

**EVALUATION OF THE EUROPEAN  
PLATFORM FOR ACTION ON DIET,  
PHYSICAL ACTIVITY AND HEALTH**

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Directorate General Health and Consumers

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## ABBREVIATIONS

<b>DG</b>	Directorate General
<b>CSR</b>	Corporate Social Responsibility
<b>EC</b>	European Commission
<b>EQ</b>	Evaluation Question
<b>EU</b>	European Union
<b>FSA</b>	Food Standards Agency (UK)
<b>HFSS products</b>	High fat, sugar and salt products
<b>HLG</b>	High Level Group on Nutrition and Physical Activity
<b>MS</b>	Member State(s)
<b>NGO</b>	Non-Governmental Organisation
<b>NPA policy</b>	Nutrition and Physical Activity policy
<b>SR</b>	Self-Regulation
<b>WHO</b>	World Health Organisation

# 1 EXECUTIVE SUMMARY

## 1.1 The objectives and approach

The European Platform for action on Diet, Physical Activity and Health is an innovative policy tool that was developed in response to the problem of the sustained, acute EU-wide increase in overweight and obesity. As outlined in the White Paper on a Strategy for Europe on Nutrition, Overweight and Obesity related health issues, the EU is using a range of instruments to address this problem, including legislation as well as other, “softer” approaches. The Platform is such a “soft” policy instrument; it relies on dialogue and voluntary commitments by stakeholders.

The evaluation was to assess the extent to which this process has been effective. More specifically, according to the Terms of Reference, the evaluation pursues the following objectives:

- Measure to what extent the *Platform collectively* met its goal of being a tool in the fight against obesity as stated in its founding statement, in particular regarding making and debating individual commitments and the monitoring of those commitments.
- Measure to what extent *Platform members’ commitments* are proportionate to the Platform’s initial goals, with particular attention given to self-regulation initiatives, and to analyse links between Platform commitments and regulatory approaches.
- Measure the *impact generated in policy* at national and European levels.
- Give an assessment of the role and function of the Platform as a *place for dialogue* between different stakeholders and the level of satisfaction of different stakeholders.

This marks the first time a Commission instrument of this type has been evaluated. The innovative and “soft” nature of the Platform as a policy instrument brings with it a number of implications and challenges for the evaluation. Most importantly, the “measurement” of the effectiveness and/or impact of the Platform in quantitative terms is inherently difficult, especially in the absence of clear, overarching SMART objectives against which to measure progress of the Platform. Even if and when a quantitative measurement is possible, the results only tell part of the story. After all, human elements such as enhanced awareness, mutual trust, understanding and dialogue are key determinants for the long-term success of the Platform, and these aspects can only be evaluated by taking into account the views and perceptions of those involved.

Thus, the approach that was chosen for the evaluation of the Platform places a special emphasis on the collection of feedback from the members of the Platform and other relevant stakeholders. While other data (including statistical data and indicators) plays a role in answering certain evaluation questions, the key to judging the success, effectiveness and impact of the Platform was to understand the needs and expectations of the actors involved, and the extent to which the Platform process has been able to fulfil these needs and expectations, and/or is likely to be able to fulfil them in the future.

Consequently, the evaluation approach can be summarised as follows:

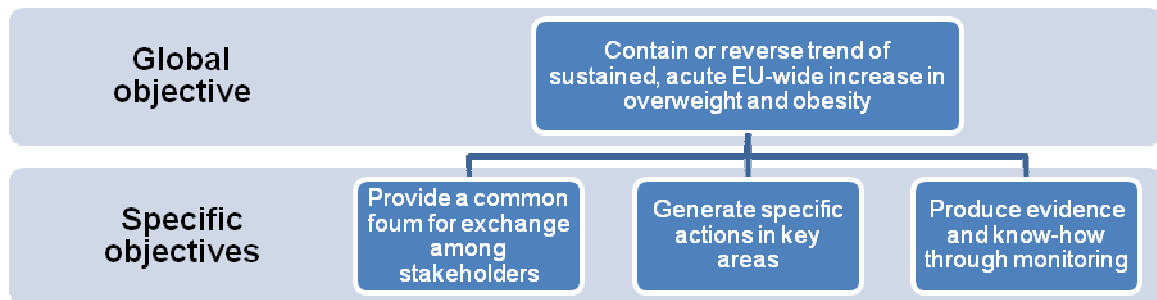
- Generation of primary data by engaging Platform members and other stakeholders, and using their feedback as a key indicator for judging the Platform’s effectiveness.
- Complementing the views, opinions and experiences of stakeholders with objectively verifiable data to the greatest extent possible by analysing aspects such as the spread and coverage of commitments made.
- Conducting an in-depth analysis of the effectiveness and impact of Platform actions in specific areas through case studies that combine participatory approaches with reference to relevant scientific research and other information.



## 1.2 Key conclusions

The triangulation of the findings gleaned from this approach allowed the evaluation team to draw conclusion on what the Platform has achieved over the past five years. To do so, it was important to first look at what it actually set out to achieve in the first place - the figure below provides an illustration of the Platform's objectives:

**Figure 1 - The Platform's objectives as specified in the founding statement**



As it was too early to judge whether the Platform has managed to 'contain or reverse the trend of sustained, acute EU-wide increase in overweight and obesity' (i.e. its global objective), and to do so did not fall within the scope of this evaluation, the evaluation sought to ascertain the extent to which the Platform has achieved its three specific objectives. In order to answer this, but also in an attempt to judge the wider impact of the Platform, the conclusions are structured around the following four key themes: Dialogue, Action, Impact and The future.

### 1.2.1 Dialogue

The Platform is a multi-stakeholder forum where members from the for-profit and not-for profit sectors come together to share knowledge and ideas, and discuss their concrete efforts towards healthy nutrition, physical activity and the fight against obesity.

Enhancing dialogue is one of the main achievements of the Platform. It is an innovative process that has brought together actors with very different interests who were previously often antagonistic towards each other. The evaluation results suggest that there is a good representation of a broad range of sectors on the Platform and that the distribution between not-for-profit and for-profit members is balanced, providing a good basis for facilitating a cross-sectoral approach to the issue of obesity. The Platform has also led to a better understanding among members from different sectors, notably through a dialogue that has become more constructive and less confrontational over the years.

However, there is still an element of confrontation between for-profit and not-for-profit members, and the enhanced understanding has not necessarily translated into greater trust. Joint actions are still very rare, and this evaluation has brought to light that industry and NGOs have very different perceptions on a number of issues.

## **1.2.2 Action**

One of the key characteristics that differentiates the Platform from other multi-stakeholder forums (and even national platforms) is the focus on action, rather than only dialogue. In order to become / remain a member, it is a requirement to make at least one active commitment which seeks to further the goals of the Platform.

Members have tabled a total of 292 commitments since the launch of the Platform in 2005. The majority of actions fall within the 'Lifestyles and education' area (56%), which reflects its relative importance in the fight against obesity and overweight. A considerable number of commitments have also been made in the other three areas for action defined in the Platform's founding statement, namely marketing and advertising, reformulation, and labelling. While it is clear that not all of these commitments are a direct result of the Platform (i.e. would not have happened without it), there are numerous examples of where the Platform process has added value and led to actions that would not have otherwise happened, at least not with the same level of ambition, coverage and timeliness.

### **The relevance and proportionality of the commitments**

This evaluation has found clear indications that commitments which are relevant and proportionate to the overall goals of the Platform (and therefore have the potential for significant impact) co-exist with commitments that are less so. Some organisations have commitments which are much wider in scope and potential impact, thereby reaching a larger target group (just under 40% of commitments reach more than 50% of the EU population), while other commitments are very inward-facing, focussing on a small target group such as company employees. Moreover, the level of action initiated by Platform members is not always proportionate to the objective set out in the founding charter, and both for-profit and not-for-profit members questioned the extent to which all the commitments are equally relevant to the objective of fighting obesity.

The mixed nature of the commitments suggests that more could be done to understand what type of action works best. The monitoring system's aim is to produce evidence and know-how (notably with a view to ensuring the relevance, proportionality and effective implementation of Platform commitments), but the system has not been exploited to its full potential with a view to doing this. In fact, while it has succeeded in placing the issue of monitoring high on the agenda of Platform members and has forced members to be accountable in some way, it could be argued that it has developed more into an end in itself, rather than a means of supporting the implementation of commitments.

### **The implementation of the commitments**

While it did not fall within the scope of this evaluation to assess the implementation of all of the Platform's commitments, making it difficult to draw general conclusions in this respect, the case studies suggest that selected commitments in the areas of marketing / advertising to children and food / drink reformulation are being implemented effectively.

Within the context of the commitments' implementation, the issue of the communication of the Platform's achievements should be raised. It was repeatedly mentioned by members that communication of the knowledge of the Platform externally was limited, and Platform members and external parties are of the opinion that more needs to be done in this respect. In fact, over a quarter of Platform members favoured the development of a better communication policy. Communication on the Platform's achievements is likely to sustain and / or increase the top level buy-in of Platform members and their sub-members going forward, but also encourage members to table more ambitious, relevant and proportionate commitments going forward. However, while many members saw potential for wider dissemination of information externally, the fact that members often disagree about the relevance and appropriateness of commitments means it could be difficult to achieve general agreement on what messages should be communicated externally.

### 1.2.3 Impact

#### The impact of the commitments

Based on the two case studies, it can be concluded that self-regulation commitments in the areas of advertising / marketing to children and food / drink reformulation are having an impact, but that the impact of self-regulation in these areas could be further strengthened, e.g. by a stricter definition of age and audience thresholds for advertising and marketing, or by governments providing further guidance on nutrient levels for reformulation. While these commitments may well be playing a part in efforts to combat obesity and overweight in Europe, it is too early to make a judgment on the health impact of Platform commitments..

That said, neither not-for-profit nor industry members are sure whether their actions are contributing to reducing obesity or not. This problem is likely to be partly due to the monitoring system, which is not succeeding in showing overall outcomes and impacts (e.g. setting clear targets, baseline data and comparable data across commitments on sales, market share etc), but it could also be a result of some of the commitments themselves which are either not measurable and / or are overly broad and intangible.

Finally, it is still too early to judge the actual health impact of commitments as partially relevant data was only available for the first couple of years following the set-up of the Platform.

#### The impact on policy

It is not possible to draw any definitive conclusions on the Platform's impact on policy at the European or national level, as a full profiling of the policies of all Member States (MS) and the EU exceeded the scope of this evaluation. Nonetheless, it appears that the policy impact of the Platform was very limited, as very few tangible examples of the Platform's impact on nutrition and physical activity (NPA) policy or other policy areas were found.

In fact, there is not enough evidence to determine whether the EU Platform activities (1) have made a difference or not to Member States' work on NPA and / or (2) have complemented or interfered with national NPA policies. However, the Platform has had an impact in terms of inspiring the development of national platforms in four MS. This, combined with the fact that national platforms have had some influence or indirect impact on NPA policy development in their countries, allows for the tentative establishment of indirect links between the EU Platform and national policy. That said, the overall indirect policy impact is likely to be minimal due mainly to a lack of cooperation between the EU Platform and national platforms once the latter have been created, but also the fact that the impact of national platforms on policy areas other than NPA appears to be limited.

Part of the reason for this limited impact on policy may be that little is known about the Platform outside the Platform itself and its members' inner circles. In fact, communication of the knowledge of the Platform externally has been limited, and communication about the Platform at MS and local level was considered to be particularly lacking.

### 1.2.4 The future

While the majority of industry members had a positive view of the solidity of Platform's founding statement and the clarity and operability of its objectives, and felt there was no need for a new mandate, the not-for-profit sector disagreed on all three counts. Given the high level of dissatisfaction among one of the two key groups, a new mandate / vision seems necessary in order to allow the Platform to maintain the buy-in of the not-for-profit sector and the Platform's momentum. However, when considering the nature of this renewed

mandate, care needs to be taken not to alienate / antagonise one group by ensuring that it is balanced and takes into account the needs of both sides.

### 1.3 Key recommendations

The following recommendations relate to the strategic direction of the Platform over the next three to five years; further operational recommendations are presented in the final chapter of this report. It is recommended that the European Commission look to defining a renewed mandate that recognises what has been achieved so far, sets priorities for future work, and establishes joint goals and operational objectives in order to ensure cross-sectoral buy-in to the process going forward and continued momentum. This renewed mandate could include:

- A summary of achievements for the first five years of the Platform.
- A list of priorities / operational objectives for the next three to five years focusing on the suggested level of ambition and scope of commitments, whether members should be focusing more on developing new commitments / implementation areas or building on existing ones, the extent to which commitments should be linked to a member's core business, the suggested target groups of commitments etc.

This mandate could set the following as priorities for the future:

- Focussing on the content and relevance of the commitments.
- Ensuring more cross-sectoral collaboration.
- Further considering under-represented sectors in the Platform such as education.
- Improving the monitoring system to ensure something is learnt from the process and the dissemination of best practice, but also by setting comparable outcome evaluation measures from the outset to help assess the impact of commitments.
- Undertaking a comprehensive assessment of the effectiveness and impact of the commitments – while this evaluation has gone some way to doing this through the case studies, the six commitments assessed in greater depth represent only the tip of the iceberg.
- Providing guidance on what type of commitments are the most relevant to the objectives of the Commission's 'Strategy for Europe on Nutrition, Overweight and Obesity related health issues'.
- Developing a balanced and transparent communication strategy.
- Strengthening ties with MS and national platforms to increase the Platform's impact on policy.

This renewed mandate could build on the results of this evaluation, and on the experience and evidence collected through the past five years of work. It could be debated by a working group involving a good cross-section of members.

Finally, as part of this new mandate, a clear reward (such as the communication of the Platform's achievements and key actions) needs to be provided to members in order to avoid Platform fatigue. It needs to be obvious to organisations that the Platform acknowledges their efforts and what is being achieved so that they internally can have a feedback loop where their member organisations or companies see that all that investment is worthwhile to them.

## 2 INTRODUCTION

This final report is the final deliverable to be submitted by The Evaluation Partnership (TEP) on behalf of the Public Health Evaluation and Impact Assessment Consortium (PHEIAC) in the context of the Evaluation of the European Platform for action on Diet, Physical Activity and Health.

The purpose of this final report is to present the findings of the two initial phases of the evaluation and the conclusions of the evaluation which have been drawn through a triangulation process by analysing the findings derived from each of the following tools: a questionnaire for and interviews with Platform members, interviews with Platform observers and former members, interviews with national authorities and national Platform representatives, and multiple desk research tasks. In turn, the recommendations have been derived from this process of triangulation. For ease of reading and identification, the findings and corresponding conclusions are presented by evaluation question.

The final report consists of the following main sections:

- Section 3 presents the approach to the evaluation and the analytical framework which served as a guide throughout the evaluation.
- Section 4 summarises the main activities that were undertaken by the evaluation team during the structuring phase and the data gathering phase.
- Section 5 presents the key limitations of and lessons learned from the evaluation.
- Section 6 includes the findings and conclusions for each evaluation question.
- Section 7 is an overarching chapter which brings together the conclusions of the 23 evaluation questions under thematic headings and presents both strategic and operational recommendations.

The Annexes are presented in a separate document and contain (1) a bibliography, (2) a description of the monitoring system, (3) the Platform member profiling table, (4) analysis of the founding statement and (5) the various tools that were used for the participatory data collection (i.e. questionnaires and interview guides).

Two independent case study reports on marketing/advertising to children and food/drink reformulation also form part of this evaluation. They have been put together as free standing reports, so do not form an integral part of this final report.

### 3 THE APPROACH AND ANALYTICAL FRAMEWORK

The European Platform for action on Diet, Physical Activity and Health is an innovative policy tool that was developed in response to a key problem facing the EU today. As outlined in the White Paper on a Strategy for Europe on Nutrition, Overweight and Obesity related health issues, the EU is using a range of instruments to address this problem, including legislation as well as other, “softer” approaches. The Platform is such a “soft” policy instrument; it relies on dialogue and voluntary commitments by stakeholders.

The evaluation was to assess the extent to which this process has been effective. More specifically, according to the Terms of Reference, the evaluation pursues the following objectives:

- Measure to what extent the *Platform collectively* met its goal of being a tool in the fight against obesity as stated in its founding statement, in particular regarding making and debating individual commitments and the monitoring of those commitments.
- Measure to what extent *Platform members’ commitments* are proportionate to the Platform’s initial goals, with particular attention given to self-regulation initiatives, and to analyse links between Platform commitments and regulatory approaches.
- Measure the *impact generated in policy* at national and European levels.
- Give an assessment of the role and function of the Platform as a *place for dialogue* between different stakeholders and the level of satisfaction of different stakeholders.

This marks the first time a Commission instrument of this type has been evaluated. The innovative and “soft” nature of the Platform as a policy instrument brings with it a number of implications and challenges for the evaluation. Most importantly, the “measurement” of the effectiveness and/or impact of **the Platform** in quantitative terms is inherently difficult, and is further complicated by the absence of clear, **overarching SMART objectives** against which to measure progress **of the Platform as a whole (as opposed to individual commitments by members)**.<sup>1</sup> Even if and when a quantitative measurement is possible, the results only tell part of the story. After all, human elements such as enhanced awareness, mutual trust, understanding and dialogue are key determinants for the long-term success of the Platform, and these aspects can only be evaluated by taking into account the views and perceptions of those involved.

Thus, TEP understood that the most appropriate approach for the evaluation of the Platform is one that places a special emphasis on the collection of feedback from the members of the Platform and other relevant stakeholders. While other data (including statistical data and indicators) plays a role in answering certain evaluation questions, the key to judging the success, effectiveness and impact of the Platform was to understand the needs and expectations of the actors involved, and the extent to which the Platform process has been able to fulfil these needs and expectations, and/or is likely to be able to fulfil them in the future.

Consequently, the evaluation approach can be summarised as follows:

- Generation of primary data by engaging Platform members and other stakeholders, and using their feedback as a key indicator for judging the Platform’s effectiveness.
- Complementing the views, opinions and experiences of stakeholders with objectively verifiable data to the greatest extent possible by analysing aspects such as the spread and coverage of commitments made.

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<sup>1</sup> SMART: Specific, Measurable, Attainable / achievable, Realistic / relevant, and Time-bound

- Conducting an in-depth analysis of the effectiveness and impact of Platform actions in specific areas through case studies that combine participatory approaches with reference to relevant scientific research and other information.

The way in which all three types of data and indicators were used to answer the 23 concrete evaluation questions is shown in the table below. This contains the overarching analytical framework for the evaluation, and makes the approach operational and transparent. It builds on the approach described in TEP's proposal, and links each individual evaluation question to the key indicators that have been used, and the tools through which the relevant data was collected. It should be noted that wherever data from interviews is cited, this refers to the interviewees' views and perceptions of the issues in question. Interviewees were also asked to provide evidence to substantiate their views and perceptions.

**Table 1 Evaluation Questions**

EVALUATION QUESTION	Interviews with...					CASE STUDIES	DESK RESEARCH
	PLATFORM MEMBERS	MEMBER STATES	NAT'L PLATFORMS	OBSERVERS	EC OFFICIALS		
<b><i>Evaluation Question 1: How relevant is the Platform in meeting its underlying goals, in particular as a forum for exchange on ongoing individual actions?</i></b>							
1.1 Is the Platform "founding statement" solid enough to guide effectively the Platform and does it propose appropriate steering mechanisms?	<ul style="list-style-type: none"> <li>Level of agreement / satisfaction with founding statement (problem / objectives / activities)</li> <li>Adequacy of the assistance and guidance provided (from statement, EC, members) for Platform work</li> </ul>	•	•	<ul style="list-style-type: none"> <li>Level of agreement / satisfaction with founding statement (problem / objectives / activities)</li> </ul>	<ul style="list-style-type: none"> <li>Level of agreement / satisfaction with founding statement (problem / objectives / activities)</li> </ul>	•	<ul style="list-style-type: none"> <li>Analysis of the founding statement's intervention logic and SWOT</li> </ul>
1.2 Is the current repartition per sector of the members of the Platform creating optimal conditions for the Platform to address its goals and engage in actions in all relevant sectors?	<ul style="list-style-type: none"> <li>Appropriateness of distribution of members and commitments</li> <li>Perceived gaps in the Platform membership (if any)</li> </ul>	•	•	<ul style="list-style-type: none"> <li>Appropriateness of distribution of members and commitments</li> <li>Perceived gaps in the Platform membership (if any)</li> </ul>	<ul style="list-style-type: none"> <li>Appropriateness of distribution of members and commitments</li> <li>Perceived gaps in the Platform membership (if any)</li> </ul>	•	<ul style="list-style-type: none"> <li>Classification of Platform members according to pre-defined criteria</li> <li>Number and types of commitments per member category</li> </ul>
1.3 How has membership in the Platform inspired its members to new and revised commitments?	<ul style="list-style-type: none"> <li>Extent to which own commitments are direct / indirect result of the Platform</li> <li>Concrete examples of how commitments were inspired by the Platform</li> </ul>						<ul style="list-style-type: none"> <li>Analysis of the link between the Platform and a sample of commitments cited by members as examples</li> </ul>
<b><i>Evaluation question 2: Are Platform members' commitments relevant and proportionate to the Platform initial goals and are they implemented effectively?</i></b>							
2.1 Are the Platform objectives	<ul style="list-style-type: none"> <li>Clarity and appropriateness of objectives stated in the</li> </ul>			<ul style="list-style-type: none"> <li>Clarity and appropriateness</li> </ul>	<ul style="list-style-type: none"> <li>Clarity and appropriateness of</li> </ul>		<ul style="list-style-type: none"> <li>Analysis of the founding statement's intervention</li> </ul>



EVALUATION QUESTION	Interviews with...					CASE STUDIES	DESK RESEARCH
	PLATFORM MEMBERS	MEMBER STATES	NAT'L PLATFORMS	OBSERVERS	EC OFFICIALS		
sufficiently clear and operational? Is the level of action(s) initiated by Platform members proportionate to the objective set out in the founding charter?	founding statement <ul style="list-style-type: none"> <li>Extent to which action(s) by members are perceived to be proportionate to the objectives</li> </ul>			of objectives stated in the founding statement <ul style="list-style-type: none"> <li>Extent to which action(s) by members are perceived to be proportionate to the objectives</li> </ul>	objectives stated in the founding statement <ul style="list-style-type: none"> <li>Extent to which action(s) by members are perceived to be proportionate to the objectives</li> </ul>		logic (including hierarchy of objectives)
2.2 Are the commitments spread adequately across the 4 implementation areas (reformulation, labelling, marketing / advertising and lifestyle / education)?	<ul style="list-style-type: none"> <li>Relative importance of the 4 implementation areas with a view to achieving the Platform's global objective</li> <li>Perceived appropriateness of the spread of commitments</li> </ul>			<ul style="list-style-type: none"> <li>Relative importance of the 4 implementation areas with a view to achieving the Platform's global objective</li> <li>Perceived appropriateness of the spread of commitments</li> </ul>	<ul style="list-style-type: none"> <li>Relative importance of the 4 implementation areas with a view to achieving the Platform's global objective</li> <li>Perceived appropriateness of the spread of commitments</li> </ul>		<ul style="list-style-type: none"> <li>Number of commitments per implementation area and segmentation by member category</li> </ul>
2.3 What is the proportion of commitments that reach more than 50% of the EU Member States populations?							<ul style="list-style-type: none"> <li>Number of commitments that cover MS that represent &gt;50% of the EU population</li> <li>Analysis of target groups of these commitments</li> </ul>
2.4 To what extent are commitments made by the industry members, linked to their core business?	<ul style="list-style-type: none"> <li>Industry members only: Validation of desk-based analysis; explanation of links of commitments to core business</li> </ul>						<ul style="list-style-type: none"> <li>Identification of industry members' core business (in case of doubt: examine turnover figures)</li> </ul>

Evaluation of the EU Platform for Action on Diet, Physical Activity and Health

EVALUATION QUESTION	Interviews with...					CASE STUDIES	DESK RESEARCH
	PLATFORM MEMBERS	MEMBER STATES	NAT'L PLATFORMS	OBSERVERS	EC OFFICIALS		
							<ul style="list-style-type: none"> <li>Analysis of all industry commitments and the extent to which they are linked to their core business</li> </ul>
2.5 To which extent has participation in the Platform affected the Corporate Social Responsibility (CSR) approach of industry members?	<ul style="list-style-type: none"> <li>Industry members only: Explanation of any Platform effects on CSR approaches</li> </ul>						<ul style="list-style-type: none"> <li>Analysis of available CSR documents provided by industry during interview and any explicit / implicit links with / mentions of the Platform and its main activity areas</li> </ul>
2.6 To what extent are actions initiated by Platform members addressing the needs of stakeholders and EU citizens, such as actions benefiting lower socio-economic groups?	<ul style="list-style-type: none"> <li>Extent to which Platform activities have addressed main needs of stakeholders and EU citizens</li> </ul>			<ul style="list-style-type: none"> <li>Extent to which Platform activities have addressed main needs of stakeholders and EU citizens</li> </ul>	<ul style="list-style-type: none"> <li>Extent to which Platform activities have addressed main needs of stakeholders and EU citizens</li> </ul>		<ul style="list-style-type: none"> <li>Identification of needs mentioned in founding statement</li> <li>Review commitments and monitoring progress reports to identify which audiences were targeted</li> </ul>
2.7 Has participation in the Platform changed its members' understanding and perception of the situation, and has it had any impact on their responses?	<ul style="list-style-type: none"> <li>Impact of Platform on members' understanding of the situation</li> <li>Extent to which specific responses (incl. commitments) were inspired by the Platform (cp. EQ 1.3)</li> </ul>			<ul style="list-style-type: none"> <li>Perception of Platform impact on members' understanding and responses</li> </ul>	<ul style="list-style-type: none"> <li>Perception of Platform impact on members' understanding and responses</li> </ul>		<ul style="list-style-type: none"> <li>Review Platform documentation with a view to identifying any changes in members' approach to obesity</li> </ul>
2.8 Should the Platform have a renewed	<ul style="list-style-type: none"> <li>Perceived need for a renewed mandate</li> </ul>			<ul style="list-style-type: none"> <li>Perceived need for a renewed</li> </ul>	<ul style="list-style-type: none"> <li>Perceived need for a renewed</li> </ul>		<ul style="list-style-type: none"> <li>Review evidence gathered for answering EQ 1 and 2</li> </ul>

