



DRAFT 1

**Response to the Joint WHO/FAO Expert Consultation
on Diet, Nutrition and Prevention of Chronic Diseases**

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Introduction

EMRA, representing over 10,000 restaurants in Europe:

- The European Modern Restaurant Association (EMRA) was established in 1995 with the objective of enhancing dialogue with policy makers and opinion formers on all public policy issues affecting the modern restaurant industry. The Association represents the leading modern restaurant operators in Europe, which include the best known brands: Autogrill, Beefeater Restaurants and Pubs, Brewers Fayre, Brewster, Burger King, Nordsee, Pizza Hut, Quick, Taco Bell, Goody's, Spizzico, Churrasco, Tascaria Mareo, McDonald's, TGI Friday's, Nudelmacher and KFC, Six Continents. Further information on EMRA is detailed in Annex I
- EMRA welcomes the opportunity to submit comments on the Joint WHO/FAO Expert Consultation draft report on Diet, Nutrition and the Prevention of Chronic Diseases. These are attached for the WHO/FAO Expert Group's consideration for the final report due at the end of 2002.

The Emergence of the Informal Eating-out market

- In recent years, the modern restaurant sector has been growing rapidly. Major changes in consumers' working habits, lifestyles and leisure patterns have increased demand for balanced quality menus coupled with efficient service and affordable prices. Less time is today devoted to the purchase, preparation and consumption of food. This trend has led to the emergence of the informal eating-out market or quick service restaurant sector, of which the EMRA members are a key part.

Geographical diversity

- Patterns of consumption vary considerably from one country to another, even from one region to another. To this geographical diversity can be added socio-economic and agricultural diversity, strongly influenced by cultural, historic and religious factors. Any discussion on nutritional requirements has to take into account the dietary diversity of Europe and also recognise certain diet-related issues specific to subgroups within the community. As nutritional habits and diets vary substantially from one country to the other, EMRA believes that this should remain a matter for subsidiarity.

From 'farm to fork'

- EMRA works in close co-operation with the other members of the food chain, from primary agricultural sources to the end-consumer, in coherence with the European Union's food safety approach - from farm to fork.

Comments

1. Today's increasing sedentary lifestyles have led to changes in individual behaviour, in both developing and industrialised countries. Changes in work habits, from longer hours to concepts such as flexi-time (in developed countries), increasing industrialisation and less manual labour (developing countries), have implications for today's lifestyles.
2. This has had a positive and negative impact on leisure time. Whilst it has given people more leisure time, there is less physical activity involved (motorized transport, labour-saving devices at home). With regard to children's leisure time, there is a substantial increase in the use of computers (video games/toys), as well as television viewing.
3. This lifestyle change is key to the challenge facing all sectors working towards the prevention of chronic diseases. It is well documented that it is the imbalance between calories consumed and calories burned that results in overweight and obesity. This imbalance is largely the result of today's increasing sedentary lifestyles.
4. Because food products are an important element of the individual's health and well being, the safety of food is critical. This is being addressed in-depth through the revised food safety legislative framework at EU level, with the full endorsement and assistance of EMRA. Safe food, with choice and variety in that food, is key for consumers to enable them to choose a well-balanced and diverse diet, in their modern lifestyle environment.
5. EMRA recognises the importance of the above issues raised within the report, and within the context of responding to these issues, would propose the following points be taken on board and discussed further:

A. Consistency of initiatives:

- There are many initiatives, at local, regional, national, European and international level, on nutrition and diet. For example, in the European Union, the European Commission is currently drafting proposals on nutritional labelling and due to propose a Nutrition Action Plan. We strongly recommend close co-ordination and co-operation within the policymaking environment.
- It is critical that there is coherence in formulating recommendations and policies, to ensure they do not contradict the very principles they strive to uphold. For example, this report advises that there is "convincing" evidence that trans fatty acids provide an "increasing risk" to cardiovascular disease, and therefore proposes a trans fatty acid reduction policy. However, the alternative could be palm oil (with a higher presence of saturated fats), which the report points out is becoming the main fat of the diets of much of South-east Asia and "merits careful attention because of the health concerns attached to it". A more comprehensive approach should be considered for the reduction of both trans and saturated fats.

