

**Comments from the UK's National Consumer Council (NCC) to be read in conjunction with BEUC's response on the European Commission's Green Paper on 'Promoting healthy diets and physical activity: a European dimension for the prevention of overweight, obesity and chronic diseases'**

The NCC welcomes the opportunity to provide comments on the European Commission's Green Paper on promoting healthy diets and physical activity. NCC is a UK consumer policy and research organisation with a special focus on the needs of disadvantaged consumers and a longstanding BEUC member.

We support the points raised by BEUC in their response to the Green paper, however we do have further comments to add to specific questions outlined below. Where possible, we have tried to draw on NCC's positioning on particular issues and provided references to any relevant research for the given points.

### **Specific comments**

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

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

As part of a broader intervention mix, a wealth of evidence demonstrates that social marketing<sup>1</sup> interventions can increase the 'attractiveness' of fruit and vegetable among targeted groups. It is able to do this by investing in formative research that is able to determine barriers to, and motivations behind people's actions (e.g. perception of cost, ability to cook).

A recent review of nutrition social marketing interventions found that, of 31 studies, the vast majority (n=24) had at least one significant positive

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<sup>1</sup> The systematic application of marketing concepts and techniques, to achieve specific behavioural goals, relevant to a social good. National Social Marketing Centre for Excellence, London (2005)

effect on some form of nutritional behaviour, whether that is fruit and vegetable consumption, fat intake, or something else. A further three studies reported non-significant trends of improvement. Only three of the 31 studies were essentially ineffective at influencing nutritional behaviour.<sup>2</sup>

*On which areas related to nutrition, physical activity, the development of tools for the analysis of related disorders, and consumer behaviour is more research needed?*

More consistent rigorous and consistent evaluation of existing (and new) interventions is needed.

#### **IV.4 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 socio-economic distribution of this condition?*

Currently there is a reliance on commercial sources for attitudinal and behavioural data. Whilst this is very valuable, it does have limitations. These include inadequate sample size, inconsistent quality, limited public health rigour (only reported BMI), omission of key variables (e.g. ethnicity), limitations in validity and applicability of questions asked, and the of drawing credible conclusions from a diversity of non-comparable data sources. Improved data sets that link BMI with motivations and behaviours around diet and physical activity would greatly assist in designing, prioritising and evaluating interventions.

Also, a consistent measurement that could accurately assess levels of activity would also be helpful.

*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?*

Increasing the perception of risk that unhealthy diets and lack of physical activity have, can be addressed effectively through the implementation of targeted social marketing concepts and techniques. For example, in reaching the general public, rather than simply

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<sup>2</sup> Institute for Social Marketing, University of Stirling & The Open University. (2006) *A review of the effectiveness of social marketing Nutrition interventions*. National Centre for Social Marketing Excellence.

communicating ineffective fearful messages, insight into the customer's understanding (e.g. what is healthy, what is obese, is it relevant to me?), can be used to refine interventions and make any messages relevant.<sup>3</sup>

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<sup>3</sup> Hastings G, Stead M and Webb, J. (2004) *Fear Appeals in Social marketing: Strategic and Ethical Reasons for Concern*. *Psychology and Marketing*. Vol. 21 (11)

## Areas for Action

### **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?*

We consider that the 'big 4', i.e. saturated fats, fat, sugar and salt should be provided as a minimum guide to consumers and we propose that these are placed on the front of pack as a multiple colour-coded option as recommended by the UK Food Standards Agency (FSA). We recognise for a front of pack labelling scheme to be consistent that it adopts the four core elements approved by the FSA<sup>4</sup>. Additional information on the back of pack that includes the 'big 8' (energy, fat, saturated fat, carbohydrate, sugar, protein, fibre and salt) would complement a front of pack colour-coded scheme.

*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?*

Research by the FSA<sup>5</sup> in the UK showed that consumers want clear and consistent front of pack labelling on food products to help them make healthy choices easier. Front of pack at-a-glance labelling would enable consumers to do this. In order to support the introduction of such a scheme, NCC considers it essential that independent bodies such as FSA or the European Food Standards Agency (EFSA) lead a public awareness campaign to educate and inform consumers. We believe that it is very important a respected independent body that consumers can trust does this. For a Europe wide scheme, we want to see the retailers and food companies throughout Europe giving their full support to this.

*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?*

We agree with BEUC's comments that following on from the Hastings Report in 2003 and the IOM report in 2005, there is a strong case for limiting how foods high in fat, saturated fat, sugar and salt are promoted to children. Self-regulation on a voluntary basis has proved to be

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<sup>4</sup> [www.food.gov.uk/news/newsarchive/2006/mar/signpostnewsarchive](http://www.food.gov.uk/news/newsarchive/2006/mar/signpostnewsarchive)

<sup>5</sup> <http://www.food.gov.uk/foodlabelling/signposting/alt>

inadequate, as companies have previously flouted codes of practice put in place to protect young consumers. NCC recognises that for an EU wide measure to be effective, it has to be mandatory and implemented through EU legislation.