EVALUATION QUESTION	Interviews with...					CASE STUDIES	DESK RESEARCH
	PLATFORM MEMBERS	MEMBER STATES	NAT'L PLATFORMS	OBSERVERS	EC OFFICIALS		
mandate including joint goals and operational objectives?				mandate	mandate		(including almost all specific questions)
2.9 Does the current monitoring system give sufficient focus to implementation to support a sound development of the Platform?	<ul style="list-style-type: none"> <li>• Appropriateness of monitoring system to achieve the objectives listed in the Monitoring Framework document</li> <li>• Problems and obstacles for monitoring and areas for improvement</li> </ul>			<ul style="list-style-type: none"> <li>• Appropriateness of monitoring system to achieve the objectives listed in the Monitoring Framework document</li> <li>• Problems and obstacles for monitoring and areas for improvement</li> </ul>	<ul style="list-style-type: none"> <li>• Appropriateness of monitoring system to achieve the objectives listed in the Monitoring Framework document</li> <li>• Problems and obstacles for monitoring and areas for improvement</li> </ul>		<ul style="list-style-type: none"> <li>• Review monitoring progress reports by the external contractor in light of the objectives listed in the Monitoring Framework document</li> </ul>
<b>Evaluation question 3: What is the Platform impact generated in policy at national and European level?</b>							
3.1 Has the European Platform made a difference, intended or unintended, positive or negative, on Member States work on Nutrition and Physical Activity (NPA)?		<ul style="list-style-type: none"> <li>• Level of awareness of the EU Platform and its work among relevant national stakeholders</li> <li>• Extent to which issues discussed in / addressed by the Platform have been taken up in the MS</li> <li>• Perceived impact on development of national NPA policies or</li> </ul>	<ul style="list-style-type: none"> <li>• Level of awareness of the EU Platform and its work among relevant national stakeholders</li> <li>• Extent to which issues discussed in / addressed by the Platform have been taken up in the MS</li> <li>• Perceived impact on development of national NPA policies or</li> </ul>				<ul style="list-style-type: none"> <li>• Review WHO Europe data on national NPA policies</li> </ul>

Evaluation of the EU Platform for Action on Diet, Physical Activity and Health

EVALUATION QUESTION	Interviews with...					CASE STUDIES	DESK RESEARCH
	PLATFORM MEMBERS	MEMBER STATES	NAT'L PLATFORMS	OBSERVERS	EC OFFICIALS		
		strategies	strategies				
3.2 To what extent have the Platform activities complemented or interfered with national NPA policies?		<ul style="list-style-type: none"> <li>Extent to which EU Platform fields of action are covered by national NPA policies</li> <li>Existence of overlaps, synergies or interferences in any particular area</li> </ul>	<ul style="list-style-type: none"> <li>Extent to which EU Platform fields of action are covered by national NPA policies</li> <li>Existence of overlaps, synergies or interferences in any particular area</li> </ul>				<ul style="list-style-type: none"> <li>Review WHO Europe data on national NPA policies</li> <li>Review NPA Network and HLG documents which provide updates of national policy/legislation actions in the area</li> </ul>
3.3 To what extent has the EU Platform inspired the development of national Platforms?		<ul style="list-style-type: none"> <li>Where relevant: Contribution / inspiration / cooperation of EU Platform with development of MS Platforms</li> </ul>	<ul style="list-style-type: none"> <li>Contribution / inspiration / cooperation of EU Platform with development of MS Platforms</li> <li>Relationship (if any) between members of MS and EU Platforms</li> </ul>				<ul style="list-style-type: none"> <li>Number and characteristics of existing national Platforms in EU MS</li> </ul>
3.4 Are there differences in policies/policy developments between Member States with national Platforms and Member States without national Platforms?		<ul style="list-style-type: none"> <li>Where relevant: Impact of national platform on recent policy developments in the MS (including concrete examples)</li> </ul>	<ul style="list-style-type: none"> <li>Impact of national platform on recent policy developments in the MS (including concrete examples)</li> </ul>				<ul style="list-style-type: none"> <li>Review WHO Europe data on national NPA policies</li> <li>Review NPA Network and HLG documents which provide updates of national policy/legislation actions in the area</li> <li>Compare MS with Platforms to MS without Platforms</li> </ul>
3.5 Is it possible to observe any impact		<ul style="list-style-type: none"> <li>Impact of EU or (where relevant)</li> </ul>	<ul style="list-style-type: none"> <li>Impact of national Platform activities</li> </ul>		<ul style="list-style-type: none"> <li>Impact of EU Platform activities</li> </ul>		<ul style="list-style-type: none"> <li>Follow-up / review of any examples cited by</li> </ul>

EVALUATION QUESTION	Interviews with...					CASE STUDIES	DESK RESEARCH
	PLATFORM MEMBERS	MEMBER STATES	NAT'L PLATFORMS	OBSERVERS	EC OFFICIALS		
on other policy areas of the EU or national Platform activities?		national Platform activities on other national policy areas (e.g. media, education)	on other national policy areas (e.g. media, education)		on other EU policy areas (e.g. media, education)		interviewees
3.6 To what extent has knowledge generated by the Platform been communicated to the right people, in the right way, at the right time?	<ul style="list-style-type: none"> <li>Extent to which members disseminate information generated / discussed in the Platform to their member organisations / companies and stakeholders</li> <li>Potential for enhancing internal / external communication</li> </ul>	<ul style="list-style-type: none"> <li>Extent to which national governments receive information generated / discussed in the Platform</li> </ul>	<ul style="list-style-type: none"> <li>Extent to which national platforms receive information generated / discussed in the Platform</li> </ul>	<ul style="list-style-type: none"> <li>Extent to which observers disseminate information generated / discussed in the Platform</li> <li>Potential for enhancing internal / external communication</li> </ul>	<ul style="list-style-type: none"> <li>Extent to which the EC disseminates information generated / discussed in the Platform</li> <li>Potential for enhancing internal / external communication</li> </ul>		
3.7 What was the impact of self-regulation commitments on EU or national regulatory initiatives?		<ul style="list-style-type: none"> <li>Impact of EU Platform self-regulation commitments on national regulatory initiatives (if any)</li> </ul>			<ul style="list-style-type: none"> <li>Impact of EU Platform self-regulation commitments on EU regulatory initiatives (if any)</li> </ul>	<ul style="list-style-type: none"> <li>Assessment of how well self-regulation commitments in 2 specific areas were implemented</li> <li>Effects of these self-regulation commitments</li> </ul>	<ul style="list-style-type: none"> <li>Number of self-regulation commitments (and trend)</li> <li>Segmentation by field of action and member category</li> </ul>
<b>Evaluation question 4: The role and function of the Platform as a place for dialogue</b>							
4.1 Has the Platform contributed to a changed / increased / improved dialogue between the	<ul style="list-style-type: none"> <li>Assessment of the quality and nature of the dialogue between sectors and its evolution</li> <li>Factors that affect the</li> </ul>			<ul style="list-style-type: none"> <li>Assessment of the quality and nature of the dialogue between sectors and its</li> </ul>	<ul style="list-style-type: none"> <li>Assessment of the quality and nature of the dialogue between sectors and its evolution</li> </ul>		<ul style="list-style-type: none"> <li>(Direct observation of Platform plenary meeting)</li> </ul>

EVALUATION QUESTION	Interviews with...					CASE STUDIES	DESK RESEARCH
	PLATFORM MEMBERS	MEMBER STATES	NAT'L PLATFORMS	OBSERVERS	EC OFFICIALS		
involved sectors and to a better understanding of each others' positions?	quality of the dialogue between sectors (e.g. size of forum, moderation, agenda...)			evolution <ul style="list-style-type: none"> <li>Factors that affect the quality of the dialogue between sectors (e.g. size of forum, moderation, agenda...)</li> </ul>	<ul style="list-style-type: none"> <li>Factors that affect the quality of the dialogue between sectors (e.g. size of forum, moderation, agenda...)</li> </ul>		
4.2 Has the Platform met the expectations of its members?	<ul style="list-style-type: none"> <li>Members' expectations when joining the Platform</li> <li>Extent to which expectations have been met</li> <li>Reasons why former or suspended members have ceased to be active</li> </ul>						
4.3 What can be considered as being the benefits in being a Platform member?	<ul style="list-style-type: none"> <li>Members' perception of main benefits for them</li> <li>Reasons why former or suspended members have ceased to be active</li> </ul>						
4.4 How have Platform members used the Platform in their communication activities?	<ul style="list-style-type: none"> <li>Extent to which the Platform is used in <b>internal and external</b> communication by members (and concrete examples)</li> </ul>						<ul style="list-style-type: none"> <li>Screen members' websites, CSR reports / other relevant documents for mentions of the Platform and/or its activities</li> </ul>

## **4 EVALUATION METHODOLOGY AND TOOLS**

### **4.1 Phase I: Structuring**

The structuring phase of the evaluation began with the signature of the contract on 26 October 2009, and ended with the submission of the inception note in December 2009. During the five weeks, the evaluation team carried out the following main activities:

#### **4.1.1 Kick-off meeting**

The evaluation kick-off meeting took place on 29 October 2009 in Brussels. It provided a first opportunity for the steering group and the evaluators to exchange views and to discuss relevant topics including the scope of the evaluation, the approach and timetable.

#### **4.1.2 Familiarisation interviews**

In order to further their understanding of the Platform, the evaluators conducted a first series of six interviews with representatives of DG SANCO (units C.4, E.4 and 02), DG INFSO (unit A.1), and Platform members (CIAA and CPME). These interviews gave the evaluators valuable initial insights into the functioning and background of the Platform, and the views of a sample of contributors, which was useful when refining the methodology and developing the data collection tools.

#### **4.1.3 Documents review**

The evaluation team conducted an initial documentation review (see Annex 1) in order to gain a more detailed understanding of the context in which the evaluation is taking place, the characteristics of the EU Platform's members and the organisations they represent, and the existence and status of Member States' NPA policies and national platforms. The review covered all of the immediately available data sources on DG SANCO's website and CIRCA, as well as information provided by WHO Europe.

#### **4.1.4 Analysis of the founding statement**

The evaluators carried out an analysis of the structure and inherent intervention logic of the Platform's founding statement (see Annex 4), including the needs, problems and objectives enshrined therein. This analysis constituted a preliminary step that will contribute to answering several evaluation questions. It has been/will be discussed with Platform members, observers and DG SANCO officials during interviews in Phase II.

#### **4.1.5 Profiling of Platform members**

By reviewing the members' list, progress reports, annual reports and plenary meeting minutes, together with members' websites, the evaluation team elaborated a profile for each Platform member and used this information to classify them according to a set of criteria. The complete list of EU Platform members was updated in Phase II based on the complete database provided by DG SANCO in January 2010 and on Platform members' own comments on the categorisation of their organisations/companies, when it was sent along with the pre-interview questionnaire in January 2010. The updated version of this profiling document can be found in Annex 3. Please note that the classification of members as not-for-profit or for-profit is based on the status of the members of Platform members.

#### **4.1.6 Profiling of EU Member States**

In order to determine the sample of national government representatives and national platform representatives to be interviewed, the evaluation team collected information on the existence of NPA policies and national Platforms in the 27 EU Member States and used this data to classify Members according to the level of development of their NPA policies and the existence of a national Platform or other coordination mechanisms.

#### **4.1.7 Refinement of the methodology**

The different tasks outlined above enabled the evaluators to validate the evaluation approach as originally described in the proposal, develop an analytical framework, refine the methodology for the interviews and case studies, and develop a draft version of the various data collection tools.

### **4.2 Phase II: Data gathering**

#### **4.2.1 Questionnaire and Interviews with Platform members**

Given the very broad range of topics on which input was to be sought from Platform members (reflecting the long list of evaluation questions), the evaluators undertook a two-step approach for this element of the data gathering exercise, consisting of:

1. An electronic questionnaire to be filled in by all members in writing (see Annex 5.1)
2. An interview to expand and follow up on the questionnaire responses (see Annex 5.2)

The responses to the questionnaire helped the evaluation team tailor the interview guides for Platform members, enabling them, during the interviews, to delve deeper into some of the issues and/or interesting points raised in the questionnaires.

The response rate to the questionnaire was high, with 32 out of the 33 Platform members filling it in. Of these, 18 were categorised as not-for-profit and 14 as industry members. Interviews were carried out, either face-to-face in a round-table format involving a maximum of three people or over the telephone, with 31 out of the 33 Platform members. Of these, 17 were categorised as not-for-profit and 14 as industry members. The evaluation team managed to gather feedback from all but one Platform member in one form or the other.

#### **4.2.2 Interviews with national authorities and national platforms**

Interviews were carried out with nine High Level Group (HLG) members from the following Member States during the first half of the data gathering phase (see Annex 5.5):



**Table 2 Sample of Member States for national authority interview programme**

Member States with long established NPA policies	Member States with relatively long established NPA policies	Member States with recently established NPA policies
Germany Slovakia Sweden	Austria Bulgaria Hungary Portugal	Poland <sup>2</sup> Spain

The selection of these Member States was undertaken in the first phase of the evaluation and is based on a segmentation of Member States into three groups, drawing on preliminary information provided by WHO Europe and the evaluation team's Member States' profiling exercise:

- Group 1 - Member States with long established NPA policies: There are 6 Member States with a long history of tackling the issue of nutrition, physical activity and obesity. They started working on these issues from the mid 90s and have worked on updating policies until recently. These are: Germany, Luxembourg, Malta, Netherlands, Slovakia and Sweden.
- Group 2 - Member States with relatively long established NPA policies: There are 17 Member States that started working on NPA policies and obesity a few years before the EU Platform was formed (2000-2004). These are: Austria, Belgium, Bulgaria, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Hungary, Ireland, Italy, Latvia, Lithuania, Portugal, Romania and the UK.
- Group 3 - Member States with recently established NPA policies: There are 4 Member States that started working on NPA policies at the same time as the EU Platform was created or just after it was created (2005-2006). These are: Greece, Poland, Slovenia, and Spain.

Interviews were also carried out with six national platform representatives with multi-stakeholder platforms similar to the EU Platform<sup>3</sup> during the first half of the data gathering phase (see Annex 5.6):

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<sup>2</sup> Unfortunately the Polish HLG member was not available for a telephone interview, but provided the evaluation team with typed responses to the interview guide.

<sup>3</sup> Other countries in the EU have coordination mechanisms/organs (e.g. the FSA in the UK) and/or strategies (e.g. the NAOS in Spain) that perform a similar function relating to NPA (see Group 3 for further examples), but are not set up as multi-stakeholder platforms as such so were not considered as part of this exercise.

**Table 3 National Platforms in EU Member States**

Member State	National Platform <sup>4</sup>
Germany	Plattform Ernährung und Bewegung
Hungary	Hungarian Diet, Physical Activity and Health Platform
Italy	Piattaforma nazionale su alimentazione, attività fisica e tabacismo
Netherlands	Rotterdam Covenant On Nutrition and Physical Activity
Poland	Polska Rada ds. Diety, Aktywności Fizycznej i Zdrowi
Portugal	Plataforma contra obesidade

This selection was established during the first phase of the evaluation based on the background documents review on the existence or not of national platforms across the EU (see Section 4), which allowed the team to identify which Member States have platforms that are similar to the EU Platform. In order to properly assess the extent to which the EU Platform has inspired/impacted on the development of national platforms (EQ 3.3), the evaluators judged it necessary to interview representatives (i.e. coordinators) of all national platforms that are comparable to the EU Platform.

#### 4.2.3 Interviews with other stakeholders

In addition to the EU Platform members, representatives of EU Member State national governments and national platforms, interviews were conducted with other relevant stakeholders over the course of the second phase of the evaluation (see Annexes 5.3 and 5.4). These were:

**Table 4 Interviews with other stakeholder**

	Number of interviews
Platform observers	2
Former Platform members	2
The external contractor responsible for monitoring	1
European Commission officials	2

It is worthy of note that one observer had had this role in the Platform since June 2008 and only attended the meetings where HLG members were present. Two representatives of the second observer organisation originally proposed were not available for interview. As a result, someone who had only

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<sup>4</sup> In the inception note, it was explained that the evaluation team would explore during the interview with the Spanish HLG member, whether or not Spain had a Platform that was similar to the EU Platform. The detailed interview with the HLG member led to the conclusion that Spain does not have a comparable multi-stakeholder platform, but a strategy (NAOS - Estrategia para la Nutrición, Actividad Física y Prevención de la Obesidad), so no Spanish representative was interviewed in this respect.

taken part in one Platform meeting, but had attended some face-to-face meetings to find out more about the Platform process was interviewed as an observer.

Moreover, for the interviews with former Platform members, in both cases staff members previously involved in the Platform had moved on and were not available for interview, so limited information on their views of the Platform process was gleaned.

#### 4.2.4 Case studies

Two independent case studies were developed on marketing/advertising to children and food/drink reformulation as part of this evaluation. The case study methodology was refined for both case studies independently during the first half of the data gathering phase and presented to DG SANCO for review and comment. The methodology and tasks carried out for each of these case studies is presented in the first annex of each of the independent reports.

#### 4.2.5 Desk-based research

The main elements of desk research carried out as part of the data gathering phase were:

1. **Analysis of Platform's monitoring practices (EQ 2.9):** Further to the interviews with Platform members, the evaluation team undertook a desk research exercise which included the review of the following documents:

- Monitoring Framework
- Second Monitoring Progress Report
- 2008 Annual Report
- 2009 Annual Report
- Monitoring Report 2009 (provided by DG SANCO)
- Background note on the monitoring of members commitments (provided by DG SANCO)
- Feedback from the monitoring coaching session held in October/November 2009 (provided by DG SANCO)
- Improving the Monitoring of Commitments: Guidance for Platform members (provided by DG SANCO)

After the documents review, the team elaborated a description of the monitoring system, including its history, objectives, minimum requirements, and the external contractor's method for assessing commitments. This is included in Annex 2.

Using the background information and triangulating it with the data collected through the questionnaire and interviews, the evaluators assessed the extent to which the objectives of the monitoring system have been achieved so far. In addition to this, they identified a set of strengths and weaknesses that served to answer EQ 2.9 and to elaborate recommendations on how to improve the current system.

2. **Analysis of the link between the EU Platform and a sample of commitments cited by Members as examples (EQ 1.3):** In the questionnaire and interviews with Platform members, the interviewees cited examples of commitments that had been a direct or indirect result of the Platform process. A sample of 11 of these cited commitments were further reviewed and analysed by the evaluation team through desk research in order to validate members' claims. The documents consulted were mainly the Monitoring Progress Reports, Annual Reports, Plenary Meeting Minutes and the commitments database. With this background information the team attempted to re-construct the causal chain that

linked them to the Platform and establish the extent to which the Platform had inspired members to new or reviewed commitments.

3. **Analysis of available CSR documents and any explicit / implicit links with / mentions of the Platform and its main activity areas (EQ 2.5):** Information on industry Members' CSR activities was collected through the questionnaire and interviews. In the questionnaire, industry members were asked to provide concrete examples of the effects of the Platform on companies' CSR approaches. The examples cited were examined through desk research, reviewing the CSR documents provided by some members, members' websites, and the commitments database.
4. **Analysis of the link between EU Platform's commitments and industry members' core business (EQ 2.4):** Information on the links between the EU Platform's commitments and industry members' core businesses was first gathered through the questionnaires and interviews with Platform members. In order to test some of these statements and provide a more objective assessment, all of industry's active commitments were individually examined and a judgment made on whether or not they were linked to their core business. This enabled the evaluation team to show the proportion of active industry commitments, overall and per member, that are linked to their core business.
5. **Screen of Members' websites for mention of the Platform and/or its activities (EQ 4.4):** A screen of members' websites to identify any mention of the Platform was carried out in the inception phase.

#### 4.2.6 Interim report

An interim report was presented to DG SANCO and the steering group on the 5<sup>th</sup> of March 2010. The objective of this report was to provide an update on the status of the project, highlight any problems, challenges or obstacles encountered, and propose appropriate solutions. The intermediate report also presented first tentative results, based on the data gathering work carried out during the first half of the data gathering phase.

### 4.3 Phase III: Judgment and reporting

The analysis of all the findings gathered in the second phase of the evaluation was carried out as part of the third and final phase of the evaluation. Through a process of triangulation, the conclusions of the evaluation were derived from the analysis of the findings, enabling related recommendations to be made.

As part of this phase, a draft final report was presented to the steering group for comment prior to the meeting held on the 28<sup>th</sup> of May 2010. The draft final report was then revised, taking into account the comments received from the steering group, and this final report presented to DG SANCO on the 23<sup>rd</sup> of June 2010. The key conclusions and recommendations of the evaluation will be presented to members at the Platform plenary on the 1<sup>st</sup> of July 2010.

## 5 LIMITATIONS AND LESSONS LEARNED

The EU Platform for Action on Diet, Physical Activity and Health is an innovative process, and its evaluation brought with it a number of specific challenges and resulting limitations. The key challenges can be summarised as follows:

- **“Soft” nature of the Platform process:** The fact that the Platform is a dynamic process that relies primarily on dialogue and exchange of views and experiences make it difficult to measure its effectiveness or impact in quantitative terms. Instead, the evaluation relied heavily on collecting qualitative feedback from Platform members and other stakeholders.
- **Different views of different actors:** Different Platform members often had radically different opinions as to the effectiveness (or lack thereof) of the Platform itself and the commitments made by its members. In the absence of objectively verifiable indicators to ascertain the views of one or the other side, the evaluation focused on providing a balanced picture of the views that were expressed, and highlighting both areas where significant progress has been made, and aspects that could still be improved.
- **Resource constraints:** In view of the many issues and questions the evaluation had to cover, the available resources were quite tight. This was further exacerbated by the fact that several of the tools and techniques that were employed proved to be more resource-intensive than originally foreseen. Most importantly, it was decided during the inception phase to introduce an additional tool (the questionnaire for Platform members), and to tailor the follow-up interviews to each individual Platform member. This meant that significantly more resources were invested to elicit feedback from Platform members than foreseen in the contractors’ proposal. However, these additional resources were put to good use, as the changes to the approach significantly enhanced the quantity and quality of the data that was collected.
- **Limited evidence for EQs 2.6 and 3.7:** In relation to EQ 2.6 on whether the actions initiated by Platform members were addressing the needs of stakeholders and EU citizens, such as actions benefiting lower socio-economic groups, it proved difficult to establish the impact of the Platform in this respect due to difficulties in finding appropriate indicators to assess impact. As for EQ 3.7 on the impact of self-regulation commitments on EU or national regulatory initiatives, limited information was provided by interviewees making it difficult to answer this question.
- **Case studies:** The area where resource constraints were most significant, in terms of limiting the scope of the analysis possible, was the case studies on self-regulation in two specific areas. The many issues and questions to be covered by the main evaluation of the Platform process meant that only a relatively limited amount of time could be allocated to the case studies (the contractors’ original proposal envisaged spending less than 15% of the total number of days on the case studies). While the actual resources spent on the case studies were significantly higher, this still led to limitations in the scope and depth of the case studies. As the resources were too limited to look at all Platform commitments in the areas in more depth, undertake any significant fieldwork or attempt to generate original data as to the impact of the commitments being examined, the case studies had to rely primarily on input from Platform members and experts, as well as the review of existing literature and documentation. Moreover, the data provided in relation to some of the commitments assessed in more depth was incomplete (e.g. no baseline data or market share data was provided, the data did not concern the whole product portfolio and/or was not comparable across commitments) and it is not possible to draw any conclusions

on the impact on health of these commitments as partially relevant data was only available for the first couple of years following the set-up of the Platform. Given the complexity of the issues being analysed, the resource constraints and lack of data meant that the case studies were able to identify strengths and weaknesses of the self-regulation commitments, but could not fully measure their actual impacts.

Keeping in mind the challenges and limitations outlined above, the evaluation team feels that the following **key lessons** have been learned which could be applied to similar evaluation projects in the future:

- The mainly qualitative approach has shown to be entirely appropriate for an evaluand such as the Platform.
- The collection of feedback from Platform members through a combination of a (1) written questionnaire containing both open and closed questions and (2) a series of follow-up interviews has enabled the evaluation team to collect a very substantial set of data on the large number of aspects that had to be covered, while ensuring that Platform members were able to consult their members and provide comprehensive responses.
- Given the mainly qualitative nature of the overall evaluation, the case studies represented an important opportunity to explore key issues in a more detailed, at least partly quantitative way, and to further explore the effectiveness of a sample of key commitments. However, given the very limited resources that were available for this element of the evaluation (partly as a result of the overall resource constraints, but also the very low profile of the case study element in the terms of reference), this opportunity could not be taken advantage of to the extent that would have been desirable. For future exercises, it is recommended that much more significant resources are set aside to allow for the generation of more primary data, and a more in-depth analysis of the issues at stake. Given the complex and specialised nature of the subject areas (reformulation and marketing / advertising), it could even be useful to commission separate studies on these areas, instead of including them as part of a general evaluation study that has to use different tools and approaches.

## 6 FINDINGS AND CONCLUSIONS BY EVALUATION QUESTION

The following chapter presents the findings and conclusions by evaluation question. For each question, information was drawn from the tools indicated in Table 1, namely:

- The questionnaire for Platform members and follow-up interviews - it is important to note for the questionnaire analysis that the total number of respondents was 32 out of a total of 33 Platform members. Of these, 18 were categorised as not-for-profit and 14 as industry members. For the interviews with Platform members, 31 of the 33 Platform members agreed to be interviewed. Of these, 17 were categorised as not-for-profit and 14 as industry members.
- The interviews with former Platform members and Platform observers - it is important to note that for the interviews with former Platform members, in both cases staff members previously involved in the Platform had moved on, so limited information on their views of the Platform process was gleaned. Moreover, the involvement of the two observer interviewees with the Platform had been relatively limited, and so their level of understanding and awareness of its work, processes and steering mechanisms was also limited.
- The interviews with national authorities and national platforms;
- The interviews with Commission officials and the external contractor responsible for reviewing Platform members' monitoring reports;
- The analysis of the commitments' database – all the 292 commitments undertaken since 2005 have been included in the statistics.<sup>5</sup> When looking at the number of commitments in a given area, it is worth keeping in mind that one commitment may or may not involve multiple actors depending on whether it is a commitment implemented by a single company or not-for-profit organisation, or a trade association with multiple members;
- The desk research which covers a number of different aspects (see Section 4.2.5).

**Please note that an overarching chapter drawing the key conclusions from these 23 evaluation questions together under thematic headings is included in the following section of this report. It also presents the evaluation team's recommendations.**

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<sup>5</sup> This includes the 83 commitments not included in the statistics included in the draft final report for reasons beyond the evaluation team's control.

## 6.1 EQ 1.1: Is the Platform “founding statement” solid enough to guide effectively the Platform and does it propose appropriate steering mechanisms?

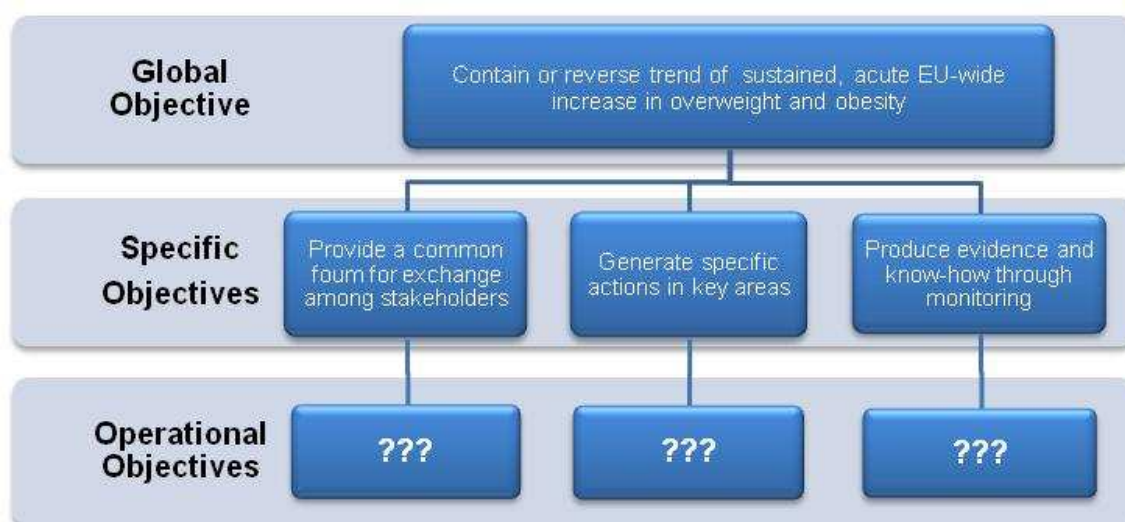
### 6.1.1 Analysis of the founding statement

At the outset of the evaluation project, an analysis of the underlying logic of the Platform’s founding statement was undertaken to draw out its strengths and weaknesses. The full analysis is presented in Annex 4. The key results of this exercise can be summarised as follows:

The founding statement clearly identifies the problem to be addressed by the Platform, and consequently its global objective. It provides an indication of why a Platform is a necessary and appropriate way of addressing these problems, and lists appropriate fields of action.

