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NACPH (National Association for Consumer Protection in Hungary) response to the European Commission's Green Paper on

'Promoting healthy diets and physical activity: a European dimension for prevention of overweight, obesity and chronic diseases', COM(2005) 637 final''

Introduction

National Association for Consumer Protection in Hungary is the only non-governmental organization for consumer protection covering all the country and the most important consumers' issues. An important task of its activity is to shape and strengthen the conscious consumer behaviour, to prevent problems. By the middle of the nineties there have already been dealing nation-wide eighteen civil advisory offices with consumer information and thousands of consumer claims. The membership of NACPH comprises regional consumer groups in all the counties and local consumer groups in several cities of Hungary. Professional work of the association is based on nearly 20 years of practice of hundreds of experts in different fields of economy. Activity of volunteers is supported by a small staff of the NACPH.

Meanwhile, the NACPH has become internationally acknowledged. It has been participating in several consumer protection conferences of three continents as a member of Consumers International, the World Organization for Consumer Protection and at the end of 1999 it became a member of BEUC, the European Consumers' Organization – a civil organization of the EU.

General Comments

We welcome the opportunity to express our view on this subject. In Hungary have been identified, and discussed many times the problems and the actions recommended by different stakeholders but too much have been taken on board.

Our organisations have an important contribution to make. We are committed to contributing to this challenge by providing information to all stakeholders on research conducted by our organization (together with BEUC) on such subjects as salt, sugar and fat found in everyday foods, what consumers would like to find on food labels, how consumers are influenced by claims, and how children may be influenced in their food choices.

Comments

IV.3. Health across EU policies

What are the concrete contributions which Community policies, if any, should make towards the promotion of healthy diets and physical activity, and towards creating environments which make healthy choices easy choices?

In Hungary 90 % of consumers get his information through the TV. We are very concerned that the revision of the Television program can be one of the way to render the problem of obesity and the regulation of advertising of foods (including drinks) high in fat, sugar and salt to children. Thus an EU wide initiative is necessary a national policy can be undermined by cable/satellite TV. The revision of the TWF Directive should address, the pressing health considerations of obesity and diet-related diseases and prohibit TV advertising to children of foods high in fat, sugar and salt.

IV.4.3. The Public Health Action Programme

How can the availability and comparability of data on obesity be improved, in particular with a view to determining the precise geographical and socioeconomic distribution of this condition?

A considerable amount of data on the health benefits of balanced diets in Hungary are available. The problem is that they are not always comparable and available in the same place. It is necessary to organise these data in a more efficient manner (for example by the Commission) and to look at the evaluation of interventions at community level.

We believe that DG SANCO should have an overview of all national initiatives and research data in the field of nutrition and obesity in order to be able to better inform its own policy decisions and interventions. This should include information on national campaigns and community initiatives and should also cover the issue of food availability for disadvantaged consumers.

How can the programme contribute to raising the awareness of the potential which healthy dietary habits and physical activity have for reducing the risk for chronic diseases amongst decision makers, health professionals, the media and the public at large?

It is very important the consistent and clear messages. Consistency of approaches could be achieved through mandatory nutrition labelling and by reducing the aggressive advertising of foods which should be consumed in moderation and increasing the advertising and marketing of fruit, vegetables and healthy options.

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

A variety of channels are already available for dissemination and could be used more efficiently.

National authorities in different Member States are placed in the best position to address consumers and to diversify messages and actions depending on the characteristics of their population. In addition they can develop strategies to target more vulnerable groups and the groups of the population most affected by poor diets.

The media could better convey consistent messages by addressing the content of advertising and marketing and by disseminating clear messages on healthy eating.

Consumer organisations are playing a role in the dissemination of nutrition concept through their campaigns, magazines and reports.

Food industry and retailers should address the issue by reviewing the marketing of their products and the in-store promotions and placement of products.

IV.5. European Food Safety Authority (EFSA)

We agree EFSA can make an important contribution to move forward proposed actions on nutrition.

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?

Consumers need to have clear and simple ways of putting nutritional advice into practice. Since under current legislation, nutrition labelling doesn't have to be provided on all products. There is often no nutrition information on the label, or the information is not detailed enough, the terminology is not understandable for the consumers. Labels are hard to read, because the colours or the letter size, and the products are not comparable.

We urge the Commission to include in the new proposal on nutritional labelling the following points

- ✓ mandatory nutritional labelling for pre-packed processed foods;
- ✓ mandatory labelling of the “big eight” ;
- ✓ appropriate labelling of trans-fatty acids
- ✓ simplified front-of-pack labelling system, in addition and not instead of the back-of-pack nutritional labelling;
- ✓ a minimum size of lettering.

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?

In order for the information on the label to be effective it needs to be standardised and simplified. BEUC's Study on Consumers' perceptions of labelling of foodstuffs¹ clearly shows that more than 75% of consumers (also in Hungary) are interested in nutrition, try to follow a balanced diet and want nutrition information on the label, the consumers do not find the current nutrition information or it is not easy to find, read or understand.

Consumers should be allowed to compare products quickly by looking at the label.

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?

At the moment the self-regulation do not work in Hungary. We need a Europe wide regulation on this territory. When the voluntary codes will not increase, it is possible a ban of advertising.

Surveys by BEUC members have highlighted that parents are increasingly concerned about the way foods are marketed and advertised to children. Food is one of the main factors linking television to obesity. Young viewers eat more often and consume more sweet drinks, fried foods (including crisps) and chocolate bars, but less fruit and vegetables. The time spent in front of the TV-screen encourages these (bad) eating habits.

