinary" message – life style, exercise, etc. –, in the context of a holistic approach which considers all the different food sources.

There is no relationship between mandatory dietary and/or food information, on the one hand, and better diet with an improvement in health, on the other. Therefore, mandatory labelling by no means translates into an improvement of public health through a better diet.

This shows clearly that any information which may be useful to the consumer in terms of dietary recommendation should not automatically be translated into compulsory foodstuff labelling !

Moreover, any system which, by nutritional evaluation, would lead directly or indirectly to categorising foodstuffs as good or bad, appears misleading, unnecessary and harmful.

→ This calls for an accurate study of the complex and difficult relationships between exercise and a well-balanced diet during the working day !

→ And finally, it should always be remembered that in many of our European societies, people who become overweight live alongside people who depend on food aid to survive !

*Established in 1963, **UGAL – the Union of groups of independent retailers of Europe** – is the European association that acts as an umbrella organisation for the main groups of independent retailers in the food and non-food sectors.*

These groups are set up like wholesale businesses by independent retailers and craftsmen. Their aim is not only to provide their members with the best purchasing conditions. What they are also seeking is to jointly contribute technical and material resources, together with all the services and the human capacity required to guarantee the operation and development of modern commercial and distribution enterprises for retailers to effectively respond to consumer expectations.

To achieve this, these groups seek economic performance through networks of points of sale – consisting of SMEs usually working under a common brand name.

UGAL represents more than 323.000 independent retailers, who manage more than 456.000 sales outlets. This represents a total employment upper to 3.477.000 persons.

Some of UGAL's member organisations are e.g. EDEKA (DE), EXPERT INTERNATIONAL, MUSGRAVE (IE), ICA (SE), INTERSPORT INTERNATIONAL, KESKO (FI), SPAR INTERNATIONAL, SYSTÈME U (FR), ESSELUNGA, CONAD (IT), MERCADONA (ES).

UGAL congratulates the Commission on having initiated a vast consultation on the measures needed to promote a healthy diet and exercise to support the prevention of overweight, obesity and chronic diseases.

Indeed, the spread of obesity and its damaging effects call for the creation of an environment enabling individuals to freely adopt the positive choice of a healthy life style.

HEALTH ACROSS EU POLICIES

1 / IV.3.2. - *What are the concrete contributions which Community policies, if any, should make towards the promotion of healthy diets and exercise, and towards creating environments which make healthy choices easy choices ?*

1) Particularly in view of the relevance of questions 21 to 23, it appears desirable to first develop a truly concrete policy to allow **economic recovery** within the EU countries to help overcome obesity by developing more tailor-made actions.

The example of the progression of obesity in the United States sufficiently demonstrates that the physical health of a population is necessarily depends on a complex mixture of, on the one hand, **increased wealth** which should necessarily be **well spread across the various different population groups** and, on the other, **educational and health systems** which must be **very efficient !**

2) All concrete actions undertaken at the EU level to promote a healthy diet and exercise as well as the creation of environments facilitating healthy choices should, for almost all of them, be **sustainable medium- or long-term actions** (1).

Any research on the effect of advertisements based either on the simple quantification of short-term actions without critically examining their real impact on the modification of consumer behaviour in the medium and long term, or on simple legislative measures to create the belief in the short term that something is being done, would be totally counter-productive.

*"Bringing about changes in dietary habits, patterns of exercise and a healthy lifestyle will require the combined efforts of many stakeholders, public and private, **over several decades.**"* (2)

3) As will be mentioned several times hereafter, concrete actions by the European Union should assist, **in support of national actions**, particularly education and promotion of exercise. This by no means rules out the definition of global political objectives at EU level, to enhance coherence and efficiency,.

(1) See also, e.g. the long term programme of the Department of Strategy and management of Public health of the Ministry of Health of the Czech Republic, as well as Healthy Cities of the Czech Republic programme – HCCZ – which pursues quality local development in the long term, health promotion, quality of life, and sustainable development, citizen participation, cross-sector management and regional co-operation.

(2) Opinion of the European Economic and Social Committee : "Obesity in Europe – Role and responsibilities of civil society partners", Brussels, 28th and 29th September 2005 – EESC 1070/05 point 3.3

2 / IV.3.2. - *Which kind of Community or national measures could contribute towards improving the attractiveness, availability, accessibility and affordability of fruit and vegetables ?*

The formulation of this question is ambiguous and above all, appears unnecessarily controversial as it infers that there is no attractiveness, availability, accessibility or affordability of fruit and vegetables.

Nothing could be further from the truth. Fruit and vegetables are freely distributed and attractively presented, are available, accessible and affordable for nearly every consumer. This assertion of general character does not mean that there are no geographically isolated spots where poverty would prevent adequate access to sufficient fruit and vegetables. This assertion of a general character does not mean that there are, under certain exceptional circumstances, no relative difficulties, e.g. relating to price and supply conditions. These exceptional circumstances and these pockets must disappear and the most appropriate means is an increase in wealth which must necessarily be spread among the various levels of the population.

A positive approach to question 2 is to see it as a question concerning the means which would allow an increase in individual consumption of fruit and vegetables by each consumer...

All factors taken together may lead to this result. The most important is **the degree of motivation** of each individual to increase personal consumption (3). The Commission is perfectly aware of the multiple actions to promote fruit and vegetables developed at the national level aided by various players in the product distribution channels concerned to obtain such a result. But a realistic answer to the above-mentioned question may only be given if the Commission develops a **precise study of the actions which may have a real and long-term effect** on eating habits.

What purpose would it serve to put particular emphasis e.g. on the distribution of fruit in schools or companies if the analysis would show that, in the medium or short term these actions would not be sustained ?

3 / IV.3.2. - *On which areas related to nutrition, exercise, the development of tools for the analysis of related disorders, and consumer behaviour is more research needed ?*

UGAL acknowledges that it is essential to emphasize consumer **education**. One should also look at **who really needs what** as well as where and how the information should be provided to arrive at an optimal result.

