

Freshfel Europe's answer to the Commission's GREEN PAPER
“Promoting healthy diets and physical activity: a European dimension for the prevention of overweight, obesity and chronic diseases”
COM (2005) 637 final

Freshfel Europe Key Statements

- 1) Based on a wealth of robust scientific research around the world that demonstrates the health benefits resulting from the increased daily intake of fresh fruit and vegetables, as well as on the opinion from several public institutions (i.e. WHO, FAO, European Parliament, European Council, EESC), Freshfel believes that fruits and vegetables have an essential role to play in the Commission's plan to fight against obesity and must be a major part of any solution that seriously addresses obesity. The benefits to population health through increased fruits and vegetables consumption would undoubtedly be huge and would also lead to significant savings in social security costs in the various Member States across Europe.
- 2) The Freshfel WG on Promotion designed a Business Plan (attached) that was presented to DG SANCO in December 2005. It offered a set of actions to address stagnating, or in many cases decreasing, consumption of fruits and vegetables in Europe by:
 - (i) raising awareness, preparing the audience through a pan-European media campaign;
 - (ii) suggesting an education scheme targeted to children and applicable throughout Europe; and
 - (iii) increasing availability of fruits and vegetables through the development of specific vending machines and the revision of the tendering system for catering contracts.
- 3) In order to give an answer to other important questions included in this Green paper, Freshfel also advocates for:
 - (i) increase the European budget for the promotion of fruits and vegetables, inline with the opinion of several international public institutions and private entities;
 - (ii) national governments should establish a 0% VAT on fruits and vegetables, inline with the example in some Member States, notably the UK and Ireland;
 - (iii) establish a regulatory framework for all types of advertisement to children, be it on traditional media or by the use of the internet, mobile phones, in-school marketing or new media tools;
 - (iv) opportunities to promote fresh fruit and vegetables should be allowed without restriction under any foreseen regulation on nutrition and health claims, given their unique nutritional health benefits;
 - (v) national governments should go back to compulsory teaching of home economics and physical activity in schools;
 - (vi) tendering rules for the award of catering contracts should be reviewed so as to allow quality and nutritional balance aspects to be taken into account to encourage awarding to be based not just on price alone.

General Comments

Freshfel Europe is the European forum of the fresh fruit and vegetables sector. As such, one of the main objectives of Freshfel is the promotion of the consumption of fresh fruit and vegetables, with a view to reversing the stagnating, and in some cases decreasing, consumption trend experienced throughout Europe. Through its actions, Freshfel contributes to the fight against obesity, heart disease and cancer, which threatens our modern society. Accordingly, Freshfel welcomes the adoption by the European Commission of the Green Paper on the promotion of healthy diets and physical activity.

As the representative of such a specific sector, Freshfel would like to highlight certain proven concepts to emphasise the important role that increased consumption of fruits and vegetables can have in the fight against overweight, obesity and chronic diseases. They are:

- 1) WHO/FAO recommendations that adults should consume at least 400 grams of fruit and vegetables per day to reduce health risks and encourage a better quality of life, are not being achieved. Perhaps, on average the EU-25 population is achieving half this recommended rate;
- 2) consumption of fruit and vegetables across Europe can be shown to be at best static and even marginally in decline. The Freshfel Consumption Monitor is confirming this concern (here appended). Of particular significance is that the "Mediterranean diet" can be seen to be losing ground fast in countries such as Spain and Italy. In the particular case of Italy, this has resulted in a cumulative loss in fresh fruit and vegetable consumption over the last 3 years approaching 20%;
- 3) the WHO Report 2002 describes in detail how a few major risk factors account for a significant proportion of all deaths and diseases in most countries. Six out of the seven most important risk factors for premature death (among which the inadequate fruit and vegetable intake is included) relate to diet and physical activity. Unhealthy diets and lack of physical activity are therefore the leading causes of avoidable illness and premature death in Europe;
- 4) substantial medical research now links increased fruit and vegetable consumption with improved cardiovascular disease prevention. There is also tangible evidence, but to a lesser degree, that it plays a roll in prevention of various cancers, and that it is a key ingredient in the fight against the obesity epidemic sweeping across Europe and elsewhere;
- 5) tackling overweight and obesity is not only important in public health terms, but also to reduce the long-term costs to health services and stabilise economies by enabling citizens to lead productive lives well into old age. Taking one example, in the UK with a population of 58.6 million, the estimated current annual financial cost of obesity alone is £0.5 billion in avoidable treatment costs to the National Health Service; and the impact on the economy is estimated to be around £2 billion. The estimated UK human cost of obesity to industry is 18 million sick days a year; 30,000 premature deaths a year, resulting in 40,000 lost years of work life and a shortened lifespan of 9 years on average. Taking the cost to the National Health Service alone per head of population at £0.5 billion, then individual costs can be estimated at €12.40 (£8.50) per person. Accordingly, across Europe the costs might be expected to be ca. €12.40 x 451,829,200 (EU25 population) = €5.6 billion per year;
- 6) other public institutions and private organisations support the need to increase the consumption of fresh fruits and vegetables:
 - Dutch Presidency conclusions of the European Council as regards the reform of the CMO of fruits and vegetables. On this paper, the Council establishes that any adjustment should be focused on, among others, recognizing the positive health aspects of consuming fruits and vegetables. On point 8, the Council says: *"Consumption of fruits and vegetables is proven to have positive health aspects for consumers. Consumption is decreasing. The Commission should give priority to projects and proposals promoting fruit and vegetables consumption within the framework of the CMO for fruits and vegetables or within the framework of the horizontal promotion measures. The recognized effects on*