V.2. Consumer education

We believe that consumer education is only one step, but we have to arrive the changing of behaviours and in reversing the current trend in obesity rates.

The environment is as important as, and is part of, the necessary consistency of messages. School and education environments should be free of commercial messages promoting foods high in fat, sugar or salt.

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

We think it needed a research for answering this question.

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 are picked up early in life.

It is important to:

- ✓ provide healthy school meals;
- ✓ provide healthy food guidelines to the industry catering for meals in schools and hospitals;
- ✓ provide healthier options in vending machines in schools to give a choice possibility to the children
- ✓ educate the experts (who are working in the catering), the parents and the consumers on healthy options that are not expensive.

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

We think the physical activity is very important for the health, but at first not in regarding the obesity.

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?

Providing healthy food (not high in fat sugar and salt) in the school premises and vending machines from educational environments.

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?

In Hungary the most important media is the TV, and the consumers believe in NGO's information. But it means money, what the NGO's do not have.

The food industry should not use the media and commercial communication techniques to promote foods high in fat, sugar and salt, to children and young people in schools and elsewhere.

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

How can employers succeed in offering healthy choices at workplace canteens, and in improving the nutritional value of canteen meals?

We recognising the role that food consumed in the work place is not too important in tackling obesity.

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

We do not comment on this aspect, because is it not too important in connection the obesity.

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

While recognising the important role that these factors play in tackling obesity, we will not comment this aspect.

V.6. Addressing the obesogenic environment

It is not important role in obesity, we will not comment on this aspect.

V.7. Socio-economic inequalities

The most vulnerable and disadvantaged in our society often have the poorest diets. Lack of money, inadequate shopping facilities, and poor transport mean that many people are denied healthy food choices. It is also a very sad paradox that the poor have a greater chance of becoming obese, as their diet often comprises of cheap, energy-dense convenience foods and lacks adequate amounts of fruits and vegetables. Differences in income have a direct effect on consumption patterns. The consumers in Hungary are very price sensitive.

Schemes should be developed to improve the availability of, and access to, healthy products for all consumers.

The following actions can help:

- ✓ provide healthy food in schools, hospitals and public places;
- ✓ provide healthy food guidelines to the industry catering for meals in schools and hospitals;
- ✓ provide access to fresh fruit and vegetables to people who live in disadvantaged areas
- ✓ educate consumers on healthy options that are not expensive;
- ✓ consider possible advantages of economic incentives and disincentives for the promotion of fruit, vegetables

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

Which are the most important elements of an integrated and comprehensive approach towards the promotion of healthy diets and physical activity? Which role at national and at Community level?

We do not want to comment this questions because it is not in close connection with obesity.

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

We are following the work of EFSA in this area and in particular the Scientific Colloquium on the development of Food-based Dietary Guidelines.

In which way could social and cultural variations and different regional and national dietary habits be taken into account in food-based dietary guidelines at a European level?

Different approaches are needed at national level to describe what this means in terms of national dietary habits, depending on the documented national diets and the presence of different target groups. It can be the issue of national food safety authorities.

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

Clear labelling, tight controls over advertising and promotion, strict school food standards, as well as efforts to reduce fat, sugar and salt levels in foods can make healthier choices easier for consumers.

How can dietary guidelines be communicated to consumers?

Dietary guidelines should be communicated in a simple way that relates the guidelines to the way that people choose foods. For example: daily amounts (GDAs) to better explain to consumers what is a lot or a little amount of fat, sugar and salt

Simple front-of-pack nutrition information could also assist in providing information on the overall nutritional characteristics of a food.

It should be used in communications by government, health professionals and other stakeholders including consumer groups and the food industry.

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

We support the development of a European nutrient profile system to be used to enforce restrictions in the use of health and nutrition claims and advertising to children and to design a coherent, clear and consistent European simplified labelling scheme. The nutrient profile system could also be used to develop more consistent and clearer messages and dietary guidance for consumers.

V.10. Cooperation beyond the European Union

Under which conditions should the Community engage in exchanging experience and identifying best practice between the EU and non-EU countries? If so, through which means?

We recognise that obesity and diet-related diseases constitute a problem which is not limited to EU countries. A large number of developing countries could soon be affected by similar trends if action is not taken. WHO's Action Plan for Food and Nutrition Policy in 2000 and its Global Strategy on Diet, Physical Activity and Health in 2004 can help in a cooperation.

V.11. Other issues

Are there issues not addressed in the present Green paper which need consideration when looking at the European dimension of the promotion of diet, physical activity and health?

ANY CONTRIBUTIONS?

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

In our opinion:

- ✓ Nutrition should be considered in other EU policies;
- ✓ Marketing to children of foods high in fat, sugar and salt must be restricted through legislation;
- ✓ Health and nutrition claims should not be allowed on foods high in fat, sugar and salt;
- ✓ Nutritional labelling should be made mandatory and standardised and a harmonised simplified labelling scheme should be adopted throughout Europe;
- ✓ All consumers should have access to healthy products;
- ✓ Manufacturers, retailers and caterers should reduce fat, sugar and salt levels in foods;
- ✓ Consumers should have clear information what is a healthy diet.

VI. NEXT STEPS

We hope that the Commission any impact assessments will take into account the benefits to public health and consumers in a justified and appropriate manner.

END

ⁱ Report on European Consumers' Perception of Foodstuffs Labelling, BEUC, 2005

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