(3) See also the answers to question 3 and many others.

But, first of all, it seems that priority should be given in the areas linked to diet, exercise, devising tools to analyse closely related troubles and consumer behaviour, to see **which actions work well**. It should be clearly established which are successful, which **induce consumers to effectively modify their behaviours**. The objective is simple : the more urgent the action, the more costly and unnecessary actions should be avoided which only defer the implementation of really efficient measures !

Strategically, apart from the amelioration of socio-economic conditions, the key to success thus seems to be an exact understanding of the **best means to motivate the individual consumer** to adopt a new life style.

A recent study (4) shows that obesity "is not seen as a significant concern by Europeans relative to other concerns". Where consumers generally perceive obesity as a real society problem, they do not feel personally concerned (5). "While many of those trying to lose weight have been on weight loss diets in the past, it appears they are not turning to any type of weight loss diet today". "This begs the question of what can be done to encourage overweight individuals to take ongoing measures to lose weight" (6). This is all the more worrying as "limiting calories and talking regular exercise are not top priority actions for those people who are trying to lose weight" (7). This observation should be compared to another, according to which "most Europeans (73 %) feel that they don't get enough exercise" (8). All these facts lead the authors of the study to conclude rightly that "this gap between awareness of exercise benefits and perceived action is an area for policymakers to explore"

The other study data (see also the comments under question 13) show that there is a gap between the recognition of a problem such as obesity and the individual motivations needed to effectively take the measures known to be appropriate to address the problem, but which are however perceived as not useful for oneself.

Therefore it seems absolutely necessary to soon undertake research on the psychological keys likely to be influenced – and in which way – to induce a person suffering from overweight to modify the different parameters of his/her behaviour. The motivation of that person, based on individual conviction, will guarantee success.

The above-mentioned study moreover totally reinforces other observations based on experience in the field and which precisely led to

(4) "Understanding the Health Gap" from GfK NOP Global Food Diet & Wellbeing Monitor (2005) – European Key Data Finding for Kraft Foods hereafter referred to as "Kraft Foods study"

(5) Table 2 and comments "Kraft Foods study"

(6) Table 8 and comments "Kraft Foods study"

(7) Table 9 and comments "Kraft Foods study"

(8) Table 10 and comments "Kraft Foods study"

the development of actions focussed on the motivation of a target consumer group. *"According to the results of several studies, it emerges that persons eating a balanced breakfast perform much better, generally concentrate better, react better and are more optimistic. In Germany, however, it was noted that only two young people out of three aged between 6 and 14 years had a daily breakfast. The problem is not the breakfast but the manner in which children and adolescents can be **convinced** of the need to adopt a varied and balanced diet. For many surveys show that children know full well (... !!!) that everything depends on a healthy diet. Prohibition and compulsion do not lead to the expected result, quite the contrary !"* (9)

Explanatory note :

The examples mentioned in this opinion only serve to illustrate the initiatives some member groups of UGAL can or wish to implement. They are in no way representative, in an exhaustive fashion, of the diversity of the actions that some would like to develop, nor are they the only actions likely to be developed by others.

UGAL is convinced that one of the basic principles of the functioning of retail groups needs also be applied here : it is **not compulsion that should be applied but persuasion !**

There is thus reason to pay more attention to the **psychological aspect** of the treatment of overweight and obesity than at present. It is much more vital to understand what might lead consumers to modify their diet and life style than to initiate research on the impact of leaflets distributed in shops or elsewhere to encourage them to be physically active (10) !
(See also the comments under question 13).

THE PUBLIC HEALTH ACTION PROGRAMME

5 / IV.4.3. - How can the programme contribute to raising the awareness of the potential which healthy dietary habits and exercise have for reducing the risk for chronic diseases amongst decision makers, health professionals, the media and the public at large ?

(9) On the occasion of the 50th anniversary of Baden-Wurtemberg and its 75th anniversary, the enterprise EDEKA-Südwest initiated the *EDEKA Martkralley* in collaboration with Mrs. Gabriele Voigt-Gempp, dietician, and the Ministry of Culture. This programme aimed at making youths and adolescents aware of food problems by means of team plays.

(10) ... unless it is shown that this weight is so great that merely carrying all these leaflets represents in itself, and for each consumer, vigorous exercise...

The answer to this question is to be closely related with the result of the research which needs to be undertaken (see question 3) to understand the **elements which might induce consumers** to modify their behaviours. According to the elements which will be advanced, the action programme in the area of public health should increase awareness among decision-makers, health professionals, the media and the public at large.

Not to proceed in this fashion would amount to supporting awareness campaigns which would not have much chance of success. If it should prove correct that consumers motivation involves a type of communication or particular action or a specific target group, it is by keeping these elements in mind that the programme may effectively contribute to sensitise the persons concerned.

Much more attention should be paid to psychological factors and not mainly the food factor – at least for the moment and at the present state of knowledge.

"Being overweight and obesity are not major personal health concerns across the European countries" (11). " ... people are just turning a blind eye to obesity..." "In any event this raises the question: should policymakers generate more awareness of this potential link as a means of promoting behavioural changes to obesity?"

Once this first step is achieved, the action programme in the area of public health should intervene **in support of national actions** which then determine, with full knowledge of the facts, the aims and means of communication to respond to global political objectives which may be defined in the EU framework.

6 / IV.4.3. - Which are the most appropriate dissemination channels for the existing evidence ?

The answer to this question is to be closely related with the results of the research which needs to be undertaken (see question 3) to understand the elements which may induce consumers to modify their behaviours.

It is undisputable that we should, moreover, ask ourselves whether useful leverage can be achieved by fully exploiting messages broadcast by information **sources which consumers trust most**.

In an above-mentioned study, "health care workers are cited as the most trusted and frequently consulted sources of information about health and well-being" (12). Then there is the information printed on the packaging... and a whole list in descending order.