health can be better communicated to consumers. The Commission is invited to examine whether it would be opportune to introduce a school fruit scheme to reach young people. A proper cost-benefit analysis should be incorporated in the analysis.”

- Report of the European Parliament as regards the reform of the CMO of fruits and vegetables, April 2005. In points 36 to 38 of the Report, the Parliament:
 - *deplores the lack of a Community strategy and research to revive consumption, and the mediocre financing allocated to the generic promotion of fruit and vegetables, which runs contrary to the European Union's growing concern to ensure nutritional balance for its citizens and food safety;*
 - *calls for the creation, in connection with the regulations aimed at promoting Community agricultural products inside and outside the EU, of a specific item amounting to EUR 15 million each year for increasing fruit and vegetable consumption; and*
 - *recalls that on 14 December 2001 the Council adopted a resolution stating that the consumption of fruit and vegetables is an effective way of promoting public health, as demonstrated by the Commission's DG SANCO in a document dating from 2002; notes that this position was officially bolstered by the Global Plan of Action for Nutrition presented by the WHO; therefore suggests that general campaigns be financed by DG SANCO to encourage the consumption of fruit and vegetables produced in the EU (e.g. school projects).*
- Opinion of the European Economic and Social Committee (EESC) on obesity. In this paper, point 5.2.7, the EESC underlines in that “*DG Agriculture have a promotion budget which could be used as an investment towards the promotion of fresh fruit and vegetables*”;
- IFAVA (International Fruit and Vegetable Alliance) aims at encouraging and fostering efforts to increase the consumption of fruit and vegetables globally for better health all based on sound science. Their website offers a wide range of scientific reports on the benefits of consuming fresh fruits and vegetables;
- EGEA (International Conference on Health benefits of Mediterranean Style Diet) regularly highlights the scientific evidence of the benefits of consuming fruits and vegetables. The third edition of the conference took place in May 2005, and was organised by APRIFEL with the partnerships of the Italian Ministry of Health and the French Ministry for Agriculture, Food and Fisheries and the participation of the International Agency for Research on Cancer. This Conference offers a further opportunity to link the benefits of consuming fresh fruit and vegetables and health.

Taking all the above fundamental truths into account, Freshfel would like to contribute with the following answers to some of the questions raised in the Green Paper. At the end of last year, Freshfel presented a business plan identifying a number of actions to stimulate consumption of fresh fruit and vegetables. Reference to these proposed actions are made throughout the response to this Green Paper.

Answers to specific sections and questions raised in the Green Paper

IV. Structures and Tools at Community Level

1. 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?

- (i) DG AGRI: In the frame of the Common Agricultural Market legislation and following the opinion of several public institutions and private entities, there should be an increase of the European budget for the promotion of fruits and vegetables. The EESC Opinion on Obesity in Europe – role and responsibilities of civil society partners – underlines the importance of dedicating increased funds for the promotion of fresh fruits and vegetables in the European Union. This in turn could be positively used in helping any other general activities in the subject. Under the Common Agricultural Policy, the Regulation on Promotion allows

for projects such as the school milk programme to be co-financed by the European Union. A similar programme should be envisaged for the fresh fruits and vegetable sector.

