



21 September 2011

EPHAC response to the EC consultation on Green Paper on “Promotion measures and information provision for agricultural products: a reinforced value-added European strategy for promoting the tastes of Europe”

The European Public Health and Agriculture Consortium (EPHAC) is an alliance of health organisations advocating for a healthier, more sustainable Common Agriculture Policy (CAP). EPHAC does this by providing a high level of health intelligence to European decision makers, building alliances and common messages with organisations working on a more sustainable CAP and facilitating debate on CAP and its impact on health. EPHAC includes the following organisations: European Alcohol Policy Alliance (Eurocare), Eurohealthnet, European Heart Network (EHN), European Public Health Alliance (EPHA), Heart of Mersey, National Heart Forum (NHF), North West Health Brussels Office, and Sustain.

EPHAC welcomes the opportunity to provide the European Commission with input on its Green paper on “Promotional Measures” and would like to congratulate the Commission on its efforts to align promotion policy and budgets with the goals for Europe 2020 and public health.

The quality and diversity of Europe’s agricultural products is widely recognised. In the previous decades, a model of European agriculture has developed standards for food safety and environmental friendly production methods. However, the successes of the past should not conceal the significant challenges it has been facing and future challenges.

In this light, the Common Agricultural Policy (CAP) is currently undergoing a reform process for a renewed policy aligned with the Europe 2020 Strategy for “intelligent, sustainable and inclusive growth”. The primary role of EU agriculture is, and should remain on guaranteeing sustainable production of safe, nutritious, accessible and affordable food and increasingly focus on providing public goods – health, environment, climate, employment, social inclusion and security. Modern European agriculture must be capable of responding to environmental, health and societal

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challenges, including inequalities in health, chronic diet-related diseases, poverty and demographic change in the EU.

Therefore we welcome the steps outlined in the green paper to use promotion funds to promote healthy diets and to promote local and regional foods and food systems as part of this strategy.

EPHAC will focus on the questions relating to these issues, as we feel questions relating to other aspects are outside our core competence.

Added value of EU intervention (800)

1. To meet the new challenges in local, European and global markets and ensure the greatest possible added value for Europe, what should the aims of the agricultural product information and promotion policy be? In addition to measures already taken by other players (e.g. the private sector), what contribution should this policy make?

EPHAC believes the greatest added value for Europe is to promote sustainable and healthy diets and products of high nutritional value for all Europe's citizens.

The SCAR 3rd Foresight report¹ highlights that a *radical change in food consumption and production in Europe is unavoidable to meet the challenges of scarcities and to make the European agro-food system more resilient in times of increasing instability and surprise*. Information measures and promotion programmes should reflect these challenges, providing information on sustainable production and consumption. Chronic disease across Europe is reaching epidemic proportions and diet is one of the main modifiable determinants of chronic disease; agriculture policy, including promotion policy can be a lever towards reversing this trend, whilst also playing a positive role in on social determinants of health and well-being.

1. The ethical and sound values of European agriculture, ensuring health, equity and sustainability should be part of the strategy.
2. Promoting healthier and more sustainable diets benefits the agriculture sector and at the same time can be part of a EU-wide strategy to reduce health care costs, maintain a healthy workforce, and reduce poverty and social exclusion.

¹ European Commission – Standing Committee on Agricultural Research (SCAR), The 3rd SCAR Foresight Exercise (2011) Sustainable food consumption and production in a resource-constrained world.

Regional and local markets

2. What information and promotion measures should be put in place to develop stronger local and regional markets? (800)

1. Targeted promotion funding should be implemented to develop stronger local and regional markets for inclusive, sustainable growth in coordination with rural development programmes.
2. Local and regional food systems can improve access to high quality, nutritious food at affordable prices.
3. Promotion measures should not only build on marketing traditional geographical designations, but provide information on the positive dimensions of local and regional food systems i.e. reduction in transport, fewer associated greenhouse gas emissions; more diversification and sustainable production; less vulnerability to widespread contamination and food borne illness; natural disasters; better access to fresh produce; diversified and more stable farm incomes; reconnecting producers and consumers and more jobs and wealth retained in the local or regional economy^{2,3}.

3. What are the specific needs in relation to information on and promotion of European products and what should the aims be in the internal market? Max 800 characters

1. Traditional funding through producer organisations, should be supplemented with funding mechanisms that allow civil society organisations and public authorities to access funding in partnership with producers or producer organisations.
2. “5 a day” movements from around Europe have shown innovation in creating healthier food environments and awareness of healthier choices.
3. Similar ideas have been developed to promote increased consumption of whole grains. These initiatives should be supported and appropriate budgets allocated.
4. Information measures can play a key role in restoring consumer confidence after food safety scares due to food borne illness or contamination; however focus should be given

² Renting, H., Marsden, T., & Banks, J. 2003. Understanding alternative food networks: exploring the role of short food supply chains in rural development. *Environment and Planning A*, 35, 393-411

³ Watts, D.C.H. & Ibery, B. 2005. Making reconnections in agro-food geography: alternative systems of food provision. *Progress in Human Geography*, 29, (1) 22-40

preventative measures in other CAP and incentivizing production systems that prevent outbreaks and chemical contamination.