B. Science:

- Scientific evidence is critical in determining the direction of a global strategy towards the prevention of chronic diseases with regard to diet and nutrition, particularly as it forms the core element of the legislative framework.
- Decisions on dietary recommendations must be made on the basis of factual evidence. There is no such thing as a good food or a bad food. When discussing a balanced diet, health experts emphasise the total diet or eating patterns rather than any one food or meal. If consumed in moderation with appropriate portion size, and combined with regular physical activity, all foods can fit into a healthy diet.
- The categorisation by "convincing" and "probable" evidence (e.g. transfatty acids versus palm oil - see point A2 p. 3 of this paper) that is presented throughout the consultation paper needs to be substantiated.
- EMRA would support more focus on research, which would enable a greater understanding and thorough analysis of the lifestyle/physical activity/nutrition link and the prevention of chronic disease, and thereby provide a strong basis for policy development.

C. Education:

- The development of coherent programmes across communities to educate and motivate people to effect behavioural change is key. As the report has identified, infancy and childhood are important stages in life to address nutritional balance. Greater involvement of schools, as well as local communities, in providing educational programmes specifically addressing a healthy lifestyle, that includes a balanced diet and adequate physical activity, will achieve positive results in the long-term. EMRA would recommend developing such programmes in conjunction with all stakeholders, who will be instrumental in effecting change to healthier lifestyles in communities.

Conclusion:

1. It is clear that today's consumers have different lifestyles, with much less physical activity. This 'sedentary' lifestyle needs to be addressed, in a consistent, informative and methodical manner.
2. In terms of food products, a range of options should be made available to consumers, so that consumer choice is maintained. The EMRA members provide options from the five different food groups - fish, meat, vegetables, potatoes, and dairy products - which fit well into a balanced diet.
3. Education about foods and understanding of their nutritional value is lacking across the population. Emphasis should be placed on the importance of a balanced diet and on the individual lifestyle. On the basis of such objective information, it is up to the consumer to decide whether and how to modify his/her diet and lifestyle. But in order to understand and utilise such information, the consumer needs adequate nutritional education. Educational programmes to address this at local level should therefore play a key role moving forward.

4. We would like to emphasise the distinction between nutrition and safety. With recent food crises shaking consumer confidence in food safety, it is absolutely critical that this confidence is restored. EMRA would like to emphasise the importance of avoiding that food safety becomes a competitive issue, and that safety is attributed to individual foods, without scientific proof that others are not safe. If foods are differentiated, through means such as taxation, it will critically damage consumer confidence, as it will lead to questioning of safety of products. EMRA strongly supports the coherent and strict legislative framework on food safety, as driven by the European Commission at EU level.
5. With regard to advertising, EMRA endorses the position taken by the WFA, the World Federation of Advertisers, which is that "policies that restrict advertising further will limit individual choice and consumer awareness about the role of a range of food in the diet and in the prevention of many diseases. Furthermore, such restrictions will have no effect on obesity". Advertising is not the principal influence on an individual's eating behaviour - indeed, it is just one amongst many factors.

Opportunities:

1. With over 10,000 restaurants across Europe, EMRA has constant contact with citizens who make daily choices on their lifestyles. Individual involvement in the prevention of chronic diseases is critical. EMRA would be happy to explore the possibilities of leveraging its large network to assist with information campaigns that address healthy lifestyle and the importance of a balanced diet and physical fitness.
2. Involvement of all stakeholders in moving this debate forward in a positive direction is important. EMRA is very pleased to contribute with the know-how and expertise of its members in a joint effort to further the health and well being of consumers. As such, further discussion through working groups could assist in this objective. EMRA would also recommend that participants include sports organisations and federations, who would provide views on the promotion of healthier lifestyles, at all stages in life.

Annex I: EMRA Information

- The products sold in the EMRA member's restaurants consist of high quality products that can make up a healthy part of a well-balanced and varied diet. As a matter of fact, the EMRA members would like to clarify that it is not the food, which is fast, but the service.
- Menus are made up of meat, fish, cereals, vegetables and dairy products -- food from the five basic food groups containing many essential vitamins, minerals and other nutrients; the basic products which are used to prepare meals at home. In addition, EMRA provide a variety of products in menus to accommodate different tastes and preferences.
- EMRA as representative of the quick restaurant services sector in Europe encourages any policy that would help the consumer make an informed choice when choosing food.
- EMRA members provide a variety of products to accommodate different tastes and preferences. The essence of a good diet is balance, variety and moderation. No food should be per se regarded as healthy or unhealthy.

Statistics:

The following statistics are indicative of the importance of the sector in the EU:

- over 10,000 restaurants
- including more than 3,200 franchised restaurants
- run by more than 1,200 SME franchise partners
- serving over 12 million meals every day
- and employing more than 500,000 people.

Funding:

EMRA is fully funded by its members.