- (ii) DG SANCO: Actions undertaken at Community level against obesity and to promote nutrition and safety, will considerably promote the increase of fresh fruits and vegetables consumption. When introducing a new Regulation on Nutrition and Health Claims, the European institutions should make sure that the fresh fruit and vegetable sector, along with public authorities, can continue to promote without restriction the unique nutritional health benefits of consuming more fresh fruits and vegetables. Legislation that would force the sanctioning of the use of nutrition and health claims for fresh fruits and vegetables could have significant negative consequences for the health campaigns of private enterprises or other bodies who wish to raise consumption of these nutritionally dense products. Further, whilst establishing nutrient profiles, it is essential to grant fresh fruits and vegetables a total exemption to restrictive conditions for the use of claims. Fresh fruits and vegetables must be clearly distinguished from those foods with added sugar. This will avoid confusing consumers who must interpret information regarding the health benefits of consuming fresh fruit and vegetables.
- (iii) EFSA and DG SANCO: To ensure that horticultural production can satisfy consumers' demands for a constant supply of fresh good quality, disease-free fruits and vegetables, plant protection products are used according to good agricultural practice and the principle as little as possible as much as necessary. These products are used according to the provisions of community rules and the fresh produce industry takes a multitude of steps to ensure that residues levels set at community level are not exceeded. DG SANCO and EFSA must better communicate the considerable inherent safety margins in residue limits to ensure industry and consumer confidence and verify that residue monitoring data are not misused to negatively affect fruit and vegetable consumption.
- (iv) DG INFOSOC: The Directive "Television without Frontiers" concerning the legal frame for the free movement of television broadcasting services in the Union, should be amended to prohibit television advertising of "unhealthy" food to children. Additional measures should be introduced to limit children's exposure to all other forms of "unhealthy" food advertisement, notably within schools and the Internet, and any other broadcast and non-broadcast media.
- (v) DG TAXUD: Influencing national governments to establish 0% VAT on fruits and vegetables, following the example in some Member States, notably UK and Ireland.
- (vi) DG ENTERPRISE: Tendering rules for the award of catering contracts should be reviewed to allow quality aspects to be taken into account besides the price.
- (vii) DG RESEARCH: To improve the quality, convenience and availability of fruits and vegetables, the role of research is very important. Research needs to be undertaken in order to develop specific vending machines for these type of products.
- (viii) DG EDUCATION: Influencing national governments to reinstate compulsory education on home economics and physical activity in schools. Further to this, the EU should influence national governments to introduce/reintroduce "home economics" to secondary schools as a mandatory subject for all pupils. This will ensure that all school leavers know how to identify different types of fruit and vegetables, and how to buy, prepare and cook them, reducing future consumers reliance on junk foods high in salt, fat and sugar. In a similar manner Physical Activity on a daily regular basis during school break times should be reintroduced. Pressure on growing curricula has led to its extinction in many schools, and parents have gone along with the eradication because they cannot clearly see the benefit from exercise for their children can be as beneficial, as for example, extra mathematic or linguistic classes in the medium to long term. To improve availability/opportunity to eat more fresh fruits and vegetables all schools should introduce a policy, promulgated and enforced by governmental educational bodies, of having fruit and vegetable available at school food outlets at all times and even to the exclusion of confectionery/chocolate items at one or more break times.

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

- (i) Freshfel suggested in its business plan a pan-European advertising campaign. Such a campaign would have the effect of reaching a sector of the population that is currently unaware of the health consequences of a diet low in fruit and vegetables. A widespread awareness campaign, if directed correctly, would be a catalyst in getting healthy diets actually accepted into other European policy areas and by the general public at large.
- (ii) In its business plan, Freshfel suggested a number of measures to improve the diets of primary school children, such as a school programme (i.e. the Food Dude Scheme) and the development of specific vending machines for fresh fruit and vegetables. This would facilitate availability of fresh produce in a wide range of outlets (schools, workplace, public transport stations, hospitals, etc.).
- (iii) Lack of affordability is a convenient excuse as to why fruit and vegetable consumption is stagnating or falling. Food in general now constitutes a much smaller proportion of household budgets than in former times. Highly perishable fresh produce, which has a limited shelf life, will always be relatively expensive to handle due to the necessity of cool-chain preservation and high wastage due to perishability. The way that the economics of the fruit and vegetable sector functions, producers do not dictate prices; fruit and vegetable prices are based on market conditions of a free market. The fragmentation of the sector implies that no one has the power to decide on the price alone (contrary to other sectors). Further, the success of the sector depends on weather conditions that often determine the season prices of specific products. Efforts to communicate the value of fruits and vegetables should be undertaken. Actions that could contribute to reduce costs of fruit and vegetables offered to consumers should also be considered. For example, the VAT applicable to fruits and vegetables varies among Member States. A VAT of 0% across Europe (following the example of i.e. the UK and Ireland) would help to keep prices down and would prevent discrimination among Member States
- (iv) Availability of fruits and vegetables in schools is important to secure a high daily intake of fruits and vegetables among the youngest pupils. A large-scale programme should be put in place to distribute fruits and vegetables to children between 4-6 years old. The efficiency of such a programme could be further reinforced and generate long lasting effects if supported by additional education programmes to encourage positive culinary behaviour and generally raise awareness of fruits and vegetables.
- (v) With changing lifestyles, and an increasing number of meals being eaten away from the home, and the multiplication of eating times/snacking throughout the day, it is important that fruit and vegetables are made more readily available to meet these new eating opportunities. In Freshfel's business plan, it is proposed that research is carried out on developing vending machines with the necessary technology to be used in schools, canteens and public places such as railway stations, bus stops, etc. Further, there is a need to increase the portions of fruit and vegetables offered in canteen menus, by revising the functioning of tendering systems to allow for qualitative parameters to be taken into account, together with the price.

