

The Consumer Voice in Europe

CHILDHOOD OBESITY

A mid-term evaluation of the EU action plan on
childhood obesity 2014 - 2020



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Why it matters to consumers

Obesity levels in Europe continue to be very concerning with recent figures showing that **over half of all Europeans are now overweight or obese**¹. Obesity is a serious, yet preventable, risk factor for non-communicable diseases such as diabetes, cardiovascular diseases and certain cancers. A holistic approach is required to tackle this health crisis at different levels. It is particularly important that high levels of consumption amongst children of foods containing levels of fat, sugar and salt are tackled immediately.

Summary

BEUC welcomes the fact that the Maltese Presidency has chosen to focus on childhood obesity during its tenure. The mid-term evaluation of the EU Action Plan on Childhood Obesity 2014-2020 is a timely and useful means of assessing actions taken to date and an opportunity to improve ambition where required.

BEUC would like to take the opportunity to make our own evaluation of the EU Action Plan on Childhood Obesity with some recommendations on how to progress on this issue.

Childhood obesity is a serious concern for EU countries with **one in three children currently overweight or obese**. The risks of childhood obesity have been well-known by policy makers for decades and the issue has long been on the health agenda. However, policy initiatives in the past ten years have failed to translate into real change.

It is essential that governments show leadership in ensuring that measures taken to counter these worryingly high levels are sufficient, enforceable and adequately monitored. **Public bodies, not food companies, should be the ones determining the content of health promotion policies.** Governments need a comprehensive and multifaceted strategy to confront the current childhood obesity challenge.

Therefore, BEUC are calling on Member State governments and the European Commission to ensure that such a strategy includes the following actions:

- **Tougher rules on marketing to children**

There is strong evidence that there is a link between childhood obesity and the marketing to children of foods high in fat, salt or sugar. Unfortunately, the current situation does not adequately protect children and should be considerably improved to better restrict such advertising.

¹ <http://ec.europa.eu/eurostat/documents/2995521/7700898/3-20102016-BP-EN.pdf/c26b037b-d5f3-4c05-89c1-00bf0b98d646>

- **Mandatory and measurable food reformulation targets**

Foods popular with children frequently have high levels of fat, salt and sugar. Any reformulation actions should be obligatory for all food companies to avoid 'patchwork' results across Europe.

- **Consumer-friendly nutritional labelling**

Accurate and easy-to-understand nutritional information provides an important tool for parents deciding on which foods to purchase for their children. BEUC supports the use of colour-coded front-of-pack labelling to help parents make these decisions as well as the introduction of nutrient profiles to end misleading health and nutrition claims on food packaging.

STRENGTHEN RULES ON MARKETING AND ADVERTISING TO CHILDREN

The advertising to children of foods and beverages high in fats, salt and sugars is now widely recognised as a significant risk factor for childhood obesity. Area for Action 4 of the EU Action Plan on Childhood Obesity (hereafter the 'Action Plan') details a requirement for action on restricting such marketing. It also lists as an operational objective 'define nutritional criteria to use in a framework for marketing of foods for children'.

Since the Action Plan was initiated in 2014 there have been significant developments at the European level with regard to marketing to children.

In 2007 major food companies created the EU Pledge as a voluntary initiative to self-regulate the marketing of their food and beverage products to children. The Pledge's common nutritional criteria which replaced individual company criteria came into force in January 2015². They determine which products companies deem healthy enough to market to children.

Whilst it can be acknowledged as a first step, **this model and the initiative in general has however demonstrated the clear drawbacks of self-regulation in producing meaningful change.** Indeed, that it took 8 years for common nutrition criteria to be implemented by Pledge members demonstrates the slow pace of change when self-regulation is used.

The publishing of the World Health Organisation's Nutrient Profile Model³ for the European Region has served to further underline the deficiencies of the industry's EU Pledge model. **The EU Pledge is much more lenient and allows foods with significantly higher levels of sugar, fat and salt to be marketed to children.** For example, the EU Pledge allows cereals with a maximum of 30g of sugar per 100g of product to be advertised to children. By contrast, the WHO model only permits cereals with a maximum of half that amount (15g of sugar per 100g). The EU Pledge also allows marketing of many categories of foods and beverages which the WHO would not permit. They include sweet bakery wares and cereal bars, juices, water ices and ice cream, beverages containing non-sugar sweeteners.

² EU Pledge Monitoring Report 2015, p4.