(11) Table 2 and comments "Kraft Foods study"

(12) Table 6 and comments "Kraft Foods study"

Without accurately answering the question which are the most useful "channels" to broadcast information from these sources, a step would already have been taken down this road by turning to **dissemination channels most suited to the most credible information sources** as they are the most widely accepted.

CONSUMER INFORMATION, ADVERTISING AND MARKETING

7 / V.1.2. - When providing nutrition information to the consumer, what are the major nutrients, and categories of products, to be considered and why ?

UGAL is convinced that nutrition labelling is an instrument that may meet the expectations of some consumers. But the needs for food information vary considerably from one country to another, because dietary habits are also very different. For this reason, the groups that are members of UGAL must take account of these differences and adapt their behaviours to demand from their consumers. This explains why many groups have already started voluntary (13) nutrition labelling. But this commitment – i.e. the range of products concerned by **voluntary** nutrition labelling – varies considerably from one country to another, depending on the actual needs expressed !

In this context, nutrients that are considered useful by consumers are energy, carbohydrates which include sugars, fats which include saturated fats and salt for all food categories.

So that nutrition information can enable everyone to choose a diet appropriate to their needs, this presupposes prior education of consumers, and that they should know their personal requirements, as well as understanding the meaning of the nutrition labelling as it appears.

Nutrition labelling cannot be an instrument to educate consumers, or compensate the lack of education on this subject or a lack of motivation to change one's habits.

It is **holistic and continuing education** of consumers, **prior** to giving them the information), that is mandatory.

In this sense, **it is the quality rather than the quantity of information that is most important.**

It should be kept in mind, moreover, that information and prior education of consumers will modify their perception of food information and, of course, also their expectations in this respect.

It should be ensured that the operators are sufficiently flexible to voluntarily adapt to these changes. Market forces and competition are indeed very

(13) for their own brand products

powerful and effective incentives to lead businesses to respond voluntarily to real consumer demand for information.

A recent study corroborates the above analysis (14). It shows indeed that a majority of consumers does not read the information printed on the foodstuff labels (15). The underlying reasons are multiple, particularly the time available for shopping. More importantly : if 26 % of consumers are very interested in food information, 27 % are so only sometimes, 22 % not really and 15 % not at all interested (16). It may be concluded from this, by comparing these data to those of the other study cited here, that successfully motivating consumers to change eating habits and education enables them to understand and exploit food information tools ; their expectations of today (17) will be different tomorrow.

Food information should therefore **not be judged too hastily and definitively** and the elements and product categories be taken into account (18).

8 / V.1.2. - 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 ?

UGAL points out that the education of the population about nutrition should be **based on scientific arguments**, putting the emphasis generally on the importance of a balanced diet and a healthy lifestyle. Appropriate education in this field should underline the fact that **there are no bad foods, but there are bad ways of eating**.

This initial education of the population about nutrition is not a responsibility that can be imposed on labelling and/or the food industry or retailers – whatever positive contributions these sectors can make on this subject.

An accurate answer to this question 8 should be closely related with the results of the research which needs to be undertaken (see question 3) to understand the elements likely to induce consumers to modify their behaviours. Appropriate education aiming at enhancing motivation should therefore be defined. It is to be feared that (19) **general education that is not be oriented towards reinforcing motivation, would only lead to**

(14) "Report on European Consumers' Perception of Foodstuffs Labelling – Results of Consumer Research conducted on behalf of BEUC from February to April 2005" hereafter referred to as "BEUC study". An important reserve by the authors of this study should be noted, according to which (on page 2, last paragraph) "... *this survey should not be considered as representative of the whole of Europe* ".

(15) BEUC study, table 9

(16) BEUC study, table 17

(17) BEUC study, table 24

(18) Besides, these problems are closely linked to the reform of the information which must figure on foodstuff labels.

(19) See above "Kraft Foods study"

understanding the problem without bringing about a change in behaviour.

As to the best channels to disseminate this education, inspiration should be drawn from the considerations developed under question 8 and, outside school, to rely mainly on the information channels best adapted to information / education **sources which consumers trust most.**

9 / V.1.2. - *Are voluntary codes ("self-regulation") an adequate tool for limiting the advertising and marketing of energy-dense and micronutrient-poor foodstuffs ? What would be the alternatives to be considered if self-regulation fails ?*

This question is puzzling... insofar as it still seems to establish a link between obesity and diet only ! Two remarks :

1)- The voluntary codes of conduct should only have one aim : help an informed public to choose a diet conforming to its basal metabolism and daily exercise.

It is obvious that the risks of self-regulation essentially reside in the emergence of multiple codes, based on the same principles but providing heterogeneous information to the consumer. On the other hand, the legislator should mainly assume responsibility for the nature and accuracy of the message to be passed on to the consumer and not for the way in which the message is broadcast.

2)- There is no objective reason to eliminate all promotion of highly energizing products if these are consumed in the context of a balanced and varied diet ! However, the creation or development of consumer services whose role it would be to provide information on products, eating habits and dangerous practices should be investigated...

10 / V.1.2. - *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 ?*

Whether the real policies of enterprises are a consequence of requirements of voluntary codes of conduct or legislation, they should respect general requirements of the law and avoid disloyalty, deception, etc.

The Government control authorities should ensure that these obligations are respected. In most European countries, they already pay particular attention to the protection of vulnerable consumers.

CONSUMER EDUCATION

11 / V.2.1. - How can consumers best be enabled to make informed choices and take effective action ?

1) This information is not useful if one does not have the knowledge necessary to use it. In other words, **increasing the amount of information indefinitely is meaningless if there is not prior holistic education which provides the decoding information** and the knowledge necessary to use it in practice. In addition, taking account of the constant renewal of the population, **this education must be systematic and continuing.**

Prior, systematic and continuing education appears to be a "sine qua non" condition to enable consumers to understand and interpret food information and try to act on that basis depending on their own needs.

