



Kraft Foods

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**To: Nordic Council of Ministers
v/Bente Stærk og Rebecka Wallin Kucer**

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RESPONSE FROM KRAFT FOODS ON “NORDIC ACTION PLAN ON BETTER HEALTH AND QUALITY OF LIFE THROUGH DIET AND PHYSICAL HEALTH”

Kraft is pleased to submit this paper to the Nordic Council of Ministers in response to its request for comments on the “Nordic Action Plan on better health and quality of life through diet and physical activity.” This response is an addition to any responses from the national Foods Associations (NBL, LI, FL and DI).

In this response we express our company positions on health and wellness. We will also try to share experiences in practice - including suchlike from other European countries, where we are present in far more food categories than in the Nordic countries.

INTRODUCTION

As a food manufacturer that sells products in all Nordic countries and beyond, Kraft has a role to play in this important public policy debate. Kraft has supported initiatives to promote the health and wellbeing of our consumers for many years. As concerns about diet and health have grown, so too has Kraft’s commitment to act. We have increasingly focused on providing the wide choice of products that our consumers want, as well as on providing the supporting information that consumers need to adopt healthier lifestyles.

Kraft’s commitment to health and wellness was first publicly set out in the 2003 announcement of our Global Health and Wellness Programme. As part of the Programme, Kraft publicly announced our intention to:

- improve the nutritional profile of many of our products;
- adjust our marketing practices and policies;
- provide consumers with more information on healthy diet and lifestyle choices;
- advocate for constructive public policy changes.

At the same time, Kraft established a Global Advisory Council made up of recognized experts to help guide our actions.

In 2005, Kraft further extended its commitment to Health and Wellness by developing “better-for-you” nutrition criteria for our portfolio of products (with the exception of coffee). Kraft has used those criteria within the EU to guide the way that we market and advertise our products. Kraft has shifted the mix of products that we advertise in television, radio and print media viewed primarily by children aged 6-11 to only those

products that meet those “better-for-you” nutritional criteria. Kraft does not advertise any of its products in media primarily viewed by children under 6. Even though the sensible solution symbol itself is not used on our products in the Nordic countries we use the same criteria for our marketing. Read more about [Sensible Solution](#).

Kraft’s Health and Wellness Policies are guided by the Kraft Healthy Living Principles. These principles express our basic belief about nutrition, physical activity and healthy lifestyles; guide the development, commercialization and marketing of Kraft products and services; and underlie our communications to consumers, customers, employees, suppliers and policymakers. They state:

- A nutritionally balanced diet along with physical activity is critical to maintaining optimal body weight and good health;
- Different foods have different roles in the diet. It is important to select foods each day from the major food groups – grains, vegetables, fruits, dairy and meat, fish and alternative source of protein – along with fluids for adequate hydration;
- Consumption of foods high in sugar, sodium and fat, especially saturated or trans fat, should be limited;
- For most people, any food can fit into a balanced diet in appropriate portion sizes and with appropriate frequency. However, an individual’s health status and lifestyle are important considerations in making suitable food choices, and for certain individuals, some foods may not be suitable;
- The relationship between the calories we take in and the calories we burn off each day is critical to achieving or maintaining optimal body weight. The amount of calories each person needs varies considerably from person to person. However, regularly consuming more calories than we burn off each day can lead to weight gain, obesity and related health issues; and
- When done appropriately, fortification of selected foods can be an important way to help people reach recommended vitamin, mineral and nutrient levels for an adequate diet.

The Healthy Living Principles underlie a dialogue that Kraft is currently conducting with a wide range of stakeholders, including consumer organizations, media, and policymakers. Our remarks in response to the “Nordic Action Plan on better health and quality of life through diet and physical activity” are part of that engagement process. We invest time and resources in establishing and maintaining links with leaders in public health, nutrition, physical activity, government, and in consumer and industry groups. We have structured this response according to selected headings in the “Action Plan”, where each part of our response addresses several parts of the plan.

