



EHN Comments to the Commission White Paper on A Strategy for Europe on Nutrition, Overweight and Obesity related health issues

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The European Heart Network (EHN) is a Brussels-based alliance of heart foundations and like-minded non-governmental organisations in 26 European countries.

EHN plays a leading role in the prevention and reduction of cardiovascular disease through advocacy, networking and education so that it is no longer a major cause of premature death and disability throughout Europe.

Introduction

The European Heart Network (EHN) welcomes the Commission's white paper on a strategy for Europe on nutrition, overweight and obesity related health issues and, particularly its aim to set out an integrated approach.

EHN also welcomes the recognition of the need for consistency and coherence in Community policies. EHN emphasises the importance of having a strong tool for assessing Community policies for their impact on nutrition, physical activity and, indeed, health.

It is clear that EU action to address ill health related to nutrition, lack of physical activity, overweight and obesity should aim at complementing and optimising actions undertaken at national, regional or local level. However, EHN believes that the EU can add value by using its legislative competence in areas where its competence is exclusive. This proposal will be further developed below. EHN considers that over and above legislation, cooperation with other EU policy areas and effective health impact assessment, the EU should maintain and/or establish mechanisms that collect and disseminate information on evidence for effective measures/policies/interventions as well as on ongoing activities at various levels.

The White Paper raises the issue of inequalities in health pointing out that obesity prevalence is higher in lower socio-economic groups. This is also the case of several

other diseases that are related to nutrition and lack of physical activities, such as cardiovascular diseases. EHN is pleased that the Commission White Paper stresses that the actions set out in the strategy must contribute to reducing all such diseases not limiting itself to addressing weight. EHN welcomes the Commission's acknowledgment of the need to address the root causes of health-related risks.

A Partnership Approach

The Bangkok Charter for Health Promotion in a Globalized World affirms that policies and partnerships to empower communities and to improve health and health equality should be at the centre of global and national development to improve public health.

In line with this, the Commission White Paper considers that the development of effective partnerships must be the cornerstone of Europe's response to tackling nutrition overweight and obesity and their related health problems.

It should be recognised that partnership and cooperation can work only where a common purpose is agreed between all partners, the pooling of the partners' resources provides a greater gain for all, and the relationship between the partners is based on shared values, transparency and agreed aims and objectives. In terms of public health, it must be recognised that partnerships and actions must lead to outcomes that correspond to objectives set within a public health framework.

In its White Paper, the Commission proposes to continue the Platform for Action on Diet, Physical Activity and Health (the Platform), to strengthen local networks for action, and also to set up a High Level Group (the Group) to focus on nutrition, physical activity related health issues.

Regarding the Platform EHN believes that the Platform should formulate operational objectives which would help to provide a focus for commitments and ensure that commitments pull in the same direction. EHN also believes that there is a need to have the Platform itself evaluated to determine its effectiveness.

Regarding the Group, its objective is to ensure the exchange of policy ideas and practices between Member States takes place with an overview of all government policies. EHN welcomes the proposal to set up a High Level Group. In its 2002 paper on *'Food, Nutrition and Cardiovascular Disease Prevention in the European region: Challenges for the New Millennium'*ⁱ EHN recommended that to develop and implement a comprehensive and integrated food and nutrition policy, there needs to be a structure involving senior policy makers. EHN recommends that the objective of the Group goes beyond being a simple exchange mechanism, this should be assured by the Commission-led Member State Network on Nutrition and Physical Activity, and that the members of the Group should be individuals that are respected and esteemed and who can take on real leadership in the implementation of the EU Strategy.

ⁱ <http://www.ehnheart.org/content/ItemPublication.asp?docid=4518&level0=1455&level1=1499>

Policy Coherence at Community Level

Partnerships and cooperation cannot replace the need for regulation and the Commission White Paper acknowledges this by referring to its review of nutrition labelling legislation in which the Commission considers the introduction of mandatory nutrition labelling and a simplified labelling on the front of the pack to facilitate the choice of healthier options, i.e. foods that have lower levels of salt, fat/saturated fat and sugar. EHN has adopted a clear position on nutrition labelling calling for mandatory back of pack nutrition labelling and a simplified front of pack scheme. Specifically, EHN recommends that mandatory front of pack labelling should be a banding scheme for key nutrients, based on percentage GDAs per serving, and which applies across all foods. The bands should be colour coded, with the additional option of using words.ⁱⁱ

Another area where the EU has exclusive competence is the regulation of cross-border advertising. The review of the Television without Frontiers/Audiovisual Media Services Directive offered an opportunity to restrict considerably the amount of cross-border advertising of unhealthy food and beverages, especially to children and young people, in audiovisual media services. Unfortunately, the Commission did not take this opportunity and the subsequent review of the Commission's legislative proposal by the European Parliament and the Member States resulted only in a provision calling for the development of codes of conduct regarding commercial communications to children of certain food and beverages. At this stage, the Commission continues to prefer a voluntary approach. EHN much regrets this position as commercial communications, as well as the wider marketing, of such products to children have a distinct impact on food preferences and dietary health of the young population.ⁱⁱⁱ It is also noted that the only regulatory approaches in EU Member States that reduce children's exposure to advertising of unhealthy food – in Sweden and the UK – are statutory.

