



The European Consumers' Organisation

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Dr. Derek Yach
Executive Director for Non-Communicable
Diseases and Mental Health
World Health Organization
20 Avenue Appia
CH - Geneva 27
Switzerland

12th April 2002

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Subject : Joint WHO/FAO Expert Consultation on Diet, Nutrition and the Prevention of Chronic Diseases.

Dear Dr. Yach,

I write on behalf of BEUC the European Consumer Organisation BEUC, the European Consumer Organisation, to submit some initial comments on the draft document on diet, nutrition and the prevention of chronic diseases. We welcome the opportunity to make these comments at this stage; there is an urgent need to implement effective strategies to deal with public health challenges related to diet, physical activity and health.

We welcome the activities of the World Health Organisation (WHO) and FAO in drawing on the latest scientific evidence to update recommendations for action by governments, international agencies and concerned partners in the private and public sector.

Changes in dietary and lifestyle pattern have been identified as contributing to the prevalence of chronic diseases, such as obesity, diabetes mellitus type 2, cardiovascular disease (CVD), hypertension and stroke, and various forms of cancer, which are of increasing concern to society.

Food labeling and advertising

Comprehensive labeling legislation is more necessary than ever, as the nature of food production becomes increasingly complex and information requirements grow.

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Food habits have changed and will continue to change. Dietary patterns have altered over the last generation - sometimes for the better, but more often for the worse thus contributing to the prevalence of diet related diseases. (i). Nowadays, hundreds of new foodstuffs are placed on the market every year. The speed of these changes is likely to accelerate.

Consumers are more than ever interested in the origin, features, characteristics, quality and nutritional properties of the food they purchase. For many products labeling has become the only tool to get this information. This shows the need to provide for more and better information by means of labeling and by other means where this would be appropriate. It is obvious that the number of mandatory labeling provisions for foodstuffs has to be extended. The OECD has indicated two main objectives for the regulation of the information provided to consumers:

- arrange that consumers are provided with the information they need to make good choices.
- protect consumers from wrong and misleading information (ii).

Therefore information on labels must be useful, clear, complete, mandatory, and easy to understand, and must enable consumers to make the right choices.

We call for mandatory nutritional information on prepackaged food to be presented in a format that enable consumers to compare different products and to make informed choices.

Distinctions from a regulatory point of view are still being made between prepackaged and unpacked food products. We think that:

- The distinction between pre-packed and non pre-packed food should be reviewed.
- Labeling needs to be improved at catering level, especially with regard to nutritional information, providing figures are available.

Advertisement and labeling claims have a great potential to mislead consumers on one hand by promoting products that are identified as having a potential for contributing to the prevalence of chronic diseases as identified in your draft report such as the amount and quality of fat in the diet, the content of sodium or free sugar in food and on the other hand by focusing advertising on particular target groups, such as children or by attributing health contributing properties to food products for which conclusive evidence of the effects might not be available.

- BEUC therefore asks for strict European harmonisation of rules for labeling in general terms, advertisement, nutritional labeling and the use of claims in Europe.

The use of symbols has been suggested in the draft report. Symbols could play a role in drawing attention to certain aspects of a product. There are however already many different symbols in place that there is great potential to confuse consumers. Symbols are only of use if their meaning is clear, well understood and when their expressed value can be substantiated. Symbols may need to be accompanied by wording or leaflets to inform consumers about their meaning.

Educational actions

The educational status of European population with regard to diet and nutrition is rather poor.

- Education should start as early as possible. Nutritional experiences are gained in early life and will be transferred to dietary habits in later life. It is therefore important to carry out educational work with and for young children in order to give them an early stage the taste for "eating well".
- Guidance should be given on the composition of school meals.
- Nutrition should be an integrated part of school programmes.
- Educational material by industry or other material should be scrutinised carefully and used only if it presents unbiased educational information.
- We support the launch of mass media campaign to promote healthy eating patterns, as well as the promotion of the eating of fruit and vegetables.
- ~~We agree that the increase of daily physical activity together with the improvement of dietary habits should play a key role in improving the status of health in relation to diet related diseases in Europe.~~

Research

- We need to develop and fund a research agenda focusing on behavioral determinants of poor dietary patterns, including the impact of marketing practices;
- It is necessary to develop and fund research on cost-effective methods for promoting healthy lifestyles including dietary modifications and increases in physical activity.
- It is important to develop comparable dietary and nutritional monitoring and surveillance systems throughout Europe to give appropriate input into European recommendations, guidelines or nutritional advice and/or nutrition and diet related legislation.

We hope that that these recommendations can be taken into account and included in the publication of the final report.

Yours Sincerely,



Jim Murray
Director of BEUC

ⁱ E. Helsing, Nutrition in Europe - some illustrations, Committee of Agriculture, Council of Europe, Strasbourg, 1994, p. 3.

ⁱⁱ Organisation for economic co-operation and development, A consumer policy handbook for economies in transition, OECD/GD/(94)20, Paris 1994.