RESPONSES TO THE “ACTION PLAN”

1.2 Physical inactivity

2.1 Stakeholders co-responsibility

4.1 Children and youth. Support local communities

Community policies should promote healthy diets and physical activity, and such policies should be focused on children. From an early age, children must embrace the notion that a healthy diet and physical activity are essential to a long and healthy life. If children

learn and follow those principles at school, Kraft believes that children can adopt appropriate behaviors and that parents will learn from their children. Kraft believes that public-private partnerships are very effective in educating consumers. In Europe, we are developing a number of partnerships to help encourage healthy lifestyles in children, with particular emphasis on the school environment. Each programme is designed to respond to the specific needs and opportunities presented by the local communities. Here some examples of Kraft's country projects, also outside the Nordics, to help generate ideas on how the industry can contribute:

- In the Nordic countries, Kraft is supporting 'Get Moving!', an innovative programme of practical and fun activities and projects which introduces children to the positive benefits of physical activity and a healthy diet and lifestyle, including the opportunity to design and create their own ideal playground. 2000 children from 10 Swedish schools have taken part with further schools in both Sweden and Norway soon to be involved. The program is intended to continue at the same level, with 10 new schools engaged each running school year to increase awareness and provide the resources and tools to help children be more active. The programme will reach children aged 6-13 from a cross-section of backgrounds.

Get Moving helps children understand the importance of regular physical exercise and a healthy lifestyle; gives them the information and confidence they need to make changes in their own lifestyles; encourages them to take part in more physical activities and enjoy the benefits; improves the opportunities for play in school grounds; and involves the local community on a sustainable level.

The programme uses a four step process: Get Thinking, which introduces the concepts of exercise, nutrition and healthy lifestyles, and encourages children to think about and experience the positive effects of physical activity; Get Talking, whereby the children undertake a series of activities to measure their activity levels and survey the opportunities for exercise and play in their school grounds; Get Planning, where the children start thinking about the kind of activities they'd like to do, the issues involved and then develop an action plan; and Get Moving, when the action plan is put into effect, with the help of a US \$1900 award from the programme, and progress is monitored, evaluated and celebrated. A fundamental part of the programme is closely involving the children in all four steps, and empowering them to identify and make changes for themselves. By taking responsibility, the children feel ownership for the programme and are more likely to be inspired to develop lifelong healthy habits.

The programme is administered by Barnens Landskap i Sweden and by FRIFO, Den Norske Turistforening (DNT), Norges Jeger- og Fiskeforbund og Norges Orienteringsforbund in Norway in liaison with a Kraft co-ordinator.

- In the Baltic region, Kraft has donated €20,000 to a new Food Bank project which targets larger families in five major cities in Lithuania, and will eventually be extended to Latvia. The project will provide 1,500 families with monthly, nutritionally balanced food parcels, together with advice on how to prepare balanced meals.
- In Belgium, Kraft supports 'A Step for Every Bite'. Run by the Flemish Parents Association, the programme brings children and their parents together on a

Sunday morning to enjoy a healthy, balanced breakfast, with dieticians on hand to give advice on healthy eating, followed by a physical activity session. This will eventually involve 8,750 parents and children. Kraft also supports 'Clever Breakfast', a similar initiative which is reaching nearly 28,000 parents and children.

- In France, Kraft supports 'Eat to Compete' in partnership with the French National Handball Association and endorsed by the Ministry for Sport. This is the first nutritional programme in France to be taught as part of sports training. It provides handball coaches with materials to help encourage healthy eating habits in youngsters in their clubs. It has already reached 15,000 13-15 year olds. In addition Kraft has supported 'Feeding and Integration', the national nutrition programme, in which 10,000 volunteers help distribute food parcels provided by the Food Bank. The volunteers have been trained to help recipients learn to eat healthily within their means.
- In Germany, Kraft has launched its 'Healthy Living Programme', in collaboration with the German Foundation for School Sports. It provides a comprehensive teaching pack of educational materials designed to engage schoolchildren's enthusiasm in regular exercise and healthy eating. By the end of 2005 all interested schools in Germany will have the pack which is also being used by the German premier league soccer club, Werder Bremen, in its parallel '100 School - 100 Clubs' programme.
- In Greece, Kraft's educational programme 'My Favourite Sport' hosted by Athens' Museum of Greek Art for Children, raised awareness of the importance of regular exercise in children aged 8-10 years. In total, 3,500 children took part in the one year programme which included taking part in physical activity and painting pictures of their favourite sports stars to inspire them into action. The company also sponsored tennis equipment for 100 students of an elementary school in north Athens and paid for the renovation of the school's grounds to provide an environment for active play.
- In Italy, Kraft's new Health and Wellness education programme is being delivered in 2005-6 in partnership with Italian parents' association MOIGE. Initially 2,000 pupils aged 6-11 years will take part in the school-based programme of lessons, activities and a lively interactive puppet show which puts across healthy eating messages and has the children jumping, stretching and doing other simple exercises. A teachers guide containing nutritional information is also provided.
- In Spain, Kraft has contributed €36,000 to two health and wellness initiatives supervised by the IUVE Foundation and Red Cross. 'One Kilo of Help' provides after school centers in Madrid, Barcelona and Valencia for immigrant children from Latin America. So far 80 children have had the opportunity to participate in fun physical activities, eat a balanced snack and learn about healthy eating habits. The Red Cross programme, which runs in 11 schools in Leon, Zamora and on Majorca, aims to encourage 900 children aged 6-11 years to follow a healthier diet through weekly clubs.