5. Information measures that encourage reduction food waste all along the food chain and address complex relationships between environment, biodiversity (including agricultural biodiversity), resource efficiency and plant and animal health should be given priority to meet current challenges.

4. What measures should be developed to achieve the aims set and thus optimise the European Union's intervention in the internal market? (800)

1. Measures that have value for whole of society beyond promoting products or product groups should be given priority.
2. Promoting agricultural products as part of a healthy diet and healthy lifestyles should be given priority. Currently, diet related chronic diseases have huge social and health care costs. In addition, the increasing gap between life average life expectancy and healthy life years⁴ will have tremendous negative impacts on the productivity of the European workforce.
3. Increased promotion funds for products of high nutritional value such as fruits, vegetables, whole grains and legumes; and information measures promoting healthier diets should be part of this strategy.
4. Increasing use of information on production standards (social and environmental), nutritional education and food label understanding, as well as the development of purchasing activities which enhance the knowledge of target groups (esp. vulnerable groups like children, young and numerous families, elderly, minorities and migrants).

⁴Eurostat (2010) Healthy Life Years statistics

Promotion in the external market

5. What are the specific needs in terms of information on and promotion of European products and what should the aims be in the external market? Max 800 characters

1. Promoting “European products” must not be at the expense of low and middle income countries efforts to develop their own agriculture production systems and markets.
2. Non-Communicable diseases, related to lifestyle factors including diet, are a growing problem in developing countries and adoption of western diet and food habits⁵ is one of the main factors.
3. In 2008, 36 million people died from non-communicable diseases, representing 63 per cent of the 57 million global deaths that year. Non-communicable diseases affect the developing world and lower-income populations hardest⁶.

6. What measures should be developed to achieve the aims set and thus optimise the European Union’s intervention in the external market? Max 800 characters

No answer

Beneficiaries

7. Who should benefit? Should priority be given to certain beneficiaries? Max 500 characters

1. Public funding of promotion and information measures should give priority to programmes and information that benefits the broader public.
2. Given the existence of a social gradient to diet quality and health inequalities, promotion and information measures should give priority to on vulnerable groups in Europe and reinforce through favourable co-financing rates.
3. Opening funding to private enterprises could have negative effects on the distribution of resources.
4. Funding should target measures that create more equitable access to markets and focus on creating funding opportunities for “non-value adding” sectors like the fresh fruit and vegetable sectors, where budgets to promote products or groups of products are limited.

⁵ Popkin, B. M. (2001). Nutrition in transition: the changing global nutrition challenge. Asia Pac.J.Clin.Nutr., 10 Suppl, S13-S18

⁶ UN (2011). Prevention and control of non-communicable diseases Report of the Secretary-General, Follow-up to the outcome of the Millennium Summit, Sixty-sixth session.

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5. Currently funding is limited to proposals by professional organisations and producer organisations. Promotion of sustainable production methods and promoting healthier diets would be more credible and efficient if civil society organisations and public authorities were involved. Funding to civil society organisations and authorities in coordination with professional organisations would increase the efficiency and reach of programmes.

Synergies with other CAP instruments

8. In order to develop more effective and more ambitious strategies for accessing local, European and global markets, are there any conceivable synergies between the various promotion and information tools available to the EU? Max 800 characters

1. Promotion funding should be used to increase the efficiency and uptake of existing programmes like the School Fruit Scheme (EU SFS) and Most Deprived Persons scheme (MDP). One of the strengths of the EU SFS is mandatory accompanying measures, which incorporate wide range of educational measures that reinforce provision of fruit and vegetables to create long term changes in healthier food behaviour.
2. Synergies with promotional tools in other areas such as healthy lifestyles, active ageing, health-promoting environments, healthy schools and cities should be optimised to communicate a consistent message which would assist agricultural policy in its contribution towards improved health and well-being of the European societies.
3. Mechanisms to improve targeting of funding should be developed. Accompanying measure are not currently financed by the EU and favourable financing frameworks could improve the quality and implementation of these measures.
4. Information provision and promotion measures for agricultural products should extend the eligibility of the fruit and vegetable programme towards vulnerable groups (low-income population groups, etc.), examine building synergies with Most Deprived Persons scheme⁷ and increase budgets accordingly.
5. Currently, 43 million in the EU suffer from food poverty⁸. Large differences in health outcomes exist between socioeconomic groups both within countries and between rich and poor countries. Low income groups (such as young families, elderly people and the

⁷ Current commission proposal amending *Council Regulations (EC) No 1290/2005 and (EC) No 1234/2007, as regards distribution of food products to the most deprived persons in the Union* is currently pending a decision in the Council.