However, the founding statement appears particularly weak as concerns the type of concrete action that members are expected to engage in, and corresponding operational and (to a somewhat lesser extent) specific objectives. It provides very little guidance as to how different members should contribute to reversing the obesity trend, and does not set out anything that might be regarded as a concrete action plan, or any milestones or interim goals to be pursued. Thus, as the diagram below shows, the statement does little to operationalise its overall objectives and turn it into concrete action.

**Figure 2 - The Platform's objectives as specified in the founding statement**



At the same time, it must be noted that this relatively vague nature of the founding statement is not necessarily a flaw in its design, but more likely a reflection of a relatively low common denominator among the Platform’s founding members. It appears likely that the ability of each member to define its own actions and commitments was key to securing support for the Platform, and that, given the innovative nature of the Platform instrument, it would have been difficult to define more concrete activities and related operational objectives a priori. Nonetheless, this might represent a problem for the Platform insofar as there is little common understanding of the concrete vision, goals and priorities of the Platform, or a concrete timeframe for their (partial) achievement.



Thus, it is difficult to determine the founding statement's strengths and weaknesses. What might have been considered a strength at the time of the Platform's creation could be seen as a weakness today. It therefore seems inappropriate to try to depict the different elements in a diagram, as their classification as strengths or weaknesses would depend on the point of view. Nonetheless, it is important to reiterate where the founding statement provides a relatively high level of direction and guidance, and where it provides comparatively little:

- The Platform's founding statement clearly identifies the rationale for and the global objectives of the Platform process. It explains broadly how the Platform is to operate, and defines a limited number of areas for action.
- The Platform's founding statement leaves it to individual members to decide how they want to become active. It does not define desired outputs or set operational objectives, nor does it provide a timeframe for when progress towards the global objective is to be achieved.

The sections below present feedback from Platform members and other stakeholders, which shows to what extent the above elements are considered to be a strength or a weakness by those directly affected.

### 6.1.2 Results from the Platform member questionnaire analysis and follow-up interviews

When asked whether the Platform's founding statement was sufficient to effectively guide the Platform's work going forward, close to 60% of Platform members (58.1%) either 'strongly agreed' or 'agreed', while 29% either 'disagreed' or 'strongly disagreed' with the statement. However, there exists a clear split in opinion in this respect between profit and not-for-profit members, with 100% of industry respondents either 'strongly agreeing' or 'agreeing' with the statement and no not-for-profit members 'strongly agreeing', only 27.5% 'agreeing' and 50.0% either 'disagreeing' or 'strongly disagreeing' with the statement.

As illustrated by the comments provided, not-for-profit members tended to agree that the founding statement "*correctly identifies the problem that needs to be tackled, namely an EU-wide increase in overweight and obesity*". They also agreed that, in the outset, it was a "*good approach*" to elaborate a broad and general statement in order to find a common point of departure for actions. However, for them, the founding statement does not include information on "*how little or how much it wants to achieve*", and has a "*lack of specificity*" regarding which type of commitments should be implemented and thus has not guided members towards actions that "*address the root causes of the health related risks*". Members mentioned that they are "*frustrated with the fact that there has been no guidance on the type of commitments they should produce*". Now that the Platform has evolved, they see there is a need to further define operational and specific objectives together with the mechanisms that will help to tackle the problem. Some have claimed it would also be necessary to consider the use of other means such as legislative actions. It was also mentioned that the founding statement focuses too much on diet and nutrition rather than on physical activity, resulting in the physical activity area being less represented and considered in the Platform. According to some not-for-profit members, more information on the organisation of the Platform and its procedures should also be included in the founding statement.

As stated before, for-profit members were more positive in their opinion of the founding statement. They tended to agree and be satisfied with it being a "*broad terms of reference*" that sets out what is expected from participants. However, some have also claimed that industry efforts "*in doing what it can in those areas where it can legitimately do something to help tackle this problem*" are not being well recognised. In effect, some claimed that the monitoring system (as one of the specific objectives included in the statement) is not providing a "*realistic hint*" of members' initiatives.

The follow-up interviews provided further information: Some members stated that there is a need to define “*priorities and guidelines*” and a “*clearer goal in terms of what constitutes success*”. It was also said that a revised founding statement should ensure that future commitments are more relevant with regard to the Platform’s objectives, instead of leaving room for any type of commitment regardless of its relevance. The need for a professional evaluation of the level of impact of commitments with regard to the Platform’s objectives was also mentioned.

Moreover, in terms of the role performed by the Commission as per the founding statement, the results overall show that members are satisfied with this role and how the Commission fulfilled it, with the profit sector being slightly more positive in its response to the two related questions:

- Close to 86% of industry respondents, and 60% of not-for-profit members, either ‘strongly agreed’ or ‘agreed’ that the role of the Commission, as stipulated in the founding statement<sup>6</sup>, is appropriate and sufficient to steer the Platform.
- While 92.9% of industry respondents stated that they felt the Commission fulfilled this role either ‘very well’ or ‘well’, just over 81% of not-for-profit members did so as well. Only one for-profit and two not-for-profit members stated that it did so ‘not very well’.

In their comments, both for-profit and not-for-profit members recognise the active involvement of DG SANCO and its commitment to steer the Platform’s activities. The not-for-profit sector highlighted the leading role of the Platform chairman in particular and his ability to “*bring disparate stakeholders closer*” in the fight against obesity. The comments below illustrate these opinions:

“(…) The presence of the Director General in the meeting has brought more credibility to the process and the meetings are managed very well” (Not-for-profit sector)

“The Commission has chaired the platform in such a way that collaboration and synergies amongst platform members have largely been fostered. Familiarity and lively, open discussions have broken down some of the initial scepticism and mistrust that de facto exist between industry and some civil society stakeholders” (For-profit sector)

Source: Member questionnaire

“It was a very positive thing that the Director General of DG SANCO chaired the Platform throughout all of its existence. There is a strong personal commitment from his side.”

“Madelin is a very good chair; it is good that the Director General shows such a strong interest. The fact that he expresses his views at the Platform adds value.”

Source: Member interviews

However, the follow-up interviews showed that the Director General’s important role was also seen as a cause for concern, as members seemed to be unsure of how well the Platform would progress if/when the current chairman gave up his role in the DG and on the Platform. Members stated that for this reason it is

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<sup>6</sup> According to the founding statement, the Platform operates “under the leadership of the European Commission”, whose role is to make sure that a cooperative and action-oriented approach is respected, and that activities are in harmony with those of other relevant bodies and fora.

important to have someone in place who could effectively replace him. It should also be noted that both not-for-profit and for-profit members mentioned that the Platform might be too dependent on the commitment and active involvement of DG SANCO. Not-for profit members also mentioned that the European Commission “*spends too much time keeping the peace*” between them and the industry. They see there is “*less willingness to intervene on some of the key areas that the platform has discussed, such as food marketing to children*”. In this respect, not-for-profit members said the Commission might need to push legislative action and regulation to help tackle the problem and also ensure that the commitments made by the industry are more related to their core business. In the interviews with Platform members, not-for-profit members stated in addition that the European Commission needs to “*enforce their role*” more to direct the Platform and make sure that the discussions on the Platform are followed up with more actions and are not “*left up in the air*” and “*go round in circles*”. The European Commission should influence the Platform more, rather than just “*hosting*” it. In one case it was also stated that the European Commission tries to avoid and gloss over via diplomacy, where possible, any discussions which concern industry’s behaviour and scandals etc.

Some of the for-profit and not-for-profit members claimed the European Commission should also work to further increase cross-sectoral cooperation and collaborative efforts amongst members in general. According to them, there are so many different approaches on the Platform, that it would be necessary for the European Commission to manage a joint approach effectively.

In the interviews, members also mentioned that the European Commission should take more control to ensure the relevance of the commitments and “*create a committee able to rank the relevance and effectiveness of commitments on the basis of scientific criteria.*”

### 6.1.3 Results from the interviews with observers

Both observers mentioned that they were not very familiar with the mechanisms steering the Platform. Having said this, the two observers did not find any particular problems in the founding statement. One pointed out as positive the fact that members have to commit to something in order to be considered active members. In addition to this, the interviewee said: “*It’s so often the case in other Platforms that they only go to attend and nothing else happens*”. The second observer agreed with the “*principles*” expressed in the founding statement and highlighted the idea of a partnership approach between different sectors was quite a “*novel way*” of fighting against obesity. To this she added: “*As it’s a multi-factorial problem, they need to have a multi-factorial solution to it as well*”. When asked about the appropriateness of the Platform’s steering mechanisms, one interviewee indicated that the monitoring system was more focused on how monitoring was doing than on the outcomes of the Platform’s work. She also noted that this might be due to the difficulty of measuring outcomes.

In terms of the role performed by the Commission, one of the observers highlighted it had a “*clear role to play in putting together the agenda and trying to link the activities done in the Platform with HLG meetings*”. This means the Commission is working as a “*communication channel*” between the Platform and Member States which was seen as very important given that “*only few Member States are observers in the Platform*”. Also in relation to the Commission’s role, this interviewee mentioned that the Commission “*could do more*” in ensuring that commitments are more linked to Members’ core businesses. To this she added that commitments should be linked to “*the action areas of the White Paper (...), the WHO food action plan and the European Charter*”. In her view, linking commitments to these documents would increase commitments’ effectiveness and would help to “*make a difference*”.

The second interviewee mainly highlighted the “*neutrality*” of the Commission’s position in leading the Platform. From her perspective, abandoning this neutrality and becoming “*biased*” would mean the Platform would not work.

#### 6.1.4 Conclusions

Given that in the questionnaire, all *industry* members either ‘strongly agreed’ or ‘agreed’ that the founding statement was solid enough to effectively guide the Platform’s work going forward, but less than a third of *not-for-profit* members held the same view, it can be concluded that the Platform’s founding statement is not solid enough to effectively guide the Platform going forward. While the Platform’s founding statement clearly identifies the rationale for and the global objectives of the Platform process, explains broadly how the Platform is to operate, defines a limited number of areas for action, and ensures that members have to commit to something, it leaves it to individual members to decide how they want to become active, does not define desired outputs or set operational objectives, and does not provide a timeframe for when progress towards the global objective is to be achieved. It is in part for these reasons that Platform members have mixed opinions as to the usefulness of the founding statement in guiding the Platform’s work effectively. While the broad objectives of the founding statement were useful for the starting-phase of the Platform, more specific objectives are now required in order to maintain not-for-profit members’ buy-in, in particular, and the Platform’s momentum, in more general terms.

The Platform’s steering mechanisms are appropriate, but many members feel that the Commission could take a more directive approach going forward. The Commission has done well at fulfilling its role of steering the Platform, as has the chairman. That said, the Commission could place greater emphasis on:

- Ensuring that commitments are relevant, effective and linked to the core business of members, and that discussions are followed up with actions;
- Fostering cross-sectoral collaboration between members;
- Further promoting communication between the Platform and MS.

## 6.2 EQ 1.2: Is the current repartition per sector of the members of the Platform creating optimal conditions for the Platform to address its goals and engage in actions in all relevant sectors?

### 6.2.1 Results from the database analysis

The profiling exercise carried out in the first phase of the evaluation and revised by Platform members (see Annex 3) revealed the following about the sectors in which current Platform members work.<sup>7</sup> The majority of for-profit members are from the Retail & Catering sector, followed by the Advertising sector. In

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<sup>7</sup> It is important to note that members’ classification as not-for-profit or for-profit here and in the members profiling exercise is based on the status of Platform members’ member organisations. Moreover, this classification does not include former Platform members, but reflects Platform membership as at early 2010.

the case of not-for-profit members, most are from the Health sector, followed by the Sports & Fitness sector. Overall, all sectors are covered by at least one member, and most members are from the health sector. It is important to note here that some Platform members are umbrella organisations with a lot of members (as Figure 2 below suggests with, for example, 73 member organisations falling under one umbrella group for the food and drink sector).

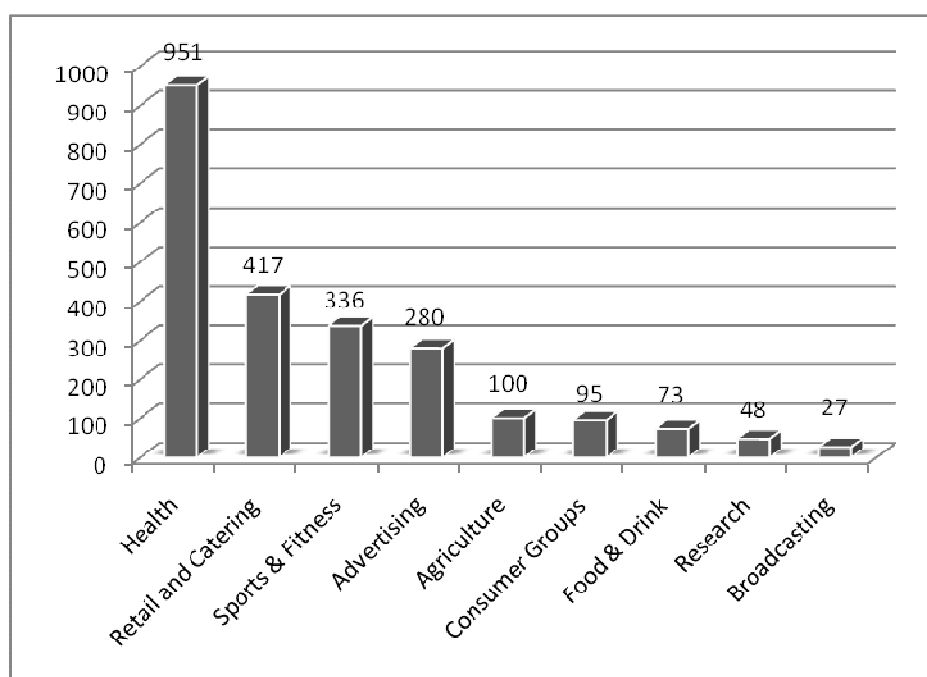
The table below shows the breakdown of Platform members by sector:

**Table 5 Platform members by sector**

Sector	'For profit' members	'Not for profit' members	Total
Advertising	3	0	3
Agriculture	2	0	2
Broadcasting	1	0	1
Consumer groups	0	2	2
Food & Drink	1	0	1
Health	0	9	9
Research	0	3	3
Retail & catering	6	0	6
Sports & Fitness	2	4	6
<b>Total</b>	<b>15</b>	<b>18</b>	<b>33</b>

The graph below shows the number of individual organisations (linked to one of the 33 Platform members) by sector; in total there are 2,327 individual organisations. Most organisations are from the Health sector, followed by the Retail & Catering, Sports & Fitness and Advertising sectors with a similar amount of organisations. The smallest number of organisations is from the Research and Broadcasting sectors.

**Figure 3 – Individual member organisations by sector<sup>8</sup>**

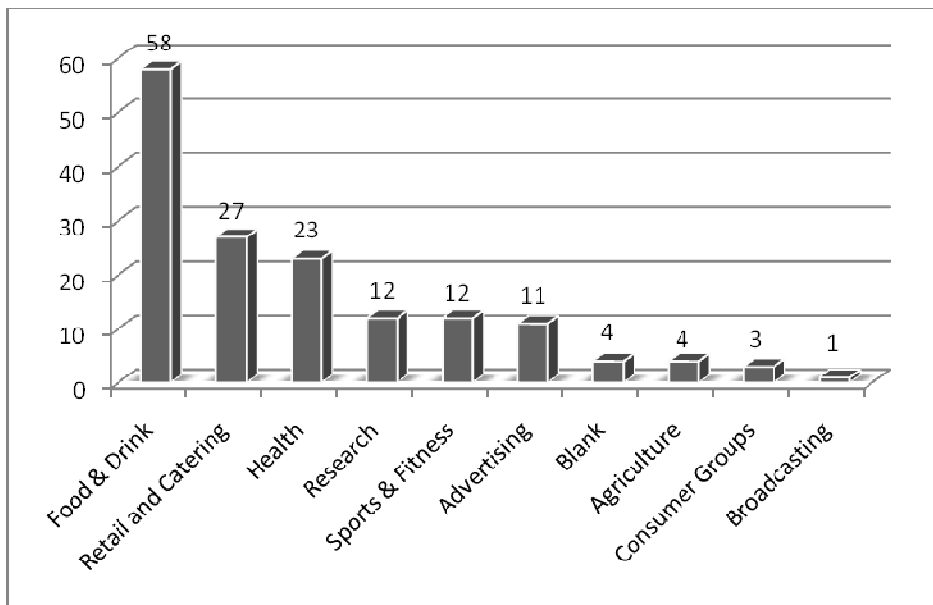


<sup>8</sup> The sector for the 9 commitments (active & inactive) from organisations in the Member States category was not provided and is therefore not reflected in this graph.

Moreover, according to the evaluation team’s assessment of both the active commitments as at January 2010 and the active and inactive<sup>9</sup> commitments combined, **certain sectors are more represented than others within the commitments themselves:**

Out of a total of 155 active commitments as at January 2010, most are in the Food & Drink sector, followed by the Retail & Catering and Health sectors. There are an almost equal number of commitments in the Research, Sports & Fitness, and Advertising sectors, while the number of commitments in the remaining sectors Agriculture, Consumer Groups and Broadcasting is very low.<sup>10</sup>

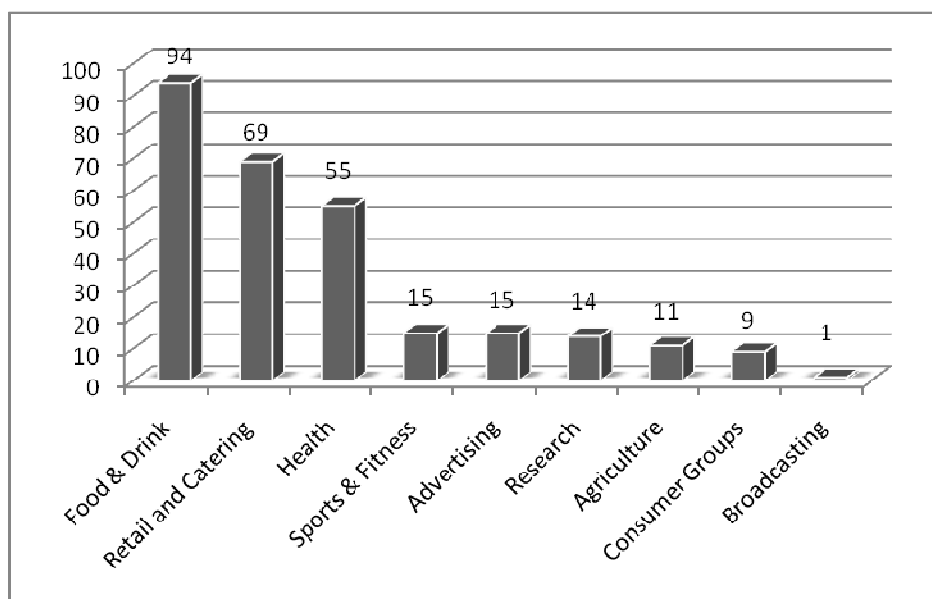
**Figure 4 – Active commitments by sector**



<sup>10</sup> A number of commitments (4) are made by Member States (UK Food Standards Agency) and not allocated to a particular sector (blank).

The analysis of commitments by sector in terms of all active and inactive Platform commitments since 2005 (amounting to a total of 283 commitments<sup>11</sup>), also shows that the majority of commitments are in the Food & Drinks sector, followed by commitments in the Retail & Catering and Health sectors. The graph below shows a similar distribution of commitments across sectors, suggesting that a similar mix of commitments has existed since the initial stages of the Platform.

**Figure 5 – Active and inactive commitments by sector**



## 6.2.2 Results from the Platform member questionnaire analysis and follow-up interviews

When asked whether current membership<sup>12</sup> was conducive to achieving the Platform's objectives, 10% of members responded 'completely', 50% 'mostly', close to 27% 'partly' and nearly 7% 'hardly', while no members responded 'not at all', reflecting an overall level of satisfaction with current membership. However, the not-for-profit sector was more critical than industry of current membership:

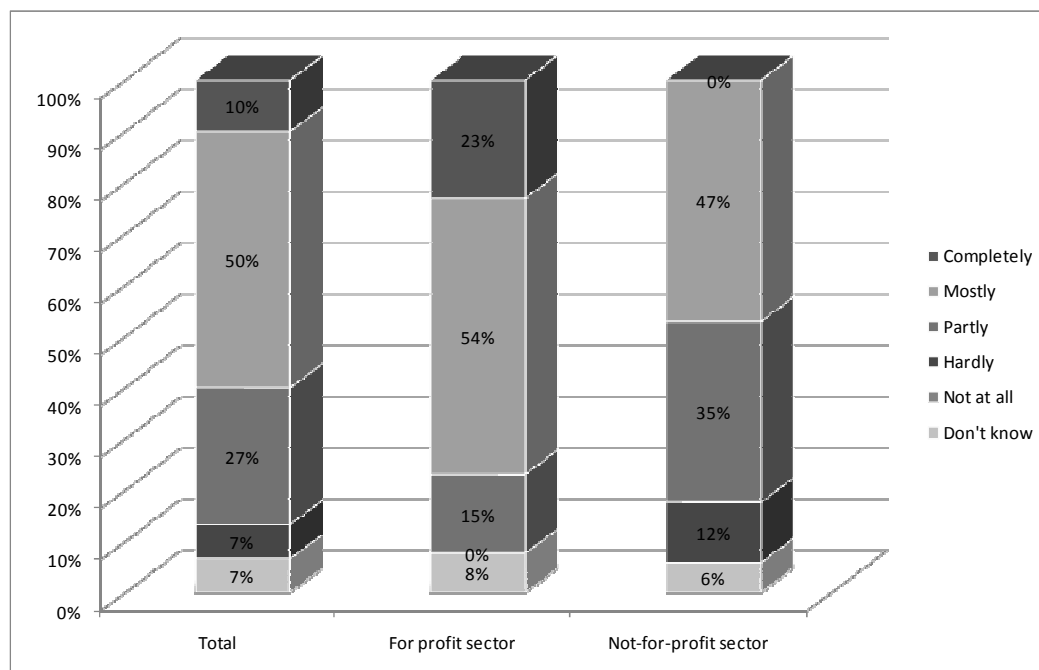
- Just under 77% of industry members responded either 'completely' (23.1%) or 'mostly' (53.8%), while no not-for-profit members felt that current membership was 'completely' conducive to achieving the Platform's objectives, just over 47% responded 'mostly', just over 35% responded 'partly' and just under 12% answered 'hardly'.

<sup>11</sup> Information on the sector of the organisations from the Member States category (9 commitments) was not provided).

<sup>12</sup> The Platform currently has 33 active members: 15 "industry" (for-profit) members representing the food industry, retail & catering, advertising & broadcasting, agriculture, and sport & fitness and 18 "NGO" (not-for-profit) members representing the sectors of health, research, consumer organisations, and sports & fitness.



**Figure 6 - Would you say the current membership is conducive to achieving the Platform's objectives?**



The number of people and level of seniority of those attending the meetings was also mentioned as factors that affect how appropriate membership is. In the interviews, a for-profit member also stated that in its second phase, between 2007 and 2010, the Platform saw a duplication of actors, not a multiplication in different sectors.

Twenty one out of the 30 respondents that answered the question on current membership being conducive to achieving the Platform's objectives commented on either an under-representation or lack of representation of one or more sectors within the Platform. The following points were mentioned in the questionnaire and the interviews with Platform members:

- One of the sectors that a few members mentioned as being under-represented is the physical activity sector (mentioned by seven out of 32 respondents). Other sectors that were seen by given members as being under-represented included: the food sector itself (rather than through umbrella organisations), health NGOs and specifically NGOs representing doctors and working with patients, and the catering relative to the manufacturing sector. Local authorities were also mentioned as under-represented partners that could help to reach more EU citizens, though it was also recognised that a link to local authorities exists through the HLG. In addition, stronger involvement of the WHO was mentioned by one member as being a good idea. An under-representation of NGOs was also mentioned by two not-for-profit members.
- The sectors that were said not to be represented by a few members included the education sector (mentioned by five respondents), environmental NGOs (mentioned by two respondents) and the 'sedentary' sector, e.g. computers, television, computer and video games, car manufacturers, (mentioned by two respondents), in particular. Given members also cited: "key

member state representatives who can replicate activities at MS level” and “regional bodies”, nutrition and diet experts, health assistance providers, children’s representative organisations, town planners, the traditional restaurant industry, and the (health) insurance sector as not being represented. One member specifically mentioned representatives of the “active transport field”, i.e. pedestrians, which is an important aspect of physical exercise, but that is not represented on the Platform. One for-profit organisation stated that the people the Platform targets, i.e. overweight people, are not represented. The traditional restaurant sector was also mentioned, although it was added that this sector has chosen not to participate on the platform.

Again, a number of both not-for-profit and for-profit organisations specifically stated in the interviews that physical activity organisations are under-represented against an over-representation of organisations in the field of nutrition. In their view, the Platform was effectively a “*Platform on diet and nutrition*” only. Large organisations from the sports sector, such as Nike or FIFA were seen as potential contributors to the Platform.

The lack of members from the education sector was mentioned by both for-profit and not-for-profit organisations, and it was stated that “*most food is consumed in the home, therefore education of parents and teachers is crucial*”. One aspect mentioned in the follow-up interviews with regard to the representation of organisations from the education sector is that public organisations generally don’t participate in the Platform, which would have to be addressed if the education sector is going to be considered more.

In more general terms, the follow-up interviews indicated that overall the broad representation of different groups was seen as positive and it was felt that the Platform leaves enough room for the approaches and interests from a broad spectrum of sectors. That said, one for-profit member mentioned that the space given to larger companies is bigger compared to small producer associations because of the lobbying power of larger companies. With regard to the Platform meetings it was stated that the for-profit sector generally has more resources to send more representatives to the Platform meetings than the not-for-profit sector, which might struggle to send a representative at all. This has an impact on the way issues are discussed and this imbalance should be addressed by the European Commission during meetings by giving NGOs more time to express their views.