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

- (i) In a communication strategy, there is a need of an evaluation of the best motivators that could serve as common denominator to promulgate through advertising. Along with this, an evaluation has also to be made on whether the national identifiers are so variable that programmes/messages have to be tailor-made for each region of the EU25. This will allow the messages to have a better chance of achieving their desired effects.
- (ii) Availability of fruits and vegetables in schools. A programme distributing fruits and vegetables in schools is already in place in the UK. Moreover, the success of the Food Dude Scheme is already well proven and to further test the hypothesis and mechanism would serve no purpose.

- (iii) In general terms it appears that the evidence supporting increased intake of fruit and vegetables in the diet to prevent obesity and cardiovascular disease is strong and growing. In the case of cancer prevention, more research needs to be done. A network composed by key scientists, nutritionists and communication experts would be an asset to convey proven and simple messages on the health benefits of fruit and vegetables consumption to consumers.
- (iv) To strengthen availability of fresh produce, it is vital that a vending machine system be developed to respond to changing lifestyles, and an increasing number of meals being eaten away from the home. It is important that fruits and vegetables are made more readily available to meet these new eating opportunities. Research should be done into the design of vending machines that can be used in schools, canteens and public places such as railway stations, bus stops, etc. In this way, availability of fruits and vegetables as a snack would be facilitated. This move fits neatly into the modern concept of people increasingly eating on the move or “grazing” with no defined meal times. Current vending machines dispense prepacked confectionery. They can do the same for prepacked fruit, but work needs to be done to find a means to handle “raw” fruit and vegetables with a minimum of packaging to minimise unit costs thus encourage consumption.
- (v) Further research is needed on how to make fruits and vegetables more attractive to consumers. The product needs to be seen as contemporary and attractive (“cool” through changing times). One good example is the French promotional programme “Fresh Attitude” (Interfel) which links the behaviour with eating habits and targets young adults providing an image of energy and simplicity of eating fresh fruits and vegetables.

4. How can the Public Health Action 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 and which are the most appropriate dissemination channels for the existing evidence?

- (i) Freshfel would welcome a programme aimed at developing a pan-European advertising campaign to alert citizens across the EU 25 to the problems of obesity arising from a poor diet and inadequate exercise. In regard to fruit and vegetables, the advertising pitfalls are myriad. Fun, taste, pleasure could be the focus of a successful campaign along with other scientific evidence, provided messages are kept simple.
- (ii) In regard to communication, no single channel is sufficient. TV, radio, outdoor and press are the most commonly used at the moment. TV is generally the most effective in raising awareness, but it can be very expensive in some countries, so a combination of media would have to be used, each with a campaign designed to suit its strengths e.g. press might be appropriate to reach certain health professionals through their own specialist magazines. In targeting young people, new media tools (internet, SMS, etc) should be considered.

V.1. Consumer information, advertising and marketing

When considering rules that refer to the way information on nutrition or nutritional value of foods is advertised or marketed to the consumer, Freshfel Europe believes that the sector of fresh fruits and vegetables should not be bound to any restrictive conditions (i.e. health claims). Scientific research clearly demonstrates the health benefits of a diet rich in fresh fruits and vegetables. It is therefore essential that the sector can continue to promote, without legislative restriction, the unique nutritional health benefits of consuming more fresh fruits and vegetables. Any necessary legislation in this area should be simple, such as several Member States’ “traffic light” systems to inform consumer on the nutritional value of the product. One must remember that the majority of consumers are not scientists.

Freshfel has also identified and implemented a number of actions in regard to consumer information, advertising and marketing:

