13 March 2006
HKL

European Commission
Directorate-General Health and Consumer Protection
Unit C4 – Health Determinants
L-2920 Luxembourg

Dear Sir/Madam

Please attached find our response to the issues raised in the “GREEN PAPER”:

“Promoting healthy diets and physical activity: Towards a European strategy for the prevention of overweight, obesity and chronic diseases”

Should you require further comments or information please do not hesitate to contact me.

Yours sincerely,

Henning Klarlund
EU-Coordinator & Research Liaison Manager
Response to the issues raised in the “GREEN PAPER”: 
Promoting healthy diets and physical activity: Towards a European strategy for the prevention of overweight, obesity and chronic diseases.

From the Danish Institute for Food and Veterinary Research, Denmark
The following responses to the specific points wrote out in the Green paper are responses based on concrete and evidence based topics related to the research and advisory areas of the Danish Institute for Food and Veterinary Research.

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

The importance of healthy dietary habits and increased physical activity is well documented and implemented in National programs. One of the most important policies affecting dietary intakes is no doubt the agricultural and food policies. Several reports have documented that the trends in the production of foods are not in agreement with most national dietary guidelines, i.e. when the EU compensates fruit and vegetable producers for destruction of their products (more than 117 million Euros per year in XXXX) it is not in harmony with most national guidelines for increasing fruit and vegetable intakes. In the same line, the EU supports production of butter with considerable amounts of funding, and subsidizes school programs with respect to full fat milk, which is in contradiction with all national dietary guidelines, which advise an increase in the intake of low fat milk products. In Denmark, a lot of research and documentation of the contents of trans fatty acids in foods has been conducted, and based on these results, it is suggested that EU takes steps towards the elimination of trans fatty acids in all foods produced and consumed within the EU.

In order to promote healthy diets and physical activity, it is highly relevant to include healthy diets and physical activities from both a theoretical and practical angel at all levels of education from kindergarten to schools, to high schools and universities.

More research is needed to be able to quantify effectiveness and efficiencies of different political measures taken in the area of diets and physical activity. For example, very little is known about the impact of availability and accessibility and prices on dietary habits of the population or subgroups of the population. The same is true for the physical activity.

**V.4. The Public Health Action Program**

In relation to actions in the area of monitoring dietary intake and level of physical activity, initiatives have been taken at the Nordic level to bring about a common action plan, which among other things will provide advice on the indicators, time of measurements and target groups for a common monitoring system. This scheme could beneficially be expanded to include other EU countries.

**IV.5. European Food Safety Authority (EFSA)**

The initiative that the European Food Safety Authority could make an important contribution to a common EU Recommended Nutrient Intakes and possibly in the establishment of food based dietary guidelines is welcomed. The Danish Institute for Food and Veterinary Research has recently
been part of the expert group behind the “Nordic nutrition Recommendations 2004. Integrating nutrition and physical activity” and together with the Danish Nutrition Council published the Danish Dietary Guidelines 2005 – and thus has recent experience and updated know-how in this regard.

V.2. Consumer education

In order to make informed choices and take effective actions in relation to diet and physical activity, a high level of basic knowledge supported by effective communication tools including action oriented and quantifiable dietary guidelines need to be implemented. In Denmark public–private partnerships have proven to be highly efficient in providing key messages to consumers relating diets. A common EU food labeling will require considerable consumer education – and will also work the other way around ie the labeling will be a strong educational tool. In the future, more efficacy studies need to be done in this area, and the future work should to a higher degree include physical activity.

V.3. A focus on children and young people

In Danish schools there is no tradition or legislation relating school meal systems. The Danish Institute for Food and Veterinary Research has developed a school meal’s project, a practical and easy-to-use model for translating the newly developed Danish guidelines for school meals for children and adolescents into concrete meal plans for 3 different age groups. The model can be used by catering operators to develop new menu plans.

Using policy frameworks as a managerial tool for implementing healthy eating at schools is believed to be a promising approach. In Copenhagen, a new project has been launched with a system for healthy eating based on sustainability and organic foods directed towards all schools in the City of Copenhagen. The project is ongoing, and thus has not been evaluated yet.

Involvement of pupils in activities regarding food, nutrition and health has proved to be crucial to promote a healthier lifestyle. In the Council of Europe project, an expert group along with the WHO supported European Network of Health Promotion schools/Young minds network tested models for involving pupils in the development of school meal concepts. The model was tested in different countries and involved the use of interactive systems. In an ongoing project with the development and testing of new models for integrating healthy catering based on student involvement alongside with a nutrition education curriculum the coherence between supply and curriculum is secured.

The Danish Institute for Food and Veterinary Research has successful experiences with public, private partnerships in relation to integrated and holistic school meal concepts. The aim of a recent project was to develop methods for small, medium, and enterprises and other catering operators to
maintain a meal planning system that comply with nutritional recommendations and at the same time takes economic and pupils’ preferences into due account. At the project “Neptun”, the partnership between the SME, NGO and governmental institutions has shown to be successful. Another set of experiences with public and private partnerships is carried out in connection to preschool/kindergarten activities with a main aim to promote healthy diet and increase physical activity at preschool level. Both projects show the importance of studying and learning from experiences from the growing number of partnerships, to develop practical guidelines for partnership participants and to set up monitoring systems that can assess the effectiveness and efficiencies of such partnership approaches.