³ http://www.euro.who.int/__data/assets/pdf_file/0005/270716/Europe-nutrient-profile-model-2015-en.pdf

Crucially, the EU Pledge does not ensure that children’s exposure to advertising of unhealthy foods and beverages is adequately restricted. The Pledge currently restricts advertising of foods and beverages which do not meet its nutrient criteria during TV programmes for which there is a minimum audience of 35% of children under 12 years old. **BEUC believes however that for any such measure to be effective, it should look at the absolute number of children watching a programme rather than the percentage of the total audience who are children.** The programmes with the highest total amount of children watching tend to be those with the highest percentage of adult watchers, i.e. the ‘family programmes’⁴⁵.

The EU Pledge often draws attention to the fact that the companies who have signed up represent 80% of the food industry and portrays this as a benefit. However, this also highlights the limitations of self-regulatory voluntary initiatives as **20% of the food industry remain outside an already weak set of advertising criteria.** BEUC believes that governments should play a much stronger leadership role in determining rules for advertising to children. Regulation or co-regulation at a minimum should be adopted.

Furthermore, technological advances have expanded the different platforms available for advertisers to reach children. Whilst TV advertising remains an important platform for children’s exposure to marketing of unhealthy foods, companies are increasingly targeting children via online tools such as ‘advergames’, social media and video-sharing platforms.

BEUC’s recent campaign ‘[Food Marketing to Children: Game Over](#)’ exposed the patchy developments of the EU Pledge and showed that it was too lenient to adequately protect children from inappropriate food and beverage advertising.

The revision of the Audiovisual Media Services Directive is currently making its way through the EU institutions. It is an excellent opportunity for stakeholders to ensure that the deficiencies with the current situation are rectified. Regardless of the outcome, Member States and the European Commission should already seek to immediately improve the weak criteria of the EU Pledge and close its loopholes by demanding:

- The use of the WHO Europe Nutrient Profile instead of the industry-designed nutritional criteria of the EU Pledge;
- The extension of the children age limit from 12 to 16 years old;
- The discontinuation of the use of brand mascots for food and beverages which do not meet the WHO nutritional criteria, including on food packaging;
- TV advertising bans of unhealthy foods to children to be extended from children’s programmes to peak viewing times of children.

MAKE THE HEALTHY OPTION THE EASIER OPTION

Area for Action 3 of the Action Plan, ‘Make the Healthier Option the Easier Option’ focuses on improving food recipes and refers to the need to keep addressing portion sizes.

Food reformulation targets should be mandatory, measurable, apply across all food categories and comply with WHO recommendations. Only under such conditions will EU targets be credible and effective. In particular, we deem it urgent to see a series of measures endorsed across the EU:

⁴ Study on the exposure of minors to alcohol advertising on TV and in online services p60-68, ECORYS, 2015.

⁵ Children and parents: media use and attitudes report p219-220, OFCOM, November 2016.

- The WHO target to achieve a 30% relative reduction of salt to limit salt intake to less than 5 grams per day by 2025 (which should be adjusted downward based on the energy requirements of children relative to those of adults)⁶;
- The WHO recommendation that no more than 10% of calories in our diet should come from saturated fat;
- The reduction of added sugar consumption for both adults and children to less than 10% of the total energy intake as a bare minimum, and ideally to aim for less than 5% of the total energy intake.

Only **independent monitoring and evaluation of food reformulation targets** can help assess progress across the board and see which businesses perform best. In addition, BEUC believes more government control is needed as targets set on a voluntary basis are not reached by all operators. Therefore, targets should be determined by national authorities to check for compliance.

Foods which are designed for and popular with children are all too often high in fat, sugar or salt. It is vital that levels of sugar in such foods are considerably reduced to ensure that children have the chance to become habituated to lower levels of sweetness in foods they consume regularly.

Indeed, **children can often consume a significant proportion of recommended daily sugar intake in single servings** of popular foods such as breakfast cereals or sugary drinks. Some cereals which parents serve unwittingly to their children can provide almost half of a child's daily recommended amount of added sugars (even when this is based on the unrealistically small serving size)⁷. Yoghurt and flavoured milk are other examples of food groups where the products aimed at children contain high levels of sugar.

New products should be in line with reformulation policies. Food manufacturers often communicate their concern over child obesity and claim to want to be a part of the solution to this public health problem. It does not make sense to claim reductions of sugar in food and at the same time to develop new items filled with added sugar and heavily marketed to kids.