In addition, a lack of communication between the Platform and the MS was mentioned by a number of for-profit organisations. It was stated that the HLG is not always aware of the developments on the Platform and does not effectively address this problem, as in some cases the HLG does not involve decision makers but “note takers” who are not able to implement any changes. It was stated that the HLG “already has an *idée fixe*” and it does not seem to be led in the same dynamic as the Platform, where members are trying to identify good practices that they can replicate at MS level: “*It’s more of a one-way dialogue; they say what is going on at national level, but they are not looking to identify good practice to take back to MS.*”

It was also mentioned that the European Commission does not involve its own departments, e.g. other related DGs, enough in the work of the Platform

### 6.2.3 Results from the interviews with observers

In relation to the Platform’s membership, one of the observers was concerned that the Platform only included umbrella organisations with different number of members, meaning that there are Platform members representing “*huge number of companies*” and others “*one small group*”. She questioned how representative the Platform was in this respect. However, she also highlighted as something positive that

governmental and not-governmental organisations, together with the private sector, were all represented in the Platform.

The second observer mentioned that there might be a lack of representation of NGOs vis-à-vis the representation of the private sector. For her, this was evident particularly in meetings where some members of the private sector had “6 to 10 people” attending.

#### 6.2.4 Conclusions

The current repartition per sector of Platform members seems to have created favourable conditions for the Platform to address its goals and engage in actions in all relevant sectors. There is a good representation of a broad range of sectors on the Platform, providing a good basis for facilitating a cross-sectoral approach to the issue of obesity. Only around one third of members in the questionnaire found the current membership to only be ‘partly’ or ‘hardly’ conducive to achieving the Platform’s objectives. Moreover, where only one to two Platform members represent a given sector, it is often the case that the large number of sub-members of these Platform members, or active commitments undertaken by them, make up for this apparent under-representation. Moreover, despite some views to the contrary, Platform membership is balanced, with a similar number of not-for-profit and for-profit members.

That said, the education sector is not represented at all, in spite of the importance of the ‘Lifestyles and education’ area which accounted for more than half of the Platform’s active commitments as at January 2010 (see EQ 2.2). While the physical activity sector was perceived by a number of members as being under-represented, this sector is in fact represented by six Platform members (18% of the total), 336 sub-members (the third largest group) and 12 active commitments (the fourth largest group). Therefore, the perceived lack of representation of this sector by members may be due more to its lack of visibility than an actual under-representation.

### 6.3 EQ 1.3: How has membership in the Platform inspired its members to new and revised commitments?

The key to answering this evaluation question is that of the *additionality* of the commitments – in other words, would these commitments have been made (and/or maintained, improved) without the Platform? To attempt to answer this question, two main approaches were used:

- **Self-reporting by members:** During the interviews, Platform members were asked to estimate the extent to which their commitments were a direct or indirect result of the Platform process, and to provide concrete examples of this.
- **Analysis of a sample of commitments:** Members cited a total of 38 commitments which they considered to be a direct or indirect result of the Platform process (please refer to the Table 6 below for a complete list of the cited commitments). It should be noted that 11 of the 38 cited examples could not be considered in the analysis because members provided limited information on how these commitments had been inspired by the Platform.

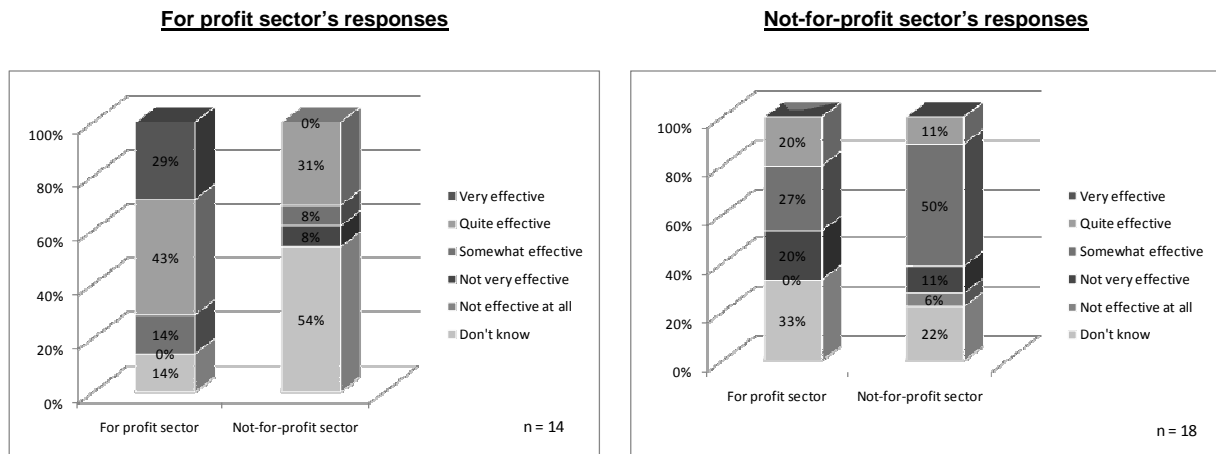
The team then reviewed the explanations provided by members to look at how the remaining 27 commitments had been affected by the Platform process. It then selected a sample of 11 commitments -based on the quantity and quality of information available on the cited commitments- and attempted to re-construct the causal chain that linked them to the Platform, by examining particularly the situation prior and during the elaboration of the commitment.

### 6.3.1 Results from the Platform member questionnaire analysis and follow-up interviews

Platform members were asked: how effective the Platform has been in inspiring its members to new and revised commitments (beyond what they would have done had the Platform not existed)? The majority of respondents took the middle ground, judging that the Platform was either 'quite effective' or 'somewhat effective' at inspiring both industry and not-for-profit organisations to do so.

- Just over 71% of industry members felt that the Platform had been either 'very effective' or 'quite effective' at inspiring them to do so, while just under 47% of not-for-profit members felt that it had either been 'somewhat effective' or 'not very effective' at inspiring industry to do so; 20% of not-for-profit respondents felt it had been 'quite effective' and no not-for-profit members felt it had been 'very effective'.
- The not-for-profit respondents had a less positive view of the influence of the Platform on their activities than industry in this respect: half of the not-for-profit respondents felt that the Platform was only 'somewhat effective' in inspiring them to new and revised commitments (compared to industry's 71%). Just under 31% of industry respondents felt that the Platform was 'quite effective' at inspiring the not-for-profit sector to do so.

**Figure 7 - How effective has the Platform been in inspiring its members to make new or revised commitments (beyond what they would have done if the Platform did not exist)?**



Part of the more negative view of the not-for-profit sector about how membership has inspired them to new or revised commitments may be due to either members' doubts about how to measure or judge "what has happened as a result of the Platform and what would have happened regardless" (mentioned

by two of the nine members that commented on it) or to their understanding that they *“have fitted existing and on-going actions into the framework of the Platform”* (claimed by three of the nine members).

One interesting issue highlighted by one not-for-profit and two for-profit members in this question is that not-for-profit members’ work is sometimes difficult to fit into the Platform’s framework. These last members mentioned that NGOs’ *“policy commitments”* are *“more difficult to measure and less critical in terms of efficiency to counter obesity”* and that *“for some NGOs it can be difficult to bring to the Platform their initiatives and qualify them as commitments”*. The comments below further illustrate the issue raised by some not-for profit organisations about the different nature of their work *vis-à-vis* industry’s.

*“There were times when we have had to generate a commitment for the sake of it, in order to remain a member. It would be good if NGOs could contribute in a different way”*

*“The problem with ‘open’ commitments, is that they do not take into account the specific responsibilities and capabilities of the stakeholders into account. For instance, smaller NGOs, which via their financing and staffing attributes can only carry out ‘awareness raising’ campaigns to the best of their ability, will appear weak against more ‘large scale’ corporate responsibility initiatives by the industry which produce more ‘objectively’ measurable results”.*

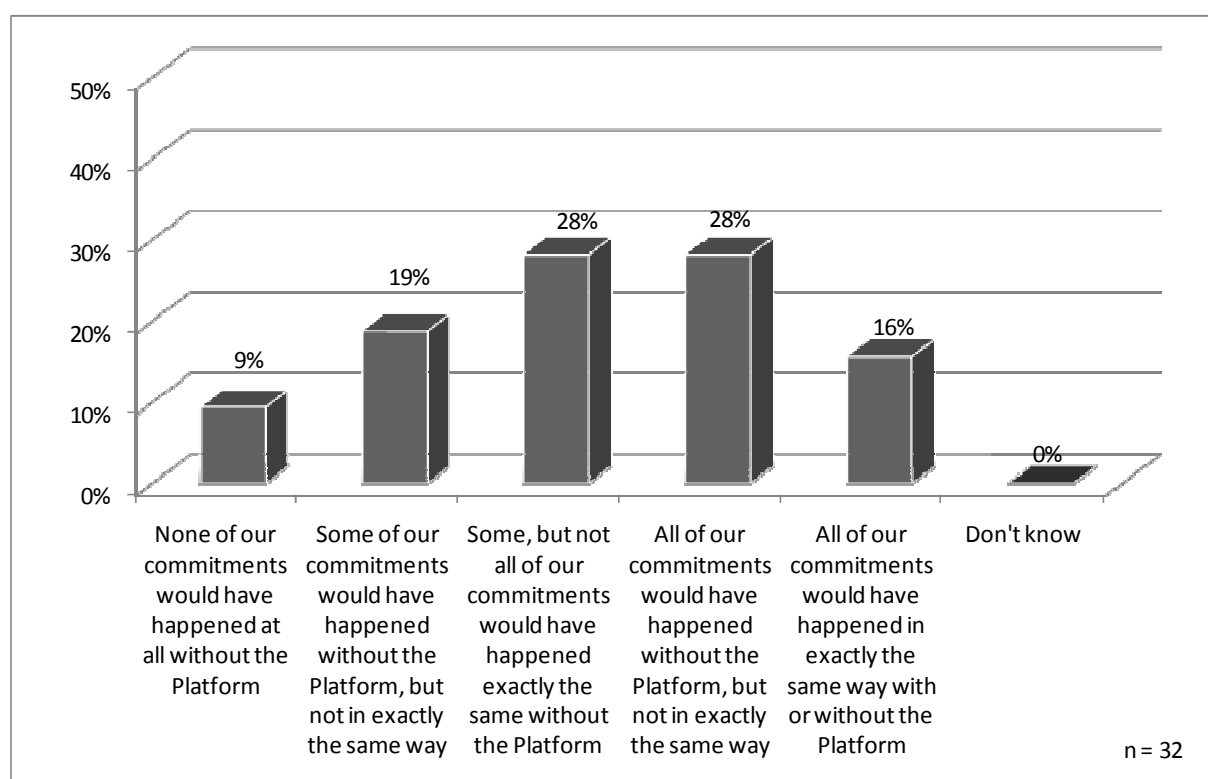
Source: Member questionnaire

This issue was also raised by one of the former Platform members during an interview. In this case, it was a for-profit organisation that stated the monitoring system was complex and *“did not really fit the project they had committed to”*. On the other hand, he mentioned it had been a problem for them –as they were an organisation related to media- to commit *“to something the Commission thought they should commit”* and, at the same time, maintain *“editorial independence”*.

When asked whether their own organisation’s commitments were a direct result of the Platform or not, only 9.4% of respondents said that ‘none of their commitments would have happened at all without the Platform’. In fact:

- Just over 28% of respondents said that ‘all of their commitments would have happened without the Platform, but not in exactly the same way’ and 15.6% judged that ‘all of their commitments would have happened in exactly the same way with or without the Platform’.
- Just under half of respondents took the middle ground: in close to 19% of cases, respondents were of the opinion that ‘some of their commitments would have happened without the Platform, but not in exactly the same way’ and just over 28% stated that ‘some, but not all of our commitments would have happened exactly the same without the Platform’.

**Figure 8 - Looking at your own organisation's commitments, were these a direct result of the Platform, or would they probably have happened anyway?**



When taking industry and not-for-profit responses to this same question separately, industry's commitments appear to have been more a direct result of the Platform than not-for-profit members' commitments:

- Just over 61% of not-for-profit members either said that 'all of their commitments would have happened without the Platform, but not in exactly the same way' or that 'all of their commitments would have happened in exactly the same way with or without the Platform'.
- By contrast, over 57% of for-profit members stated either that 'none of their commitments would have happened at all without the Platform' or that 'some of their commitments would have happened without the Platform, but not in exactly the same way'.

Platform members were asked to give example of commitments that were a direct result of the Platform. The combined results from both the questionnaire and the interview demonstrate that more than two thirds of organisations have commitments that are a direct result of the Platform. In the questionnaire and during the interviews, twenty three of the 31 members provided examples, amounting to 38 examples overall. Four of these commitments had already ended at the time of the analysis. Twenty one of these examples are in the Lifestyles area, seven are in the Marketing & Advertising area, two in Labelling, one in Reformulation, and seven are categorised as "other". This distribution is in line with the overall distribution of commitments across the four main areas. Please refer to the table below:

**Table 6 Examples of commitments that were a direct result of the Platform by member**

Evaluation of the EU Platform for Action on Diet, Physical Activity and Health

Member	Provided example of commitment that is a direct result of the Platform?	N° of Commitment	Area	Description
<b>CESS</b>	Yes	1059	Lifestyles	Physical Activity and Nutritional habits for families
<b>EASO</b>	No	N/A	N/A	N/A
<b>ECF</b>	No	N/A	N/A	N/A
<b>EGTA</b>	Yes	1054	Marketing and advertising	Producing EGTA guidelines on the ICC Food and Beverage framework
<b>FEPI</b>	Yes	741	Marketing and advertising	FEPI Award "Capital of Play"
<b>IDF</b>	Yes	640	Lifestyles	IDF Europe - Diabetes Prevention Forum
<b>ISCA</b>	Yes	754	Lifestyles	P.A.T.H.E. Physical Activity Towards a Healthier Europe
<b>EuroCommerce</b>	No	N/A	N/A	N/A
<b>EUROPREV</b>	No	N/A	N/A	N/A
<b>BEUC</b>	Yes	1048 (finished)	Others	Generation Excess III
		1047 (active)	Others	Advertising and marketing unhealthy foods to children in EU
<b>COPA-COGECA</b>	Yes	1066	Lifestyles	The Whole Grain Partnership (Fuldkornspartnerskabet)
<b>EFAD</b>	Yes	1032	Others	The Dietetic Contribution to Health in the Workplace
		1112 (very new)	Lifestyles	Position paper on the dietetic management of obesity
		1111	Lifestyles	Evaluation of the EUFIC Energy Balance Tool (commitment 326)
<b>EHN</b>	Yes	1035	Lifestyles	Heart Healthy Physical Activity Initiatives in Europe (2007 - 2008)
<b>ESPGHAN</b>	No	N/A	N/A	N/A
<b>IBFAN</b>	Yes	1068	Others	Policy and programme coherence in infant and young child feeding in the EU
<b>EHFA</b>	Yes	610 (CIAA) / 546 (WFA) / 1053 (EACA)	Marketing and advertising	Promoting healthy lifestyles through advertising

Evaluation of the EU Platform for Action on Diet, Physical Activity and Health

Member	Provided example of commitment that is a direct result of the Platform?	N° of Commitment	Area	Description
<b>EVA</b>	Yes	1104 (new)	Lifestyles	EVA's webpage on actions for choice in vending machines and lifestyle actions
		518	Lifestyles	Best Practice Guidance - Vending in schools : a matter of choice
		1036	Lifestyles	Smart Choice Programme for Vending in Education (by Mars Inc.)
		801 (finished)	Lifestyles	Communication on healthy initiatives (finished)
		803 (finished)	Lifestyles	Health at workplace: The EVA will promote healthy lifestyle internally.
<b>COFACE</b>	Yes	1106	Marketing and advertising	Media, advertising and nutrition: media literacy educational package
<b>AREFLH</b>	Yes	724	Lifestyles	Coordination and promotion of regional education programmes
<b>CIAA</b>	Yes	610	Lifestyles	Healthy lifestyles public information advertising campaign (Green Lace project)
		826 (not monitored in 2009)	Reformulation	Survey on product reformulation, innovation and labelling
<b>CPME</b>	Yes	1038	Others	Exchange of best practices on nutrition/physical activity/obesity
		1039 (finished)	Lifestyles	Physical activity prescriptions: Mapping of reimbursement in MS
<b>EACA</b>	Yes	1053	Lifestyles	Healthy Lifestyles Campaign
<b>ENGSO</b>	No	N/A	N/A	N/A
<b>EPHA</b>	Yes	1043	Others	Dissemination of information with EPHA's members organisations
		1105	Others	Monitor, encourage and support the implementation of the EU SFS
<b>EUFIC</b>	Yes	1061	Lifestyles	Using EUFIC communication vehicles to promote physical activity
		521	Lifestyles	Consumer research on nutrition information and labelling
		526	Lifestyles	Using EUFIC communication vehicles to raise awareness of the EU Platform
<b>EuroCoop</b>	No	N/A	N/A	N/A



Member	Provided example of commitment that is a direct result of the Platform?	N° of Commitment	Area	Description
FERCO	Yes	507	Lifestyles	FERCO partnership with its European Social Partner, EFFAT
		504	Labelling	Provision of nutritional information to the end consumers
FRESHFEL	Yes	775	Lifestyles	Freshfel "Fresh Produce Charter" on fruit & vegetables at the workplace
EMRA	Yes	536	Labelling	Consumer Information
IOTF	No	N/A	N/A	N/A
WFA	Yes	562	Marketing and advertising	Strengthening advertising self-regulation across the EU27
		1075	Marketing and advertising	The EU Pledge - Changing Food Advertising to Children
		546	Marketing and advertising	Promoting healthy lifestyles through advertising

### 6.3.2 Results from the interviews with observers

When asked whether they thought the Platform had inspired its members to do more than they would have otherwise done to combat obesity, one of the observers said that it was a difficult thing to assess and brought up the idea that some commitments *“may have been chosen because they were easy to do or because members had been working in the field”*.

The other observer had a different perspective, sustaining the idea that the Platform had inspired members and that it had given them the *“impetus”*, even if they were thinking about obesity already. In this sense, the commitments were made *“quicker”* than without the Platform. She judged this impact as one of the most successful aspects of the Platform.

Regarding the extent to which commitments were a direct or indirect result of the Platform, this interviewee said it was very difficult for her to generalise considering there are so many commitments. She thought commitments were *“in part”* a direct result of the Platform, meaning that *“if the Platform had not been there, some commitments would not have happened, but some of those undertaken by larger organisations may have happened anyway because of increasing pressure by consumer organisations to decrease the trend in obesity”*.

### 6.3.3 Results from the desk research

As mentioned above, members cited a total of 38 commitments which they considered to be a direct or indirect result of the Platform process (please refer to Table 6 for a complete list of the cited commitments). It should be noted that 11 of the 38 cited examples could not be considered in the analysis

because members provided limited information on how these commitments had been inspired by the Platform.

The team then reviewed the explanations provided by members of how the remaining 27 commitments had been affected by the Platform process. According to these explanations, the evaluators were in a position to say that **the Platform had inspired members in at least three ways:**

- The request of having active commitments to remain in the Platform has obliged some members to submit new commitments or adapt existent work to the Platform's requirements for commitments.
- The discussions and exchange of information occurred within the Platform inspired members either to think of new commitments or improve existing ones.
- The Platform facilitated the interaction with others members, resulting in joint commitments that would not have happened if the Platform had not existed.

The team then selected a sample of 11 commitments - based on the quantity and quality of information available on the cited commitments - and attempted to re-construct the causal chain that linked them to the Platform, by examining particularly the situation prior and during the elaboration of the commitment. The 11 sampled commitments were grouped according to the three cases mentioned above, as follows:

***The request of having active commitments to remain in the Platform has obliged some members to submit new commitments or adapt existent work to the Platform's requirements for commitments.*** Ten out of the 27 cited examples were considered to be "inspired" by the Platform in this way. The team selected a sample of four (all of them made by not-for-profit Platform members) and analysed them in depth to try to establish how this process worked. The review of the available project documentation suggests that all four commitments were indeed made primarily to comply with the obligation to have at least one active commitment. In two cases, this meant that the respective Platform members engaged in activities in areas they would not otherwise have considered (i.e. they would have focused their resources elsewhere). Thus, the additionality of these commitments is clear (although in one case the Platform members felt that the actual value of its commitment was low, and that its limited resources would have been better spent concentrating on its core activities). In the other two cases, Platform members seem to have adapted initiatives they were already carrying out anyway, and converted them into a Platform commitment; therefore the Platform did not really lead to any additional action, although it facilitated the exploitation of the results.

***The discussions and exchange of information occurred within the Platform inspired members either to think of new commitments or improve existing ones.*** Another ten out of the 27 cited examples were considered to be inspired by the Platform in this way. The team selected a sample of four commitments (two by industry members, two by not-for-profit members) and analysed them in depth to try to establish if and how exactly these commitments were in fact the result of discussions and/or exchange of information within the Platform. From this analysis, it emerged that two of these commitments (both made by not-for-profit members) were direct or indirect reactions to commitments or work by other Platform members, which lead other members to scale up their own work in related areas (i.e. to conduct additional research on the issues covered). The other two commitments that were examined (made by industry members) were designed based on discussions held within the Platform in the area of advertising and of the Health in the Workplace working group, respectively. In at least one of these cases, input from Platform members and the Commission was incorporated into the commitment. Thus, it can be confirmed that all four commitments that were examined were the direct result of the Platform process, even if it was not always a case of picking up or operationalising new ideas generated or discussed within the Platform, but also of following up on or scrutinising specific commitments made by other actors.

***The Platform facilitated the interaction with others members from different sectors that resulted in joint commitments that would not have happened if the Platform had not existed.*** Six out of the 27 cited examples were considered to be inspired by the Platform in this way. Three of these commitments were selected for a detailed analysis. All three commitments involved more than one Platform member: in one case two not-for-profit members, in one case four industry members, and in another case two not-for-profit and one industry members. Difficulties with implementation notwithstanding (this applies to one of the commitments in particular), the research undertaken has shown clearly that at least two of these three commitments were a direct result of contacts made within the Platform. In the final example, some co-operation between the actors had already existed prior to the Platform, but this became more intense due to the Platform. While these positive examples show the potential of the Platform, it should also be noted that the number of joint commitments, especially joint commitments between members from different sectors, has remained very low.

Overall, the in-depth review of the available documentation suggests that the vast majority of commitments cited by Platform members as examples were indeed direct results of the Platform process, and it could thus be argued that the Platform has been very successful in inspiring its members to make new commitments. However, it should be kept in mind that the commitments that were examined were put forward by Platform members themselves as examples that were a direct result of the Platform. The fact that even among these commitments, a few seemed to consist of a re-framing or slight scaling up of work that would have been carried out anyway (rather than a real “new” commitment) means that care should be taken in extrapolating the results of the analysis described above to the total universe of Platform commitments.

#### **6.3.4 Conclusions**

Since 2005, Platform members have made a total of 292 commitments (see EQ 2.2). However, the evidence suggests that many of these commitments were not entirely new (or additional) actions, but existing activities that members scaled up, revised or re-framed to turn them into Platform commitments.

The combined results from both the questionnaire and the interviews suggest that more than two thirds of organisations have commitments that they claim are a direct result of the Platform. The Platform has tended to inspire members in three ways:

- The need to have active commitments to remain in the Platform has obliged some members to submit new commitments or adapt existing work to the Platform’s requirements for commitments.
- The discussions and exchange of information occurred within the Platform inspired members either to think of new commitments or improve existing ones.
- In a relatively small number of cases, the Platform facilitated the interaction with others members, resulting in joint commitments that would not have happened if the Platform had not existed. Such joint cross-sectoral commitments were difficult to implement due to divergences of opinion among Platform members, but also more procedural issues within the wider European Commission.

However, the findings suggest that the Platform has only inspired members to do things that they would not have normally done in a small number of cases. More frequently, members have tended to scale up, revise or re-frame their activities to turn them into Platform commitments. In fact, only a small minority of respondents to the questionnaire said that ‘none of their commitments would have happened at all without the Platform’. Moreover, according to the questionnaire, industry’s commitments have been more a direct result of the Platform than not-for-profit members’. This can be partly explained by the fact that not-for-profit members work primarily in areas such as lobbying, awareness raising and research, making it difficult to bring to the Platform new, measurable commitments. Finally, the analysis of a sample of

commitments that were cited by Platform members as examples and the causal chain that links them to the Platform showed that while a vast majority of these commitments were direct results of the Platform process, even among these commitments a few seemed to consist of a re-framing or slight scaling up of work that would have been carried out anyway (rather than a real “new” commitment). This means that care should be taken in extrapolating the results of the analysis described above to the total universe of Platform commitments.

## **6.4 EQ 2.1: Are the Platform objectives sufficiently clear and operational? Is the level of action(s) initiated by Platform members proportionate to the objective set out in the founding charter?**

### **6.4.1 Results from the Platform member questionnaire analysis and follow-up interviews**

#### **The objectives**

The majority of respondents (51.6%) ‘agreed’ that the Platform’s objectives (as spelled out in the founding statement) were sufficiently clear and operational. Close to 70% of industry members were of this opinion, whereas only 38.9% of not-for-profit members ‘agreed’ and just over 33% ‘disagreed’. See EQ 1.1 for further comments in this respect.

However, in the follow-up interviews, organisations from both the for-profit and not-for-profit sector commented that the Platform’s objectives in the founding statement were not focused enough. It was repeatedly mentioned that while the definition of broad objectives was appropriate when the Platform was first set up, there is now a need for objectives that give clearer guidance in terms of the type of commitments that should be developed: *“Objectives are large and big. There is nothing that determines what sort of commitments to expect, what results to expect, what commitments should look like, how to define the target audience, how to define children, which ages. Overall, how little and how much is the Platform expected to achieve. As it is now, everybody can put anything in the Platform. There is no defined focus or targets.”*

It was also mentioned that there is a need for clearer goals in terms of what constitutes success: *“The Platform has admirable broad goals, but doesn’t say what key indicators are to say this has worked. This is what is missing from the Platform.”*

#### **The level of actions**

Platform members were also asked whether overall they considered the level of action(s) initiated by Platform members to be in line with the Platform objectives. The majority of respondents either ‘completely’ or ‘mostly’ agreed that the level of action(s) initiated by Platform members was in line with both Platform objectives, i.e. ‘Actions should contribute to containing or reversing the rise in obesity’ and ‘Members should devote a higher level of resources and effort to the fight against obesity than before the Platform was launched’. However, half of not-for-profit members considered the level of action(s) initiated by Platform members to be only ‘partly’ in line with the objective of having members devote a higher level of resources and effort to the fight against obesity than before the Platform was launched.

