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To: European Commission, Health and Consumer Protection Directorate-General,
Unit C4 – Health Determinants, L-2920 Luxembourg

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Altroconsumo's responses to the Green Paper on Nutrition

Altroconsumo, an independent consumer organisation¹, would first of all like to thank the European Commission for the opportunity our organisation has been given to express its views on the Green Paper on Nutrition. Nutrition is a theme to which our organisation pays particular attention, especially as regards the quality and quantity of information to which consumers are exposed.

Altroconsumo is the only Italian consumer organisation in BEUC (The European Consumers' Organisation). Therefore, in expressing our opinion on the Green Paper, we would like to state right at the outset that, in the vast majority of cases, our organisation is in full agreement with the response submitted by BEUC, to which we will refer on a number of occasions in this document.

At the beginning of 2005, we launched a nutrition campaign in Italy. This campaign was part of a European campaign organised by BEUC (*see the article published in Altroconsumo No 185, September 2005*).

“Un piatto di salute” (“*A Plate of Health*”) is the title of the food information and education campaign organised by Altroconsumo so as to contribute to the appeal launched by the World Health Organisation to stop the ever-increasing problem of obesity, particularly among the young. Indeed, Italian children seem to hold the sad distinction of being the fattest in Europe, at least in the 9-13 age group. Sedentary lifestyles, foods that are high in fat (often hidden) and sugar: a lot of empty calories that do not provide the necessary nutrients and are not burned off by children, who are ever more idle playing computer games or in front of the television, which bombards them with harmful advertising.

We will now illustrate the main objectives of the campaign.

1. A European nutrition policy (with a European Action Plan)

There is a need to formulate and adopt, at European level, nutritional guidelines that are common to all the EU Member States. These should take account of the culture, food traditions and nutritional requirements of the individual countries and, at the same time, be in line with the measures recommended in the WHO's strategy for fighting obesity.

We believe that the EU must clearly outline a nutrition policy of its own, setting objectives and timescales for their achievement. This policy should recognise the strategic priority to be given to this issue above all other action areas and, therefore, ensure that the other Community policies (e.g. the CAP and other regulatory measures of an economic, industrial and commercial nature) do not have a negative impact on food quality and Europeans' eating habits.

¹ Altroconsumo, which is the country's most representative consumer organisation, has more than 280 000 members throughout Italy and is the only Italian member of BEUC (The European Consumers' Organisation).

2. A clear and simple food labelling system

It is becoming ever more difficult to find the information that is truly useful to consumers on the packaging of food products. It is practically impossible to discover, at a glance, whether a given product satisfies our dietary requirements or not: the list of ingredients is often written in tiny, barely legible letters or hidden in folds in the packet, while the nutritional label is not yet compulsory for all products and needs to be improved so as to make it easier to understand and use.

There needs to be an additional, simple and direct visual notification system to inform consumers about the “more appropriate” and “less appropriate” foods for a correct diet.

3. Restrictions on food advertising

Food advertisements lead consumers – even the most mature, aware, educated and well-informed among them – into temptation. Their impact in misleading younger consumers, particularly children, and conditioning their tastes and preferences is decisive. The positive impact of any educational drive on the part of public bodies, schools and families risks being quickly undone if steps are not taken to limit the amount of advertisements and food marketing aimed at children and young people. This is the only way in which it will be possible to correct and set on the right path the eating habits of young people, who are suffering at an increasingly early age from obesity and eating disorders.

4. Better ingredients

Food must be safe and, in our opinion, safety also means that products on sale must be nutritionally appropriate. So as to improve the health of Europeans and the quality of their diets, the food industry must play its part and modify the ingredients of those products that are too high in fat, sugar and salt, by changing their composition and reducing to a minimum the use of additives, which are often used only to mask shortcomings in the raw materials used.

5. No to health-related statements on unhealthy products

The use of health-related statements on food products has been banned until now. However, at European level, various parties are pushing for the introduction of the possibility to use such statements. The need to harmonise the existing laws in the various countries is the justification for a proposal for a Community regulation. Such a regulation is also meant to safeguard consumers against possible abuses for solely marketing-related purposes. Therefore, there needs to be a ban on nutritionally inadvisable foods being able to bear health- and nutrition-related slogans.

6. Access to healthy food for all consumers (price and availability)

Fruit and vegetables are increasingly expensive, despite the fact that the price paid to farmers does not justify such increases. In more general terms, the “healthiest” products in all food categories are also the most expensive. Therefore, access to a correct, healthy diet risks becoming a luxury available only to the well-off. This phenomenon is particularly noticeable in English-speaking countries, but it is also on the rise in Mediterranean countries. The members of BEUC request tangible action on the part of governments to actively monitor market dynamics so as to prevent price speculation, to ensure the distribution of the basic foods needed for a correct diet, and to facilitate access to and availability of healthy foods, including for the most disadvantaged sectors of society.

7. Nutrition must be included in education and the school curriculum

Education on a correct relationship with food and one's own body image must at last become a constant feature of teaching and form part of the curriculum for young people from nursery school to university.

A section dedicated to the “*Un piatto di salute*” nutrition campaign has been included on our website: www.altroconsumo.it. This section contains all the documents concerning the initiatives undertaken during the year, as well as a part devoted entirely to the photograph competition that we organised.