- In the UK, the “health4schools” programme encourages 6-11 year olds to grow their own food, plan and cook healthy meals, appreciate the benefits of breakfast and engage in active play. Each school receives €7,000, a resource pack and teacher support. The award winning programme is underway in 50 Gloucestershire schools and will extend to 100 schools in future years. The programme was developed in partnership with the Local Education Authority, Business in the Community and is governed by an independent steering group. The ‘Get Moving!’ programme has been introduced to 25 schools helping 3,000 children make more of their playground activities.

Our health and wellness initiatives regarding our products are more extensive outside the Nordic countries, where we are present in a wide range of food categories. But also with a Nordic product portfolio, mostly within the indulgence segment, we can contribute with product development. Here are two examples, drawn from our health and wellness initiatives in the Nordic countries, show how we contribute to solutions:

- Portion sizes. We want to make smaller portion sizes available and have made Freia and Marabou chocolates available in 24-30 g. sizes and Maarud and Estrella snacks in 40 g. bags. We also label with “Number of portions” where appropriate.
- Improve nutritional content. We have just finished a reformulation program where we limited, and in most cases removed all industrially produced trans fat from our products. We have also developed snacks with better nutritional profiles such as Estrella Less Fat (30% less fat), Maarud Superchips (45% less fat), chocolates with up to 86 % cocoa content, O’boy No Sugar Added and Philadelphia Light (12% fat). Better nutritional alternatives will be focus for our product development also in the future.

4.1 Ensure children and youth adequate knowledge on and easy access to healthy diets and physical activity

Kraft Foods fully supports efforts to improve children’s diets. We believe that food manufacturers have a role alongside Government, parents and schools in this mission and we are committed to playing our part in promoting healthy lifestyles. Specifically:

- Kraft fully supports national governments in their drive to improve the standards of school meals. It is right that Government should be the driver to try and instill good nutritional habits at an early age.
- Kraft supports the introduction of nutritional and quality standards for school lunches. However, the actions taken must be effective in encouraging and securing a better nutritional balance as part of a wider healthy balanced lifestyle initiative within schools.
- National governments have a duty to specify the nutritional standards that they wish to deliver for school lunches. Food manufacturers such as Kraft, as suppliers of these foods, will meet the prescribed specification, in the same way as they do for their retail customers.
- Kraft believes that school menus should exemplify and encourage the eating of a balanced diet; balance should not mean that certain foods are characterized

negatively and banned. On the contrary, such practice sets a dangerous example for children.

- Finally, Kraft strongly supports the idea of a 'whole school approach'. Only by teaching children about diet and health, including cooking skills, and by enhancing knowledge of the production and the physiological and social aspects of food, can changes in pupils' behaviour, especially in building their diets, really start to happen. In the UK Kraft, in partnership with Gloucestershire County Council's Local Education Authority and Business in the Community, developed a programme 'health4schools' which encourages 6-11 year olds to grow their own food, plan and cook healthy meals, appreciate the benefits of breakfast and engage in active play.

Schools should be providing a variety of well prepared and nutritionally balanced meals from which students can choose. Students should be educated about the composition of a meal and the different roles of different foods in the diet. They should know that it is important to select foods each day from the major food groups (grains, vegetables, fruits, dairy, meat and fish or alternative sources of protein) along with fluids for adequate hydration. Snacks are also important for children and help prevent between meal hunger. Snacks can be part of a balanced diet, but should not replace the five main food groups.