2) Drawing inspiration from question 10 above, it should be pointed out first of all that the relationship between credulity and its counterpart, scepticism, on the one hand, and education, on the other, are difficult to assess. Indeed it is generally considered that the Danish consumers are among the most educated and most active consumers. But regarding foodstuff labelling a recent study (20) stresses that 50 % of the persons questioned say they trust nutritional claims with a view to receiving nutritional information. However, *"this figure was considerably lower in Denmark (33 %)"* whereas it is a country where *"claims (and the fortification of products have been strictly regulated for many years"*.

This goes to show that despite extensive "consumerist" education and strict regulations applicable on this case to claims, the rate of scepticism vis-à-vis the latter is more pronounced than in other EU countries. It may therefore justly be concluded that credulity and scepticism, e.g. vis-à-vis the need to make intelligent choices regarding overweight or obesity, may prove to be independent from the level of education and even the existence of encouraging regulatory measures.

In other words, to best help consumers make intelligent choices and to act effectively, **the leverage of education alone may not be sufficient.** Once more, **an education enabling to understand a problem does not necessarily lead to individual change in behaviour.** The example of tobacco is worth mentioning in this context. Many persons who are well-educated also receive relevant information on the ravages caused by tobacco but nevertheless continue to smoke... !

The comments relating to question 3 should also be considered here.

(20) BEUC study, comments under the paragraph referring to nutritional claims

3) The action campaigns developed at the European and national levels as well as the **initiatives of private operators** may all contribute to promoting a healthy diet and exercise.

However, the efficacy of these campaigns would have much more impact and the costs involved would be much more rational, if a study could **show, among the possible actions, that those that have an impact translate into effective change of consumer behaviour.**

Action is urgently required here !

By way of example, it should be mentioned that

- since 2004, the leading food retailers' group in Germany (21) *"is for the first time the principal sponsor of the Deutschland Tour, a cycling competition taking place in August. Given the close link between cycling professionals and amateurs, a very large population could be reached this way"*.

- navigating on the group's Internet site, one can find *"a lot of information on nutrition (in particular a healthy diet) and exercise. One can also find balanced recipes and many interesting data on foodstuffs"*.

- *the leading food retailers' group in Germany launched, in November 2005, a nutritional service on a nation-wide scale. This new initiative helps consumers to compose balanced menus, provides culinary advice as well as other related information, e.g. on the composition of foodstuffs.*

This nutritional service is composed of specialists such as nutritionists and dieticians, which constitutes of course the basis of a serious consultation service on dietary matters, as confirmed by the Warentest Foundation in its 11/2005 edition. All advisors work in close collaboration with the SGS Institute Fresenius as well as with the quality control supervisors of the national head quarters in Hamburg. (...) Every new request coming in on the hot-line is registered in a "learning" database. Thus, the leading food retailers' group in Germany perfected a unique system which may well become the biggest nutrition information centre in the not too distant future. This hot-line is a further step for the group towards winning their customers over."

- another UGAL member organisation developed a whole series of different actions (22) :

Nutritionist : This organisation retains a nutritionist, Sarah Keogh, who is involved in presentations to the public at our stores, as well as feature

(21) the EDEKA group, see website <http://www.edeka.de>

(22) MUSGRAVE SuperValu-Centra – Overview of Activity aimed at encouraging healthy eating & lifestyles – March 2006. While Musgrave SuperValu-Centra are happy to play a part in consumer education, in conjunction with recognised experts in the area of healthy eating and obesity in Ireland. There are 180 SuperValu supermarkets throughout the Republic of Ireland, and 375 Centra stores, with a throughput of almost 1.7 million consumers, so this organisation represents a valuable communications resource for any authority wishing to reach a consumer audience.

writing for a number of consumer publications, and taking part in media interviews. We publish six information leaflets a year, from healthy school lunches to sensible dieting, and our stores carry point-of-sale material regarding the benefits of fresh foods. Our investment in this activity is in the region of € 150,000 PA. Sarah also advises the own-brand product development team on food content, labelling and legislation around food issues.

Fresh Magazine : The consumer magazine, which is published twice annually, contains a six page section on healthy eating and lifestyle advice for families. At store level, food information and point-of-sale material encourage children and parents to adapt a healthy lifestyle. Investment in this project, between us and store owners, is over € 2 million over a four year period.

Leaflets on healthy eating, supplying fruit hampers to schools and visits to schools and supermarkets countrywide by nutritionists is all part of the programme.

General Point-of-Sale and Promotional Activity : This organisation participates fully in all consumer education campaigns promoted by organisations such as Bord Iascaigh Mhara, Bord Bia and Bord Glas, to inform consumers on the benefits of fresh foods and suggest recipe ideas. This organisation also provides information from the Food Safety Authority of Ireland on how best to handle and store fresh foods and we have participated in a consumer road-show organised by SafeFood Ireland to promote a sensible approach to food consumption. Their stores regularly provide tasting of fresh produce for consumers also.

National Healthy Eating Week : This organization supports initiatives by the Health Promotion Unit of the Department of Health and Children, including the two national healthy eating week campaigns organised by Grayling PR. Participation includes hiring the 2FM Roadcoaster, distributing leaflets and point-of-sale and organising tasting of fresh fruit and vegetables in stores.

- another example from a member organisation of UGAL is worth mentioning here (23) :

"Providing solutions to meet the changing needs of Irish consumers is very much at the forefront of this organisation's success in Ireland, as the leading convenience retail group. A focus on Health & Wellbeing is one of the top consumer trends amongst Irish consumers and the media.

As part of the organisation's strategy is developing innovative food and beverage solutions through the recently launched Food Strategy, including healthy options is an important focus for this organisation. New products such as the Treehouse Juice & Smoothie Bar, Healthy Breakfast Range, healthier options in Sandwiches and Chilled Ready

(23) SPAR Ireland. All of the above activity is very much based on SPAR's strategy to respond to the changing needs of Irish consumers.

Meals have recently been launched and are now in a number of pilot stores in Dublin and the West of Ireland."