- (i) From Freshfel's Platform commitments 2006 (see document attached): Serving as a supportive platform for several of our members, as well as a number of non-members, on their activities for the promotion of fruit and vegetables at national level, Freshfel Europe is in an outstanding position to serve as a platform to exchange and disseminate information on the different promotional activities that our members and other entities undertake, possibly with the cofinance of Member States and DG Agriculture. These experiences increase awareness of the efforts to raise fresh fruit and vegetables consumption and the sharing of novel and successful ideas to increase consumption of fruits and vegetables. Their dissemination will encourage the realisation of more promotional activities which in turn benefits the consumer and helps share best practices among industry and policy makers.
- (ii) Freshfel Europe will encourage its members to carry out new promotional activities and will maintain regular contact with these actors in order to exchange experiences and collect information on the promotional activities underway. Once the information has been collected, it will be broadly disseminated with a view of increasing awareness of actions being undertaken by the sector for the promotion of consumption of fruits and vegetables across Europe (see Freshfel "Fresh Times" No 1 attached).
- (iii) From Freshfel's Platform commitments 2006: Freshfel has created a new pan-European logo for the promotion of fresh fruits and vegetables, with the aim of encouraging consumers to increase consumption of fruit and vegetables (information attached). Today different logos are used in different countries, which creates confusion at consumer level as products freely circulate on the internal market. This logo indicates that the package bearing the logo contains fruit or vegetable which are fresh and conveys good health and the good health-promoting properties of fruit and vegetables.

5. When providing nutrition information to the consumer, what are the major nutrients, and categories of products, to be considered and why?

- (i) The information regarding nutrition should be kept simple, as simple as possible.
- (ii) It should be limited to the following elements:
 - o Protein
 - o Carbohydrates (Starches, Sugars)
 - o Fats (saturated, unsaturated)
 - o Salt (NaCl)
 - o Vitamins (A Bs C D E)
 - o Essential minerals
- (iii) We must remember that most EU citizens do not understand the role and significance of these nutrients. Further, these are the very people with whom we need most to communicate (and being realistic, probably the people with whom we least meet and talk to in our lives).

6. 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?

- (i) In regard to fruit and vegetables, information should be kept as simple as possible. Each food group could be depicted by one of the colours of a traffic light, which would be carried through onto product labelling so that the consumer has it easier to understand labels. While the food "pyramid" has evolved, it remains confusing. The "plate of food" concept which manages to show a range of foods in the proportion that they should be eaten, could therefore also be used as an alternative. Concepts are being developed in the fruit and vegetables sector to recommend half of the serving to be composed of fruit and vegetables.
- (ii) Further to the information provided by the manufacturer in the label, EFSA and DG SANCO should play a key educational and communication role in supporting health benefits of fruit and vegetables properties.

7. Are voluntary codes (“self-regulation”) an adequate tool for limiting the advertising and marketing of energy-dense and micronutrient-poor foods? What measures should be considered if self-regulation fails?

- (i) Have we got time to experiment with self regulation?
- (ii) Self-regulation can certainly help, but within a legal framework. Manufacturers of energy-dense and micronutrient-poor foods are usually global, powerful and resourceful companies whose marketing department’s *raison d’être* is to sell more product more profitably. They will always seek to give their products an advantage, perceived or real, over those of competitors – so they seek to exploit difference. This is good from a competitive standpoint, but it can profit their cause to confuse the consumer sometimes. Therefore basic minimum “do’s and don’ts” need to be enshrined in law or they will surely find loopholes within voluntary guides.
- (iii) There is a need to regulate on certain aspects. Food advertising to children should be strictly forbidden except for certain categories of basic nutritional food such as fruit and vegetables. On subjects such as promotion, sponsoring and general communications, rules should be established to create a minimum framework that protects the interest of the consumers, including the youngest.

8. How can effectiveness in self-regulation be defined, implemented and monitored? Which measures should be taken towards ensuring that the credulity and lacking media literacy of children is not exploited by advertising, marketing and promotion activities?

- (i) The bureaucracy that would have to be in place to implement, monitor, and assess self-regulation would likely be immense and impose another layer of cost.
- (ii) Already we are seeing key food sectors voluntarily stopping advertising their products to young children, but we do need to advertise “good” food to children, and we do need very much the funds and help and good will of these large companies to do so. A solution might be to ask/force large companies to fund (creative and airtime) an approved generic message to children under 12 years old for every advertisement they air to an older audience.

V.2. Consumer education

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

- (i) When considering the insufficient intake of fresh fruits and vegetables, it is not only sufficient to reduce the cost of fresh fruit and vegetables available to the population. This is the strategy at present but fruit and vegetables demand is price inelastic. Even at no cost, sustained uptake does not always occur.
- (ii) An additional incentive needs to be given which is educational in the sense that it provides sound, easily comprehensible reasons why the consumer should increase fruit and vegetables intake, but also in that it educates the consumer’s palate through repeated tastings.
- (iii) Through simple but well-thought out promotional messages presented to them via a number of media *ad nauseam*. There is absolutely no substitute for repetition.
- (iv) Having raised awareness, the more difficult task is to promote action, and this is where all the sophistication of the advertising industry shall be needed.