## **V.2 Consumer Education**

*How can consumers best be enabled to make informed choices and take effective action?*

In relation to diet and physical activity, the choices that consumers make are very complex and variable, and often driven by more than knowledge alone. Therefore, though it is critical to make consistent information available to all, other influencing factors must also be considered. These include: motivation (e.g. attitudes towards exercise, self-esteem); ability (e.g. skill) and opportunity (e.g. mapping of physical access to sports activities).<sup>6</sup>

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

Public-private partnerships can provide opportunities through which the complimentary skills and resources of the various sectors can be brought together. For example, industry can provide access to valuable insight that is not regularly held in the public health domain i.e. attitudes to food and exercise that is linked to consumption.<sup>7</sup>

*In the field of nutrition and physical activity, which should be the key messages to give to consumers, how and by whom should they be delivered?*

Given the complexity and variability of attitudes and behaviours around health, diet and exercise in the EU, care should be taken not to leap to defining messages and means of communicating them, before clearly identifying whom the target audience is.<sup>8</sup> Once this has been determined, varied techniques and approaches will be necessary for different groups.

## **V.7 Socio-economic inequalities**

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<sup>6</sup> Rothschild, M.L. (1999) Carrots, *Stick and Promises: A Conceptual Framework for the Management of Public Health and Social Issue Behaviours*. Journal of Marketing. Vol 63. pp 24-27

<sup>7</sup> This is currently being undertaken by the UK Department of Health, where NGOs and industry have both provided data sets that are being used to inform the National Obesity Social Marketing Programme.

<sup>8</sup> GfK NOP. (2006) Understanding the Health Gap. *Helping to Translate Understanding into Action. Insights from GfK NOP Global food, Diet and Well-being Monitor*. Sponsored by Kraft Foods.

The NCC believes that all consumers particularly those from disadvantaged backgrounds should have access to affordable, healthy food. In addition to decreasing the physical and financial barriers that low socio-economic groups experience, acknowledgement of more subtle influences on consumption and uptake are necessary. For example, perception of the cost of healthy foods (when this may not actually be the case) can be as detrimental as lack of actual access.

Recent research by MORI commissioned by the NCC<sup>9</sup> found that consumers cited access to affordable healthy food as one of the top four ways of encouraging a healthier diet.

The NCC's report, *Putting Food Access on the Radar*<sup>10</sup> highlighted the fact that the poor not only pay more but also in some cases pay twice. A Geographical Information System (GIS) based tool was employed to identify areas where there was poor food access. The report found that those consumers, who were totally reliant on shopping at local smaller shops, not only paid a higher price for their goods but were often faced with poorer choice and quality. NCC are now working with other partners in the UK to develop a Food Access Toolkit to help officers working in local authorities to identify where there are areas of poor food access and work with communities to develop appropriate solutions. We appreciate this model is very specific to the UK, but believe that some of the principles could be adapted for wider use within other EU countries.

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

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

The NCC considers the nutrient profile model recently developed by FSA UK to be a scientifically sound system that can be used to enforce restrictions in the use of potentially misleading health and nutrition claims, and in the promotion of foods high in fat, saturated fat, sugar and salt to children. We would like to see this model used throughout Europe and support the development of a European nutrient profile system. It is important

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<sup>9</sup> MORI interviewed a nationally representative quota sample of 2,056 adults aged 15+ between 6th and 10th October 2005 in 197 sample points, using Computer Assisted Personal Interviewing (CAPI). Interviews were conducted face to face, in respondent's homes. All data have been weighted to the known profile of the population.

<sup>10</sup> *Putting Food Access on the Radar*, National Consumer Council July 2005  
[http://www.ncc.org.uk/food/access\\_radar.pdf](http://www.ncc.org.uk/food/access_radar.pdf)

that the criteria used to determine the healthfulness of a food is consistent so as not to confuse consumers further.

If you wish to discuss further any of the points I have raised please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink that reads "Jillian Pitt". The signature is written in a cursive style with a large initial 'J' and a stylized 'P'.

Jillian Pitt  
Senior Policy Officer

**About the National Consumer Council (NCC)**

The NCC makes a practical difference to the lives of consumers around the UK, using its insight into consumer needs to advocate change. We work with public service providers, businesses and regulators, and our relationship with the Department of Trade and Industry – our main funder – gives us a strong connection within government. We conduct rigorous research and policy analysis to investigate key consumer issues, and use this to influence organisations and people that make change happen. Check [www.ncc.org.uk](http://www.ncc.org.uk) for our latest news.

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