

The European Commission  
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### **Green Paper on Diet and Physical Activity**

The Danish Consumer Council has the following 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":

The Danish Consumer Council finds that the Commission's Green Paper is a good and necessary initiative. There is a need for action now, and especially for a strategy for concrete regulatory and research initiatives.

In this response we have chosen to focus on aspects which matter directly to the individual consumer in relation to the promotion of healthy diets, but we support all initiatives that facilitate citizens' access to physical activity.

#### **IV.1. European Platform for Action on Diet, Physical Activity and Health**

The Danish Consumer Council can support co-operation and dialogue between players, but it must be ensured that this does not prevent or delay necessary regulatory or research initiatives. Apart from fixing a limited time frame and milestones for the work, it is important that the Commission measures and evaluates the results of the platform and the Commission's resource consumption.

#### **IV. 3. Health across EU-policies**

The Danish Consumer Council finds that the Commission's intention of ensuring that health is taken into consideration in other Community policy areas is very relevant. Especially within the agricultural policy there is a need for new thinking to reduce the prices of healthy food such as fruits, vegetables, cereals and lean meat and milk products rather than continuing the subsidising of fat animal products and by-products.

The Danish Consumer Council finds it absolutely inadmissible that the Commission, in the fortification proposal, allows fortification with vitamins and minerals in products high in fat, salt and sugar in spite of the knowledge that the fortification will help legitimise and promote the consumption of this type of

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unhealthy products. The same nutrient profiles should be established here as proposed in connection with the claims proposal.

#### **IV. 5. European Food Safety Authority (EFSA)**

The Danish Consumer Council finds that EFSA should play a far more active role in the nutrition area than is the case today. EFSA was originally established to achieve a high level of consumer safety and protection and not least to ensure consumer confidence and acceptance of the European food legislation. This is certainly needed in the nutrition area. We consider that EFSA should give the following a high priority:

- determination of upper safety limits for fortification with vitamins and minerals.
- determination of a model to assess the total intake of vitamins and minerals to prevent an overintake as a result of the total intake of naturally occurring and added vitamins and minerals from food and dietary supplements.
- risk assessment of "other substances" and drawing up of a positive list for these in connection with the fortification proposal.
- establishment of nutrient profiles in connection with the claims proposal.
- assessment of the scientific documentation for claims.
- working out a model with criteria for a nutrition logo which is in accordance with the nutritional criteria to be determined in connection with the proposal on nutritional and health claims and, hopefully, the fortification proposal.

In this connection EFSA should be ensured an economy which allows the prioritisation of these areas. If not, there is a risk that the initiatives in the nutrition area, which the Commission itself has effected, will get the opposite effect.

#### **V.1. Consumer information, advertising and marketing**

The Danish Consumer Council and the other BEUC member organisations consider that the Commission should give a very high priority to a mandatory nutrition label and that in addition there should be a graphical interpretation of the label in the form of a symbol placed on the front of the food – a nutrition logo.

Several surveys of the consumers' opinions on these issues show that the consumers want easy and accessible knowledge about food and health, including the energy and nutrient composition of food. One prerequisite for a free and informed choice is easily accessible information on the product packaging in the form of a mandatory nutrition label and graphical interpretation of this in the form of a nutrition logo.

**Nutrition label:**

- A mandatory, easily read and standardised nutrition label covering energy contents, protein, total fat, including saturated fat, total carbohydrates, including sugar, and fibre contents in pre-packed products measured in grams per 100 gram. Salt should be covered if a risk assessment shows that it is necessary to reduce the intake.
- The graphical design of the nutrition label needs to be examined to ensure the best possible consumer understanding and relevance.

**Nutrition logo:**

- A nutrition logo must be an overall graphical interpretation of the nutrition label and at the same time be a tool which may function as a credible counterbalance to the industry marketing and help the consumer make an easy and fast healthy choice in the shopping situation.
- The unhealthy products must also be labelled as it is a major problem that the industry markets products with a high content of sugar and/or fat to make them seem healthier than they really are.
- The Danish Consumer Council supports the Danish proposal for a nutrition logo scheme which has been drawn up by the Danish Institute for Food and Veterinary Research. We propose that the criteria on which the logo is based are used when drawing up the nutritional criteria in the claims proposal (and the fortification proposal!) in order to ensure coherence in the various types of consumer information.
- The graphical design of the nutrition logo needs to be examined to ensure the best possible consumer understanding and relevance.

- Also a concept for nutrition labelling of meals in restaurants etc. should be developed in order that the consumer can also make a healthy choice here.

In connection with both the nutrition labelling and the nutrition logo there is a need for an effective and targeted information campaign which could be carried out as a partnership project.

### **Ban on marketing unhealthy products to children:**

There is strong evidence that food commercials have an effect on children and for instance affect their choice of food. So children are not only affected to buy certain brands, but also to choose certain types of food. We see a tendency towards an increased preference for food with a high content of salt, sugar and fat. A WHO report from 2002 also identifies the commercials of the fast food industry as one of the causes of the obesity increase, in particular due to marketing targeted at children, and establishes: "The overall lack of regulatory processes in most European countries aids the escalating childhood obesity epidemic" (International Obesity TaskForce, 2002.)

