

MINISTRY OF AGRICULTURE, FISHERIES AND FOOD

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Subject:

Comments on Commission GREEN PAPER

“PROMOTING HEALTHY DIETS AND PHYSICAL ACTIVITY: A EUROPEAN DIMENSION FOR THE PREVENTION OF OVERWEIGHT, OBESITY AND CHRONIC DISEASES”

1. GENERAL COMMENTS

- Generally speaking, we take a positive view of this document by the Commission, which makes a renewed effort to impress upon all of the Member States the importance of working on activities directed towards a healthy diet and the promotion of physical activity.
- The GREEN PAPER draws attention to the major health problem facing us (in health and economic terms) and of which the effects are already being felt, as we continue to move away from eating healthily and taking sufficient physical exercise.
- With this document, the Commission intends to establish a common framework enabling all of the Member States to move in the same direction to attain the same objectives. It is important to establish a common framework that is flexible enough to enable each Member State to develop and adapt it to its own special characteristics afterwards.
- Emphasis is placed on relevant and high-priority areas of intervention (education, information, guidance for children and young people, etc).

- Focussing on specific aspects of the Green Paper and, more specifically, on the **global approach to be taken to the problem of obesity among the population**, we should point out that Spain is already working along the lines of this Green Paper. Various measures implemented at national level respond to many of the calls made in the conclusions of the Council on Obesity, Nutrition and Physical Activity, as reported in the Annex to the Council of Health Ministers held on 3 June 2005.

Here in Spain we are actively working to implement policies that will enhance awareness of the benefits for the whole population of a healthy, balanced and varied diet, together with regular physical exercise, attaching particular importance to prevention during childhood.

- We firmly believe that any type of activity in this area must revolve around and take into account the dietary realities of each country — i.e. the way we eat in each Member State with all of the differences and particularities this implies, treating **each country's food and culinary traditions** with the utmost respect while never losing sight of the concept of varied and balanced eating.

Community texts make many references to culinary tradition and diversity within the European Union.

Therefore, any adequate food policy must include sufficient and accurate information and education for consumers on food in general, the nutritional characteristics and content of each foodstuff or group of foodstuffs, with the core idea that food is a single entity and that all foodstuffs have their function and contribution, that no single foodstuff has a particular contribution to make but that they all come together to form a whole, that – in short – there are no good or bad foods but only good or bad diets, good or bad ways of eating, and balanced or unbalanced eating habits, not forgetting the practice of physical activity to reach a satisfactory state of health.

- We would stress the importance of the *principle of consumer responsibility*, so that the production sector can respond to consumer demand: those in charge of consumer organisations have a clear role to play here by communicating tastes and requirements to producers, so that supply can be increased and improved in a manner consistent with changes in demand.

Here again we would stress the importance of involving those responsible for education, information and guidance, with particular emphasis on the school environment.

We would also draw special attention to activities intended to inform and educate consumers on the need for a varied, complete and balanced diet including all of the food groups.

2. COMMENTS ON SPECIFIC POINTS

➤ NUTRIENT PROFILES

We should like to refer to point V, paragraph V.1., of the Green Paper, headed **V.I. Consumer information, advertising and marketing**.

The point should be made here that there are no good or bad foods, only “correct” or “incorrect” diets. Foodstuffs must be considered in a global context within the diet as a whole.

We therefore suggest the following change to the text:

V.1.1.

“This includes the principle of setting nutrient profiles, in order to *take account of not only the content in particular nutrients and other substances contained in foods but also the function and importance of foodstuffs in the diet of the population as a whole, as well as the overall nutritional makeup of foods and the presence of nutrients of which the effect on health has been scientifically acknowledged.*

Nutrient profiles will be based on scientific knowledge of diet and nutrition as well as their relationship to health. The Commission is also considering amendments to the current rules on nutrition labelling.”

➤ CHANGES TO LABELLING

- Regarding the questions raised by the Commission calling for contributions on various aspects of nutrition labelling, it should be borne in mind that there is currently an ongoing debate within the EU to revise Directive 2000/13/EC on the labelling, presentation and advertising of foodstuffs and Directive 90/496/EEC on nutrition labelling for foodstuffs.

These questions are being examined by all interested players (producers, consumers and public authorities). Once these discussions are complete we will be able to respond to the questions raised by the Commission.