The interviews with Platform members showed that while it is difficult to compare individual commitments with each other, it was felt by both for-profit and not-for-profit members that there are generally different levels of involvement among the members. Moreover there are differences between commitments that have broad objectives and reach a large target group, and commitments with narrower objectives which target a limited amount of people, or focus on internal policy, such as an organisation's own employees, rather than on an organisation's core business: *"There is an imbalance in the quality of the commitments – there is an imbalance between an association providing bowls of fruit or an association subsidising gym membership for 7 members versus 11 food companies committing to advertising and marketing restrictions to children or putting labelling on thousands of products voluntarily. Each gets the equivalent weighting in the numbers game, but the value, potential impact and difference they can make is going to be a lot more in terms of fulfilling the original remit of the platform."* Extensive monitoring requirements were mentioned by both not-for-profit and for-profit organisations as a reason for organisations developing commitments with narrower objectives that are easier to monitor, which is not helping the Platform to progress in terms of its objectives: *"The kinds of commitments with the highest scores include website production in different languages. What difference does that really make?"*

Another issue raised in this respect was the limited capacity of not-for-profit organisations to allocate more resources to commitments or monitoring than they are already doing. To illustrate this, one member said: *"It is difficult to devote more resources, as there is such a great difference between the two 'types' of members: NGO's and corporates (the latter have much more money and resources available). So we should not create a situation of 'the more, the better'".* According to a number of organisations, the nature of the work of NGOs, such as lobbying, awareness raising and distribution of information also means that the type of commitment they are able to commit to differs to the commitments of for-profit organisations. This was mentioned by a number of not-for-profit organisations: *"One can demand more from industry simply because they have more resources, better knowledge in terms of products. They control the marketing and advertising. NGOs also share the responsibility, but their actions are more limited because they have fewer resources. The field where they can provide initiatives is more limited – e.g. they can work on reformulation from a certain perspective, but they can't reformulate products themselves."*

Some not-for-profit members were very critical, saying, for example, that *"the nature and scope of the commitments is unambitious compared to the scale of the problem"* and that *"industry is following their basic financial interests and actions to reduce obesity are taken to improve their public image"*. The issue of "greenwashing" was also raised in the interviews by a not-for-profit organisation, stating that some members use insignificant activities that only apply to a small amount of member organisations as a way of promoting the entire organisation. For-profit organisations were also seen as stalling progress in specific areas by not putting enough resources and effort into commitments whilst still promoting their work in this area. In this context, many questioned not only the amount of resources the industry is using to fight against obesity, but also the way in which they are using these resources and the type of commitments they are implementing with them: *"Lifestyles is an easy thing to do, it means industry can look good without tackling core business."* However, one not-for-profit member mentioned that in some cases for-profit organisations have reacted to the criticism from NGOs and made changes to their commitments. Another aspect that was mentioned was that it has to be ensured that Platform members implement the outcomes of the Platform discussions to make their commitments more relevant to the Platform's objectives by continuously refining and adjusting them.

In the follow-up interviews, several for-profit members stated that NGOs keep on being overly critical of the activities undertaken by for-profit members, assuming a "watch-dog" role while justifying their own lack of activities with the fact that they have lesser resources: *"I would like to see more NGOs come forward and outline their contributions to the issue. There is currently a bit of an imbalance between*

*delivery and criticism". "It's more about NGOs keeping an eye on industry – monitoring industry; a performance which is not a very productive contribution in the context of the Platform."*

For-profit members also stated that there is not enough interaction between the two sectors, which is in line with the general view of the Platform that a stronger joint approach amongst members needs to be facilitated, as mentioned in EQ 1.3.

#### **6.4.2 Results from the interviews with observers**

According to one of the observers, the appropriateness of the level of actions initiated by members depends on whether *"they are able to do more"* and large companies could be asked "to do a bit more". However, she considered this was a sensitive issue given that *"pushing them"* more could end up compromising their participation in the Platform. In her words: *"At the end of the day, they are businesses. There is a need to work together instead of push them (...) Maybe as the Platform progresses, they could be persuaded to do a bit more"*.

In relation to this, the second observer said that members' level of commitment depends on the level of funding. She noted that since NGOs have limited funding they should be focusing more on their role, this is, *"ensuring that local NGOs get passed down information as discussed in Brussels"*. In her view, all commitments should be more in line with Members' *"area of work, core business, mission and statement"*. In this sense, the private sector should be *"working on reformulation and providing better information to consumers"* rather than working on nutrition education or physical activity.

#### **6.4.3 Conclusions**

The striking differences in the views of the different sectors (70% of industry respondents to the questionnaire had a favourable opinion of the Platform's objectives, but a third of not-for-profit respondents stated that the objectives were not sufficiently clear and operational; members from both sectors voiced concerns to this effect in the follow-up interviews) suggest that the Platform's objectives may not be sufficiently clear and operational to maintain members' buy-in (notably that of not-for-profit members) and the Platform's momentum going forward. There is a need for more concrete, operational objectives to give more guidance to Platform members on the type and scope of actions they should develop to meet the Platform's objectives.

Furthermore, the level of action(s) initiated by Platform members is not always proportionate to the objective set out in the founding charter. There are differences in members' involvement and level of action. Some organisations have commitments which are much wider in scope and potential impact, thereby reaching a larger target group, while other commitments are very inward-facing, focussing on a small target group such as company employees. Moreover, both sectors tended to be critical of each other: Not-for-profit members were sometimes seen as over-critical and not contributing enough in terms of actions, while for-profit members were sometimes perceived as not putting enough effort and resources into their commitments, and choosing easy-to-implement commitments instead, using the Platform as a 'public relations exercise' more than a real vehicle for change. The level of action of not-for-profit relative to for-profit members seems to be a result of the formers' generally limited resources.

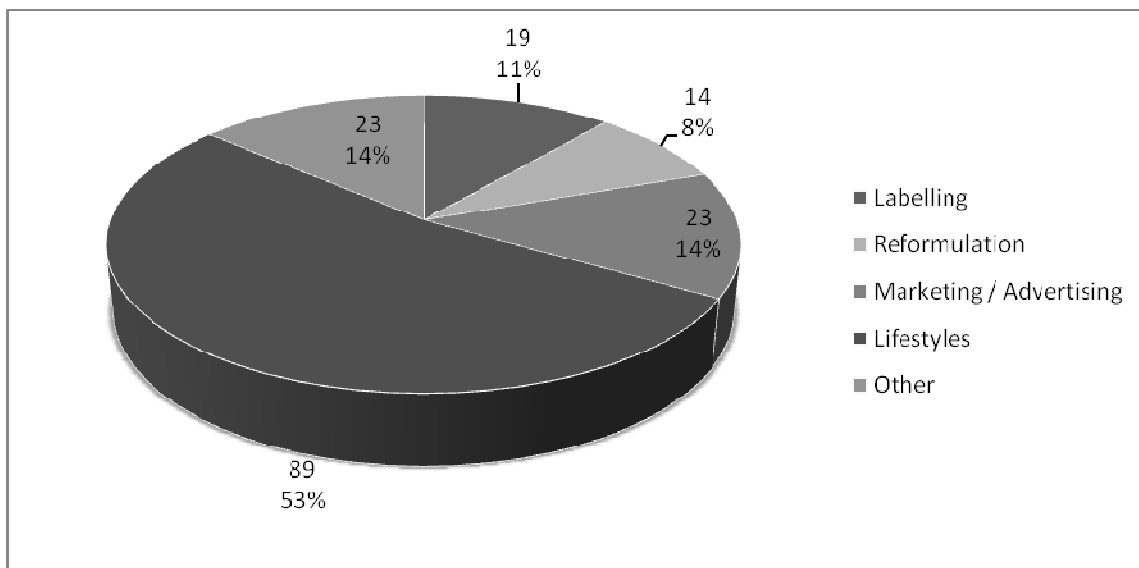
## 6.5 EQ 2.2: Are the commitments spread adequately across the four implementation areas (reformulation, labelling, marketing / advertising and lifestyle / education)?

### 6.5.1 Results from the database analysis

The spread of commitments across the four implementation areas was first analysed using the commitments database. Overall, this showed that most commitments are in the Lifestyles area. This is the case for all active and inactive commitments since 2005 and also for the 155 active commitments as at January 2010. However, it is important to note that these figures do not take into account the number of individual actors implementing a given commitment so, while there are fewer commitments in the labelling, reformulation and marketing/advertising areas, it is likely that these commitments are actually being implemented by a large spectrum of actors, i.e. the members of Platform members.

There were 155 active commitments as at January 2010<sup>13</sup>. More than half of the commitments are in the Lifestyles activity area, with a similar amount of commitment in the Labelling and Marketing & Advertising activity areas. Only 8% of commitments are in the Reformulation area. It is important to note that a number of commitments fell under more than one activity area, resulting in a total of 168 areas counted (relative to 155 active commitments in total).

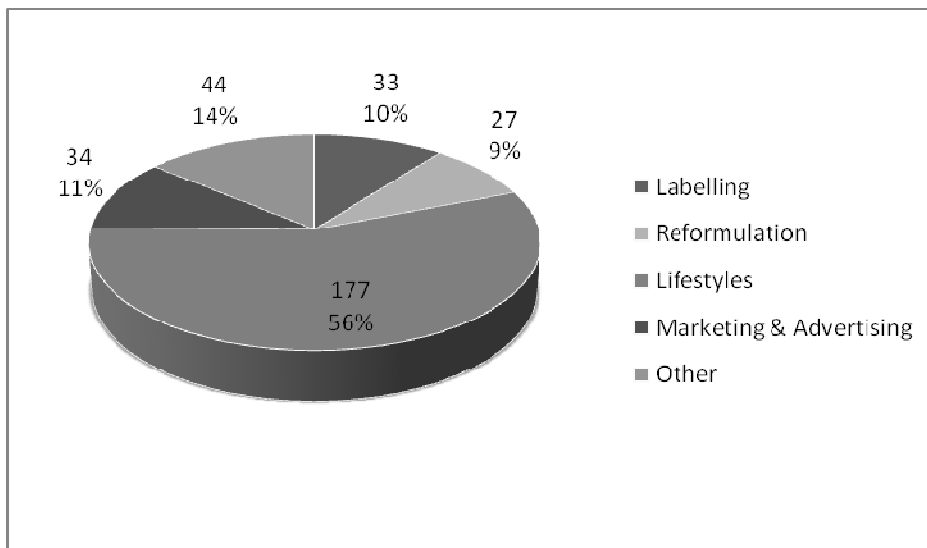
**Figure 9 – Active commitments by activity area**



<sup>13</sup> This includes a number of commitments that were scheduled to end in 2009, as it is not clear at present how many of these commitments have actually ended and how many have been extended.

As the graph below illustrates, when looking at all the active and inactive commitments since 2005 by activity area (amounting to a total of 292 commitments), Lifestyles is the largest of the four activity areas, with more than half of the commitments (56%) falling in this area (including over half of the industry commitments and 67% of the commitments by not-for-profit members)<sup>14</sup>. There is a fairly even split between the three other activity areas, with Marketing / Advertising being the second largest of the four areas overall. Commitments in other areas amount to 44%. It is important to note that a number of commitments fell under more than one activity area, resulting in a total of 315 areas counted (relative to 292 active and inactive commitments in total).

**Figure 10 – Active and inactive commitments by activity area**



## 6.5.2 Results from the Platform member questionnaire analysis and follow-up interviews

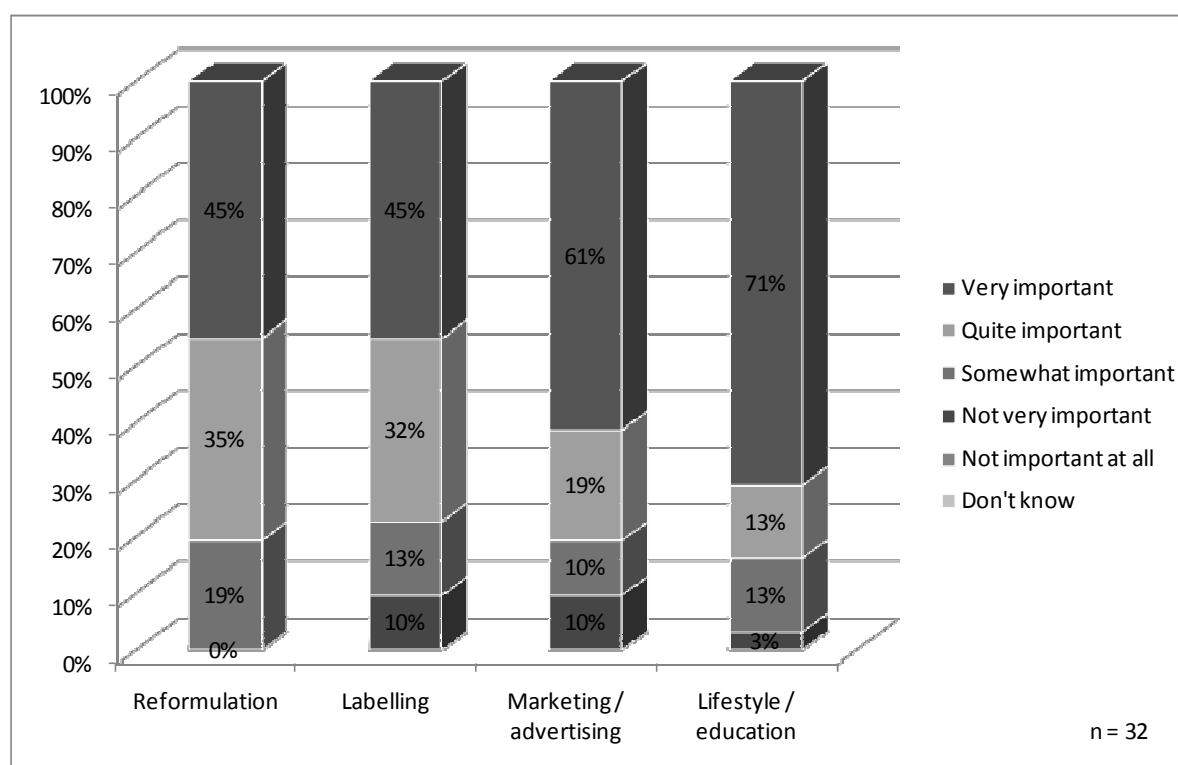
### The importance of action in given areas

While action in all four main implementation areas was considered either ‘very important’ or ‘quite important’ by a majority of respondents in each case, marketing / advertising and lifestyles / education were the areas where action was considered ‘very important’ by over half of respondents; 61.3% and 71% respectively.

<sup>14</sup> It is important to note that a number of commitments fell under more than one activity area, resulting in a total of 345 areas counted (relative to 292 active and inactive commitments in total).



**Figure 11 - In your view, how important is action in each of the 4 implementation areas with a view to reducing obesity in the EU?**



- For-profit members placed particular importance on action in the area of lifestyles / education, with 84.6% of respondents judging this to be a 'very important', and the rest of respondents a 'quite important', area for action. However, marketing /advertising and labelling were seen as 'not very important' areas for action by just over 23% of respondents in each case.
- Marketing / advertising and lifestyles / education were perceived by the largest proportion of not-for-profit respondents as being particularly important fields of action, with 72.2% and 61.1% of respondents judging them to be 'very important' areas of action. Few (5.6%) not-for-profit respondents judged one of the four areas to be less than 'somewhat important'.

In their comments, members of both sectors tended to agree that these four are the main areas through which obesity has to be addressed and that there is no single area that will solve the problem on its own. In this respect, for-profit members said:

*"No single factor is that important on its own. This is the strength of the platform, in that numerous stakeholders can make specific commitments in their area of expertise/competence in order to achieve a holistic response. every little bit counts and one hopes that the cumulative impact of all these commitments can make a difference"*

Source: Member questionnaire

*"It is quite difficult to identify the relevance of one single area as obesity is a hugely complex and multi-factorial issue that needs a holistic response. Such a holistic response is made possible by the very wide participation in the Platform of different sectors/stakeholders"*

Source: Member interview

The lifestyles / education area instigated mixed views. On the one hand, some not-for profit members questioned the large amount of commitments in the lifestyle / education area. Some members questioned the focus on this area, saying that there is an over-representation of commitments in the area and that this results in placing *"too much responsibility on the individual"* as a means of tackling obesity. Having commitments in this area was seen as a means for industry to shift the responsibility to the individual by a couple of interviewees. One not-for-profit organisation stated that lifestyle commitments from for-profit members are a *"cop-out"*, a way to participate in the Platform without making any sacrifices: *"On the side of for profit members I can see that working on lifestyles/education is nice, cosy, looks good, and isn't trouble enough for them. It about saying we have sponsored such and such campaign."*

On the other hand, other members suggested that more resources are needed to help citizens change their habits given that transforming lifestyles is "the biggest challenge". One member also claimed that *"lifestyle and education is what helps tying all these points together [reformulation, labelling and marketing] by making a consumer aware of the food he eats, making him read and understand the labels, learning to decode and understand marketing techniques in order to extract the "information" needed about a product without being affected by the urge to buy, and finally, commit to all other behaviours which are essential to be healthy such as physical activity and the likes"*. The follow-up interviews largely supported the view that education is an important aspect: *"All four part form part of the same picture, but the number of elements that lifestyle and education include are considerable relative to other elements."* While, education is clearly seen as an important area for action, one organisation also stated that *"education is important but only as long as it is not influenced/funded/carried out by commercial bodies"*.

As regards labelling, the interviews showed that some of the members that saw this as a less important area than the other three supported their opinion by saying that commitments relating to labelling tend to have less of an impact on obesity<sup>15</sup>. In particular, they highlighted the fact that, in their view, *"consumers never read labels"* and that marketing and education can have more of an influence on consumers' behaviour by increasing their food and nutritional knowledge. One organisation specifically stated that they think it would be more useful to focus on education than on labelling as obesity is a *"habitual problem and can't be successfully prevented by simply providing information on nutrition"*. One

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<sup>15</sup> It should also be noted here that members tended to think that the areas in which they worked were relatively more important than the areas where they had no commitments, meaning that those who saw labelling as less important than the other three areas did not have any labelling commitments.

organisation underlined the importance of education and reformulation over labelling: *“If you reformulate, for example, if you reduce the content of salt then people will live longer. This happened in the UK, so it is one way to make a huge contribution. You can also label food in a certain way, but not with the same impact. Education reaches the people we should reach”* Another member also linked the issues of labelling and education, stating that the need for labelling decreases as one moves up the socio-economic ladder to a point where the well-educated don't need the guidance provided by labelling on products.

One for-profit organisation stated that reformulation was a crucial aspect for the obesity issue as companies whose business it is to market and sell unhealthy food (such as fast food chains) have no other means of contributing to the Platform's work than reformulating the content of the food they sell. At least three of the eight members said that *“more efforts were needed on reformulation”*. However, it was also pointed out by a member that while reformulation can change the calorie content of a product, only education can have an impact on the amount a person eats of this specific product, clearly underlining the importance of education as a main factor in reversing the obesity trend in Europe.

Marketing and advertising commitments were also criticised as an *“easy way out”*. One for-profit organisation stated that *“Members prefer to make changes in their marketing strategies rather than changing a product or trying to change people's habits”*.

### **Limits to the four areas**

A few other areas were mentioned by members as being important in complementing the current spread of commitments:

As mentioned previously, at least three not-for profit members (out of the 11 that provided comments on the implementation areas) mentioned that it was difficult to fit NGOs' actions within the four implementation areas. One of them explained that some of this sector's commitments are placed under the *“other”* category because they cannot easily work on labelling, reformulation and/or marketing. Thus this member proposes to add another implementation area called *“advocacy, policy work or information exchange”*.

In addition to this, physical activity was raised as an area that is *“getting lost in the lifestyle area”* and should be considered as an individual 5<sup>th</sup> activity area. It was also mentioned that there is a lack of action in the physical activity area, usually by the sports & fitness organisations, but also by the retail & catering sector. One not-for-profit member from an NGO working in the field of physical activity mentioned that there are currently not enough commitments in this field due to the strong focus on nutrition-related commitments.

Moreover, one of the Platform members interviewed said that there is a focus on obesity and a lack of focus on other nutrition-related issues, such as calcium and vitamins. Prevention was also mentioned as an area that should be more strongly promoted. More focus on the work at the local level and the price of products were also mentioned as areas that should be considered more, as well as inequality: *“I see we don't address inequality. This is a big issue. We could address it with the right commitments. Commitments are usually across the 27 Member States and for everybody, so we don't tackle inequality.”*

**Note: It is worth considering the responses to this evaluation question in conjunction with those relating to the representation of sectors within the Platform in EQ1.2, notably when it comes to**

***opinions on the under and non-representation of the physical activity and education sectors respectively.***

**The spread of commitments and reducing obesity**

Members were asked whether they considered the spread of active commitments<sup>16</sup> to be appropriate with a view to reducing obesity in the EU. Overall, opinions on this subject were relatively mixed and whereas more than half (57.1%) of industry members felt that the spread was only 'partly' appropriate, the largest proportion of not-for-profit members (38.9%) felt that the spread was 'mostly' appropriate.

Not-for-profit members tended to challenge the content of commitments regardless the area in which they are framed. In particular, they called into question the "*potential impact*" and "*scope/outreach*" of commitments, rather than their spread across the different implementation areas saying, for example, that "*[we] would urge the evaluators to assess the extent to which these commitments are designed to have the maximum possible impact on levels of obesity in Europe*".

They also raised the issue of whether commitments are related to for-profit members' core business. The comments below illustrate these findings.

*"We would expect more commitments from the industry on marketing, labelling and reformulation as they are in a position to act in these fields".*

*"The not-for-profit sector has no choice but to carry out mostly 'lifestyle and education' initiatives, since they are not responsible for either of the three other fields. The for-profit sector, on the other hand, should do less education and more 'action' on their own products!"*

Source: Member questionnaire

Some members questioned the extent to which actions in the area of lifestyles / education actually help to reduce obesity. One interviewee said that "*it is not easy to do anything meaningful at EU level in terms of education as this must take place at national/local level*". Another member stated in relation to the lifestyles area that: "*of course commitments that look to promote health at the workplace are relevant, but it would be more relevant if they were submitted by associations of employers on a larger scale, rather than by individual companies; then it would have a big impact. There is a need to look at interventions that are working on population level and proven to have a big impact or have the possibility to impact on a wider population.*"

To conclude on this point, one member mentioned that the aspect of policy coherence should be considered more with regard to the effectiveness of the Platform: "*There is also the question of policy coherence: small interventions are crucial, but so long as the wider framework is not in place, such as labelling provisions, reformulation action plans etc., then local interventions aren't going to have a chance to succeed.*"

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<sup>16</sup> The active commitments by Platform members can be broken down as follows: For-profit members: Total of 107 commitments (Lifestyles 54; Marketing and Advertising 22; Labelling 12; Reformulation 9; Others 10). Not-for-profit members: Total of 48 commitments (Lifestyles 28; Marketing and Advertising 3; Labelling 1; Reformulation 1; Others 15).

### 6.5.3 Results from the interviews with observers

One of the observers highlighted the importance of reformulation and advertising, particularly in relation to the role food manufacturers can play in these areas. She also saw the lifestyles and education area as *“not necessarily part of the [food manufacturers’] core business”*.

The other interviewee claimed that the physical activity sector might be under-represented in the Platform. She also noted that there might be a need for a *“whole community approach”* to obesity, *“looking at town planning, transport, and having a more integrated approach”*.

### 6.5.4 Conclusions

The Platform’s commitments are spread across the four implementation areas, but the number of commitments in the area of lifestyle / education is significantly higher than in the other three areas. By far the highest number of commitments was in this area (including over half of the industry commitments and 67% of the commitments by not-for-profit members); the remainder are spread relatively evenly across the other implementation areas. The relative importance of the area of lifestyle / education in numerical terms was mirrored in members’ comments: Although all four areas were seen to contribute to the objective of combating obesity, on average, the area of lifestyle / education was found to be slightly more important than the other three in this respect.

That said, while the area of lifestyle / education appears over-represented in terms of the number of commitments in this area relative to the other three areas, it is important to keep in mind that the more limited number of commitments in areas like labelling, reformulation and marketing / advertising can involve a large number of actors (i.e. the members of Platform members), and tend to have a wide geographical scope and outreach.

In terms of the extent to which action in these four areas is contributing to the fight against obesity, it is the scale, scope and outreach of given commitments that will determine the extent of their impact, i.e. commitments undertaken by trade associations on a larger scale, by multiple actors, across borders will have more of an impact than single commitments made by individual companies or organisations in any of the four areas.

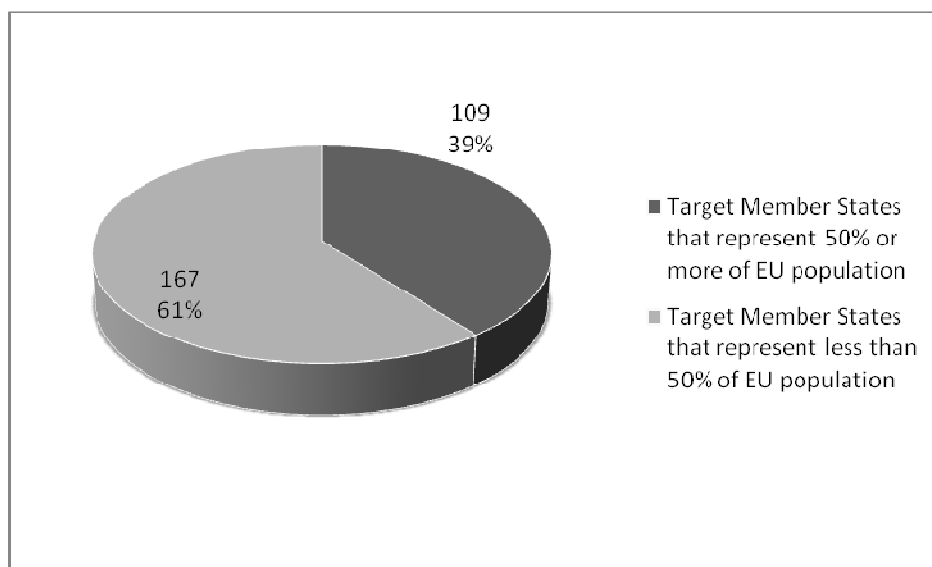
## 6.6 EQ 2.3: What is the proportion of commitments that reach more than 50% of the EU Member States populations?

### 6.6.1 Results from the database analysis

The analysis of all active and inactive commitments since 2005 (amounting to a total of 292 commitments) showed that a larger proportion of commitments target Member States that represent less than 50% of the EU population. That said, a larger proportion of commitments are multi-national, rather than targeting just one Member State.

As illustrates the Figure 12 below (including all active and inactive commitments since 2005), only 39% of the commitments target 50% or more of the EU population, compared with 61% of commitments which target less than 50% of the EU population.<sup>17</sup>

**Figure 12 – Active and inactive commitments targeting Member States representing 50% or more of the EU population**



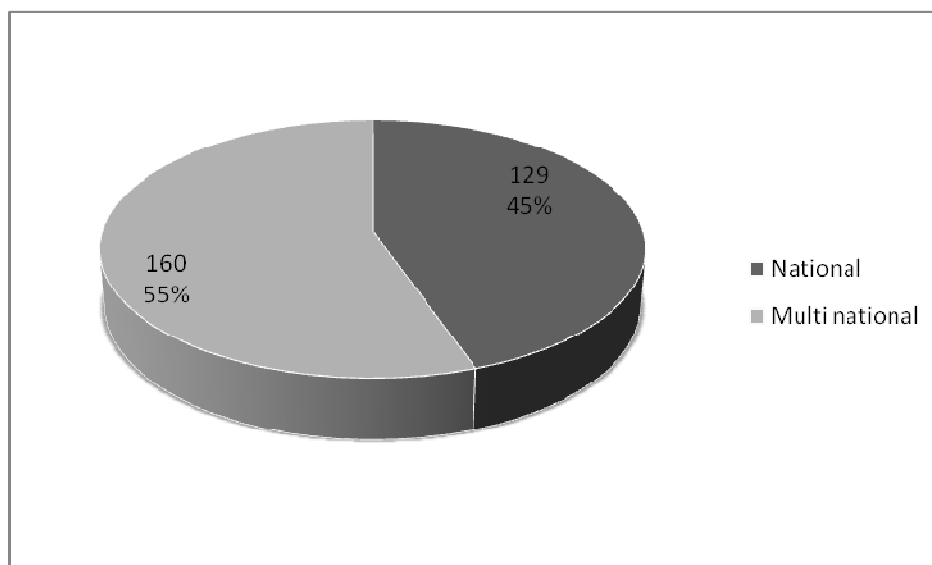
However, as shown in Figure 13 less than half of the commitments are national commitments, i.e. they only target the member state where the actor making the commitment is based. The remaining 160 commitments are multi-national commitments that target more than one Member State.<sup>18</sup>

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<sup>17</sup> The population of the member states targeted by each commitment was added up in order to see which commitments target 50% or more of the total of the EU population (499,800,000).

