



*Communauté européenne des coopératives de consommateurs  
European community of consumer cooperatives*

## **EURO COOP RESPONSE 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)**

EURO COOP is the European Community of Consumer Co-operatives. Its Secretariat is based in Brussels. Its members are the national organisations of consumer co-operatives in 17 European countries. Created in 1957, EURO COOP today represents over 3,200 local and regional cooperatives, the members of which amount to more than 22 million consumers across Europe.

EURO COOP welcomes the opportunity to comment on the Commission's Green paper 'Promoting healthy diets and physical activity: a European dimension for the prevention of overweight, obesity and chronic diseases'.

EURO COOP member organisations across Europe have a long-standing commitment to helping consumers make informed eating choices and develop healthier lifestyles. All over the years, many of them have carried-out successful and ground breaking initiatives, ranging from awareness-raising campaigns thru responsible marketing to product reformulation.

### **GENERAL COMMENTS**

The Green paper 'Promoting healthy diets and physical activity: a European dimension for the prevention of overweight, obesity and chronic diseases' is long overdue. The Commission's White paper on Food Safety called for an action by the EU on nutrition and health in 2000. In addition to that, that document envisaged the development of an Action Plan i.e. a set of proposed actions whereas the Green paper is only meant to stimulate a broad consultation process amongst interested parties. What is more, the Green paper itself does not add very much to the nutrition and health debate that has been taking place so far at EU-level. EURO COOP thinks that many of the questions raised by the Green paper have been already answered, or are being debated, via stakeholder consultations and discussions (i.e. the stakeholder consultation on nutrition labelling, the EU Platform for Action on Diet, Physical Activity and Health, the Round Table on Self-regulation in advertising etc.). EURO COOP believes that, building on this experience, the Commission's services could have developed a more-in-depth reflection and, as a consequence, foreseen clearer policy scenarios.

First of all, in EURO COOP's view, in order to elaborate a coherent strategy at EU-level, the Commission's services should first ensure that the EU forums discussing health and nutrition matters work in a coordinated manner and avoid overlapping or duplication of work. For this reason, it would be appropriate to ensure some interface between the two main bodies that currently focus on nutrition related issues i.e. the EU Platform for Action and the Members States' Network on Nutrition and Physical Activity (Green paper part IV.1 and IV.2). In particular, the active participation of representatives from the various Member States in the EU Platform meetings would allow EU key stakeholders to map-out relevant governments' initiatives for promoting healthy lifestyles and to use them as a benchmark for assessing the compatibility and the effectiveness of their actions. This may also result in facilitating the establishment of partnerships between private stakeholders (e.g. food operators and consumer organisations), on one hand, and national authorities, on the other. In this regard, EURO COOP welcomes the Commission's initiative to organise in March a joint conference with WHO Office for Europe with the participation of Members States' governments and Platform members.

Secondly, in order to make the future EU strategy comprehensive, EURO COOP believes it is important that EU policymakers strike a balance between policy initiatives and legislative measures. If initiatives such as the European Platform for Action on Diet, Physical Activity and Health or the reflections on the role self-regulation can play vis-à-vis nutrition and health are certainly to be supported and brought forward, it should not be forgotten that the development of

an appropriate regulatory framework allowing consumers to make informed choice about what they eat needs likewise to be encouraged.

Thirdly, EURO COOP thinks that in developing a strategy at EU-level policymakers have to take into account all the different behavioural, social and economic factors determining unhealthy dietary habits and physical inactivity in the European population. Being obesity a complex issue, the EU should be prepared to take action within several relevant policy areas (V.3). As it will be outlined further on, consumer protection, internal market and education are policy areas key to fighting against obesity. Agricultural policy can be also of relevance in tackling obesity to the extent which consumption of healthier food such as fruit and vegetables can be encouraged. In this regard, EURO COOP thinks the forthcoming revision of common market of fruit and vegetables may represent an opportunity to look into possible ways of promoting their consumption within the EU. Finally, urban planning and transport policies are relevant to the extent which measures encouraging people to move or exercise (e.g. availability of sport facilities, green spaces, pedestrian areas, cycling routes etc.) can be promoted.

The Commission's Green paper raises a list of questions. EURO COOP intends to respond to those that are relevant to its areas of work.

## **CONSUMER INFORMATION, ADVERTISING AND MARKETING (V.1)**

Consumer information seems to be an area where legislation and self-regulation can work together.