Another particularly interesting example regards an own-brand product of the leading Finnish retail group (24) and which reveals that "*Pirkka Snack Carrots are the Food Product of the Year. Pirkka Snack Carrots were chosen as the Finnish Food Product of the Year as the winners of the contest organised by the Finnish Food and Drink Industries' Federation.*

Pirkka Snack Carrots are a tasty and healthy product as such, their package resembles a bag of sweets, which entices both children and adults to choose snack carrots over others of poorer food value ; the product suits a great number of consumers and is likely to win over new carrot lovers, a commendable product in these times when obesity among children is increasing. The demand for Pirkka Snack Carrots exceeded expectations and their production volume has doubled during the first six months already (25)".

12 / V.2.1. - What contributions can public-private partnerships make toward consumer education ?

Generally, UGAL member groups participate voluntarily, according to their individual means and capacities, in awareness campaigns initiated and developed by the public authorities, particularly to promote balanced diets and to promote practising sports to increase exercise.

UGAL is of the opinion that **the most significant message** for the consumer, and the most promising in terms of behaviour change, **is a "multidisciplinary" message** which has to consider different factors, among which in particular individual lifestyle, the need for exercise, the respect of diverse and balanced diets. This is far preferable to a message limited to the specific nutritional value of pre-packed foodstuffs.

So did we learn, for example, that the Irish government adopted a proactive approach which led to the creation of a *National Taskforce on Obesity* (NTFO) in March 2004 and which adopted 93 recommendations including a new education and training programme for health professionals ; guidelines for food labelling ; an examination of fiscal policy and its impact on overweight and obesity ; and guidelines for the detection and treatment of overweight and

(24) KESKO Group – press release of 20.04.2005, see under http://www.kesko.fi/index.asp?id=73B7F525B57043D3BD3816FDFAD83FE7&data=1,886DF6EFA394CAC9DC90F5CC0110D096_0C8A2712817D4779950F4A4F742D113E&groupid=379EF0A99FF04FBABF4BDCB91277997D&tabletarget=

(25) The Finnish Food Product of the Year prize is already the second major recognition received by the Pirkka Snack Carrots. Last year they were granted Weight Watchers' Honorary Diploma of the Year.

obesity. These recommendations also include a ban on vending machines in primary schools, and the first steps towards this were announced last week by a number of key operators.

The recommendations require action across six broad sectors : high-level government ; education ; social and community ; health ; food, commodities, production and supply and the physical environment.

The private sector, in a broad consultation of which one of UGAL member organisations (26) was part of, has acknowledged it has a responsibility and will be proactive in addressing the issue of overweight/obesity. In a joint approach between public and private sectors, recommendations for the food industry involve taking a multi-sector action on the marketing and advertising of products which contribute to weight gain, in particular those aimed at children.

The recommendations have already contributed to the establishment of a Nutrition and Health Foundation, members of which provide consumers with evidence-based information on diet and lifestyle. Also, companies are now operating under the Broadcast Commission of Ireland's new Code on Advertising to Children.

13 / V.2.1. - In the field of nutrition and exercise, which should be the key messages for consumers and how and by whom should they be delivered ?

The answer to this question is to be closely related with the result of the research which needs to be undertaken (see question 3) to understand the elements inducing consumers to change their behaviours.

One of the above mentioned studies underlines that an action on diet and exercise must consider the **complexity of human behaviour and the socio-cultural factors of each EU Member State !**

The authors of the study (27) thus conclude :

"While Europeans understand the need to exercise and eat a healthy diet, there is a clear gap between their knowledge and behaviour. Further, when it comes to losing weight (which not enough people are trying to do), Europeans are not sufficiently focused on exercising and limiting calories (as seen on chart 9)".

"Awareness and action differ across nations. These findings suggest that a 'one size fits all' approach to health and well-being education campaigns may be challenging. If public policy in relation to obesity is to resonate and effectively engage Europeans of all shapes

(26) RGDATA – the Retail Grocery, Dairy and Allied Trades' Association – in Dublin

(27) Conclusion of the "Kraft Foods study" – Kraft and GfK NOP decided to publish this information drawn from broader research in the hope that it will inform and stimulate debate among policymakers and the many stakeholders about how to effectively tackle obesity, particularly amongst children. A number of conclusions to be drawn from the data indicate where further study would be useful to inform policy action.

*and sizes, **the variances between nations this report reveals must be recognized and integrated into education campaigns.***"

"Government nutrition guidelines are not regularly used or relied upon. Most Europeans give relatively low priority to nutrition information from local and national government guidelines, questioning the confidence in or accessibility they may have of information from governmental agencies. This may be a hurdle for policymakers as they wish to connect with consumers to promote behavioural change."

"It is clear that European consumers have a fair knowledge of what they should be doing."

*"The obesity challenge requires a joint effort among all stakeholders to address this major health issue and **find which vehicles** – either in the form of communication or new food product offerings – **Europeans will be more receptive to** and will help them overcome the obstacles they face to eating well and sufficiently exercising."*

Thus, it seems that the key messages should be adapted to **national particularities** and to the **capacity they will have to effectively motivate the persons** concerned to modify their behaviours. This **probably contradicts the idea that there might be key messages equally applicable to all EU countries !**

A FOCUS ON CHILDREN AND YOUNG PEOPLE

14 / V.3.2. - *What are good examples for improving nutritional value of school meals, and how can parents be informed on how to improve the nutritional value of home meals ?*

It is difficult at UGAL level to draw general theoretical conclusions on the basis of fragmentary examples for which there is – to date – no comparative analysis permitting to assess its medium or long-term effect.

A member organisation of UGAL (28) is *"the national sponsor of Buntus, the official PE curriculum for primary schools, in conjunction with the Irish Sports Council and the Department of Education. Its involvement is designed to support the work of teachers in encouraging children to take part in sports activity and games, in preference to more sedentary pastimes"*.