Slashing sugar, salt and fat levels should apply to whole ranges of products, not just to a few, if we are serious about tackling the childhood obesity epidemic. Our French member UFC-Que Choisir found that a popular brand selling biscottes developed a 'low in salt' category while the salt level of its conventional products increased by 20% between 2007 and 2013⁸.

Product improvement does not only mean less. It should also mean more. Because consumption of fruits and vegetables is still declining in the EU, reformulation strategies should look at increasing their share in food recipes. We need to help children improve their diet in accordance with dietary guidelines and nutrition recommendations, such as by increasing their consumption of fruit, vegetables, whole grain products and healthy proteins such as fish poultry or lean meat.

⁶ http://www.who.int/nutrition/publications/guidelines/sodium_intake_printversion.pdf

⁷ <https://www.gov.uk/government/news/new-change4life-campaign-encourages-parents-to-be-food-smart>

⁸ Salt in bread, UFC Que-Choisir, N°512, November 2013.

Sugar

Intake of free sugars is much higher for children in Europe than for adults, ranging from 12% of total energy intake in countries such as Denmark or Sweden to nearly 25% in Portugal⁹. Very high levels of sugar are routinely found in foods popular with and routinely consumed by children such as some popular breakfast cereals, yoghurts and sugar-sweetened beverages. The overconsumption of such foods and beverages has significant implications for children's risk of becoming overweight or obese.

Under the EU Framework for National Initiatives for Specific Nutrients¹⁰ the European Commission has suggested a modest reduction of added sugars: a minimum of 10% by 2020 against Member State baseline levels at the end of 2015. The implementation of this 10% reduction must be carefully examined to make sure that the reformulation efforts have tangible health benefits for all consumers.

The 10% target is an overall target which means that a food company may choose to reach it by reducing the sugar content of its products in some Member States whilst leaving the same products in other Member States untouched. Thus, children in one EU Member State may have the opportunity to become accustomed to lower sweetness levels in foods and beverages whilst the children of another EU Member State continue to develop sweeter taste preferences.

BEUC believes that consumers and especially children, should be afforded the same level of health benefits from any reformulation exercise, no matter where they live in the EU. Furthermore, if a food company has been able to reduce the sugar content in a product in one Member State, it is clear that it is entirely possible to do so in another. They should therefore not be able to 'cherry-pick' countries for reformulation efforts.

Moreover, an overall aggregate target could mean that a food company, instead of reducing sugars in its current products, opts to reduce portion sizes or formulates new products which are low- or no-sugar alternatives with non-sugar sweeteners. It will be up to Member States to decide on whether such options are acceptable. If they should decide to allow such measures, they should examine closely the relative impact this could have on reducing sugars in original products.

Furthermore, the use of sweeteners as an alternative for sugar should not be a replacement for reformulation of products as the European Commission itself has stated. **Any reduction of added sugars should also lead to a reduction of the sweet taste** in order to allow for adaptations of the taste to lower levels of added sugars. This is of particular importance for children as those who routinely consume artificially sweetened foods and beverages, may begin to lose interest in less intensely sweetened foods such as fruit. Early experience with food during childhood is a foundation for taste preference development across the life course¹¹.

⁹ <http://www.who.int/mediacentre/news/releases/2015/sugar-guideline/en/>

¹⁰ See Added Sugars [Annex](#)

¹¹ Early Influences on the Development of Taste Preferences, A. Ventura and J. Worobey, *Current Biology* 23, May 2013.

In addition, **the European Commission should come forward with guidance on portion sizes.** Food companies can currently suggest their own serving sizes on food labels. Those recommended on the packaging are often very unrealistic and much smaller - or even half the size - when compared with actual consumption size¹². This can create a confusing situation for parents when purchasing food for their children who may believe the servings sizes to be realistic representations of what their children actually eat. For example, the serving size for most cereals targeting children is 30g which is very unrealistic. Our Swiss member, FRC, recently found that 40g chocolate Easter bunnies were labelled with a recommended portion size of just 25g¹³. The use of smaller and unrealistic portion sizes is deceptive and helps to disguise the higher levels of sugar, salt and fat consumed by children.

Indeed, even the serving suggestion depictions (graphics relating to serving size) on cereal packaging can present a conflicting message to parents and children. Research has shown that portion size depictions in such photographs and graphics are often much larger (on average 64.7%) than the recommended portion sizes on the nutritional information panels. Such serving size depictions on packaging can guide consumption norms, especially for children upon whom images can exert strong influences, including how much is a reasonable and appropriate amount to serve.¹⁴

Furthermore the Belgian consumer organisation Test-Achats also found that some chocolate bars and biscuits popular with children give unrealistic portion sizes on their labelling. For example, even when two or more bars or biscuits are wrapped together, as is the case for Kinder Bueno chocolate bars, the portion size is given as just one bar or biscuit¹⁵.