<sup>18</sup> For three commitments no information on the target area was provided.

**Figure 13 – National / multi-national active and inactive commitments**



### 6.6.2 Conclusions

Of all the commitments made between the beginnings of the Platform and January 2010, just under 40% target more than 50% of the EU Member States populations. According to the database statistics, 55% of Platform commitments as at January 2010 were multi-national and targeted more than one Member State, while the rest were national commitments.

## 6.7 EQ 2.4: To what extent are commitments made by the industry members linked to their core business?

### 6.7.1 Results from the Platform member questionnaire analysis and follow-up interviews

For-profit Platform members were asked to judge the extent to which their own commitments were linked to their organisation's (or members') core business. Three quarters of the 12 respondents stated that the commitments were either 'completely' (41.7%) or 'mostly' (33.3%) part of their organisation's (or members') core business.

Ten of the 14 for-profit respondents provided examples of commitments to show how their actions were linked to their core business. The table below summarises these findings.

**Table 7 Examples of commitments to show how actions are linked to members' core business**

Sector	Type of commitment
Food & Drink	Implementation of GDA nutrition labelling schemes
Advertising	Promotion and adoption of advertising self-regulatory mechanisms and codes
Sports & Fitness	Creation of links between health clubs and schools
Agriculture	Teaching children about food production
Retail & Catering	Implementation of national guidelines and information of products' nutrition content

One member stated in the interview that their organisation's objective could be linked to their core business in a better way, but that it is difficult to influence what some of their individual sub-members do.

### 6.7.2 Results from the desk research

Information on the links between the EU Platform's commitments and industry members' core businesses was first gathered through the questionnaires and interviews with Platform members, as shown above. In order to test some of these statements and provide a more objective assessment, all of industry's active commitments as at January 2010 were individually examined and a judgment made on whether or not they were linked to their core business. This enabled the evaluation team to show the proportion of active industry commitments, overall and per member, that are linked to their core business.

In this context, the core business of an organisation was defined as the organisation's "main" or "essential" activity, and is essentially the type of activity that generates most of the profit for the organisation. Based on this definition, the core business of the food industry is for example manufacturing and selling/marketing food, rather than educating staff or sponsoring sports events.

The table below presents the core business of each for-profit member, their explanation of how their actions are linked to this core business, and the number of active commitments linked to the actor's core businesses based on the definition stated above:



**Table 8 Overview of members' core business / Active commitments linked to core business**

MEMBER CHARACTERISTICS		CORE BUSINESS		
Member	Type	Core Business	Explanation provided in the interviews of how actions are linked to actors' core business	Number of active commitments linked to core business of actors
EGTA	FP	Advertise, media and sales promotion	No explanation given.	1 of 1 commitment
FEPI	FP	Manufacturing and distributors of outdoor and indoor play equipment and safety surfacing	It is linked to the organisations core business.	1 of 1 commitment
EuroCommerce	FP	Retail, sale, trade and distribution of goods	They are all linked to the core businesses of our members.	7 of 7 commitments
COPA-COGECA	FP	Production of agricultural and food products	It should be better linked. We can only make farmers who produce food products aware to a certain extent that their products affect the health of consumers. 'The core business of food business operators in the agricultural sector is to produce food. Teaching children on production in the sector is linked to this core business'.	0 of 3 commitments
EHFA	FP	Provision of health & fitness services (e.g. instruction and training)	'Completely linked'.	2 of 2 commitments
EVA	FP	Self-service sale or provision of goods and/or services operated by a vending machine	Commitments all linked to core business. 'It is about vending and we are in vending'.	2 of 3 commitments
AREFLH	FP	Production of fruits and vegetables	Animate networks in order to share experiences'.	0 of 1 commitment
CIAA	FP	Manufacturing of food and drink products (e.g. bakeries, fruit juices, fruit and vegetable preservers, sugar, soft drinks, etc.)	CIAA would not go into an area that is not relevant to their core business and activity.	23 of 58 commitments
EACA	FP	Advertise, media and sales promotion	We provided the creative and strategic input to the Healthy Lifestyles Campaign'.	1 of 1 commitment
EuroCoop	FP	Advocacy: Defend the interests of consumers in food policy, environment policy and sustainable consumption,	No explanation given.	3 of 5 commitments

MEMBER CHARACTERISTICS		CORE BUSINESS		
		consumer information and education		
FERCO	FP	Catering of food and drinks to businesses, organisations and society in general	All commitments are related to the provision of food services and have a direct link with the terms and conditions of the contract with the client organisation and the relation with the national food authority.	2 of 4 commitments
FRESHFEL	FP	Commerce (importers, exporters, distributors, wholesalers, retailers, providers) of fruits and vegetables	No explanation given.	5 of 5 commitments
WFA	FP	Advertise, media and sales promotion	All commitments are lined to their core business; They are all part of the remit of the organisation, but some are truly new in terms of the types of activities.	9 of 9 commitments
EMRA	FP	Restaurant chains	Their commitments are linked to their core business, as the commitments impact how meals are presented and/or sold to customers, which is our members' main activity.	3 of 3 commitments
ACT	FP	Free-to-air, pay-tv and digital distribution of audiovisual content	No explanation given	1 of 1 commitment
<b>TOTAL</b>		<b>60 out of 104 commitments (58%)</b>		

Of the 104 active commitments from for-profit organisations reviewed above, the evaluation team established that 60 commitments are linked to the actors' core businesses (i.e. 58%) and the remainder (42%) go beyond the scope of members' core business. A more detailed assessment shows that:

- More than half of the commitments made by one Platform member (i.e. CIAA, which has a very high number of commitments amounting to more than half of the commitments considered as part of this exercise) are not linked to their actors' core business (35 out of 58, or 60%). The activities of this one member have widened the breadth of commitments overall and led to the high number of commitments not linked to core business (44 out of 104).
- Most Platform members' commitments are linked to their actors' core business, rather than taking on a broader scope. When removing the member with the largest number of commitments (i.e. CIAA), the overall number of active commitments made by the remaining 14 for-profit members amounts to 46; nine of these (less than one fifth) are not linked to the actors' core business.

- In the case of two of the 15 for-profit members, none of their commitments were linked to their core business. Only four members had some commitments that were linked to their core business and some that were not.
- For nine for-profit members, all of their commitments were linked to the actors' core business.

Within this context, it is important to note that the Commission has encouraged members to make commitments not only related to their core business, but to also explore ways of becoming active in other areas in order to ensure that the activities of the Platform cover all four action areas. Such a steer from the Commission may help explain why a few for-profit members (six out of 15) have made commitments that go beyond the scope of their core business.

### 6.7.3 Conclusions

Most active commitments (as at January 2010) made by industry Platform members were linked to their core business.<sup>19</sup> Nine out of the 15 for-profit members only had commitments linked to their core business. Four out of 15 for-profit members had some active commitments that were linked to their core business and some that were not, and two had only commitments that were not linked to their core business. While it seems important for industry members to make commitments that are linked to their core business and thus take obesity concerns more into account in their normal operations, it should be kept in mind that commitments in other areas can also be beneficial, and industry members have been encouraged by the Commission in the past to become active in a wide range of fields and implementation areas.

## 6.8 EQ 2.5: To which extent has participation in the Platform affected the Corporate Social Responsibility (CSR) approach of industry members?

### 6.8.1 Results from the Platform member questionnaire analysis

Opinions among industry members were mixed in relation to the impact of participation in the Platform on their CSR approach: while one quarter of the 12 industry respondents stated that participation in the Platform had had 'somewhat of an effect' on their approach to CSR, a third felt that it had had 'no effect at all'. Only two respondents stated that it had had a 'considerable effect', another two 'did not know' and none found that it had had a 'large effect'.

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<sup>19</sup> In this context, the core business of an organisation was defined as the organisation's "main" or "essential" activity, and is essentially the type of activity that generates most of the profit for the organisation. Based on this definition, the core business of the food industry is for example manufacturing and selling/marketing food, rather than educating staff or sponsoring sports events.

## 6.8.2 Results from the desk research

The interviews and questionnaire with industry members showed that there is no broad impact of the Platform on their (or the organisations they represent) CSR approaches. However, from the few examples cited where the Platform had had some impact, the evaluators can say that there is one fact that has facilitated that impact: the existence of work and discussions in the Platform has prepared the ground for the adoption of obesity-related issues in companies' CSR approaches. There are two examples cited by members in the interviews that evidence this:

- One member said the Platform had had a 'considerable effect' and mentioned an agreement they signed with a trade union. In this case, the Platform member acted representing employers and the trade union spoke for workers. The agreement was signed in January 2007 and was aimed at integrating CSR principles into their relations with their employees, consumers, customers, shareholders, suppliers, public authorities and, more generally, the community. The agreement intended to set voluntary minimum standards in a number of suggested areas, such as health and safety, food safety and hygiene, working conditions and work organisation, amongst others.

It should be noted that the agreement stated that the Platform member and trade union concerned had been working for a long time in supporting these types of initiatives that went beyond the legal requirements. In this framework, both organisations had decided to work together on CSR, focusing on social aspects and employer/employee relations<sup>20</sup>. This could suggest that the impact on their CSR approach had more to do with past work than with their participation in the Platform.

However, the CSR agreement contains a specific section devoted to the fight against obesity which may indicate that there was an effect of the Platform process on this CSR initiative. In the agreement, both organisations recognise that obesity and overweight have reached epidemic proportions, making this disease one of the greatest challenges of public health for the 21st century. They also point out that the problem requires the involvement of all stakeholders and of society as a whole and recognise that they have a role to play in this issue. They propose to use the dialogue between them as a *"platform from which to encourage their members to contribute to the promotion of a healthy diet and the prevention of a sedentary lifestyle"*.

After the agreement was signed in January 2007, in October of that year both organisations signed a common statement on obesity where they encouraged companies and their employees to work jointly to promote healthier diet and physical exercises (e.g. diversified meals respecting culinary traditions, contribute to the end consumers' education about nutrition, training programmes tackling issues such as the importance of healthy eating habits and physical exercise, etc.)

It is important to mention that this initiative was placed as a commitment in the Platform in 2006 and is still active. Back in 2006, the Platform member committed to strive to gain the trade union's support to promote healthier lifestyles and to encourage its member organisations and companies to develop sustainable training programmes in this area for employees. This shows that the agreement

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<sup>20</sup> It is possible that the more intense work on this CSR approach started in July 2001 when the Commission issued the Green Paper Promoting a European framework for Corporate Social Responsibility. This document is stated as reference in the agreement signed by the Platform member and the trade union. Some areas included in the CSR approach has been worked even before the Green Paper was published. For example, both organisations signed an "Agreement on vocational training" in October 1999 and a "Joint Declaration in favour of higher food safety and hygiene standards and their proper implementation" in April 2000.

and common statement signed in 2007 were achieved in the framework of this member's work in the Platform.

Moreover, as it was explained in the questionnaire and interview, it was due to one of the organisations' participation in the EU Platform that the fight against obesity was identified as one priority area in the CSR agreement and that it is also in the agenda of the annual meeting held by both organisations. This explanation, together with the evidence collected through desk research, show that there has been an impact of the Platform on this member's approach to CSR. However, it should also be noted that this was facilitated by the fact that both organisations had been working together on developing a CSR strategy and also had a well-established social dialogue that must have facilitated the discussion around the obesity issue.

- The second example is the voluntary adoption of the Guideline Daily Amounts (GDAs) on labelling by the industry across the EU mentioned by another Platform member as evidence of the impact of the Platform on the CSR approach of industry members. According to this member, this could have happened without the Platform as *"they [the industry] were going in that direction anyway"*. However, *"putting it into a framework and setting targets was due to the Platform"*. This member also stated that, without the Platform, industry would have taken more time to adopt it. Initially set as a Platform commitment that was due by 2009, the adoption was in fact much quicker. They also mentioned that monitoring the level of adoption was something that would not have happened without the Platform.

The commitments database shows that, in effect, one Platform member committed to recommend to the organisations it represented that they include front-of-pack and back-of-pack nutrition labelling to introduce GDAs. This recommendation was adopted in June 2006 and the commitment was still active at the time of writing. Seven companies initially committed to implementing the scheme in full, later rising to 11 companies who were prepared to adopt the recommendation. As a result of a monitoring survey conducted in 2007 in the framework of this commitment to assess the implementation of the nutrition labelling scheme, this member showed that, by the end of 2008, all 27 Member States were going to have GDAs on at least some of their products. Moreover, by the end of 2009 it was expected that 10 of the 11 companies would be using GDA on 100% of all their packages.

As in the other example mentioned above, it is possible to say there has been some impact of the Platform on industry's CSR approach, particularly in relation to nutrition labelling. However, from what was said in the interviews, it is also evident that what helped the Platform to have an impact in this area is that industry was already moving towards what the Platform member proposed in its commitment and thus the ground was somewhat prepared.

Among the other members that said the Platform had had 'somewhat of an effect' on their approach to CSR, one mentioned not a robust change in the approach, but a small example of how Platform membership had increased their awareness of issues that lead to obesity. They mentioned they now have healthy work lunches on Fridays and that this was particularly inspired by the former chair's request to replicate workplace wellness actions and have the organisations they represent do so too. This member also explained that it had not been very easy to tell their own members that they need to implement such schemes, particularly when these are organisations that are not related to the food-sector and thus have not interacted much with the Platform. Thus, the effect on their members' CSR strategies had been very limited.

Finally, among the members that said the Platform had had 'no effect at all' on their approach to CSR, one said they did not have a CSR approach at all, one mentioned their CSR strategy was already in place before entering the Platform, and another claimed this was not a relevant question for them given that

they were in the physical activity sector and they understood this was naturally related to fighting obesity. The last respondent was not very sure what the effect could have been.

### **6.8.3 Conclusions**

The findings suggest that Platform has only had a limited, rather than a significant and consistent effect on the CSR approaches of industry members (or of the companies members represent). In fact, there are certain umbrella organisations that do not have a CSR approach at all and/or have difficulties in influencing their members regarding internal matters such as CSR approaches. That said, in the few cases where an impact was discerned, what facilitated the implementation of certain innovations was the existence of work and discussions in the Platform that prepared the ground for the adoption of obesity-related issues in companies' CSR approaches.

## **6.9 EQ 2.6: To what extent are actions initiated by Platform members addressing the needs of stakeholders and EU citizens, such as actions benefiting lower socio-economic groups?**

### **6.9.1 Results from the database analysis**

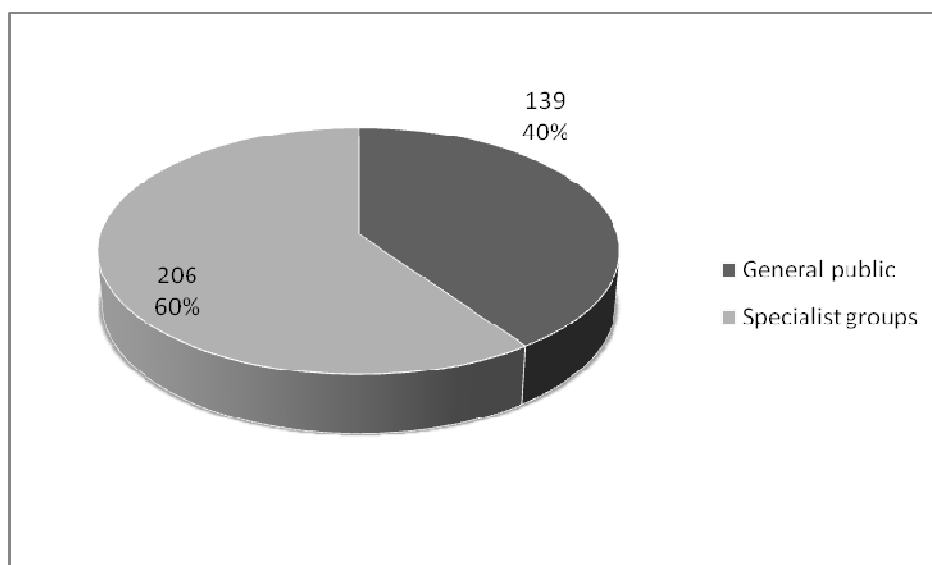
First of all, an analysis of the groups targeted by the commitments (all Platform commitments since 2005 targeting the general public/specialist groups amounting to a total of 292 commitments) was carried out to establish the type of groups the commitments are directed at.

The majority of commitments target specialist groups such as Children & Adolescents, however more than one third of commitments target the general public. A number of commitments target more than one target group and were therefore counted more than once to reflect the actual type of groups targeted. This resulted in 345 target groups being counted for 292 commitments<sup>21</sup>. It should be noted that the additional 53 target groups are mainly specialist groups (e.g. industry) rather than the general public, which was only named as an additional target area in six cases.

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<sup>21</sup> This also applies to the following paragraph on the target group of commitments that target 50% or more of EU population.

**Figure 14 – Active and inactive commitments targeting the general public / specialist groups**



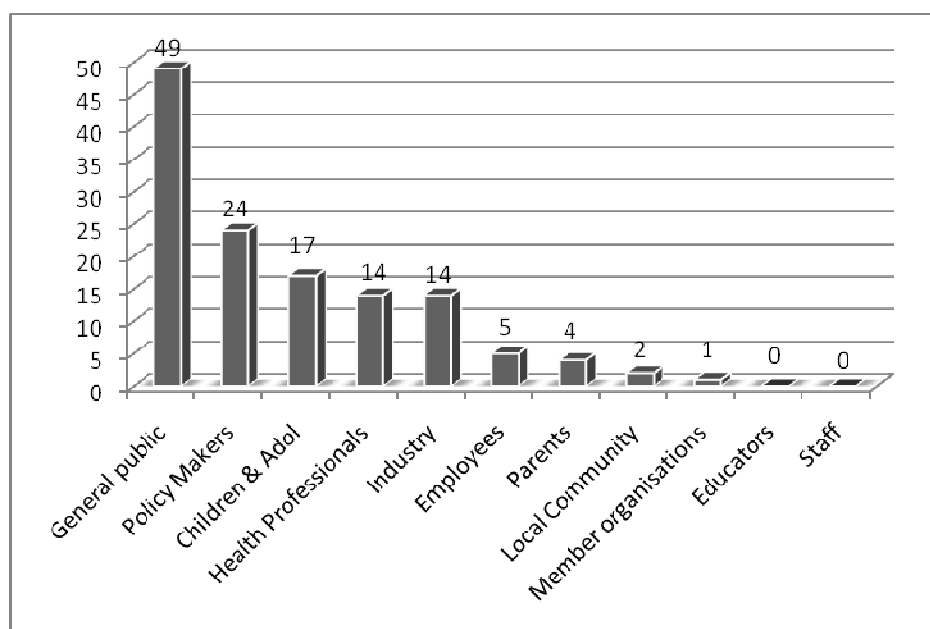
Out of the active and inactive commitments targeting 50% or more of the EU population<sup>22</sup>, less than half of the commitments (49) target the general public. This amounts to 45%, with the other 55% of commitments targeting specialist groups.<sup>23</sup> The second largest group targeted is Policy Makers, followed by Children & Adolescents, Health Professionals and Industry.

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<sup>22</sup> This concerns all active and inactive Platform commitments since 2005 that target 50% or more of the EU population by target group, amounting to a total of 109 commitments.

<sup>23</sup> Some commitments target more than one target group, resulting in a higher number of target groups than commitments.

**Figure 15 – Active and inactive commitments targeting Member States representing 50% or more of the EU population by target group**



### 6.9.2 Results from the Platform member questionnaire analysis and follow-up interviews

Platform members were asked whether, in their view, the actions instigated by Platform members to date adequately address the needs of (1) Stakeholders and potential multipliers (such as educators, parents, etc.). (2) Especially vulnerable or affected groups (such as children, lower socio-economic groups, etc.). Over half of respondents found that the actions instigated by Platform members only ‘partly’ or ‘hardly’ addressed the needs of these two groups, with a slightly higher percentage (34.4%) finding that they did so ‘partly’ for stakeholders and potential multipliers, relative to especially vulnerable or affected groups (25.0%).

- Industry generally felt that the needs of these groups were more adequately addressed by actions instigated by Platform members. While the largest proportion of for-profit respondents felt that these groups’ needs were ‘partly’ met, the largest proportion of not-for-profit respondents felt they were ‘hardly’ met in both instances.

One of the issues raised by several not-for-profit members was the difficulty in knowing what the real impact of the Platform’s actions has been on these groups. According to them, even though the importance of targeting these groups had been highlighted in the Platform’s meetings, they were uncertain about the real effect of commitments in this respect and mentioned a *“lack of any solid evidence”* in order to make a judgement. One for-profit member added to this, saying that *“in Platform meetings parents/educators may not have been sufficiently present, nor has a solid justification been provided regarding addressing lower socio-economic groups”*.

The interviews indicated that a number of for-profit and not-for-profit organisations felt that the needs of children and adolescents were taken into consideration. One organisation from the not-for-profit sector



mentioned that in terms of reaching relevant target groups, the commitments do not address the needs of immigrants, which were seen as an important group with regard to the obesity problem in Europe because of the changes in lifestyle and eating habits that immigrants are often confronted with. Targeting lower socio-economic groups was seen as being most effectively achieved through education, once again underlining the importance placed on activities in this area (see EQs 1.2 and 2.2).

In fact, the need for clearer guidance in terms of the needs of target groups was mentioned by a for-profit organisation, who also stated that obese people were one of the Platform's main target groups, but that it is a group that is not represented on the Platform and their needs are not known: *"In terms of target audiences, I think that it is sometimes not clear enough what the needs of the target audiences are. There are no organisations representing overweight people on the Platform, so it is hard to tell if the commitments actually target their needs."*

Questions were raised as to who exactly was responsible for ensuring these groups were targeted. One not-for-profit member stated that private companies should take more responsibility in this field and that the European Commission should require that organisations from the private sector pay more attention to vulnerable groups. One for-profit organisation stated, on the other hand, that targeting specific groups should be the responsibility of Member States rather than private companies. It was also mentioned that there is not enough information on whether commitments meet the needs of specific target groups. According to one organisation, the European Commission should disseminate more information about this to Platform members.

While targeting specific groups was clearly seen as important, it was also mentioned that trying to meet the needs of too many specific groups can also weaken the Platform's impact: *"If we try to sub-divide too much when we don't even have the thrust of the Platform doing everything that it should be doing, then you'd just be diluting the effort. The Platform is not so successful that it can afford to split its resources and focus on smaller target groups."*

### **6.9.3 Conclusions**

The majority of actions initiated by Platform members tend to be targeted at specific target groups (such as children and adolescents, policy makers and industry) rather than the general public. While Platform members claim their actions are intended to address the needs of stakeholders and EU citizens, it is unclear to what extent commitments are actually addressing the needs of (1) stakeholders and potential multipliers (such as educators, parents, etc.) and (2) especially vulnerable or affected groups (such as children, lower socio-economic groups, etc.). Although the intention is there, this evaluation was not in a position to ascertain what these groups' actual needs are, and therefore unable to judge whether members' actions are effective at addressing these needs or not.

## 6.10 EQ 2.7: Has participation in the Platform changed its members' understanding and perception of the situation, and has it had any impact on their responses?

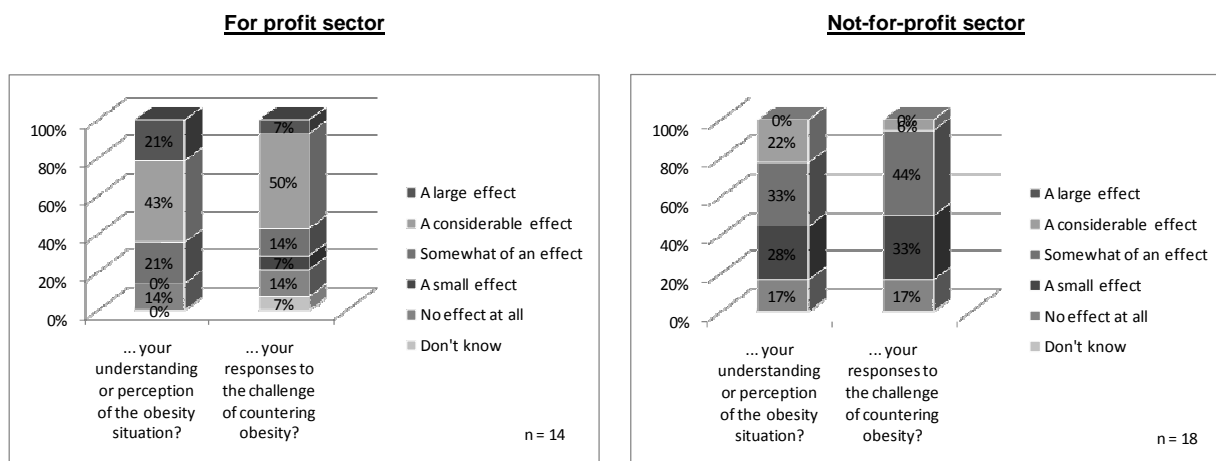
### 6.10.1 Results from the Platform member questionnaire analysis and follow-up interviews

Over 50% of respondents felt that participation in the Platform had had either a 'considerable' or 'somewhat of an' effect on their understanding or perception of the obesity situation and their responses to the challenge of countering obesity. The largest proportion (31.3%) were of the opinion that the effect was 'considerable' in terms of their understanding or perception of the obesity situation, but 'somewhat' (31.3%) in relation to their responses to the challenge of countering obesity.

However, industry claimed that participation in the Platform has had a much larger effect on their understanding of and responses to the obesity situation than not-for-profit members:

- Industry members were generally of the opinion that participation in the Platform had had more of an effect on these two areas, with close to 43% being of the opinion that the effect had been 'considerable' in terms of their understanding or perception of the obesity situation, and 50.0% being of the same opinion in relation to their responses to the challenge of countering obesity.
- Well over half of not-for-profit respondents, on the other hand, found that participation in the Platform had had either 'somewhat of an effect' or 'a small effect' on their understanding or perception of the obesity situation, and their responses to the challenge of countering obesity.

Figure 16 - Has participation in the Platform had any effect on...