Moreover, students should be given enough time to enjoy their meals and to socialise during the meal.

Kraft believes that public-private partnerships are very effective in supporting health education efforts made by schools. Our most recent and far reaching initiative, announced in January 2006, is our support of and partnership with *Shape Up*, a new 3-year school-community project that aims to address the determinants of childhood obesity through child participation, giving children a sense of ownership over the decisions affecting their wellbeing. Developed by leading European education specialists as a direct response to the EU Platform on Diet, Physical Activity and Health call for action on rising obesity levels in children, *Shape Up* reaches all 25 Member States and will develop, test and evaluate practical in-school and community activities in 26 cities across the region to help children learn about food, nutrition and physical activity and develop actions to impact those factors contributing to their health and well-being. The only program of its kind to receive EU funding, *Shape Up* is a European project supported by the European Commission Directorate General for Health and Consumer affairs. Kraft Foods is a supporting partner of *Shape Up* through its Kraft Cares community partnership programme as part of its ongoing commitment to help communities encourage healthy lifestyles in children and their families, with particular emphasis on the school environment.

Shape Up will not focus solely on obesity, but rather will focus on a positive and critical view of food and body movement. Through the child and the school, *Shape Up* aims to involve the whole community in shared reflections and actions about healthy living conditions and lifestyles. The project will develop a participatory framework to have the school and surrounding community start a constructive dialogue to look at diet and nutrition, aesthetics and taste of food, food availability (including availability of fresh fruits and vegetables), social relationships and societal image. The dialogue will also cover body movement, considering physical exercise as well as play, body image,

and environmental conditions affecting mobility. This IVAC-framework (Investigation-Vision-Action- Change) will be used to facilitate health promoting actions with regards to determinants of obesity.

When children, schools and communities work with the IVAC approach they will collaborate on Investigating health issues related to food, body and movement, developing shared Visions and taking joint Action to Change the determinants of obesity. A comprehensive network of 26 cities has been created to test and evaluate the framework in participating schools involving children aged 4 to 16, and will culminate in dedicated local *Shape Up* weeks during the summer of 2007 and 2008. This European network of cities will further facilitate the exchange of best practices initiated by children, twinning and other agreements based on specific activities. *Shape Up* experiences, achievements and results will be shared and disseminated European-wide as research papers and a book on the *Shape Up* story, which will be presented at the closing conference in December 2008 where policy makers can discuss children's proposals. Adapted versions of such programs might be interesting for public administrations in the Nordic countries.

4.1 Limit the availability of unhealthy foods

In 2003, we eliminated all in-school marketing. We do not operate or supply vending machines for our products in schools in the Nordic countries and we recommend specific nutrition criteria for products sold in school vending machines.

Kraft does not support the existing tax regime for chocolate and sugar confectionary in Norway and Denmark. We believe in other actions, described in this document, to guide the public towards better health and quality of life through diet and physical activity. We believe that special duties loaded on some part of the food industry have limited effect on people's personal lifestyle choices and are only fit to:

- distort competition between products with similar nutritional profiles (some are taxed some are not – reasonable criteria/definitions are too hard to enforce)
- limit future investments in Nordic food industry
- nourish the flagging out tendency in the food industry
- threaten work places in traditional Nordic food companies

This is an area of deep concern for all of us working in the chocolate and sugar confectionery industry, management as well as employees. We insist the Nordic Council of Ministers to carefully weigh the chance of positive health effects on the population up against the total perspective. We will be happy to provide an in-depth presentation of this subject.

4.1. Restrictions on the marketing of less healthy foods towards children and youth

Kraft believes that self-regulation, including meaningful enforcement, is the most appropriate tool to address concerns about the advertising and marketing of energy-dense and micro-nutrient poor foods. We believe voluntary codes are the most effective means of initiating responsible, effective and timely action, rather than waiting for the lengthy process of legislative change to bring results.

Self-regulation is also a sensible complement to current regulations that require that advertising and marketing not mislead consumers.