Salt

In the EU the average salt intake is almost twice the maximum level set by scientific bodies including the WHO whilst 80% of salt in our diet is derived from processed foods. The WHO strongly recommends a reduction in sodium intake because **children with increased blood pressure are at high risk for hypertension and its related morbidities as an adult**¹⁶. It is therefore essential that Non-Communicable Diseases' (NCDs) risk factors such as elevated blood pressure are addressed during childhood to mitigate the chances of such NCDs manifesting in later life. It is also worthwhile noting the influential role early dietary experience can have in shaping salty taste preferences of children which can initiate life-long eating behaviours.

In recent years, food businesses committed to reduce salt in food products via voluntary pledges after national governments encouraged them to take action. Whilst there has been some progress in reducing salt from a high starting point, there remains room for improvement.

Research from our members **shows a wide divergence between very similar products with varying levels of salt content.** Many of these products are foods which would be expected to be regularly consumed by children in the home environment e.g. pasta sauces, bread, soups.

¹² Portion Distortion: A Study of College Students, R. Bryant and L Dundes, The Journal of Consumer Affairs, September 2015.

¹³ 'Zoom sur le lapin des Pâques', FRC, May 2015.

¹⁴ *Depicted Serving Size: Cereal packaging pictures exaggerate serving sizes and promote overserving*, A Tal, S Niemann, B Wansink, BMC Public Health, 2017; 17: 169.

¹⁵ Il est temps de mieux définir les portions alimentaires, Test-Achats, September 2016.

¹⁶ Chen X, Wang Y. Tracking of blood pressure from childhood to adulthood: a systematic review and metaregression analysis. *Circulation*, 2008, 117(25):3171-3180.

A UFC-Que Choisir test on 200 baguettes found that one baguette contained 1.09g of salt per 100g while another contained 2.02g, so almost twice the amount¹⁷. UFC-Que Choisir also compared two menus featuring similar products from different brands. One menu led to a salt intake of 6.44g while the second one brought 13.09g.

In Switzerland, the consumer organisation FRC found a tomato sauce can contain up to eleven times the amount of salt of another tomato sauce¹⁸.

The Dutch consumer organisation, Consumentenbond, also recently found significant variations of salt content in very similar products. For example, two different brands of sweet and sour sauce had a steep difference of salt content, with one containing four times the amount of the other¹⁹.

The argument that food businesses have reached the maximum possible level of reformulation is therefore highly dubious.

Reformulation efforts have the potential to help make the healthier choice the easier choice. To do so however, they should be meaningful, mandatory and properly monitored. BEUC calls on the Member States and the European Commission to:

- Ensure that all reformulation efforts are independently monitored and evaluated;
- Prevent food manufacturers from focusing their reformulation efforts in only a select few Member States;
- Take action on the unrealistically small portion sizes used by manufacturers.

BETTER INFORM AND EMPOWER FAMILIES

Nutrition labelling Area for Action 5 of the Action Plan 'Inform and Empower Families' stresses the importance to improve nutritional labelling.

Making the healthier choice the easier choice requires a combination of several policies aimed to inform, educate and protect consumers. Providing truthful information on packaging is one key aspect. The WHO listed nutrition labelling as an important means of meeting consumers' requirements for "accurate, standardised and comprehensible information on the content of food items in order to make healthy choices". In parallel, the OECD views nutrition labelling as "a main tool for preventing increasing rates of obesity and unhealthy diets"²⁰.

Labelling is an important tool for parents who should be able to quickly assess the nutritional make-up of foods they buy for their children.

If labels are to be truly useful to consumers, they should be easy to understand, including for those who are less educated and they should not be misleading. BEUC members' research shows that consumers prefer front-of-pack (FOP) labelling as information can be gleaned at a glance. It is therefore regrettable that the Food Information to Consumers Regulation currently only requires businesses to provide nutritional information on the back of the pack.

¹⁷ *Salt in bread*, UFC Que-Choisir, N°512, November 2013.

¹⁸ *Observatoire du Sel - Sel: la main lourde partout*, FRC, November 2012.

¹⁹ *Significant Salt Reduction Possible in Supermarket Products*, Consumentenbond, January 2017.