Industry members stressed in the questionnaire how dialogue between the different sectors provided them with a better understanding of the issue of obesity: *“To know the problem better is always a good thing even if it is to realise how much more needs to be done. The scientific and up-to-date facts and data are useful to know.”* It had also increased their knowledge of where each member stands and industry felt that the discussions held in the framework of the Platform had helped them define and elaborate their commitments. The box below shows some of these comments:

*“Through the Advertising Roundtable, we managed to have a cross-stakeholder discussion about advertising self-regulation and the components required for this to be effective. Input from consumer and public health groups were critical in shaping our best practice model which we are rolling out across Europe. Separately, it was the input of the Commission and other stakeholders which inspired our development of an EU Pledge programme which has impacted considerably the types of foods promoted to children in Europe. Social marketing was also an area identified consensually as a valid and legitimate area of activity” (For-profit sector)*

*“The Platform enabled the association to get into contact with NGOs, focus constituency views, enabled [our] smaller members to be inspired by actions undertaken by members with more resources” (For-profit sector)*

Source: Member questionnaire

For-profit members also stated in the interviews that they amend their commitments in response to the discussions and feedback from the Platform, which shows that their approach to the issue of obesity has changed. One member mentioned that their understanding of how to approach the issue in an effective way had increased: *“The impact has been to focus on how we can get more out of what we can do rather than having hundreds of different initiatives.”* Moreover, industry members in the interviews stated that they gained a better understanding of the individual aspects of how to tackle the issue of obesity. One member stated that it gave them an *“understanding of the cumulative effect – they understood the need for quantitative restrictions which helped them to formulate a response through [our commitment]. (...) It helped us to deepen our wider understanding of advertising self-regulation and see what we wanted to get out of this. We identified two criteria as critical to effective advertising self-regulation.”* The same member also mentioned a discussion on self-regulation which *“led to a consensus about the way forward in terms of self-regulation. This gave level of confidence needed to go a step further with the Platform.”*

The open responses to the questionnaire showed that not-for-profit members tended to agree on the fact that the Platform has had an effect on their understanding of other stakeholders' positions - particularly that of industry - and of the difficulties faced by the European Commission to promote actions that involve industry; nine out of 18 questionnaire respondents from this sector made further comments on this aspect this. One not-for-profit member mentioned that they are now more aware of the sacrifices private companies have to make, e.g. in the field of reformulation, where customer expectations have to be managed when the salt or sugar content of a product is changed. In the interviews, this was also mentioned with regard to commitments in the labelling field, where the understanding of industry actions in the case of one not-for-profit organisation had increased through the Platform: *“In relation to the information for consumers, there are two competing methods of front of pack labelling of products – traffic lights and GDA. It seems to me that more and more studies on the subject find that the traffic light system is infinitely superior, yet most of industry sticks to the GDA system and industry has managed to get the European Commission in its preliminary report on the issue to favour this. I would have found this incomprehensible if it had not been for the Platform.”* The member further explained that *“[A food manufacturing company] reported that it had cut the level of salt in its products significantly, but their competitors did not and they lost market share. There is a reluctance on the part of industry to accept the traffic light system and with GDA, they do not have to make it so clear what the level of salt is.”*

Among the not-for-profit members that mentioned that participation in the Platform had not particularly affected their understanding of the issue of obesity and how it should be addressed, some claimed that they already had this knowledge and understanding before joining the Platform, but some also felt that it

was at least beneficial for them to learn in how far other organisations on the Platform had an understanding of the issue of obesity and which aspects were not yet so well understood.

The above comments show that participation in the Platform has increased members' understanding of the issue of obesity itself, the different positions of members of the Platform, and the actual approach which seeks to effectively contain and reverse obesity.

### **6.10.2 Results from the interviews with observers**

As regards how far participating in the Platform had changed their understanding and perception of the obesity situation and their responses to the problem, the two interviewees agreed that the Platform had not had a significant effect on their perceptions and understanding.

However, one pointed out that she had seen a *"novel"* approach in the Platform and that the meeting that she had participated in had *"broadened her understanding"*. She also pointed out that if the Platform was not handled with a *"neutral tone"* then certain members *"would quite quickly not be interested anymore and would just leave"*.

### **6.10.3 Conclusions**

Participation in the Platform appears to have had a considerable impact on members' understanding and perception of the situation, notably by increasing a mutual understanding of each others' positions. The majority of members feel that participation in the Platform has had at least 'somewhat of an effect' on their understanding and perception of the situation; only 15% claim that it has had 'no effect at all'. That said, the effect seems to have been more significant among industry members than among not-for-profit members.

However, the Platform has not had such a significant impact on members' responses to the challenge of countering obesity. The largest proportion of respondents (31%) said it had only had 'somewhat' of an effect, with here again industry finding the effect more significant than not-for-profit members.

The Platform process seems to have allowed members to develop greater awareness of the different stakeholders' interests and positions, more so than help them gain greater knowledge of the issue of obesity and how it should be tackled. Both industry and not-for-profit members explained that they now have a better understanding of what each group is seeking from the Platform and also what difficulties they face when trying to implement actions.

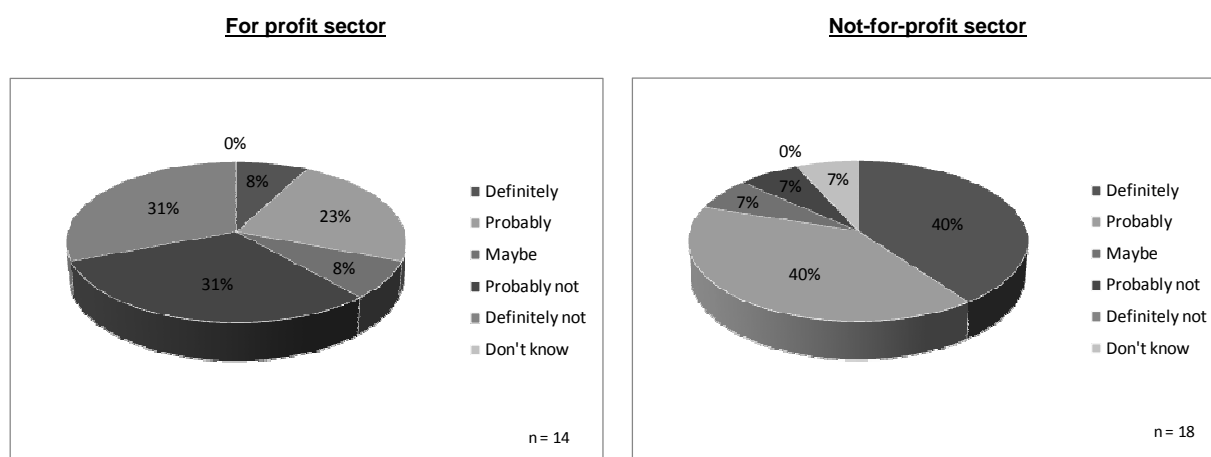
While the findings suggest that the impact of the Platform on members' understanding of the situation appears to be greater than on their response to it, it is important to note that the findings for EQ 1.3 demonstrate that commitments have been inspired/affected in some way by discussions, the exchange of information or the pressure brought to bear by the European Commission to increase members' commitment to the Platform.

## 6.11 EQ 2.8: Should the Platform have a renewed mandate including joint goals and operational objectives?

### 6.11.1 Results from the Platform member questionnaire analysis and follow-up interviews

Overall, over half of respondents (57.1%) were of the opinion that the Platform was in need of an explicit new mandate / vision, but the not-for-profit respondents were much more of that opinion than industry. While 40.0% of not-for-profit respondents stated that the Platform was 'definitely' and another 40.0% said that it was 'probably' in need of an explicit new vision / mandate, the for-profit sector was of a different opinion. Only 23.1% of industry respondents said the Platform 'probably' needed an explicit new vision / mandate and close to 62% answered either 'probably not' or 'definitely not' to the question.

Figure 17 - Do you consider the Platform is in need of an explicit new vision / mandate?



Platform members provided the following examples of what this new vision / mandate could include:

- *“The overall purpose remains useful, but it would be useful if it could be more focused so that members feel that continuing to participate will lead to significant change“*
- *“The Platform could become more active in monitoring activities that have been promised by EU-partners and/or ministries and BIG stakeholders in Europe.”*
- *“The new vision should be based on the positive aspects of the outcome of this evaluation. A leading role in changing the Life Style of Europeans. “*
- *“A political ‘policy making’ mandate, a stronger more directive mandate.”*
- *“It would be helpful if the Platform were mandated to give more feedback to partners and to exploit and disseminate outputs to all stakeholders.”*
- *“Enhanced cooperation with the national level, as most of the Member States now have their own strategy. Indeed, it is clear that [our] members and companies are now putting more efforts into their involvement in national platforms than in the implementation of the commitments [with] the EU platform.*

- *“What the Platform does need is renewed emphasis on its objectives and support from the highest political level.”*

### 6.11.2 Conclusions

The fact that more than half of all Platform members (including 80% of not-for-profit members) see a need for a renewed mandate means that this issue needs to be taken seriously, and that a renewed mandate should be developed in order to allow the Platform to maintain momentum. At the same time, it is important to recognise that there are clear differences between the sectors in terms of their assessment of the current situation, and that the majority of industry members see no need for a new mandate. Any attempts to develop a new mandate need to take into account the concerns of both sides, and ensure that the new mandate provides an added value and addresses the concerns of both industry and NGO members.

## 6.12 EQ 2.9: Does the current monitoring system give sufficient focus to implementation to support a sound development of the Platform?

### 6.12.1 Results from the Platform member questionnaire analysis and follow-up interviews

Platform members were asked to judge the effectiveness of the Platform’s current monitoring system in relation to the objectives that were identified when the system was created. The monitoring system was seen by a majority of members as being either ‘quite’ or ‘somewhat’ effective at allowing members to achieve the following objectives:

- ‘Ensur[ing] commitments are relevant to the general aims of the Platform’,
- ‘Fine-tun[ing] their commitments,
- ‘Understand[ing] what needs to be done and how (for the commitment to achieve its objectives)’,
- ‘Identify[ing] and eventually duplicat[ing] good practices.

However, the areas where it was perceived as being less effective by the largest proportion of respondents related to:

- ‘Enhanc[ing] the trust of other stakeholders in commitments’, with nearly half of respondents stating that it was ‘not very effective’ at doing so.
- ‘Better integrat[ing] their commitments with those of other members’, with just over 28% of respondents being of this opinion.

Few (between 0 and 4) respondents judged the system to be ‘very effective’ in terms of allowing them to achieve any of the given objectives.

The not-for-profit sector generally took a more critical view of the monitoring system:

- A majority of industry respondents judged that the monitoring system was either ‘very effective’ or ‘quite effective’ at allowing members to: ‘Ensure commitments are relevant to the general aims of the Platform’, ‘Fine-tune their commitments’ and ‘Understand what needs to be done and how (for

the commitment to achieve its objectives)'. The majority of respondents in the not-for-profit sector, on the other hand, stated that the system was either 'quite effective' or 'somewhat effective' at doing so, with the first objective being judged more positively (44.4% stated it was 'quite effective') than the other two.

- Just over 55% of not-for-profit members stated that the monitoring system was either 'not very effective or 'not effective at all' at allowing members to 'Better integrate their commitments with those of other members' and 61.1% judged that it was 'not very effective' at allowing members to 'Enhance the trust of other stakeholders in commitments'. While these two objectives were also seen by industry as being the least effective, their judgement of them was not as critical as that of the not-for-profit members.

There were mixed opinions from both industry and not-for-profit members on the extent to which the monitoring system was effective at allowing them to 'Identify and eventually duplicate good practices'.

As regards the problems and challenges encountered with the current monitoring system in both the questionnaire and interviews, both for-profit and not-for-profit members mentioned the following points:

- The system is too rigid, complex and time consuming. Commitment with less ambitious objectives might be the consequence of the system as too much effort is needed for complex commitments.
- The system of awarding scores is not transparent enough.
- Monitoring is difficult for umbrella organisations with member organisations in different Member States. Monitoring has to be considered when a commitment is being developed.
- It is stopping members from developing or increasing commitments as the monitoring takes up too many resources. Organisations opt for "easy" commitments rather than complex ones.
- The system is very focussed on quantifiable measures which makes it difficult to monitor areas such as advocacy work, information exchange, policy development, awareness raising work, etc.<sup>24</sup>

In addition, for-profit members highlighted the following:

- The monitoring scores do not necessarily take into account the relevance and real impact of activities
- The approach is too standardised. The requirements should be tailored more to the individual organisations and commitments.
- There are too many people / departments involved. It would be better if there was just one person at DG SANCO responsible for the monitoring of a commitment, like an account manager.
- The system is not independent enough
- The system only monitors in how far the commitments have met their objectives rather than the overall effect of the commitments which might include results and outputs that were not anticipated.

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<sup>24</sup> In one case a member stated that they did not make advocacy commitments anymore, even though their activity in the area had increased.

- The format of the monitoring is made for people implementing projects.
- Some commitments are non-monitorable in terms of the impact they are having so monitoring is not useful.
- The technology used is poor

In relation to these problems, for-profit members asked that procedures be simplified, that the system become more flexible and that a more dynamic and technological solution is considered. The type of organisation should also be taken into account, as umbrella organisations have more difficulties in getting the monitoring information from their members and alternative arrangements have to be made.

Not-for profit members, for their part, mentioned the following problems and challenges in relation to the monitoring system:

- It is not clear what is expected from the system
- NGOs have limited resources to allocate to both implementation and monitoring. There should be different requirements for profit and non-profit organisations.
- There should be more focus on relevance of commitments than on monitoring.
- There are aspects that can be hidden with self-monitoring, e.g. a reduction of sugar by substituting it with other sugar-types.
- The contractor did not understand the significance of the monitoring figures as they were not briefed by the European Commission properly beforehand.
- The timing of commitments is not necessarily in accordance with the timing of reporting
- The monitoring forms are often not useful for the kind of information not-for-profit organisations have and it is difficult to complete the forms.

Not-for-profit organisations recommended that: members be offered further guidance on what types of commitments should be implemented, the monitoring system be adapted or made flexible enough to consider the different nature of the commitments, and that they be provided with some financial support to compensate for their limited resources. Different levels of monitoring could be required from profit and not-for-profit members, with not-for-profit members having to spend fewer resources on monitoring.

It is also worthy of note that a couple of members, in the context of the open question on the monitoring system, commented on the monitoring workshop in particular, saying that it had been beneficial.

***For more findings as to members' expectations for the future of the Platform, please also refer to EQ 4.2.***

### **6.12.2 Results from the interviews with observers**

The Platform observers were asked to provide their views on the current monitoring system. One of them saw that it was a *“good way of ensuring that members at least go some way to doing what they say they are going to do”*. However, she pointed out that it is a monitoring of members' monitoring and not of their actions. This also means that the system is not focusing on the implementation of commitments. A comment made by a not-for-profit member in the questionnaire went further in this respect: *“The monitoring process, while important in order to gauge success and share best practice, also seems to*



*have developed a momentum of its own so at times it has seemed that the Commission's main focus has been around the quality of the form filling, rather than the quality and relevance of the commitments made.*" That said, the observer seemed to agree with the current basic approach –which she described as *"pragmatic"* and *"realistic"*- particularly because a third party monitoring members' actions would imply losing their *"good will"* in evaluating them themselves. She claimed this was in accordance with the purpose of *"inspiring people and not forcing them"*.

The other observer highlighted as positive that the monitoring system had an *"independent organisation"* reviewing the reports presented by members. However, she questioned the extent to which this organisation went back to members to ask for further clarifications or information.

### **6.12.3 Results from the desk research – an overview of the findings**

In order to answer this evaluation question, the monitoring system's **objectives** were classified according to the extent to which they have been achieved so far, based on what members have said in the questionnaire and interviews, together with the contractor's and the Commission's examination of the monitoring of commitments available in annual monitoring progress reports, plenary meeting minutes and interviews.

Before assessing the monitoring system, the evaluators agreed that an **average level of achievement** (i.e. met to an extent) would be assigned to those objectives where the evidence gathered in the interviews, questionnaire and desk research showed that the results were variable and thus it was not possible to say the expected results were achieved to a high extent. On the contrary, a **high level of achievement** (i.e. mostly met) would be given to objectives where the evidence collected revealed that a high number of stakeholders considered that the monitoring system had met its goals and where this was also supported by the secondary data gathered in the desk research. Finally, a **low level of achievement** (i.e. not met) would be assigned to objectives where there was evidence that stakeholders were not very satisfied with the monitoring system's performance and the secondary data also exposed some weaknesses towards achieving the objective.

The table below summarises the assessment's results.

**Table 9 Monitoring system's assessment**

Monitoring system's objective	Comments on progress achieved against desk research, interviews and questionnaire analysis	Level of achievement
<p><b>1. Ensuring commitments are relevant to the general aims of the Platform</b></p>	<p>Overall, <b>the majority of members claimed that the monitoring system had been either 'quite' or 'somewhat' effective at achieving this objective</b>, ranging from 71% amongst for-profit members to 61% amongst not-for profit ones. Overall, this was the objective that was judged more positively amongst all not-for profit members.</p> <p>Beyond this relatively positive results in the questionnaire, it should be noted that <b>both groups pointed out in the interviews that monitoring the relevance of commitments and ensuring they were contributing to achieving the aims of the Platform was still a weak area</b>. Platform members also mentioned that they were unsure if the system was monitoring "<i>the right things</i>" and that it only monitored in how far the commitment had met its objectives rather than the overall effect of the commitment which might include results and outputs that were not anticipated.</p> <p>The desk research exercise revealed that <b>there has been no assessment of the relevance of commitments so far</b>. The European Commission's external contractor for monitoring stated in all monitoring progress reports that their job has not been to make judgements on the relevance of particular commitments to the aims of the Platform, but to objectively assess the information contained in monitoring forms. On the other hand, there were some mentions in plenary meeting minutes that showed that even though it was expected that the monitoring process would assist in identifying the relevance of commitments, some members have remained concerned over time over the relevance of some individual commitments<sup>25</sup>.</p>	<p><b>Met to an extent</b></p>
<p><b>2. Fine-tune commitments (e.g. taking early corrective action)</b></p>	<p>Results from the questionnaire showed that <b>thirteen out of eighteen not-for-profit members (72%) and eight out of fourteen for-profit (57%) agreed the monitoring system had been either 'quite' or 'somewhat' effective at achieving this objective</b>.</p> <p>In the interviews it was mentioned several times, by both for-profit and not for profit members, that the monitoring system is useful in terms of improving commitments. However, in some cases members also stated that they were not sure if this was the case. The system of awarding scores was seen as not very transparent by some members, making it <b>difficult to understand what needed to be changed</b>. In addition to this, some interviewees suggested that in some cases the monitoring system had been counterproductive with regard to the aims of the Platform, as it <b>prevented members from developing new commitments (adding to existent ones) and/or setting high objectives due to the heavy monitoring requirements</b>. Thus, with the monitoring</p>	<p><b>Met to an extent</b></p>

<sup>25</sup> Plenary Meeting Minute (20 September 2007): [http://ec.europa.eu/health/ph\\_determinants/life\\_style/nutrition/platform/docs/ev\\_20070920\\_mi\\_en.pdf](http://ec.europa.eu/health/ph_determinants/life_style/nutrition/platform/docs/ev_20070920_mi_en.pdf)

Monitoring system's objective	Comments on progress achieved against desk research, interviews and questionnaire analysis	Level of achievement
	<p>system in mind –that weights all commitments in the same way, independently of their size and relevance to the aims of the Platform- some members might have tended to submit easy-to-measure commitments instead of engaging in challenging initiatives. On the other hand, some stakeholders also suggested that there are <b>no incentives to build on existing commitments</b> by increasing their coverage or including more challenging objectives instead of submitting new ones each year.</p> <p>Desk research showed that both <b>the Commission and its external contractor for monitoring have developed documents aimed at helping members to improve their monitoring</b>. There have also been opportunities where members received individual feedback from the external contractor after their commitments were reviewed (e.g. in 2008 after the submission of the 2007 monitoring forms). However, there have been <b>few opportunities to discuss this individually</b> with members (e.g. in a one-to-one meeting) in order to develop a greater understanding of their particular difficulties and opportunities to improve the monitoring of commitments<sup>26</sup>. The coaching sessions organised after the 2009 review of commitments are an example of this and could be further used as a tool to collect feedback from members and use it to provide them with tailored advice and/or make adjustments to the system<sup>27</sup>. Beyond this, it should be noted that the assistance provided by the Commission and the external contractor has been focused on the monitoring and reporting of commitments and not on their implementation. Providing assistance on implementation issues would mean helping members to use the monitoring data to assess the way in which they are implementing their commitments (e.g. as stated in the Monitoring Framework, good monitoring data can help members identify good practices, take early corrective action and also indicate what efforts or inputs are needed for further implementing an action),</p>	

<sup>26</sup> The evaluation team identified four documents aimed at helping members to conduct and improve the monitoring of commitments: the Monitoring Framework prepared by the Monitoring Working Group early in 2006, a memo prepared by the external contractor in December 2006 (after the initial assessment of the 2006 commitments) to give advice on how the monitoring of Platform commitments could be improved, a presentation by the external contractor to the Platform's Monitoring Working Group in January 2007 that contained some hints of what needed to be improved, and a guide called "Improving the Monitoring of Commitments" prepared by the external contractor in June 2009 after delivering a workshop on monitoring to a dozen members of the Platform. In addition to this, as reported by DG SANCO to the evaluators, there were coaching sessions held in October/November 2009 with 15 Platform members who, after resubmitting their commitments, were still under an average score of 3 in the 2009 review. The one-to-one session was followed by a written individual report sent to each of these 15 members.

<sup>27</sup> It is important to note that DG SANCO has already begun (in 2010) making more efforts in this direction. In view of the previously detected need for further individual assistance, as part of the 2010 monitoring report (not included within the scope of this evaluation) DG SANCO has asked the external contractor to provide individual written feedback after the 2010 review of commitments and also to be available for individual questions during a period of two weeks after the feedback submission.

Monitoring system's objective	Comments on progress achieved against desk research, interviews and questionnaire analysis	Level of achievement
<b>3. Understand what needs to be done and how (for the commitment to achieve its objectives)</b>	<p>Overall, the majority of members understood the monitoring system had been either 'quite' or 'somewhat' effective at achieving this objective (62%). Some members from both the not-for-profit and the for-profit sector mentioned in the interviews that <b>the monitoring system provided some guidelines and is helpful to increase members' understanding, but that the system has not necessarily been helpful in assisting in the commitments' implementation.</b> It was also mentioned that the feedback from the Commission has not always been helpful and sometimes did not focus on members' particular needs. This is also linked to what was mentioned above on the <b>few opportunities provided to discuss difficulties and opportunities on a one-to-one basis.</b></p> <p>Moreover, the desk research showed that <b>there have not been many occasions where members have been able to discuss collectively what the scoring system reflects overall, which are the areas that are working well and what should be improved</b> in order to meet not only the monitoring system's objectives, but also the Platform's. It is the team's understanding that this situation makes it more difficult for members to understand what needs to be done and how (for commitments to achieve their objectives and the Platform's objectives).</p>	<p><b>Met to an extent</b></p>
<b>4. Better integrate their commitments with those of other members</b>	<p>Overall, more than half of not-for profit members (55%) stated that the monitoring system had been either 'not very effective' or 'not effective at all' at achieving this objective. For-profit members were more positive about it with more than one third (36%) that agreed with not-for profit members and another third (36%) that said it had been 'quite' effective. Members also mentioned that <b>there had not been many multi-stakeholder commitments</b> and that the European Commission should support collaboration amongst members more by putting structures in place for this.</p> <p>The analysis of all Platform commitments since 2005 showed that multi-member commitments (i.e. commitments between at least two of the 33 Platform members) represent a very small share of all commitments, reinforcing the idea that <b>the Platform process (including the monitoring system) has not very much favoured the integration of commitments and the development of joint actions.</b> Evaluators have identified only four multi-member commitments to date (531, 1053, 1105, and 1111).</p> <p>Moreover, it should be noted that it does not fall within the scope of <b>the external contractor's system for assessing the reported commitments to include criteria aimed at establishing how each commitment integrates with other commitments or other members' work.</b> While the external contractor could potentially provide such a steer on a yearly basis at the time of the monitoring report, the European Commission is probably best placed to do this on a more continuous basis, such as at Platform plenary meetings.</p>	<p><b>Not met</b></p>
<b>5. Enhance the trust of other stakeholders in commitments</b>	<p>Overall, circa two thirds of not-for profit members (67%) thought that the monitoring system had been either 'not very effective' or 'not effective at all' at achieving this objective, being the area where not-for-profit members were most negative. For-profit members were more positive about it with circa one third (36%) that agreed it had been 'quite' effective; however it was still <b>seen as one of the objectives that had been</b></p>	<p><b>Not met</b></p>

Monitoring system's objective	Comments on progress achieved against desk research, interviews and questionnaire analysis	Level of achievement
	<p><b>achieved to the least extent.</b></p> <p>Within this context, it is worth trying to identify the source of this lack of trust. First of all, there were some members (in both the for-profit and not-for-profit sectors) that had the view that <b>the scoring system used by the external contractor is not transparent enough, which is likely to contribute to this lack of trust.</b> It is important to note that scores are communicated to members on an individual basis, thus organisations are not aware of other members' scores. The review of how the monitoring and reporting system works conducted by the evaluators confirmed this and showed that every year the external contractor only reports on how the scores (for each criterion) have evolved over time. The interviews and the questionnaire evidenced that members have many doubts about how scores are assigned and, consequently, what scores reflect: Is it commitments' impact? Is it their relevance to the Platform's objectives? Is it the amount of work undertaken? Even if they do not know other members' scores some members have the impression that there are commitments that are "easy to monitor" and thus "they score highly and the overall impression is given that the Platform is effective". Mistrust amongst members on how (their own and/or other members') commitments are scored / monitored contributes to enhancing their doubts on the commitments' effectiveness at achieving objectives and, lastly, on the Platform overall as a means to fighting against obesity. As explained by one member in the questionnaire "good monitoring is critical to engendering trust in the wider platform process". Secondly, it is worth keeping in mind that this lack of trust may be linked to something more deeply seated than the commitments and come from a lack of trust among Platform members themselves of 'the other sector'. In fact, the interviews revealed that trust is an issue for both for-profit and not-for profit members. As one member said, "It [the Platform] has created a notion of accountability amongst stakeholders and certainly amongst industry and this is new", however, "it's not enough; it needs to be monitored to generate trust among people that are not part of your constituency".</p>	
<p><b>6. Identify and eventually duplicate good practices</b></p>	<p>The predominant opinion amongst both not-for profit and for-profit members was that <b>the monitoring system had been 'somewhat' effective at achieving this objective</b>, with just over one third agreeing on this in both cases (33% and 36% respectively). Members stated different opinions in the interview, some of them saying that identifying good practices would imply using resources that are scarce and also increasing the administrative burden the monitoring system already implies.</p> <p>As stated before, the desk research showed that annual monitoring progress reports are mainly a description of what members have done each year and what has been the overall score for each of the criterion assessed. <b>Based on monitoring results, there has been no work so far towards identifying good practices and learning from each other.</b> This work would imply moving one step forward in the monitoring of commitments and trying to make some assessment of their content, outputs and outcomes.</p>	<p><b>Not met</b></p>

## The strengths

Based on the table above, the evaluation team is in a position to say that the Platform's monitoring system has partially met half of its objectives, but has not been very successful in meeting the other half to date. Overall, the evaluators consider that the main achievement is that the system has succeeded in placing the issue of monitoring high on the agenda of members and has forced members to be accountable in some way. As the external contractor noted in the Second Monitoring Progress Report, the first step towards effective monitoring of commitments was to adopt a *"monitoring mindset that understands what information is required for successful monitoring"*. According to the external contractor, back in 2007, there was a large divide between those who understood why monitoring practices needed to be specific and those who did not. However, they also said that, after two years of work, *"the Platform had developed a range of skills in producing monitoring data"*. That said, as evidenced by the last monitoring scores<sup>28</sup>, and by what members have noted to be the main challenges of the monitoring system, there are still considerable variations in the quality of commitments' monitoring and reporting among members.