EHN welcomes the White Paper's backing of utilizing the Common Agriculture Policy (CAP) to promote healthier food options. EHN agrees that a school fruit and vegetable scheme co-financed by the EU would be a big step in the right direction. EHN will continue to advocate for this. The Commission should also undertake a comprehensive review of the health impact of the CAP to assess whether other similar policy changes might be made which would facilitate an improvement in diets across Europe. This review should for example investigate whether the CAP could be modified to help support a reduction in the consumption of high fat, energy dense meat and dairy products.

The Commission proposes to initiate a study in 2008 to explore the potential for the reformulation of foods to reduce levels of nutrients the intake of which should decrease at population level, notably fat, saturated and trans fats, salt and sugar. EHN supports the carrying out of such a study in principle but only on condition that the food industry co-operates fully in providing data and the analysis is carried out independently of commercial interests.

ⁱⁱ <http://www.ehnheart.org/content/ItemPublication.asp?docid=6501&level0=1455&level1=1499>

ⁱⁱⁱ <http://www.food.gov.uk/multimedia/pdfs/foodpromotiontochildren1.pdf>

EHN wonders if the proposed voluntary approach to the reformulation of products with respect to their salt content is the most effective approach in an area where, like cross-border advertising, intervention can have a substantial impact on population health.

Regarding physical activity, EHN agrees with the White Paper's proposals which demonstrate a strong commitment to enhancing physical activity through relevant EU policies such as transport and urban mobility with a view to supporting walking and cycling.

The Commission states that it will develop and support – in cooperation with the Member States and relevant stakeholders – scientific information and education campaigns to raise awareness of the diet and physical activity related health problems. EHN strongly recommends that any pan-European campaigns are solidly embedded in wider policies supporting campaign message(s) and linking in with national initiatives so as to avoid any conflict or overlap.

What Private Actors Can Do

The Commission considers that private actors have a major role to play in developing the healthy choice for consumers and in empowering them to make healthy lifestyle decisions.

The Commission encourages the private actors to make demonstrable improvements in areas such as the reformulation of foods in terms of salt, fats, particularly saturated and trans fats, and sugars. Whereas efforts by the private actors, including retailers, in this area are very welcome, EHN is concerned that not all people will benefit and that the adoption of harmonised rules setting maximum levels of these nutrient is likely to be more effective as they must be observed by all private actors not just those who chose to do so. This would ensure that the healthier choices are made available to all consumers and thus help to reduce inequalities. It would also create a level playing field for the private actors.

EHN whole-heartedly agrees that food companies and retailers could, and indeed should, fully contribute to current voluntary national initiatives on labelling. However, as companies and retailers are adopting a wide variety of different schemes, EHN recommends that binding legislation on nutrition labelling is adopted at EU-level to ensure one simple front of pack information scheme is available leaving no room for confusion. As stated above, EHN recommends a colour-coded front of pack scheme.

The Commission points out schools as a good setting for interventions to promote healthy diets and increased physical activity and proposes that these can be carried out in partnership with private partners, including the business community. EHN proposes that this can be achieved through the establishment of the Health Promoting School concept. The EU could encourage all Member States to establish and support a Health Promoting School Network. The Commission emphasises that schools should be protected environments and that partnerships should be undertaken in a transparent and non-commercial way. Schools are of course a Member State competence but EHN welcomes the Commission's admonishment to protect children in their schools from commercial communications in their broadest sense.

In relation to businesses supporting the development of healthy lifestyles in the workplace, EHN suggests that public health organisations are included together with employee organisations in developing a healthy work life balance policy and proposals for ways in which companies can introduce measures to promote healthy lifestyles of employees.

The Commission proposes that health professional bodies act to strengthen the training of health professionals with regard to nutrition and physical activity related risk factors for ill health with particular emphasis on a preventive approach and the role played by lifestyle factors. EHN supports this and recommends that this could be further explored within and by the members of the EU Health Policy Forum. The Commission also proposes that civil society organisations develop evidence of the impact of policies and action at all levels. EHN agrees and recommends that public funds be made available to co-finance such work.