



foodwatch contribution to the European Commission's Cardiovascular Health Plan

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foodwatch promotes access to safe, healthy and affordable food. We are a consumer-based NGO with offices in the Netherlands, Germany, France, Austria and Brussels, with approximately 1 million supporters. Food matters to us all, therefore public interest must be given priority over interests of the food industry. foodwatch exposes the legislative shortcomings and food industry practices that are detrimental to the interests of consumers and mobilises people and puts policymakers and companies under pressure to take action. As a consumer rights organisation, foodwatch is financially and politically independent of governments, the EU and the food industry.

Cardiovascular disease (CVD) is the leading cause of sickness and premature death in Europe. The vast majority (80%) of premature CVD deaths are preventable. An EU Action Plan on Cardiovascular Health must therefore have a considerable **focus on prevention** and in doing so address one of the most pervasive but modifiable risk factors: **unhealthy diets**.

The current food environment in the EU is failing citizens. Too often the blame is put on consumers for bad eating choices, but people live in a food environment they cannot escape and that influences their behaviours more than they realise. The **Commercial Determinants of Health** are pervasive: unhealthy foods are the cheapest and most accessible option; it is unhealthy food which is constantly marketed everywhere we go and especially at young people; and lobbyists from the food industry have an easy access to decision makers and a disproportionate influence in the legislation that is needed to regulate them. A real prevention policy needs to turn this situation around immediately with legislative proposals which will have impact and make the healthiest choice, the cheapest and easiest one.

We must:

- 1) **Make healthy foods the easiest choice:** Promotion of fruits, vegetables, whole grains, legumes and nuts with fiscal measures, marketing restrictions and food system interventions, including public procurement policies.

Food companies spend billions every year marketing unhealthy products, often targeting vulnerable households and children via digital platforms. This entrenches inequalities, as healthier foods remain less affordable during a cost-of-living crisis.

foodwatch recommends:

- **Revise school food schemes** so all children have access to free or subsidised healthy, sustainable options. This means fruit and vegetables and water for all and healthy school meals.

- Regulation to **restrict marketing of unhealthy foods to under-18s** across all media, including digital platforms. This should also extend to off-line advertising in places where children and adolescents are present, including sport and music events.
 - Regulate the access of the food industry to decision makers. Unhealthy food is as harmful as tobacco and, considering that 19% of the population smoke and a 100% of the population eat, the impact of food is more widely spread – even to our children. Industrial access to decision makers must be regulated as in the WHO Framework Convention on Tobacco Control where Article 5.3 Protects public health policies from commercial and other vested interests of the tobacco industry.¹
- 2) **Give consumers easy to understand information:** Consumer surveys show that many people would like to make healthier choices, or avoid Ultra-Processed Foods, but they do not always know what they are. The correct on-label information must be present (not via QR-codes or apps).

foodwatch recommends:

- **Mandatory and harmonised Front of Pack nutritional label across the whole of the EU.** The promised measure in the Farm to Fork Strategy, which has since disappeared off the Commission agenda, must be brought back as a matter of urgency. We have no more time to lose and therefore it is **Nutri-Score** that meets all the criteria of scientific integrity and consumer accessibility that is ready to be rolled out.²
 - **Ingredients labels must clearly mark additives with BOTH the E number and the name/type of additives.** Currently legislation allows either the E number or the name and type of an additive on the label and this does not enable consumers to make an informed decision on the type of product they are buying.³
 - **Health and Nutrition claims must be regulated** to ensure that they are not misleading and should not be used on food which would not merit a high Nutri-Score value. Currently the use of health claims is not sufficiently regulated, and it leaves consumers in a confusing situation
- 3) **Assess risks from Farm to Fork:** Production methods are also important. Soil and water contamination from pesticides, dioxins and heavy metals are linked to higher CVD

¹ [https://www.who.int/europe/teams/tobacco/who-framework-convention-on-tobacco-control-\(who-fctc\)](https://www.who.int/europe/teams/tobacco/who-framework-convention-on-tobacco-control-(who-fctc))

² <https://www.foodwatch.org/en/campaigns/sugar-fat-and-salt/nutri-score-europes-best-chance-for-a-consumer-friendly-front-of-pack-nutritional-label>

³ <https://www.foodwatch.org/en/campaigns/additives>

risk. Reducing pesticide use is thus integral to cardiovascular prevention and food security.

foodwatch recommends:

- **Implement a crop by crop pesticide-reduction plan across the EU.** For each crop (from grain to apples) the plan foodwatch has developed describes the steps to freeing the EU from pesticides. All instruments are available, and a production decline is not to be feared⁴.
- EU-wide introduction of a **pesticide tax**. This would help to effectively reduce pesticides in taxing harmful substances more heavily than safe ones.

- 4) **Special attention to Ultra-processed foods (UPF), including energy drinks.** Energy drinks have grown in popularity. Due to their sweet taste and targeted marketing via social media influencers, energy drinks are particularly popular among children and young people. 68 per cent of young people in the EU regularly drink energy drinks.

Over the last decade, prospective studies have consistently found associations between consumption of UPFs and a wide range of chronic diseases as well as all-cause and cause-specific mortality.⁵ Higher consumption of UPFs is indeed associated with higher risks of cardiovascular⁶, coronary heart, and cerebrovascular disease⁷

foodwatch recommends:

- **Limit the sales of Energy drinks to young people.** Energy drinks pose serious health risks: consuming energy drinks can lead to sleep disorders, restlessness and gastrointestinal problems. When combined with exercise or alcohol, energy drinks can even cause cardiac arrhythmia, kidney failure and seizures. Energy drinks should be limited for sale to those who are over-18 and should carry a front of pack warning label.
- **Ultra-Processed Foods (UPF) need to be taken seriously and regulated.** The European Commission needs to take the necessary steps to clarify the UPF category and regulate it accordingly. This means looking into their ingredients (additive cocktails), the processes (including use of processing agents) and the food environment which is pushing their consumption.

⁴ <https://www.foodwatch.org/en/locked-in-pesticides-europes-dependency-on-harmful-pesticides-and-how-to-overcome-it>

⁵ [https://www.thelancet.com/journals/lanepi/article/PIIS2666-7762\(24\)00377-6/fulltext](https://www.thelancet.com/journals/lanepi/article/PIIS2666-7762(24)00377-6/fulltext)

⁶ <https://pmc.ncbi.nlm.nih.gov/articles/PMC6538975/>

⁷ <https://pubmed.ncbi.nlm.nih.gov/36432470/>

By embedding these measures, the EU can make the healthy choice the easy, affordable and accessible choice—helping to prevent millions of avoidable deaths.