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

The food service staffs have a major influence over food consumption through the range and composition of foods that they produce. Several dietary interventions at worksite settings have been quite promising in influencing employees to purchase and consume more healthy meals, while other studies have been less positive.

Increasing the accessibility and appeal of healthy choices seem to be the most effective way of achieving dietary changes at work places. In Denmark, a successful strategy to increase the consumption of fruits and vegetables has been implemented in a “6-a-day” canteen study focusing on fruit and vegetable consumption in 5 selected worksite canteens. This intervention study showed significant increases in the total consumption of fruit and vegetables at the worksite canteen from baseline to end-point: An average of 70 g per day per customer. In a different intervention study at different worksites, a serving buffet style at worksite canteens with a fixed price for a varied number of dishes has been shown to increase the fruit and vegetable consumption significantly without increasing total energy consumption compared to a la carte style serving. In Denmark, several worksite fruit programs, where employers receive a free price of fruit through the working day, have been shown to be very effective in increasing the employers’ daily fruit intake. In Denmark, worksite fruit programs have gained increasing popularity in recent years. Since 2001, the number of worksites having fruit initiatives has increased from about 600 to about 5000 in 2003.

The “Food at Work” study was conducted as a partnership between the General Workers Union in Denmark, mainly organizing unskilled workers, the National Health Agency, and a research institute. The aim was to investigate opportunities and impacts of promoting healthy eating in blue-collar worksites both with and without cafeterias. The results indicated that the study was successful in changing self-reported food habits and decreasing fat served in cafeteria meals. This intervention study showed the importance of increasing the employees’ involvement in participation rate in different company types rather than merely on the presence of health related activities. More research is needed on how the social support can be strengthened both between co-workers and by involving the whole family to optimize sustainability. More research is also needed to identify simple methods to obtain baseline reference values on nutritional quality of food served in order to
plan and prioritize efforts. Furthermore, evaluation of the methods and tools are needed to provide information about the extent to which the activities in the canteen and worksite are being implemented as planned and to evaluate the efficiency of the programs.

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

Several Danish studies have shown very convincingly that nutritional counseling by registered dieticians for obese patients and patients at risk of ischemic heart disease, identified by the general practitioner, are cost-effective (high efficiency). A Danish project has indicated that a prescription from the general practitioner to physical activity and diet is effective in increasing the physical activity and decreasing the weight of the majority of overweight patients. More than 90% of the participants continued with a physical activity after the end of the prescription period. With regard to needs of research, it is urgent to unveil the harm of obesity in the elderly. While debates persist that the relationship between obesity and old age and total or disease-specific mortality, the definition of obesity in the elderly, its clinical relevance and about its treatment is urgently needed.

V.6. Addressing the obesinogenic environment

In Denmark, a project with focus on safe cycling and walking path to schools for the general public has been very effective in increasing the average daily physical activity levels among the inhabitants of the town where this intervention was carried out. The environmental interventions included a range of different factors affecting the daily physical activity levels over a 4-year period. This project resulted in an increase of 20% in the number of every-day-cyclists and a number of considerable fadings in the health budget.

An increase in the physical activity in the daily routines can be enhanced by economic measures and by changing the public transport systems.

V.7. Socio-economic inequalities

Analyses of the Danish data show that overweight and obesity is inversely associated with educational background and socio-economic status. Initiatives to promote healthy diets and physical activity towards these vulnerable population groups and households include the following:

Healthy meals and physical activity in schools and kindergartens through emphasizing food and physical activity policies at the institutional levels, including the learning curriculum.

Healthy eating at worksites has been shown from the Danish experience to be a highly efficient way to change dietary habits. More research should be done on interventions in the area of physical activity.
activity. More research is needed in the determinants for the social inequalities in dietary and physical activity habits. Very little is known at this point about interventions and the efficiencies of interventions especially towards the lower socio-economic groups in the area of diets and physical activity.

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

Experiences from the Danish programs aiming at improving the quality of the dietary intake have been most successful in the area of reduction of fat intake and increase in the fruit and vegetables intake. The following components have been crucial to the success of the Danish programs:

1. Solid national data on dietary food and nutrient intake and distribution of intake according to age, sex, socioeconomic status, education level etc.

2. Information campaigns have been action oriented and directed towards specific target groups.

3. Through partnerships between private and official bodies the information campaigns were followed by changes in availability of the foods in focus.

It is the recommendation that a scientific documentation in the area of diet and physical activity should be worked out at EU level and thereafter evaluated in relation to specific national conditions. With regard to availability and accessibility, national corporation with authorities, NGO’s and food producers are critical. Especially in relation to the free trade within the EU system, considerable economic measures could be undertaken in order to have an impact on the dietary intake of the EU population.


It is the Danish experience that food based dietary guidelines should be worked out taken into consideration social and cultural variations in regional and national differences. Only at the overall level, it will be possible to work out European dietary guidelines.

It is crucial that the EU has a common food labeling policy. It is strongly recommended that a common European nutrition profiling system is worked out, evaluated and implemented.
V.11. Other issues

The Green paper does not mention issues relating to infants and toddlers. There is strong scientific evidence that diets and nutritional status of infants and toddlers are of great importance for the growth and well-being during childhood and some indications that the nutritional status in childhood and youth is important for health in later life. It is highly recommended that this area be included in future EU policies or research programs.