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

- (i) Almost all private concerns above a certain size make use of advertising agencies which they have chosen because of their a) creative departments and b) the practicality/logicality of their suggestions. Member

States could prevail upon their agencies to create ideas and suitable campaigns. Costs for this, a new concept, remain to be evaluated.

- (ii) Government at national level would have to legislate to get commercial or State-owned media TV, radio and press channels to carry the selected messages free-of-charge at a weight and airing time that will make a difference. Partnership could be organised between the fruit and vegetables sector and the government in order to develop the appropriated messages related to these products.
- (iii) Government would also have to ensure that its educational authorities backed selected campaigns through curricula matching and use of support materials, which private companies could ensure was present on their packaging at the same time in an agreed format. A champion would be needed in each country to make it happen correctly and on time - ideally a champion from each side together (government and industry).

11. 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?

- (i) Great care is needed in sending messages that encourage the consumer to taste and subsequently consume more fruit and vegetables. Expressing the reasons in medical terms may only have an effect counter to that desired. This could lead to a situation where fruits and vegetables are only consumed at times when recommended by doctors to ward off disease.
- (ii) A network composed by key scientists, nutritionists and communication experts would be an asset to convey scientifically proven and simple messages on the health benefits of fruit and vegetable consumption to consumers.
- (iii) Fresh fruit and vegetables need to be seen as contemporary and attractive ("cool" through changing times). As mentioned above, one good example is the French promotional programme "Fresh Attitude" (Interfel) which links the behaviour with eating habits and targets young adults providing an image of energy and simplicity of eating fresh fruits and vegetables.
- (iv) It is to be noted here that, contrary to the message that is communicated to some food sectors, in the fruit and vegetables sector a consistent message is to increase (and not reduce) portions. Simultaneously, portions of other products should be reduced as it is important to increase the proportion of fruits and vegetables relative to other foodstuffs.
- (v) Delivery should be via media and through a range of hands-on school activity.

V.3. A focus on children and young people

The initial discussions within the EU Platform for Diet, Physical Activity and Health clearly highlighted that eating habits should be modified, in particular within the youngest generation. Education programmes are deemed an essential instrument to develop successful actions. Fresh fruit and vegetables have also been identified as one of the key foods which contain many nutrients in suitable concentrations which should be eaten to improving the health of EU citizens and combat disorders.

Human psychology has an unfortunate predisposition to foods containing a high sugar, salt and fat content. It is hard to break adults' tendencies to choose such products once established, but it is well proven that it is much easier for children to divest themselves of such bad habits.

To yield the maximum returns on promotional-money spent, efforts must be concentrated on primary-school children (approx 5 to 12 years) where their minds are open to suggestion and their taste buds are less honed towards "junk" products, and more readily changed where children choose salty, sugary and fat rich foods. In middle age people tend to be concerned over diet and convert to eating increased quantities of fresh fruit and vegetables. It is therefore highly recommended that any promotional scheme have its main thrust aimed at primary

school children. This also has the benefit that the investment will also have the maximum effect, since it is vested in the youngest segment of the population who shall have the longest time on earth to influence those around them. It can be difficult to gain funding for such projects since the investment has to be made with the knowledge that an observable increase in fruit and vegetables consumption will be delayed until these children start to make their own purchasing decisions. It would be foreseen that subsequent generations would also benefit from this knowledge. Experience indicates that the early funding and the subsequent wait are well worth the investment.

12. 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?

- (i) Food Dude Scheme – see material already submitted to DG-Sanco and appended here including the Freshfel Business Plan.
- (ii) Offering fresh fruit and vegetables to children to the exclusion of snacks dense in salt, sugar and fat.
- (iii) Increasingly school management, in conjunction with parent associations and teachers, are, or have, banned vending machines offering energy-dense snacks and sweetened drinks from school campuses so that they are not available to pupils. These can be replaced by healthier products such as fresh fruits and vegetables, since such vending machines could be satisfying demand for foods.
- (iv) Oblige, through legislation, the tendering systems to increase the portions of fruit and vegetables offered in canteen menus (schools, workplace, hospitals, prisons, etc). It is to be noted that one of the difficulties for increasing the number and/or size of fruit and vegetables portions in canteens is the functioning of tendering system. Often the lowest bid is the one to be accepted, based on the rules applying to tendering. Other qualitative parameters might need to be considered in tendering schemes to increase the availability of fruit and vegetables in canteen meals.
- (v) Along with any scheme aimed at changing dietary patterns in children, a level of investment needs to be directed at their parents, given the role of parents as educators. Furthermore, children need to feel the messages promulgated at school have parental approval.
- (vi) A good example of improving the nutritional value of school meals is the “School meal” programme, which provision of a nutritionally balanced lunch free of cost to school-children on all working days

13. 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?