At Kraft, self-regulation applied to our own advertising and marketing has become part of the way we do business. We maintain high standards in advertising and marketing to ensure that our practices are consistent with our Healthy Living Principles and recognise the unique status of children. For all audiences, we ensure that our advertising and marketing materials depict appropriate serving sizes, and we avoid suggestions of over-consumption. We also discourage sedentary behaviour and, where appropriate, encourage an active lifestyle.

We recognise that marketing to children is a concern to regulators and the public alike. We share these concerns and wish to act responsibly. We have therefore developed policies which go beyond existing codes and regulations on marketing to children. For some time we have been committed not to advertise in TV / radio / press in programme airtime aimed at children under 6 years old. In 2005 we announced a further extension to our policies. We stated:

- Only products meeting Kraft's own category-specific "better for you" nutrition standards ('Sensible Solution' products) can be advertised to children aged 6-11 years. Which means that none of our current chocolate- or snacks products in the Nordic countries will be advertised to children under 12.
- Restrictions also apply to websites aimed at children under 12 years. By end of 2006 these will show only products meeting our "better for you" nutrition standards and healthy lifestyle advice must be included on the site. In practice this means no web sites aimed at children under 12 in the Nordic countries – given our current product portfolio here.
- Kraft businesses are encouraged to include healthy lifestyle messages and activities in more of their promotions - especially for products consumed by children.

Kraft's advertising and marketing policy is regularly reviewed and modified as appropriate. In addition to our own policy we are working through our trade associations with other members of the food industry to develop voluntary codes of practice on advertising. These will establish minimum standards to ensure an industry wide approach to responsible advertising, especially to children. Kraft contributes to industry self regulation in a number of ways, including:

- Kraft has supported the implementation of the International Chamber of Commerce (ICC) framework for responsible food and beverage communication and complies with its provisions. We also support the World Federation of Advertisers (WFA)'s efforts to have the framework fully implemented in 23 out of 25 EU Member States by the end of 2006
- Kraft was actively involved in developing the food industry marketing communication principles which were delivered as a CIAA commitment to the EU Platform on Diet, Physical Activity and Health. These principles update and extend the ICC framework, addressing concerns about marketing media other than advertising. Kraft supports WFA's commitment to have these new provisions implemented in 20 Member States by the end of 2007

- We have played an active role and supported WFA in the implementation of the European Advertising Standards Alliance (EASA) Self-Regulation Charter which sets out 10 principles for effective advertising self-regulation
- Kraft further supports the efforts of the WFA to establish self-regulation more widely in the EU and the commitment that WFA has made to the EU Platform on Diet, Physical Activity and Health to establish by the end of 2006 Self-Regulatory Organizations in 4 of the 7 Member States where they do not currently exist. In particular Kraft has played a leading role in setting up Self Regulatory Organizations in Poland & Lithuania.

Kraft currently holds the Presidency of the WFA and contributes actively to the association's work, including as one of 9 companies funding a further Platform commitment of WFA to monitor the compliance of TV food and beverage advertisements against national self-regulatory codes of practice in 14 EU Member States to ascertain whether self-regulation standards are adhered to.

Kraft's advertising will be scrutinized as part of this exercise. Such monitoring exercises are important in reassuring all stakeholders that the industry is complying with the standards it has set. WFA has committed to sharing with the EU Platform members the results by Member State surveyed.

In conclusion, Kraft believes the current legal provisions set out in the Unfair Commercial Practices Directive, the Television Without Frontiers Directive and the Misleading Advertising Directive, combined with the range of complementary self-regulation measures in place, provide adequate assurance that advertising and marketing of foods are undertaken responsibly, taking into account consumer concerns, especially as regards children.

This said, there should be further efforts to extend self-regulation and to implement the EASA vision of effective advertising self regulation, coupled with regular monitoring of compliance with the standards set.

4.2 Ensure an improved product related nutrition information

Kraft is committed to providing consumers with useful information to help them make the most appropriate nutrition and lifestyle choices. This involves providing relevant information on packaging, as well as supporting information and advice via a range of different media, including websites.