Another UGAL member organisation also promotes *"the benefits of healthy diet and exercise through their Kids Programme. An independent panel of contributors (nutritionist/sports consultant etc)*

(28) Musgrave SuperValu-Centra – Overview of Activity aimed at encouraging healthy eating & lifestyles – March 2006

have developed the programme consisting of a magazine and a series of wall charts distributed to primary schools around Ireland. The programme also involves a competition for schools to participate in". (29)

15 / V.3.2. - What is good practice for the provision of exercise in schools on a regular basis ?

Among the parameters influencing the offer of exercise at school, the quantity and quality should be mentioned.

- Quantity : If we take the example of one EU Member State (30), exercise regularly practiced in nursery classes (31) is limited to 2 sessions of 45 minutes each per week in primary school to then increased to 2 sessions (1 hour + 2 hours) as of college entry. This continued shortage of exercise at school, and particularly on the threshold of adolescence, seems to be a very important factor in the development of obesity in this age category.

During recreations, nursery pupils are offered the possibility to do exercise (32). As of primary school level, the pupils no longer dispose of tools inciting them to do exercise. Moreover, at college level, there is no real physical "recreation". Between courses there are only a few minutes available to go from one classroom to the other.

The offer of exercise on Wednesday afternoons by school and university sport associations is rather wide-spread. These structures offer a wide range of sports and have many members... but they only partly fill, due to their voluntary status, the gaps in the school training offer !

- Quality : The concentration of lesson periods spent on what is considered principal subjects as of college entry are sessions of 2, 3 or 4 consecutive hours. The exercise planned on the school agenda is often relegated to hours which are not compatible with pupil motivation (33).

16 / V.3.2. - 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 ?

It is difficult for UGAL to draw general theoretical conclusions on the basis of fragmentary examples for which no comparative analysis is available to assess medium or long-term effects.

(29) SPAR Ireland

(30) based on empiric data collected in France

(31) effective sessions of 30 minutes each day foreseen in the curricula

(32) provision of bicycles, balls ...

(33) Mondays at 8 a.m. for example...

2005 saw the development of a new primary schools project, Kids in Action, which combines three separate initiatives to address the serious issue of childhood obesity. The programme, which entails an investment of over € 2 m, is aimed at increasing exercise levels in the 5-12 year age group, and encouraging a fresh look at nutrition and diet. (34)

Another example of good practice stems from the leading Finnish retail group (35).

The co-operation between this group and the Young Finland Association (36) promotes physical exercise and the welfare of children, adolescents and their families. Annual joint campaigns encourage hundreds of thousands of children to engage in physical exercise.

Increasing the everyday exercise of children and families with children, and encouraging children and families to adopt healthy eating habits, lies at the heart of cooperation between this group and the Young Finland Association.

As part of the 2004 Sports Adventure, children were given scorecards for noting down their daily exercise, the number of meals they had each day, and how long they slept. Similar themes were also highlighted in a 'Parents' Guide' distributed by schools to parents and designed to help parents keep track of their children's daily activities and make any improvements needed.

Providing the right kind of energy for growing, physically active children is essential to their health. The recipe pages of the Parents' Guide were drawn up by and tested at the K-test kitchen. The guide stresses the importance of an even energy supply based around five meals a day. Fun, easy-to-prepare, wholesome alternatives – 18 recipes in all plus five good snacks – were included, together with instructions on how to plan a balanced meal and an energy comparison of different snacks (STRIP study by the University of Turku). A revised edition was published in March 2005, highlighting the importance of ingredients in total energy and fat intake as well as the quality of fat.

- Sports Adventure around the Globe : 182,000 participants in schools (1st-6th grade), campaign material to parents : 200,000 brochures on the importance of sleep and correct nutrition, healthy recipes included, product suggestions and coupons.

(34) Musgrave SuperValu-Centra - SuperValu Kids in Action - Overview of Activity aimed at encouraging healthy eating & lifestyles – March 2006

SuperValu developed the programme in conjunction with a number of expert partners including the Irish Sports Council (ISC), the Irish Universities Nutrition Alliance (IUNA) and INDI, the Irish Association of Nutritionists and Dieticians. 78 % of primary schools across Ireland have registered with the Kids in Action programme and over € 1 m worth of sports equipment will be distributed to these schools through SuperValu Kids in Action.

(35) KESKO Group – press release of 10.06.2005

(36) The Young Finland Association is very active : sponsorship per year € 170,000, paid by Kesko Food Ltd.

- "Rucksacks" (hobby materials) to 30,000 children in the afternoon school activities (1st and 2nd class), 1,400 in day care, brochure to parents, receipts, coupons
- "Toes on the Move", 90,000 children in day care, 100,000 brochures to parents - summer sports campaign, 6,000 kids (1st - 6th grade) - Junior sports clubs' members helping retailers in campaigns/seasons etc. - 319 articles published in newspapers, 31 radio broadcasts, 16 TV-broadcasts, K-retailers interviewed in 65 articles, pictures of them in 72 %.

17 / V.3.2. - *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 also the comments under question 11.

Another example of specific advice by a commercial enterprise to help parents support health education efforts undertaken in schools may be consulted on the website of one of the French foodstuff retailer groups which are UGAL members (37). There you can find a lot of good advice.