- (i) Given man’s hereditary predisposition to the consumption of fats, salt and sugar, this is an area where legislation is necessary. However, the speed at which the decrease in consumption to the target levels of these ingredients in manufactured processed products is attained must be through discussion with industry if they are to maintain the product line and thereby safeguard employment.
- (ii) It is easier to be successful at primary school level. Availability of fresh fruits and vegetables and their presence within canteen meals is the first key point. Beyond that, the introduction of “fruit breaks” at normal class break times, where no energy dense foods are available, works well.
- (iii) Abundant availability and choice of fruit and vegetables should then be carried through into secondary schools. Vending machines can help fill this gap. Therefore, it is necessary that an effort is put on developing specific machines for these natural products with high perishability.

14. 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?

- (i) A decided well-thought-out message must be identically repeated to the public sector by all the media, and health services to society. In the case of fresh fruit and vegetables, use of the single Freshfel logo alone is a small but good place to start.

- (ii) Media should be encouraging the reintroduction of home economics classes onto school curricula by repeatedly highlighting the long-term benefits to diet and health of consuming more fresh fruits and vegetables.
- (iii) Media should be prepared to give over airtime/press advertising space at reduced rates to support a pan-European campaign to promote the consumption of fresh fruit and vegetables by way of a partnership.
- (iv) Health services should explore, with the fruit and vegetable industry, programmes to make fresh fruit and vegetables more available to both adults and children.
- (v) In its business plan, Freshfel makes suggestions on a pan-European campaign for promoting the increased consumption of fresh fruits and vegetables.

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

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

- (i) Through commitment at top level of management to ensuring canteen menus offer balanced diets, and that promotional materials on diet and health circulates on specific issues.
- (ii) Information should be provided to employers to understand the need to offer healthy choices in the workplace. This should present data on hours lost through ill health, lack of concentration due to poor diet, extra costs to companies because of those factors to make the financial case for senior management intervention.
- (iii) Increase the portions of fruit and vegetables offered in canteen menus (schools, workplace, hospitals, prisons, etc). The current functioning of the tendering system favours the lowest bid. This makes it difficult for increasing the number and size of fruit and vegetable portions in offered meals. Other qualitative parameters might need to be considered in tendering schemes to increase the availability of fruit and vegetables in canteen meals.

V.7. Socio-economic inequalities

16. Which measures would promote healthy diets and physical activity towards population groups and households belonging to lower socio-economic categories, and enable these groups to adopt healthier lifestyles?

- (i) As regards the promotion of healthy diets, the introduction of fresh fruit and vegetables' pre-paid vouchers (non-exchangeable for money or any other product), could ensure better access to fruits and vegetables for lower socio-economic categories. These vouchers are already in use in the UK and the US as aid to the underprivileged. Also shops with very low prices and open only to underprivileged population could help promoting healthy diets.
- (ii) The Food Dude School Programme is proven to work exceptionally well with deprived or the lower socio-economic categories in converting them to consuming worthwhile levels of fruit and vegetables.

17. How can the “clustering of unhealthy habits” that has frequently been demonstrated for lower socio-economic groups be addressed?

- (i) The challenge is to provide an alternative activities to prevent young people congregating at fast-food outlets, watching TV for extended hours thereby leading to the over consumption of sugars, fats and salts accompanied by no exercise.

- (ii) As suggested by the Freshfel Business Plan, the Food Dude Scheme can help tackle the diet area so that young adults are already aware and eating better and in a more balanced way by the time they reach their teenage years.
- (iii) Companies advertising their fast food products to children should be restricted to being able to do so by time limits. e.g. not until after 21.00hrs every day, and then through a government levy on this airtime the money collected should be used to advertise at earlier times to promote generally balanced diet and exercise.
- (iv) As suggested in the previous question, the introduction of fresh fruit and vegetables' price vouchers could help improve access of peoples in the lower socio-economic categories to fruits and vegetables and to challenge deep ingrained unhealthy eating habits.

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

18. Which are the most important elements of an integrated and comprehensive approach towards the promotion of healthy diets and physical activity?

- (i) Repeating the core message *ad nauseam* throughout the EU25 in a coordinated standard manner.
- (ii) Getting healthy eating messages to primary school children above all else.
- (iii) Presenting healthy eating messages to primary school children to promote improved life-long dietary habits.
- (iv) Raising awareness, implementing educational programmes and making sure there is availability.

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

19. In which way can food-based dietary guidelines at a European level take the different regional and national dietary habits, as well as social and cultural variations into account?

- (i) Core nutritional messages to be used across Europe should be agreed upon, and this list should be kept short. Ideally a chart could be produced that is scientifically correct, easy to understand and timeless.
- (ii) Applying the above list to visual "plates of food" for each region so that they feature the local dishes – the visual image can be much more colourful and powerful than words – and ensuring that the dishes chosen are both balanced and costed so that they appeal to all socio-economic groups.