²⁰ *2004 Global Strategy on Diet, Physical Activity and Health*, WHO, 2004.

A consumer-friendly FOP nutrition labelling system should provide at-a-glance and easy-to-understand information about salt, sugar and saturated fat levels. BEUC believes colour-coded schemes are the most appropriate tool to fulfil this goal. These schemes also empower consumers with low awareness levels of nutrition which is particularly important as they are high-level consumers of processed and low nutritional food.

Research has confirmed that such schemes empower consumers as they help them to correctly identify if a product contains high, medium or low levels of sugar, salt and saturated fat. They crucially allow parents to compare products they buy for their children. Consumer research shows that overall people have difficulties determining if the food is high in salt, sugar or fat without traffic lights labelling, one of the most commonly used colour-coded schemes²¹. In the absence of a European colour-coded scheme, some Member States have explored the concept in their own countries. The UK uses a voluntary 'traffic-light' scheme which has a high take-up amongst food companies and major retailers whilst France is currently considering the results of four trial schemes. National authorities should encourage and facilitate such initiatives which can help to enable consumers to make healthier choices.

BEUC further calls on the European Commission to consider amending the Food Information to Consumers regulation to require food manufacturers to include 'added sugars' on the nutritional label. It is currently impossible for European consumers looking at the label to determine how much of the total sugar content is derived from added sugars. The United States has already adopted a new nutritional label to come into force in July 2018 which will include added sugars labelling.

Nutrition and health claims

As mentioned above, it is crucial that labelling does not mislead consumers. The main stated objective of the EU Nutrition and Health Claims Regulation is to ensure that consumers are not faced with misleading, scientifically unfounded or exaggerated health claims.

However, the failure to implement the requirements of this regulation have resulted in a situation where **health claims are still being used on food products high in salt, sugar and/or fat**. It has now been almost a decade since nutrient profiles were supposed to have been introduced to avoid this very situation. Such "healthy"/"unhealthy" categories would help determine which foods are allowed to bear claims.

Of particular concern is the use of claims on unhealthy food targeted to children as pinpointed by our Austrian member VKI in 2013²². More recently, our German member VZBV found claims about the immune system and energy levels on fat-rich processed sausages marketed to children²³. Many foods intended for toddlers also refer to the presence of vitamins. Yet they can contain record-high levels of sugar as highlighted by our Swiss member FRC²⁴.

The setting of nutrient profiles would also combat the practice to label products as 'low in X' whilst adding substantial amounts of sugar, salt or fat.

²¹ *Ampel-Kennzeichnung bei Lebensmitteln hilft Verbrauchern - Ergebnisse eines Online-Quiz zur Nährwertkennzeichnung*, VZBV, June 2013.

²² <http://www.konsument.at/lebensmittel-check/nestle-nesquik-ca-multivitamine>

²³ VZBV (2014). *Lebensmittel mit Gesundheitsversprechen – wirklich gesünder?*

²⁴ <http://www.frc.ch/articles/des-allegations-qui-jouent-sur-lemotionnel/>

BEUC is also particularly concerned about the tactics used by the industry to circumvent the Regulation. Several companies have chosen to add vitamins and minerals to their products to continue to use the claims they had to remove from their products after receiving a negative opinion from EFSA. Several BEUC members, such as UFC Que-Choisir²⁵ and Consumentenbond²⁶, recently flagged the example of a company who added vitamins to its product to continue to use health claims relating to the good functioning of the immune system.

As nutrient profiles are currently being reviewed in the REFIT exercise, it is regrettable that, at an EU level, this essential tool for honest labelling and making the healthier choice the easy choice is being further delayed. Meanwhile misleading claims continue to be used to the detriment of consumer information and the fight against obesity. **Member States and the European Commission should swiftly act to finally introduce this instrument which is vital to helping consumers make healthier choices.**

Accurate and meaningful nutritional labelling is a key tool for providing information to consumers about the food they eat to empower them to make healthier choices. BEUC therefore calls on the Member States and the European Commission to:

- Encourage colour-coded front-of-pack nutritional labelling schemes such as the UK 'traffic light' scheme or those currently being considered in France;
- Ensure that the practice of placing health and nutrition claims on foods high in fat, salt or sugar is ended by introducing nutrient profiles.

ENDS

²⁵ UFC Que Choisir, Actimel de Danone, Nouvelles Allégations Santé, May 2014.

²⁶ Vitamin tricks for 'healthy' food, Consumentenbond, June 2014.



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