On the legislative side, EURO COOP thinks a lot of work still needs to be done by the EU institutions in order to ensure that consumers can make informed eating choices. Food labelling in the broader sense has to be regarded as the primary tool that can serve this purpose.

Accordingly, EURO COOP is in favour of the adoption of mandatory rules for on-pack nutrition information. The Green paper refers to the much-awaited review of the 1990 nutrition labelling directive, but does not give any actual indication about possible timing and contents of it. In this respect, EURO COOP is persuaded of the importance of setting a EU-wide mandatory scheme for nutrition labelling that is understandable to consumers. In particular, EURO COOP member organisations think that on-pack information should be given to consumers with regard to the following nutrients and in the following order: calories, fat, of which saturates; salt; carbohydrates, of which sugar and, possibly, fibre<sup>1</sup>. Quantity of single nutrients should be then expressed on 100mg/100ml basis rather than per serving: this solution is supported as it is more useful in comparing one product with another one. Finally, EURO COOP looks favourably at providing objective interpretation of numerical data e.g. by using for each nutrient graphical descriptors<sup>2</sup>. Nutrition labelling can be further improved by means of Guidelines Daily Amounts (GDAs) with a view to helping consumers to put a single food into the context of the overall diet<sup>3</sup>.

Today EURO COOP recognizes the emerging need to look into possible ways to communicate nutrition information in a simplified manner to consumers i.e. food signposting. In this respect, given lot of research is still ongoing both at national and EU-level, EURO COOP believes it is too early to identify a preferred solution. Nevertheless, EURO COOP is of the view that a signposting scheme should be preferably developed by public authorities rather than by economic operators and should ideally convey positive messages to consumers as it is the case for the Swedish scheme 'Keyhole'.

EURO COOP is also of the view that proper consumer information can be ensured provided that strict rules on the use of health and nutrition claims on foods are adopted. In this regard, EURO COOP fully supports the legislative framework that the Commission has proposed for regulating such claims when used as a marketing tool and calls therefore on the other EU institutions, in particular the European Parliament, to support it. The harmonisation of health and nutrition claims at EU-level will help in increasing the degree of confidence in the internal market

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<sup>1</sup> The proposed order of nutrients is based on a research conducted by one of the EURO COOP member organizations in order to identify which nutrients are of key importance to consumers.

<sup>2</sup> E.g. the graphical descriptors HIGH, MEDIUM and LOW which are used by the Co-op Group, EURO COOP British member organization.

<sup>3</sup> EURO COOP position on nutrition labelling is available at the following link <http://www.eurocoop.coop/publications/en/position/nutritionlabelling04.asp>

by both food operators and consumers. In particular, EURO COOP member organisations believe that restrictions for the use of these claims should apply when they are made on energy-dense foods. Accordingly, claims referring to health or nutritious properties of a given food should not be allowed in case that food does not meet a desirable nutrient profile<sup>4</sup>.

Likewise, EURO COOP supports the current Commission's proposal on fortified foods. EURO COOP is of the view that the voluntary addition of vitamins and minerals to foods needs to be given a common framework at EU-level. With a view to protecting consumers from potentially misleading claims EURO COOP member organisations would like to see the advertising of fortified energy-dense foods restricted on the basis of the above recalled nutrient profiling principle. This practice, which is often used for marketing purposes, may lead consumers to believe that energy-dense foods are appropriate sources for the intake of those substances when it is not the case<sup>5</sup>.

Provided that the outlined legal framework is adopted, also self-regulation of marketing and advertising practices by food operators can play a role in changing the current unhealthy dietary habits. EURO COOP recognizes the efforts that certain food operators, especially some major multinationals, are making in order to mainstream consumers' health into their long-term corporate social responsibility policies.

However, in order self-regulation in marketing and advertising to be effective, EURO COOP member organisations think that certain requirements need to be met. Firstly, any self-regulation code should be drafted and managed by industry associations rather than by a single company: this solution should contribute to create a common level-playing field for competitors who are members of those associations and ensure at the same time an adequate degree of impartiality in the monitoring of food marketing and advertising practices. Secondly, while elaborating a self-regulation code, industry stakeholders should attach the same importance both to the content and the volume of advertisements and marketing techniques. Thirdly, codes should envisage the involvement of consumer associations both at the stage of their drafting and their implementation. Finally, concerning the protection of vulnerable groups, EURO COOP member organisations think that children's credulity should not be exploited and food advertising targeted to children should be made subject to appropriate restrictions.