The Danish Consumer Council therefore finds that the Commission should work for a ban on the marketing of unhealthy products targeted at children below the age of 16. This includes:

- all commercials for unhealthy food where either the product or the marketing itself is addressed directly at children below the age of 16.
- all child-oriented mention or use of figures, symbols etc. for unhealthy food, e.g. on the Internet or in information material, unless it is in the nature of objective nutrition information. This means that for instance Kinder Eggs or the Frosties Tiger may not appear in children's games on the Internet and that melodies/jingles/sounds associated with unhealthy products may not be used for mobile ring tones.
- all marketing of unhealthy food in media for children, around children's programmes or other places primarily seen by children.
- "unhealthy food" means food which is high in for instance sugar, salt and fat, and which therefore does not meet the nutritional criteria established in connection with the nutrition label and the claims proposal.

## V.2. Consumer education

The Danish Consumer Council finds that the large amount of different information which the consumers receive in connection with nutrition and health add to the creation of enormous confusion and some feeling of powerlessness among consumers. It is therefore important:

- to develop tools such as nutrition labelling and a nutrition logo which are independent of corporate marketing and which ensure the consumers real and objective nutrition information at the product level.
- that the Commission's proposal for nutrition and health claims is followed up by a research evaluation of how consumers perceive claims and what role claims play for the dietary composition and consumers' health perception.
- that the dietary advice, which set out guidelines for the dietary composition and the role of physical activity for a better lifestyle, are communicated effectively to the population. In this connection there is a need for research on how to best communicate the dietary advice to different population groups and how to best motivate people to a healthier lifestyle.
- to establish a knowledge centre, at national authority or EFSA level, which can communicate objective and updated expert knowledge on nutrition – popularly speaking a "myth buster" where the various myths on healthy and unhealthy lifestyle could be evaluated by experts. And which could collect and pass on good experiences with prevention and treatment initiatives in relation to obesity, overweight and physical activity.
- that information on and tools to promote healthy dietary habits, appropriate preparation and storage is communicated effectively to the population, including specific groups which might have special needs.
- education at primary school level on dietary composition, health, safety, quality and how children can see through corporate marketing.

The Danish Consumer Council believes that a healthier lifestyle cannot be achieved through information only, but also largely depends on the widespread access to healthy products so the consumers actually meet products which make it easy to compose a healthy diet.

It is important that the Commission sets aside funding for both national campaigns and partnerships which promote the accessibility and consumption of healthy products, in line with the Danish campaign to eat 6 fruits/vegetables a day. Partnerships might also play an essential role in the communication of dietary advice and nutrition information, possibly on packaging such as milk cartons and breakfast cereals which are placed on the table during the meal. A specification of the implications of "a healthy and varied diet" might also be communicated in this way.

There is also a need for research into:

- concepts which increase the accessibility of nutritionally balanced food with a high natural nutritive content and with a high eating quality, including a wide range of nutritionally balanced fast food and convenience products for a healthier food selection in restaurants, cafeterias, kiosks and the public meal provision.
- method development of dietary studies which can take account of the new and fortified products which can be expected in the near future.
- what initiatives promote the motivation to develop healthy food
- examine methods to promote nutritionally balanced dietary habits and use those which work.

### **V. 3. A focus on children and young people**

- More and better education in primary school on food composition, health, safety and quality.
- Better linking of the subjects athletics and nutrition/home economics, including more lessons.
- Better co-operation between schools and sports clubs.
- A ban on selling sweets and soft drinks in schools and improved access to cold drinking water.
- Promotion of healthy food in schools and day-care centres.

- Grants for all types of sports for children (and grown-ups) from low-income families.

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

It is important to ensure that the legislation provides an incentive for and allows preventive initiatives at the work place, such as physical activity, massage, physiotherapy, dietary advice etc.

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

Ideas for measures at different levels of the health services:

- At the national level both municipalities and regions should be directed to work out concrete action plans and strategies across sectors which include both physical activity, diet, town planning and education in schools in order that obesity increasingly becomes a public matter. The Commission should consider whether individual Member States could be placed under an obligation to implement these measures with a view to ensuring concrete action in all Member States. Below we mention some examples of what we think the local action plans should cover:
- possibility of public facilities for preventive advice on healthy diets and physical activity and prescription of guidance for citizens.
- possibility of providing obesity and overweight treatment through networks.
- experts should focus more on diet and lifestyle which should therefore be thought into a wider educational context, e.g. through more focus on diet and lifestyle in health professional education and physical activity and nutrition science as a mandatory basic subject in all educational training.
- establishment of a "food industry fee fund" in line with the Danish agricultural funds which nationally contribute to the funding of partnerships and promote objective nutrition advising at work places, schools and sports clubs.

## **V.11. Other issues: prioritisation**

First and foremost there is a need to draw up concrete action plans with time limits both at the European and the national level, including plans for regulatory measures, prioritised wishes for public-private co-operation and prioritised research areas which may be included in the next framework programme.

As regards the food part, the Danish Consumer Council believes that it is very important to promote honest and objective nutrition information for the consumers in the form of nutrition labelling and a nutrition logo in order to increase the consciousness of the factual nutritional value of food.

Another high-priority issue is a ban on the use of industrially produced transfat acids, in line with the Danish ban. Danish experience shows that it has not been too difficult for the food industry to change the production – the financial and technical costs have been immaterial, but health advantages to consumers significant.

Also a ban on the marketing of unhealthy food directed at children is a very high-priority issue.

As regards research we would like to see a strengthening of research programmes related to:

- consumer behaviour, including the subjects already mentioned in our response, but definitely also
- nutrigenomics with a view to increasing the basic nutritional and physiological knowledge on the interaction of diet and genes
- vitamins and minerals (fortification and dietary supplements), including the positive and negative effects of vitamins and minerals and risk assessments of the consequences of a high/low/distorted vitamin and mineral intake.
- consumer conceptions of nutritional and health claims and how they affect their dietary habits and health conception.

Best regards

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