In 2003 Kraft announced our global commitment on voluntary nutrition labeling. To make it easier for consumers to make informed food choices, Kraft will provide nutrition labeling on all our products in all EU markets. This means:

- We will provide nutrition labeling on all packs except single-ingredient products (e.g., pure coffee), where space is available.
- On smaller packs the 'big 4' (energy, protein, carbohydrate and fat) information will be provided per 100 grams. Where space permits 'big 8' (energy, protein, carbohydrate, fat, sodium, sugar, saturated fat and fiber) information will be provided. Energy, fat, saturated fat, sugar and salt are the most relevant nutrients regarding nutrition and their effect on overweight, obesity and chronic diseases
- Where appropriate voluntary national Guideline Daily Amount (GDA) targets have been developed such information will be provided

- The information will be set out in a standard format, so that it is easy to read
- Today, in all European markets the majority of Kraft's products already provide 'big 4' nutrition information and an increasing number provide 'big 8' labeling. All our products will have nutrition labeling by the end of 2006.

Kraft also supports the notion of "at-a-glance" front-of-pack signposting. Kraft believes that different approaches in different countries by different groups of stakeholders are not optimal. Kraft does believe that there is a need for clarity and consistency Europe-wide. Kraft's vision for front-of-pack nutrition labeling, or "signposting," is based on the following principles:

- It is applicable to all markets in the EU (internal market)
- It is supported by science
- It is effective in changing consumer behaviour
- It is category-specific and does not exclude any categories (e.g., oils and fat, cheese, etc.)
- It is supported by the vast majority of manufacturers and retailers
- It is positive (e.g., Swedish keyhole) and not negative (e.g., red traffic lights)
- It is supported by government and consumer organisations

Kraft supports these criteria because it seems that:

- consumers are most likely to select foods and drinks **within** product ranges, rather than **among** food categories, so nutritional criteria should be category-specific.
- signposting should help consumers select better-for-you options within product categories and not serve to exclude or give negative signals about some food categories
- consumers respond better to positive on-pack messages (i.e. flagging 'better-for-you' options) rather than negative ones (i.e. flagging foods 'red', thus signaling them being inherent 'unhealthy') (Research from The Monitor – see response under 6 and 7)

Ideally, Kraft recommends that any effective, credible labeling system contain the following elements:

- A back of pack nutrition table setting out 8 nutrients (where feasible)
- Nutrients disclosed on a per portion and per 100g basis
- A back of pack disclosure Guideline Daily Amount
- A front of pack signpost using a "healthier choice" logo based on credible, category-specific nutritional criteria

Any such signpost system that is developed must be accompanied by an educational campaign so that consumers understand its meaning.

4.2 Information and advice on healthy diet and physical activity to the general population

Kraft believes that industry, government, public health authorities and NGOs have a role in educating consumers about the information on food labels. Kraft also believes that

such nutrition education should be led by and directed through government and school education programmes.

Schools need to take a leading role in educating children about the importance of food labels. Schools should provide practical education about how to put a meal together, which nutrients are important in the composition of a meal, and what a good meal consists of.

School programmes need to be supplemented by public health campaigns sponsored by the government aimed at adults. Governments should sponsor educational campaigns that remind consumers of what information is contained on labels and where consumers should focus. Governments should also focus on a “calories in, calories out” campaign to address obesity head-on.

Industry also has a role in educating consumers about food labels. In the United Kingdom, for example, Kraft along with four other companies (Danone, PepsiCo, Kellogg's and Nestlé) has declared its intention to launch GDA signpost labeling in the UK. The signpost is modeled on a system that Tesco, a retail chain, has introduced, and highlights five of the most important nutritional elements for consumers to emphasize their importance.

In addition to the front-of-pack voluntary signposting in the UK, Kraft uses its product labels to provide other messages to consumers. Kraft supplements the ingredient information contained on its labels with other healthy living messages where we can on packs. For example, in the UK simplified healthy living messages appear on products consumed primarily by children (e.g. on *Dairylea Lunchables*: “Munch 5 pieces of fruit or veg a day”, “get moovin’! -Do some exercise like football or cycling”). In Belgium, Kraft includes the food pyramid on *Miracoli* packaging. The food pyramid is the key reference tool in Belgium to help promote a balanced diet to consumers.

Kraft also uses websites and a number of printed publications to reach consumers. Kraft has already launched new dedicated Healthy Living websites in the UK (www.healthyliving.co.uk) and Germany (www.kraftaktivleben.de) to provide consumers with information about how to balance healthy diets and active lifestyles. The web address for these Healthy Living sites appears on 50% of Kraft UK food products and is a prominent feature in all German advertising. Kraft Healthy Living websites are planned for all Nordic countries.