"If your child is really overweight or obese, he/she should seek the advice of a medical specialist. Endocrinologists, paediatricians, nutritionists, dieticians, psychologists, are there to help you. Do not hesitate to consult them. It is important for your child not to mention the word "diet" and not to frustrate his/her efforts. It is, on the other hand, wiser to increase his/her exercise, to reduce TV watching and to cut out snacking. The child should grow while keeping the same weight. In practice, for the sake of your child's health :

- *Less television and more walking ! Also limit video games and hours spent in front of the computer ... Prefer fresh air for the whole family during a weekly walk.*
- *No fizzy or other sugary drinks at the table. Get your children (and yourself) used to drinking ... water !*
- *Replace the usual sweet bread by wholegrain bread, butter and a piece of chocolate.*
- *Teach your children from a very young age on to eat fruit and vegetables every day.*
- *Do not make your children feel guilty because they are too fat. They already have to suffer the stares of others. Do not be too strict with them, either, but treat them now and again to food they particularly like.*
- *Do not weigh them every day ! You risk scaring your children.*

(37) SYSTÈME U - see the heading "Vie pratique / Dans votre assiette / Conseils de la diététicienne Dr Natacha YAKOUBSOHN-SEBAGH" at the address : http://www.systeme-u.fr/fr/vipratik/table/dieteticienne/dieteticienne_2.jsp?idDoc=3072&idTheme=139

- Lastly, learn about dietetics so that you can teach them a lot on the subject. This is the best service you can render them."

FOOD AVAILABILITY, EXERCISE, AND HEALTH EDUCATION ON THE WORK PLACE

18 / V.4.1. - *How can employers succeed in offering healthy choices at workplace canteens, and in improving the food value of canteen meals ?*

Most canteens are subject to exact nutritional standards. Whether the quality or attractiveness of the dishes may be improved upon is another matter.

The real problem seems to be **the multiplicity of different food sources leading to and making modern life possible.**

What is the impact of a balanced meal at the canteen of an enterprise if the person eating there during the day consumes, voluntarily and for personal pleasure, other foodstuffs whose nutritional input destroys the balance of the canteen meals ?

On the other hand, how can the consumer, if at all, during shopping consider the diversity of nutritional input served in the canteen, that of his/her children and other sources in connection with different foodstuffs at different hours and in different places, for himself and the other family members ?

While unquestioningly recognising the importance professional and school canteens play in the nutritional balance of the persons concerned, it seems necessary to **develop a global approach considering all the different food sources.** Behavioural advice should be proposed as well as **communication covering overall input.**

It appears incoherent to "carve up" the thought process into different levels of consumption.

19 / V.4.1. - *What measures would encourage and facilitate the practice of exercise during breaks, and on the way to and from work ?*

The subject of practising exercise during breaks should be investigated much more critically as to date.

Exercise, when practised during lunch break, for example, generally leads to skipping lunch and too often to food compensation during the afternoon by the intake of free sugar. This is not compatible with the principle of reduced caloric intake during the day. A delay in food intake is often "compensated" by a copious dinner.

Therefore it appears necessary to **study very closely the complex and difficult relationship between exercise during the working day and a balanced diet !**

ADDRESSING THE OBESOGENIC ENVIRONMENT

21 / V.6.1. - In which way can public policies contribute to ensure that exercise is "built into" daily routine ?

Weekly working hours : Introducing work breaks of 3 hours allowing to combine balanced meals and daily exercise would provide a viable solution.
The reduction of weekly working hours : does not seem to lead to significantly increased exercise in overweight persons.

Job stability : Various studies have shown that the transition from employment to actively looking for work following e.g. redundancy leads to important weight fluctuations in persons at risk.

These last two instances underline that the availability of more time which could potentially be used for exercise does not necessarily lead to effectively practising a exercise.

Access to associative exercise on offer : Importance of general sports character of activities for any club practising a given sport, existence of teams representing different age classes.

22 / V.6.1. - Which measures are needed to foster the development of environments that are conducive to exercise ?

In line with the answers to the questions above and below, a passage from a EESC initiative opinion should be cited here (38) :

"A change in mentality, awareness raising and education via a combination of sound and effective actions are needed at all levels, with psychological support, close monitoring and evaluation of their impact. Additionally, individuals will have to take charge and responsibility for change."

(38) Opinion of the European Economic and Social Committee : "Obesity in Europe – Role and responsibilities of civil society partners", Brussels, 28th and 29th September 2005 – EESC 1070/05 point 3.3

SOCIO-ECONOMIC INEQUALITIES

23 / V.7.1. - *Which measures, and at what level, would promote healthy diets and exercise towards population groups and households belonging to certain socio-economic categories and enable these groups to adopt healthier lifestyles ?*

The relationship between the population of some lower socio-economic categories and life styles likely to favour overweight or obesity, would by itself require specific treatment which UGAL is not competent to undertake, also in consideration of the elements inherent in modern life which contribute to reduce physical efforts daily.

As concerns the link between **poverty and obesity**, two points however deserve underlining :

- First of all, the fact should be recalled that **diet is not THE factor responsible for obesity**, but a vector among multiple causes.
- It should also and above all be recalled that in many European societies **people suffering from obesity live alongside other people who depend on food aid to survive !** This paradox is likely not neutral and should be given some thought.

Concerning diet, a single aspect seems to attract our attention in particular. This is, among the factors contributing to the spread of obesity, the impact of "convenience" aspects and price in bad dietary habits.

The immediate availability in almost all circumstances of cheap food increases over-consumption and induces dietary imbalance. **The food, by itself, is not necessarily problematic.** It is **its repeated consumption** due to **its availability** and **its very low price** which **may become the cause of damage.**

UGAL has no ready-made solution but not to mention this aspect would be equivalent to ignoring a consumer behaviour which is spreading – seemingly like an epidemic – within the population of some lower socio-economic categories. What can be done to change the situation ? Simple education allowing these population categories to understand, to perceive the problem does not necessarily induce them to change their behaviours !

More than likely an increase in **economic wealth** should be associated with **education** and **motivation** to modify their life style. The comments relating to questions 1 and 3 should also be considered here.

24 / V.7.1 - *How can the "clustering of unhealthy habits" that has frequently been demonstrated for certain socio-economic groups be addressed ?*

See comments under question 23.

FOSTERING AN INTEGRATED AND COMPREHENSIVE APPROACH TOWARDS THE PROMOTION OF HEALTHY DIETS AND EXERCISE

25 / V.8.2. - *Which are the most important elements of an integrated and comprehensive approach towards the promotion of healthy diets and exercise ?*

See e.g. the global approach (NTFO) mentioned under question 12.