## **CONSUMER EDUCATION (V.2)<sup>6</sup>**

According to EURO COOP, education about the benefits of a balanced diet coupled by physical exercise should start at a very early age. The EU institutions should therefore ensure proper coordination amongst the Member States so that nutrition and physical activity are given adequate space in schools curricula. The inclusion of these subjects in the school programs may also help in reaching out all the strata of the society, including the poorest ones, which are said to be the most affected by overweight and obesity.

However, consumer education in areas such as nutrition and health has to be regarded as a long-life training process. As a matter of fact, new nutrition needs may in fact develop in a life span depending on ageing and health conditions. Besides that, consumers are constantly faced with innovative and complex foods being put on the market

On the basis of their experience, EURO COOP member organisations believe that theory always needs to be accompanied by hands-on experience. For this purpose, some EURO COOP member organisations run educational programmes targeting children and adults that combine the learning about healthy lifestyles with simulation exercises (e.g. reading and understanding food labels, composing a balanced meal) that take place in their outlets.

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<sup>4</sup> EURO COOP position on the Commission's proposal on health and nutrition claims is available at the following link <http://www.eurocoop.coop/publications/en/position/claims05.asp>

<sup>5</sup> EURO COOP position on the Commission's proposal on fortified foods is available at the following link <http://www.eurocoop.coop/publications/en/position/fortification04.asp>

<sup>6</sup> EURO COOP's views on the importance of consumer education have been already included in a report EURO COOP itself has elaborated in the framework of the European Platform for Action on Diet, Physical Activity and Health available at the following website <http://www.eurocoop.coop/publications/en/memos/pdf/ReportV23nov05.pdf>

## **CHILDREN AND YOUNG PEOPLE (V.3)**

Today it is well-known that obesity levels are particularly worrying when it comes to children and young people. The EU institutions should therefore ensure these individuals can grow up in a healthy environment.

Inclusion of nutrition and physical activity in the schools curricula, restrictions on food advertising and increased availability of sports facilities are measures that may help in achieving this objective. In particular, EURO COOP thinks that schools are settings that can be used in order to positively influence children and young people's behaviour. Therefore, serving healthy meals in the schools' canteens and freely distributing fruit and vegetables are practices that have to be encouraged. Additionally, foods high in fats, sugar and salt sold in vending machines should be ideally replaced by healthier alternatives. A healthy environment for children can be created only with the close cooperation between public authorities and responsible business operators at different levels.

## **FOOD AVAILABILITY, PHYSICAL ACTIVITY AND HEALTH EDUCATION AT WORKPLACE (V.4)**

Basing itself on the experiences of its member organisations, EURO COOP believes that employers can play a major role in encouraging their employees to turn towards healthy lifestyles. Accordingly, some EURO COOP member organisations encourage their staff to take regular exercise either by providing gym facilities in their premises or subsidising enrolment in sport clubs. Some of them also use decision prompts to push employees to use stairs instead of the lift. Finally, their canteens offer a wide variety of foods and sometimes make essential nutrition information available through menus or billboards.

## **FINAL REMARKS**

The Green paper closes by asking respondents to identify which issues should receive first priority at EU-level (V.11). According to EURO COOP, consumer information and education are the two areas where action is needed urgently.

Regarding consumer information, the current set of European rules governing nutrition labelling needs to be revised in order to make the relevant labelling readable and accessible to consumers. Nutrition labelling should be then made mandatory. Research about how to communicate simplified nutrition messages i.e. food signposting should be carried-out by public authorities with a view to developing a system conveying positive messages to consumers. With regard to food marketing and advertising, EURO COOP believes that at this stage self-regulation by food operators can not achieve alone the expected results in terms of behavioural changes, but needs to be coupled by an appropriate regulatory framework working as a safeguard net.

Regarding consumer education, nutrition and physical activity have to be introduced in schools curricula. In particular, educational programmes focussing on nutrition should combine theory with practical experience. It is a fact that schools are ideally placed to influence lifestyles of children and young adults. Therefore, in these settings EURO COOP thinks that whereas consumption of healthy options should be strongly encouraged.

**EURO COOP Secretariat 13 March 2006**

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## **CONTACT PERSON**

**Francesco Montanari**, Food Policy Officer  
**Tel:** + 32 2 285.00.74 – **Fax:** +32 2 231 07 57  
E-mail: [Fmontanari@eurocoop.coop](mailto:Fmontanari@eurocoop.coop) or [info@eurocoop.coop](mailto:info@eurocoop.coop)

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