Kraft also supports campaigns to educate consumers through its trade associations. Kraft has supported CIAA (Confederation of EU food and drink industries) work on the development of a common framework, suitable for further adaptation at national level, for an informative/educational brochure aimed at informing consumers on how to interpret and understand nutrition information and nutrient claims. Kraft also supports CIAA’s social marketing campaign on healthy lifestyles in Europe, which is a CIAA commitment in the framework of the EU Platform on Diet, Physical Activity and health. In addition, Kraft has supported research done by EUFIC (European Food Information Council) on nutrition labelling in order to contribute to raising consumers' awareness of the active role they play in safe food handling and choosing a well-balanced, healthy diet.

4.2 Support workplace actions to promote healthy lifestyle among employees

At Kraft, our long term goal is to help our employees *live better* and *live well* – physically, financially and personally. Our commitment to employee health and wellness is global and we recognise that there is no one programme or solution that meets the diverse needs and cultures of our workforce. Generally, actions will fall under three main headings:

- Information: giving employees the opportunity to learn more about health and wellbeing, through internet bulletins and other resources
- Ongoing activities: supporting activities that promote wellbeing such as the provision of salads, fruit and reduced-fat or calorie choices in canteens; organising sports clubs and exercise classes, and offering free health checks.
- Special events: supporting employees participating in local/national events (such as charity 'fun runs') and holding interdepartmental sports competitions

A number of actions have been, and are being, introduced across the Kraft European business. Here are some examples from Norway and Sweden covering activities on our sites:

- Well equipped gym / fitness rooms
- Subsidized gym membership (Friskis&Svettis)
- Subsidized gym and admission to swimming hall
- Local sport clubs sponsored by the company; football, indoor bandy, golf, bowling, fishing, culture etc. Priority for group activities
- Healthy meals in the canteens.
- Health weeks, focus on physical activity during the day and eating right
- "Indoors hill walking". Motivating employees to use the stairs instead of the elevator. Top of Aconcagua in one year.

It is important to see the employee's health as a whole. These examples, present at different sites, are equally important:

- Company doctor / nurse available at both sites plus special arrangement for sales representatives
- Medical check ups and health profile assessment. Special focus on shift workers and seniors. Strong focus on work related health problems, noise exposure etc.
- Risk areas mapped
- Stress Management Training
- Physiotherapist, massage
- "IA bedrift" - a national project to reduce long time sickness absence, secure employment for persons with impaired functional capacity and raise the average age of retirement.
- Grønn Jobb (Green job) project ongoing. Psychosocial work environment.

6. Laying the ground for the development of best practice

7. Reinforced cooperation on scientific research

Kraft has recently started to work with the market research company GfK NOP's Global Food, Diet & Wellbeing Monitor ("Monitor") to learn more about the issue. The Monitor is a population based study that is conducted every six months amongst a representative sample of 500 adults aged 18-71 in 18 countries around the world, including Sweden. Each country's sample is quota'd in terms of age/sex, work status, presence of children,

income, region and personal values in order to ensure that a representative picture of that individual country emerges. In addition, a boost sample of mothers with children aged 3-16 living at home is interviewed, to provide a robust base of approximately 150 mothers in each country. The Monitor is intended to spotlight the factors that contribute to health and wellbeing, and to identify consumer trends as they emerge.

The Monitor addresses more than 25 major topics, such as eating patterns, ease of eating healthily, foodstuffs being avoided/targeted, weight management, obesity, relaxation, exercise, disease concerns and individuals' confidence in their general health and that of their children. The Monitor provides opportunities to analyse and compare attitudes and actions amongst different demographic, regional, attitudinal and BMI groups.

Kraft and GfK NOP have recently published the EU data from The Monitor into a report entitled "Understanding the Health Gap." Please contact us to get the report.

Kraft supports the development of appropriate science-based dietary guidelines and participated at the EFSA Scientific Colloquium N°5: Development of Food-based Dietary Guidelines 21-22 March 2006 in Parma.

CONTACT INFORMATION

We hope that our responses at this stage have been useful and we look forward to further discussion of the "Nordic Action Plan on better health and quality of life through diet and physical activity" with the Nordic Council of Ministers and other stakeholders. For further information, please contact:

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