Comments on the Green Paper on Nutrition

IV.3 Health across EU policies

The common agricultural policy should give greater consideration to nutritional issues. Any type of promotion supported by public communication techniques should refer to nutritional and food safety issues.

We are particularly concerned by the fact that the revision of the *Television Without Frontiers* Directive is not directed towards helping to solve the ever-increasing problem of obesity, nor towards better regulating the issue of the massive amount of advertising targeted at children for foods (including beverages) that are high in fat, sugar and salt. In fact, at present, some European countries are introducing restrictions on television advertising. Unfortunately, however, these restrictions will only apply at national level. The revision of the TWF Directive should aim (Article 3G) to promote themes such as nutritional well-being (obesity, eating disorders, etc.) and to ban television promotion of products that are high in fat, sugar and salt.

For the **responses to Section IV.3.2**, please see the BEUC document, with which we are in agreement.

IV.5 European Food Safety Authority (EFSA)

Altroconsumo believes that the EFSA contributes more than satisfactorily to publicising nutrition-related issues. However, we are concerned about the allocation of funds to the Authority. In the coming years, we do not want the work carried out to date on nutrition to be compromised by a lack of financial contributions.

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?

First of all, we would like to stress that Altroconsumo pays a great deal of attention to the issue of correct information, which is why the majority of our activities are aimed at improving the flow of information.

In relation to nutritional labelling, we would like to draw attention to an article published in our magazine *Salutest* (*Salutest 52, October 2004*), which set out our main thoughts on this issue:

- the majority of foods bear the nutritional label. However, as there is no precise legislation in this area, manufacturers often provide information that is incorrect and difficult for consumers to understand;

- it often requires an effort to read nutritional labels due to the use of hard-to-read colours and very small letters;
- it is difficult to compare different products' labels;
- as there is no precise reference model for the label, manufacturers often do not clearly show information that is particularly important for consumers (information on saturated fats, sugar, sodium, etc.).

In relation to this last point, we carried out an investigation to analyse the nutritional labels on foods considered to be "light" (*Salutest 55, April 2005*).

We are in agreement with BEUC in considering it to be fundamentally important that the new proposal to regulate the nutritional label include the following points:

- a requirement for all packaged foods to be labelled;
- a requirement for labelling to include energy values, carbohydrates, sugar, fat, saturated fats, protein, fibre, salt/sodium;
- a simplified label to be introduced on the front of products so as to enable consumers to easily assess the nutritional qualities of the foods that they wish to purchase;
- a definition of the minimum size of letters that may be used.

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?

Voluntary self-regulation codes work only to a limited extent, particularly as regards television advertising. European surveys have shown that parents are highly concerned about the amount of advertising to which their children are exposed. Children are considered to be the most important target for food manufacturers. We enclose a study carried out during our nutrition campaign, which illustrates in detail the flow of information to which children are exposed. More than 30% of children watch television for more than three hours a day and are thus exposed to countless advertisements. Furthermore, Altroconsumo is carrying out monthly monitoring of the main television networks, which shows that the majority of channels do not observe the limits on advertising levels laid down by the law (*Altroconsumo 179, February 2005*).

For the remaining questions in this section, please see the BEUC document.

V.2 Consumer education

We believe that consumer education alone cannot guarantee a change in behaviour and habits, nor can it reverse the current trend of diseases linked to obesity. In Italy, schools take many initiatives in relation to the eating habits of children, but this is not enough. In order for real results to be achieved, it is necessary for the whole context to be changed.

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?

Eating habits begin developing in childhood. Therefore, it is necessary:

- that schools provide the healthiest lunches possible;
- that school canteens provide nutritional rules to be followed in the preparation of lunches;
- that the snack vending machines in schools offer choices that are nutritionally sound and do away with foods that are high in fat, sugar and salt;
- that children be educated on the consumption of healthy, inexpensive food.

How can 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?

The food industry should not use the media to promote foods that are high in fat, sugar and salt, either in schools or elsewhere. In many cases, it should also change the composition of its products and make them more healthy.

V.7 Socio-economic inequalities

For the questions in this section, please see the BEUC comments.

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

For the questions in this section, please see the BEUC comments.

V.11 Other issues

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

We are in agreement with BEUC in considering the following to be our main requests and objectives for any nutrition policy:

- greater attention should be paid to nutrition in other European policies;
- advertising aimed at children of foods that are high in fat, sugar and salt must be regulated by specific legislation and there needs to be a section on this issue in the revision of the TWF Directive that is currently being carried out;
- the nutritional label must be made compulsory, standardised and harmonised. A simple reference model for the nutritional label should be adopted and applied throughout Europe;
- all consumers should have access to safe and healthy products;

- manufacturers and retailers should reduce the levels of fat, sugar and salt in food;
- consumers have the right to clear and consistent information on how to have a balanced diet.

External Relations Office

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- Altroconsumo No 185, September 2005, "*A lezione di mangiar sano*" ("Lessons in healthy eating")
 - Salutest No 52, October 2005, "*Caos etichette*" ("Labelling chaos")
 - Salutest No 55, April 2005, "*Scegliere leggero, un compito pesante*" ("Choosing light, a heavy burden")
 - Altroconsumo No 179, February 2005, "*Un'abbuffata di spot*" ("A blow-out of ads")
 - Presentation of the report on the "*Un piatto di salute*" campaign