⁸ European Court of Auditors (2009) EUROPEAN UNION FOOD AID FOR DEPRIVED PERSONS: AN ASSESSMENT OF THE OBJECTIVES, THE MEANS AND THE METHODS EMPLOYED. Special Report No 6, ECA Luxembourg

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unemployed), eat less well, pay more for what they get in relative terms, and have worse access to healthy options^{9,10}.

Eligible products

9. Which agricultural and agri-food products should be eligible and what criteria should be used to decide? Max 500 characters

1. Public health, social, environmental criteria should be the main focus when developing the overall objectives for promotion and information measures and determining what products should be eligible.
2. Promotion of products that are potentially damaging to human health should be addressed critically in terms of coherence with other EU policies.
3. Programmes encouraging even “moderate and responsible drinking levels” should not be supported with public funding, and EU funding of promotion of products containing alcohol is not coherent with EU public health Policy. The European Region has the highest proportion in the world of total ill health and premature death due to alcohol and the EU is the heaviest-drinking region compared to the rest of the world¹¹.
4. Impacts of promotion measures should be weighed against potential economic gains for these sectors or themes.

Actions and messages

10. To be more incisive, which means of promotion should be used? Should the focus be on promoting key messages, such as ‘5 portions of fruit and vegetables a day’ or ‘the taste of Europe’, or on product ranges (such as cheese, wine, etc.)? max 500 characters

1. Promotion of key messages or identifying key themes for promotion and information should be given focus.
2. Messages and themes should be flexible so that they can be adapted to national contexts.
3. For example, 5 a day type messages adhere to an overarching principle of increasing fruit and vegetable consumption and provide a concrete target, but messages vary from Member state to Member state.

⁹ Pomerleau, J.; Knai, C.; Branca, F. et al.(2008) ‘Review of the literature of obesity (and inequalities in obesity) in Europe and of its main determinants: nutrition and physical activity’.

¹⁰ Andreyeva, T.; Long, MW. And Brownell KD. (2010) ‘The Impact of Food Prices on Consumption: A Systematic Review of Research on the Price Elasticity of Demand for Food’. American Journal of Public Health, 100(2), pp. 216-222.

¹¹ WHO (2011) The Global status report on alcohol and health, World Health Organization, Geneva.

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4. New themes on whole grains and legumes (plant based protein sources) would complement the promotion of fruit and vegetable consumption to promote healthier diets.
5. Themes should be developed on biodiversity, climate friendly diets and resource efficient food systems.
6. “Buy local or regional” themes targeting retail and public sectors (public procurement) be developed to promote local and regional markets.
7. Supporting local and regional markets through promotion projects can create synergies between farmers and communities and help to reconnect citizens with food and agriculture creating value far beyond products or commodities.

Origin

11. Would it be appropriate to provide more space for the indication of origin of the product and what criteria should be used to decide? Max 500 characters

No answer (not our core competence)

Brands

12. Would it be appropriate to use brands as a promotion tool in the external market and what criteria should be used to decide? Max 800

No.

Multi country programmes

13. What is stopping the presentation and implementation of Multi-country programmes? What would need to be done to encourage these programmes with a greater European dimension? Max 800

1. Multi-country programmes can lead to efficiencies of scale and sharing of best practice and ensure a better “return on investment”.
2. However organising multi-country programmes requires more coordination and increases the complexity of promotion programmes potentially limiting successful applications for funding and uptake of promotion programme.
3. Complexity and time required to coordinate can lead to inequality in funding programmes, instead of ensuring that programmes reach sectors or thematic areas that are most needed.

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4. Multi-country programmes should be encouraged to facilitate efficiency, but not at the expense of reach, quality or single country promotion and information measures.

14. Do any other types of programmes and/or tools need to be developed? Max 500

1. Funding of workshops and seminars around identified themes or messages would encourage new networks, exchange of information and multi-country programmes.
2. Establishing multi-country platforms for exchange of best practice i.e. 5 a day movements could also lead to increased networking and facilitate more cooperation.

Implementation

15. How can the selection and implementation of programmes be simplified and improved?

No answer

General comments

16. Participants are invited to raise any questions concerning the information and promotion policy for agricultural products that have not been covered in this document. Max 800

The Commission has indicated its wish to increase the budget of promotion funds and increase the amount of funding to support increased promotion and information measures in 3rd countries or external markets. European standards of health, equity and sustainability should be guaranteed in promotion programmes

The primary focus should be on the internal market and promote a healthier, sustainable and more equitable food system to meet the goals of Europe 2020 for smart, inclusive sustainable growth.