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

- (i) It needs to be recognised that while attempting to reach children over the age of 12 and adults is very laudable, the cost of generating change in this sector will require simply huge resources, and perhaps this is not realistically possible.
- (ii) Freshfel Europe believes that many actions could be implemented at "micro" level, to increase the availability of fruit and vegetables and indirectly induce people to raise their daily intake of fresh produce (as a substitute to other snacking options). On a non-exhaustive basis, our association has identified the following:
 - availability of fruit and vegetables for sale (by piece) by the cashier at retail outlets, canteens and cafeterias in sport and leisure facilities (tennis clubs, swimming-pools, fitness, cinemas, theatres...);
 - improve availability in public transports (e.g. trains and planes);
 - free distribution of (good quality) fruit when purchasing other products (e.g. "buy one sandwich and get a piece of fruit for free");

- fresh fruit (or fruit salad) being more widely proposed as dessert in restaurant menus;
- fruit and vegetable “baskets” available at physicians’ waiting rooms; and
- fruit and vegetable “baskets” available at hotels.

21. How can dietary guidelines be communicated to consumers?

- (i) Firstly, through using consultants via tender in a pan-European competition (which would generate substantial attention and free publicity) to design a simple communication chart that can be immediately understood (is instantly comprehensible no matter what language the vendor uses, like the London Underground map) and is scientifically accurate.
- (ii) Then via “plates of food” concept depicting foods in colour to be eaten in the correct proportions to give a balanced diet and adjusted for national, regional differences/preferences, and in sufficient variation to constitute recipe ideas for the consumer.
- (iii) The above to be communicated to the EU25 populations via TV and print media.

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

- (i) Freshfel advocates for a simple EU scoring system.
- (ii) Operating in a vacuum in the UK, multiple supermarkets have used the absence of generic material on this subject to create their own individual scoring systems for different nutrients. This leads to a plethora of different systems that might, in the end, only confuse the consumer further.
- (iii) One unique system by mandatory legislation is desired. The competing multiples can each still apply their own markers, but if the generic system is both mandatory and clear it is likely that other systems would, in time, be abandoned in its favour.
- (iv) Any EU-wide system of scoring should be integrated with the core messages being advertised and promoted across the EU 25.

V.10. Cooperation beyond the European Union

23. Which are the best means of exchanging experience and identifying best practice between the EU and non-EU countries?

- (i) Freshfel Europe has already commenced circulating to its members a promotional newsletter regarding world-wide promotional matters so that members can see best practices as they apply to the industry and stimulate discussion and cooperation (first edition appended). The project could be broader, including more promotional ideas, if funding would be provided.
- (ii) Freshfel has also recently created a new pan-European logo for the promotion of fresh fruits and vegetables, with the aim of encouraging consumers to increase consumption of fruit and vegetables. This logo indicates that the package bearing the logo contains fruit or vegetable which are fresh and conveys good health and the good health-promoting properties of fruit and vegetables. The logo is available for use in Europe and beyond, and is not restricted to Freshfel members.
- (iii) A good example is the creation of IFAVA (International Fruit and Vegetable Alliance), launched on September 2005 in Canada. IFAVA’s objective is to support efforts to increase intake of vegetables and fruit by providing members with up-to-date information and support resources, including: research literature surveillance and science reviews; media relations and other communications tools; forums for transferring success stories and sharing resources; and a 5 a Day-type program starter tool kit in collaboration with WHO.

V.11. Other issues

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

- (i) Fresh fruit and vegetable consumption is at best stagnant across the EU25 and, according to several reports, alarmingly declining in some territories. The benefits of increased consumption are proven. To raise consumption of fresh fruits and vegetables is a top priority.
- (ii) It is necessary to work on the image of fruits and vegetables. Efforts need to be made on giving these products an image of providing energy and being easy to consume, all the way being a “cool” product throughout all ages of consumer.
- (iii) Special consideration should be given to the under 12 year-olds (and schools) in the European population as these citizens are our future; their impressions and habits can be changed for life, and every passing day with increasing trends towards obesity builds the health expenditure that government shall have to face.
- (iv) Improving the availability of fresh fruits and vegetables should be considered as a priority. The development of specific vending machines and the change of tendering rules to allow for fruits and vegetables to be more obviously present, are two ways of tackling this issue.

Annexes:

- I. Freshfel Business Plan
- II. Freshfel Consumption Monitor
- III. Fergus Lowe Scientific Document
- IV. Freshfel Commitments to the EU Platform 2006
- V. Freshfel “Fresh Times” No 1
- VI. Freshfel press release on pan-European logo launch

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