26 / V.8.2. - *Which role at national and at Community level ?*

Different comments received all point in the same direction with rather close degrees of intensity. The promotion of a healthy diet and exercise is a matter for individual Member States and the EU is unlikely to play a helpful role in tackling this problem if it attempts to impose EU wide regulations or standards in this area.

It should be recalled once more that concrete actions at the EU level should provide support, **by strengthening national actions**, particularly in the area of education and the promotion of exercise. This does by no means exclude that, to become more coherent and efficient, the definition of global political objectives may be realised in the EU framework.

As indicated under question 13, it appears that the messages to be broadcast should be adapted to **national sense of identity** (39) and to the **capacity they will have to effectively motivate the persons** concerned to change their behaviours. This underlines the necessity to transform the European dimension of the problem in an impulsion to act in the long term at national level and in measures to support actions implemented at this level.

A Community approach, which would aim to regulate in the short term and in the absence of precise knowledge of actions which work – i.e. yield results and lead the consumer to effectively change his/her behaviour – would be counter-productive !

(39) Conclusions of "Kraft Foods study"

RECOMMENDATIONS FOR NUTRIENT INTAKE AND FOR THE DEVELOPMENT OF FOOD-BASED DIETARY GUIDELINES

27 / V.9.3. - *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 European level ?*

UGAL advocates **national dietary recommendations** as close as possible to consumers of the different EU countries to make them consider different (good and/or bad) consumption habits.

The comments, particularly under questions 13 and 26, indicate the reserves which should be expressed regarding dietary recommendations at the EU but not at national level.

28 / V.9.3. - *How can the gaps between proposed nutrient targets and actual consumption patterns be overcome ?*

29 / V.9.3. - *How can dietary guidelines be communicated to consumers ?*

First of all, it seems evident that it will always be difficult for the consumer, at any time, to consider the diversity of nutrients from different food sources, at different times and in different places, for him- or herself and the other members of the household !

Therefore, one should in all probability consider the fact that there **will effectively always remain a gap** between food objectives proposed and dietary habits actually observed.

Consequently, one should be sceptical vis-à-vis the notion of dietary messages trying to aim at impulsing shopping for food away from home and/or catering establishments.

Messages aiming at making the consumer feel guilty and to reduce the "pleasure" dimension of food should also be banned.

Furthermore, UGAL is of the opinion that there is **no correlation between mandatory dietary and/or food information** on the one hand, **and a better diet with an improvement in health**, on the other.

There are reasons to believe that this correlation has not been proven, and that it remains just an assumption that has not been borne out by the facts.

If we take the recent American example, a considerable increase in obesity has been observed in the last ten years, despite mandatory nutrition labelling since May 1994 ! It should be borne in mind that over that period, obesity has affected all groups of the adult population,

whatever their gender, age, ethnic origin or level of education (40), even if certain groups of the population are more concerned than others.

UGAL emphasises that this practical experience shows that **mandatory nutrition labelling is definitely not synonymous with an improvement in public health through better diet.**

This clearly demonstrates that **any information which might be useful to the consumer – here as regards dietary recommendations – should not automatically be translated into an obligatory mention on foodstuff labelling !**

30 / V.9.3. - *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 ?*

The comments above already strongly underline **cultural and national variations of good and bad consumer habits.**

A previously cited study is very revealing in this respect (41) :

*"The majority of Italians and Swedes agree the need to combine exercise and eat a healthy diet is important to stay healthy, whereas only half of the population in the UK and Spain make this connection. Although there is some commonality in limiting fat in the diet and increasing fruit and vegetables, agreement on what other ingredients to increase or decrease varies widely – including what to reduce in their child's diet. In the UK, consumers are aware of the need to cut down their salt intake. In France, a big focus is on reducing alcohol consumption. These findings suggest that... if public policy in relation to obesity is to resonate and effectively engage Europeans of all shapes and sizes, **the variances between nations this report reveals must be recognized and integrated into education campaigns.**"*

Therefore, any national experience is interesting by way of an illustration of what can be achieved. But it should not be envisaged to impose it in a binding form as a model to be adhered to in all other countries. It is only in this way that the guidelines for voluntary nutrition labelling including the use of Guideline Daily Amounts (GDAs) published in 1998 following collaboration between government, consumer organisations and the food industry (IGD) in the UK should be appreciated.

(40) See the study published in the Journal "The American Medical Association" JAMA. 2003 ; 289 :76-79 / Vol.289 N°1, January 1st, 2003 – distributed by the CDC and the National Center for Chronic Disease Prevention and Health Promotion of the US Department of Health and Human Services.

(41) Conclusions of "Kraft Foods study"

Moreover, and as mentioned many times, UGAL is convinced that there are no good and bad foodstuffs, but that a healthy diet is based on balance and variety. Therefore, **any system which**, through food assessment – e.g. GDAs – **would lead directly or indirectly to categorise foodstuffs as bad is considered** by UGAL **misleading, unnecessary and harmful**.

OTHER ISSUES

32 / V.11. - *Are there issues not addressed in the present Green paper which need consideration when looking at the European dimension of the promotion of diet, exercise and health ?*

Although the European Union or UGAL have practically no competence in the area, it seems that the aspects of "public health" as well as individual health factors which contribute to overweight should be broached. The high degree of confidence placed in the medical profession justifies more consideration of the possibility to call on it.

33 / V.11. - *Which of the issues addressed in the present Green paper should receive first priority, and which may be considered less pressing ?*

Several priorities clearly stand out :

- an improvement in economic wealth which should necessarily be evenly spread among the different population levels ;
- an education system and an efficient health system ;
- reliable studies to determine actions which work, yield results and motivate the consumer to effectively change his/her behaviour ;
- do not only concentrate on diet and do not believe that it is absolutely necessary to legislate to give oneself an alibi and show that something is being done ;
- take care that all actions taken are sustainable.

Brussels, 13th March 2006

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