It is also evident that Platform members consider the monitoring of their commitments as an important practice and have a positive attitude towards improving their own monitoring practices and the system overall. In fact, at least ten members stated in the interviews that the monitoring of the commitments is necessary / useful and only three members questioned the existence of the system or said that if they could choose, they would not be spending resources on monitoring, but for example, using them towards the implementation of the commitments.

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<sup>28</sup> This information was provided to the evaluation team by the Commission.

The box below illustrates some of these comments:

*"[...] I also think that it [the monitoring system] is useful and will improve the quality of the commitments. If it was too easy, it wouldn't be as effective" (For-profit sector)*

*"I think that [...] the monitoring system is also a motivation to do more, and a learning tool, so it is useful" (Not-for-profit sector)*

*"Is not about getting rid of systematic monitoring, but about balancing the bureaucratic burden with something more on relevance / usefulness" (Not-for-profit sector)*

*"I agree it is good to monitor and see if actions are serving any purpose." (For-profit sector)*

*"The monitoring exercise is complex and time consuming but important for [us] to follow actions seriously" (For-profit sector)*

*"Things do take time, are tedious, but [we] respect the intention that is there. It is appropriate to ask what was planned and put into it. It's a necessary pain. We are happy with the format and [the external contractor's] scoring" (Not-for profit sector)*

*Source: Members interviews*

The evaluators got a sense from the interviews that members perceive that having an independent organisation reviewing the reports presented by members has been an important aspect of the monitoring process. This has ensured that a common approach for looking into commitments was developed and that all actions were assessed in the same way, without the possible bias that could be derived from knowing the members and their attitudes to the work in the Platform. However, as mentioned in the table above, it would be positive to have more opportunities for members to discuss individually on a one-to-one basis with the external contractor what they are doing well and what they should improve, with a view to improving their monitoring practices<sup>29</sup>.

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<sup>29</sup> Here again, it is important to note that DG SANCO has already begun (in 2010) making more efforts in this direction (see footnote 28), but that these practices were put in place after speaking to members, so fall outside the scope of this evaluation.

## The areas for improvement – relevance and trust

In terms of what has not worked as expected in the monitoring system, the evaluation team considers that there is a lack of judgment of the relevance of commitments that has impeded members from understanding (and agreeing on) what type of commitments they should be implementing to achieve the Platform's objectives. It has also hampered the possibility of confirming and fine-tuning existing commitments. This has been deduced from the average level of achievement of objectives 1, 2 and 3 of the monitoring system and of the low level of achievement of objective 6 (see Table 9 above for details of the system's stated objectives).

As stated in the Monitoring Framework, one of the minimum requirements for monitoring commitments is that they are relevant (or pertinent, connected, or applicable) to the general aims of the Platform. However, the relevance of commitments has been taken for granted so far, based on members' self-assessment of how relevant their actions are to achieving the Platform's objectives. This is in accordance with what one of the observers of the Platform, the external contractor and the Commission have explained: the monitoring system is a "quality assessment exercise" focused on examining how well Platform members are monitoring and reporting on their commitments<sup>30</sup>. This means there has been no assessment on the side of the external contractor and/or the European Commission on the extent to which the commitments being implemented are contributing to achieving the expected results. This can be seen in the low level of achievement of objectives 4 and 5 (see Table 9 above for details of the system's stated objectives).

In addition to this, one of the key weaknesses of the monitoring system is that it has not succeeded in developing stakeholders' trust in the commitments of others and in the data reported on. Thus, members' commitment to self-monitor performance in a transparent, participative and accountable way has proved to be insufficient. As expressed by one of the observers in the Platform, this initial approach of relying on members' "good will" to evaluate their own commitments must have been "pragmatic" and "realistic" at the beginning of the Platform process as it ensured that members did not feel their actions were being monitored and assessed by an external party that may end up telling them what they should do in order to fight against obesity. However, according to what members said in the questionnaire and interviews, trust in members' actions has not been enhanced through this self-reporting exercise. Moreover, the evaluation team noted that members are not required in the monitoring forms to identify and list the sources they use to collect the data, nor are they required to state the methodology they use to assess and judge it, which may be also limiting the level of confidence in the data provided.

However, it should be mentioned that beyond what could be improved in the reporting and monitoring system, there is an overall problem of trust and confidence among members that does not have to do with the monitoring system itself, but with the opinions members hold about each others' interests and objectives in the task of fighting obesity. In this sense, members of both the for-profit and not-for profit sectors revealed in the questionnaire and interviews that there are "ideological viewpoints", "mistrust", "scepticism", "dogmatic approaches", "taboo topics", "politicalities", "langue de bois" etc. that undermine

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<sup>30</sup> This was further highlighted in the document "Improving the Monitoring of Commitments – Guidance for Platform members" sent to Platform members in June 2009. The document stated the following: "The scoring is intended to support efforts by the Platform to communicate clearly their plans to contribute concretely to the pursuit of healthy nutrition, physical activity and the fight against obesity. It is not intended as a comment on the relevance of a particular commitment to the aims of the platform".



not only trust amongst members but also the possibility of implementing joint actions. Having said this, members' views of the monitoring system and its capacity to confirm the relevance of the commitments undertaken limits the system's ability to dispel misconceptions or unveil the real effects of members' actions. Improvements in how members assess their actions and report on them could help to address this weakness.

### **The areas for improvement – commitments in the area of advocacy and policy**

Furthermore, the monitoring system has proved to be particularly difficult to implement for commitments related to advocacy work and policy development. In this respect, members claimed that advocacy/policy-related actions, usually linked to not-for profit organisations, are more difficult to monitor and measure than actions that have clearer indicators and parameters towards which they can be assessed. Moreover, these are actions where the outputs and outcomes can take a longer period of time to become evident. This is related to the average level of achievement of objectives 2 and 3 of the monitoring system (see Table 9 above for details of the system's stated objectives).

In relation to this point, the analysis of the scores assigned to members' commitments in 2009 (which correspond to commitments implemented during 2008), showed that of the 153 commitments reviewed that year<sup>31</sup>, 68 scored below 3, with 25 of these commitments belonging to members of the not-for profit sector (37%) and 43 to for-profit ones (63%). It should be noted that for-profit members were responsible for circa 74% of the 2008 commitments, meaning that for-profit members scored better than not-for-profit ones<sup>32</sup>. One of the reasons that can explain not-for-profit members' lower performance is that the majority of their commitments are related to policy/advocacy work, which these members consider to be more difficult to monitor. This is evidenced by the fact that of the 25 commitments that scored below 3, 60% belonged to the "Other" category (usually used to categorise actions related to advocacy and policy development). Most of the actions these members implemented during 2008 were targeted at policy makers or health professionals and included: generating reports to use as basis for policy-making; collecting and disseminating information on obesity, nutrition and/or physical activity; increasing awareness of obesity-related issues; advocating for specific policies and programmes; etc. Moreover, regarding the four for-profit organisations that scored under an average of 3, all of their commitments were either in the areas of labelling, reformulation, lifestyles and/or marketing and advertising. However, it should be noted that, when the evaluators reviewed the descriptions of their commitments, some resembled the commitments implemented by not-for-profit organisations that had proved particularly difficult to monitor e.g. participating in national authorities' initiatives; promoting healthier lifestyles amongst employees; raising local authorities awareness; informing the general public etc.

In fact, both in the reporting forms and in the questionnaire and interviews, not-for-profit members highlighted that they have problems fitting their commitments in the reporting form, identifying parameters/criteria to which their actions can be measured and quantifying results. As stated in the table above, this might actually be stopping some not-for profit members from submitting commitments

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<sup>31</sup> The sample did not include the eight commitments implemented by the Food Standards Agency given that this is not a member of the EU Platform.

<sup>32</sup> From all the commitments tabled by for-profit members in 2008 (113), 38% scored below 3. From all not-for-profit members' commitments (40), 63% scored below 3.

related to advocacy and policy development. Moreover, it should be added that 10 out of the 15 members (66%)<sup>33</sup> who had at least one commitment that scored under an average of 3 in 2009 and that decided to participate in the coaching session organised by DG SANCO were not-for profit organisations, meaning that compared to for-profit organisations, not-for profit ones showed more interest in attending the session with a view to improving their monitoring.

In addition to this –but not related specifically to advocacy and policy development commitments- not-for-profit members claimed they had encountered problems allocating enough resources (including money, personnel and time) to both the implementation and monitoring of commitments and collecting information from their member organisations (that also have limited resources for monitoring). In relation to this, the external contractor responsible for reviewing and scoring the monitoring forms explained that those members who had well-articulated project plans found filling in monitoring forms much easier and it represented less of an administrative burden to them.

As assessed by the European Commission after the coaching sessions, this situation might be indicating that the accuracy of the monitoring depends on various factors but it does not normally relate to the actors involved, but more to the type of commitment chosen<sup>34</sup>. As reported by the European Commission in one of the familiarisation interviews, *“all but 3 who attended the workshop got higher scores after attending and reworking their monitoring reports”*, which also shows the benefit of providing assistance to members on an individual basis in relation to their particular commitments<sup>35</sup>.

In this respect, the external contractor mentioned that they were aware many members have tried hard to improve the quality of their monitoring forms, but they have also struggled with concepts that are not easily applicable to the work they do. Thus, the effort has not always been translated into good indicators and better results. In their view, this has raised some questions as to why it is so difficult for some organisations to monitor their commitments. The answer to this question is likely to lie in the evidence provided above in this section and in that on the areas for improvement.

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<sup>33</sup> According to DG SANCO, of the 68 commitments that received an average score of below 3 in 2009, 19 resubmitted their commitments (27%). Of those commitments that were resubmitted, 18 improved their scores 0.7 points (in average). Given the low marks some of the commitments had received in the first assessment, 13 of the 18 resubmitted commitments still had a score of below 3. Taking into account the new scores (assigned after resubmission), figures still demonstrated that 63 commitments (41% of all the commitments included in the 2009 review) remained with an average score for monitoring of 3 or lower. In view of this, DG SANCO proposed to conduct individual coaching sessions with all members who had still scored below 3. Only 15 of these members decided to attend.

<sup>34</sup> Feedback from the monitoring coaching session held in October/November 2009 (document provided by DG SANCO)

<sup>35</sup> Considering that the 68 commitments that scored under 3 belonged to 22 members (10 being for-profit members and 12 not-for-profit) and that 15 members attended, this results in a 68% rate of attendance, which reflects the high interest of organisations in attending a coaching session.

#### 6.12.4 Conclusions

While the monitoring system has succeeded in placing the issue of monitoring high on the agenda of Platform members, has forced members to be accountable in some way and a significant number of members find it to be necessary and/or useful, it has not succeeded in meeting all of its six objectives<sup>36</sup>. The system is more focused on assessing the quality of members' monitoring and reporting practices than on supporting the implementation of commitments. In fact, the questionnaire results show that it has at best 'partly met' all the objectives that are more related to implementation (i.e. fine-tuning commitments, understanding what needs to be done and how, and identifying and eventually duplicating good practices). Both for-profit and not-for-profit members questioned the extent to which all the commitments that have been made are equally relevant to the objective of fighting obesity. Moreover, the monitoring system has proved particularly difficult to implement for commitments relating to advocacy work and policy development, but also for certain umbrella organisations who are reporting on a large number of independent projects carried out by members (often in multiple Member States) within the framework of a commitment. This problem is compounded by the fact that the priority in terms of monitoring and reporting for some member organisations of Platform members is the national, not the EU, level.

Furthermore, the monitoring system does not appear to enable the judgment of commitments' impacts, though in many cases it is still too early to judge the actual health impact of commitments (see Section 5 of this report). Neither not-for-profit nor industry members are sure whether their actions are contributing to reducing obesity or not. In fact, some expressed doubts as to the usefulness of the Platform in effectively reducing obesity. This problem may be partly related to the monitoring system, which is not succeeding in showing overall outcomes and impacts. The case study on reformulation in particular showed that assessing the impact of the commitments in the area was difficult in the absence of clear targets and baseline data. Moreover, data provided by industry for the three commitments reviewed was often incomplete and difficult to compare due to the different forms it took.

Finally, the monitoring system has shown a limited capacity to enhance members' trust in the commitments of others.

### 6.13 EQ 3.1: Has the European Platform made a difference, intended or unintended, positive or negative, on Member States work on Nutrition and Physical Activity (NPA)?

#### 6.13.1 Results from the national authority interviews

In order to explore whether the EU Platform has made a difference on Member States' work on Nutrition and Physical Activity (NPA), three issues were analysed in the interviews with the nine national authorities interviewed:

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<sup>36</sup> The monitoring system's six objectives are: Ensuring commitments are relevant to the general aims of the Platform, Fine-tune commitments (e.g. taking early corrective action), Understand what needs to be done and how (for the commitment to achieve its objectives), Better integrate their commitments with those of other members, Enhance the trust of other stakeholders in commitments and Identify and eventually duplicate good practices.

- the level of awareness of the EU Platform and its work among national authorities;
- the extent to which issues discussed in / addressed by the Platform have been taken up in the Member States; and,
- the perceived impact of the Platform on the development of national NPA policies or strategies.

When asked whether they were aware of the EU Platform for action on Diet, Physical Activity and Health, all nine representatives interviewed stated that they were aware of the Platform and all apart from one representative followed the Platform activities through their participation in the High Level Group (HLG). Only two representatives mentioned other channels for gaining information on the Platform, such as newsletters or the website and the intranet (Circa). The representatives generally agreed that the amount of information passed onto them was appropriate, apart from one representative who mentioned that more information on activities and initiatives should be made available.

When asked if the four main implementation areas of the Platform also form part of their national NPA policy, representatives gave a variety of answers. Three countries stated that labelling is regulated at EU level and no further national activities are taking place. Reformulation is addressed in all apart from two countries, where this is either planned or partly influenced through regulation in other fields such as strong labelling standards. Marketing / Advertising is addressed in six countries, but to varying degrees, ranging from the development of recommendations (Poland), to individual initiatives e.g. regarding food in schools (Hungary). In Spain, marketing / advertising has been addressed mainly through covenants (“Convenios”) which formalise the industry’s self-regulation commitments. These are agreements that are signed by industry and the government. There are no sanction mechanisms. Representatives of three countries did not have any information on marketing / advertising activities. Lifestyles and education is addressed in all countries.

Representatives gave different answers to the question asking whether the EU Platform had any direct or indirect effect or influence on the development or review of their country’s NPA policy. In six cases it was stated that the EU Platform had an influence on the national NPA policy, of which in three countries the influence was seen as direct. In the case of Poland, the establishment of the EU Platform was among the factors which led to development of the POL-HEALTH programme in and the formulation of the major tasks in the field of counteracting obesity. The programme initiator, the National Food and Nutrition Institute was in close contact with other European centres responsible for various programmes initiated to prevent and control obesity and also with the EU Platform. In Slovakia, the information from the HLG gets passed on through 36 health promotion centres in the country. In Portugal, the EU Platform was seen to have an influence on the Portuguese platform, which influences national policy, e.g. in the field of salt. The representatives in the remaining three countries saw the influence as minimal or did not consider there to be any influence at all.

### **6.13.2 Results from the national platform interviews**

In order to explore whether the EU Platform has made a difference on Member States work on Nutrition and Physical Activity (NPA), the same three issues were analysed in the interviews with national platform representatives as with national authorities (see above).

As regards the level of awareness, interviews with the six national platform representatives showed that all national platforms are aware of the existence of the EU Platform; however, the level of interaction with it is different in each case:

- The representative of the German platform (Group 1: Member States that constituted a national Platform before the EU Platform was running) explained that she knew of the Platform from a previous job she had (as a nutrition specialist), but that her platform currently has no direct links with it.
- National platforms from Group 2 (Member States that constituted a national Platform once the EU Platform was set up) are more aware of the EU Platform activities and have more interaction (or disposition to interact) with it. National platforms in Italy and Poland have the most interaction with the EU Platform, given that interviewees mentioned they have representatives that participate in meetings and receive reports. This involvement depends more on national platforms' disposition to participate in/follow the EU Platform than on the existence of established channels of interaction between platforms. This is the case in Hungary too, where the interviewee said she follows the EU Platform processes but, apparently, this is due to her decision to do so. The Dutch interviewee said she is aware of the Platform too, but did not know much about. In the Portuguese case, the interviewee stated he is regularly informed on the EU Platform actions given that he is a member of the High Level Group (HLG). Thus, it is his particular position in the EC's initiative that makes him more aware of the Platform's activities.

Regarding the extent to which issues discussed in / addressed by the EU Platform have been taken up in the Member States, the interviews showed that the way national platforms work is similar to the EU Platform, however the pressure to commit, monitor and report is not as it is at EU level:

- The EU Platform covers a lot of issues and implementation areas in comparison with other platforms. National platforms tend to focus either on specific target audiences (e.g. the German and Italian platforms are focused on children) or certain implementation areas (particularly education, lifestyles and physical activity).
- National platforms that are more aware of the EU Platform and that have more information on its actions have taken up more issues or approaches from the European experience. For example, the Hungarian representative emphasised that the idea of the importance of physical activity and the discussions on how to develop a message to educate society all came from the EU Platform. In addition, she mentioned they used "*reliable information produced by the EU Platform*" to elaborate proposals e.g. for a balanced diet. The Italian interviewee said that the national platform followed the EU Platform particularly in the labelling area. The Polish interviewee said that, currently, the platform is attempting to develop the Polish Food and Nutrition Pyramid, which takes into consideration the nutrition habits in Poland, as is recommended by the EU Platform.
- Another issue that has been taken up by Member States is the need to have a multi-stakeholder approach in order to fight obesity. Most national platforms involve members from the public sector, industry, NGOs, and research, just as the EU Platform does. The Hungarian representative, for example, mentioned that the need to involve scientists came from the example of the EU Platform. The Polish representative said that the national platform includes the Organisation of Polish Food Producers and Media representation, as the co-operation with the private sector was something recommended at EU level.
- The idea of "working together" and establishing a framework for cooperation and collaboration in order to set priorities permeates national scenarios. However, it is not clear if this can be attributed solely to the example of the EU Platform, particularly when considering that the German platform has been working like this since 2004.

- The objective and strategy on which most national platforms are based is similar to that of the EU Platform: to bring together all interested parties, understand each other's interests and objectives and set priorities together. The following comment illustrates these ideas: *"The EU Platform has always been and continues to be a good base where the national platform can find its approaches or can take a hint for new projects"* (Italian national platform)
- The main difference, though, is that national platforms do not favour the idea of having "mandatory" commitments in order to actively participate in the platform. Most national platforms' representatives emphasised that members' actions/initiatives are voluntary and that there is hardly any follow up or monitoring of the implementation of those initiatives, at least not as in the EU Platform. This is particularly the case in Italy and Hungary where commitments are optional and welcomed, but not required. In Italy, however, there are some specific bilateral commitments/agreements between the Ministry of Health and members. In the Netherlands, commitments are voluntary and all organisations monitor themselves; some organisations are very active, review their activities and present updated commitments, however others do not present commitments at all. In the German case, there is no work with commitments, at least inside the platform. Platform members work on projects together, communicate on the subject, and bring the theme into the open. Poland is the only exception to this: the national platform representative explained that the platform requires some commitments from its members and that these are later monitored via an electronic system of health monitoring.

It should be noted that, when looking at the differences between how the EU Platform and national platforms work, it is not clear whether interviewees know how the EU Platform works and how its commitments are set and monitored. This would confirm the existence of a lack of information at national level on the EU Platform which will be further explored in EQ 3.6.

In terms of the perceived impact of the EU Platform on the development of national NPA policies or strategies, little information was provided by the interviewees. In most cases, national platform representatives were not sure about the impact of the EU Platform, mainly due to the lack of information they have on the EU Platform's activities in their own countries. This was particularly the case in the Netherlands, Hungary and Germany. In addition to this, the representative in Poland talked about the impact in general terms saying that they *"adjust legislation in Poland to the European regulations"* and that *"the guidelines on diet and nutrition produced by the EU were very helpful in this respect"*. In this case, it is not clear whether this impact can be attributed solely to the EU Platform. In Italy, the interviewee provided some information on the impact of their national platform on NPA policy, but not of the EU Platform. The Portuguese representative mentioned that the EU Platform has an influence on the Portuguese platform which, at the same time, influences national policy, but he did not make clear how this process works or which is the specific impact he sees on NPA policy<sup>37</sup>.

### 6.13.3 Conclusions

It is difficult to say whether the EU Platform has made a difference or not on Member States' work on Nutrition and Physical Activity (NPA). Based on the interviews with representatives of a sample of

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<sup>37</sup> Unfortunately the Portuguese national authority had very little time to respond to the evaluation teams' questions so this could not be explored further.

national authorities, in a few cases the work of the EU Platform has had a direct impact in one or more specific areas, but in several others the Platform was thought to have made no difference. Where there was an influence of the EU Platform on Member States' work, this was through the HLG in particular; information was passed from the Platform to national authorities and there are a few concrete examples of how the Platform has influenced NPA policies (see findings above).

Nonetheless, the overall extent to which the EU Platform has had a direct impact on Member States' NPA policies appears to have been quite limited. However, in some cases there may have been an indirect impact on certain Member States' NPA policies, in that the EU Platform inspired the development of a national platform, which in turn had an impact on national NPA policies (see also EQ 3.2). That said, this is unlikely to be true for all countries with national platforms, as the interaction between national platforms and the EU Platform has been quite limited.

## **6.14 EQ 3.2: To what extent have the Platform activities complemented or interfered with national NPA policies?**

### **6.14.1 Results from the national authority interviews**

In order to establish if the Platform activities have complemented or interfered with national NPA policies, representatives from nine national authorities were asked to state in how far this has taken place in their country and to give examples.

Only a small number of countries mentioned that the EU Platform activities had complemented national NPA policies, though it was mentioned several times that the broad issues addressed were often similar. Reformulation was the only field mentioned where the EU Platform is considered to have actually added to national activities as in the case of Austria, national activities occasionally refer to EU Platforms activities in this field. Interferences were not mentioned. Several representatives agreed that the EU Platform could potentially increase its value by further influencing national NPA policies through more cooperation with initiatives in Member States and better communication of processes and activities.

### **6.14.2 Results from the national platform interviews**

The majority of the six national platform representatives provided limited information as regards the extent to which EU Platform activities complemented or interfered with national NPA policies. However, some mentioned that the EU Platform had inspired them, particularly in relation to their approach to obesity. For example, the Italian representative commented the following:

*“The innovative approach of the EU Platform in involving different sectors has been important and effective, particularly considering that obesity has not only a clinical meaning. The main strength is for sure to have merged the medical concept of obesity as a disease with the wider idea that “health” means also lifestyle, education, culture and choices”.*

As mentioned before, the ability of the EU Platform's initiatives to complement or influence NPA policies may depend on the level of awareness of the Platform and its actions at a national level. Based on

interviewees' responses, it seems that the EU Platform and its activities are little known within some national platforms, let alone outside national platforms.

In the Portuguese case, the interviewee said that, as in the EU Platform, reformulation is being addressed in the national NPA policy, particularly in the area of salt, but it is not clear whether this a direct effect of the EU Platform's initiatives. The German interviewee said that *"in Germany you don't hear anything about the Platform, unless you really look for it"*. She also said it is easier to make a difference at national level than at EU level and that in each country there are different trends (e.g. she said in some countries people use bicycles more than others so there is a need to find other options for encouraging exercise). She mentioned she knows little about the Platform, but she thinks it is better to work with a bottom-up approach than with a top-down one.

### 6.14.3 Conclusions

There is not enough evidence to determine whether the EU Platform activities have complemented or interfered with national NPA policies, but indirect complementary links can tentatively be established. First of all, it is possible to say that the broad issues addressed by the EU Platform and NPA policies are often very similar, particularly in the case of reformulation, where the EU Platform is considered to have actually contributed to national activities. Moreover, the national platform representatives of four countries stated that the EU Platform has had an impact on the development of their national platform, which in turn had an impact on national NPA policies. In the case of some national platforms, the EU Platform had inspired them, particularly in relation to their approach to obesity. It is therefore feasible to establish indirect impact links between the EU Platform and national NPA policies via the national platforms of these countries. As mentioned before, the ability of the EU Platform's initiatives to complement or influence NPA policies may depend on the level of awareness of the Platform and its actions at a national level. No indication of any interferences of the EU Platform with national NPA policies was identified.

## 6.15 EQ 3.3: To what extent has the EU Platform inspired the development of national Platforms?

### 6.15.1 Results from the national authority interviews

The four national authority representatives from countries with national platforms that are similar to the EU Platform in that they are multi-stakeholder platforms<sup>38</sup> (i.e. Germany, Hungary, Poland, and Portugal) were asked in how far the EU Platform had inspired the development of their national platforms.

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<sup>38</sup> A sample of nine national authorities were interviewed and four of these countries had national platforms.



Of these four countries, two countries stated that the EU Platform had inspired the development of the national platform to a certain extent (i.e. Poland and Portugal), either in the form of references made or aspects taken over and lessons learned from the EU Platform. In Poland the national platform “was [developed] in response to” the set up of the EU Platform and in Portugal it was “inspired” by it. However, in the case of Germany, it was stated that the national platform was developed before the EU Platform and was therefore not inspired by it.

When asked about communication and cooperation between the national and the EU Platforms, Hungary and Poland mentioned some degree of cooperation, mainly in the form of joint events and participating in meetings of the EU Platform. The other two countries, Germany and Portugal, did not state any cooperation, but in one case an increased sharing of best practice was suggested as an improvement.

### 6.15.2 Results from the national platform interviews

The interviews with the six national platform representatives with multi-stakeholder platforms comparable to the EU Platform<sup>39</sup> revealed that the EU Platform has had an inspirational effect, particularly in Portugal, Hungary, Italy and Poland. These are four out of the five national platforms that were created after the Platform) that were interviewed. The Netherlands was the only member that stated clearly that it was not inspired by the EU Platform, despite the national platform having been created after the EU Platform. In effect, the interviewee had little information on the EU Platform. The German interviewee saw no inspirational effect either, given that the German platform existed prior to the EU one (Germany was the only country with a similar platform to the EU Platform that was created prior to the EU Platform).

- The representative of the national platform in Hungary pointed out some advantages derived from the fact that the Hungarian platform was constituted after the EU Platform: *“it was easier to make clear what the objectives of each of the parties involved were on the basis of the EU Platform experience”*.
- The Italian representative mentioned that the EU Platform had been a solid base and a valid tool to calibrate some of the strategic approaches of the Italian platform (e.g. partnership with industry, collaboration with civil society associations, involvement of different stakeholders and not only with clinical/medical ones).
- The Portuguese representative said the national platform had been inspired by the EU Platform and that they had tried to use the best aspects of it and improve on any weak areas. For example, it is his understanding that the representation of industry organisations is low in the EU Platform, and thus they have tried to increase industry participation in the Portuguese platform (e.g. the national platform’s communication strategy is financed by a private company as part of their CSR policy. He believes that this company would otherwise not have been involved in the Portuguese platform).

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<sup>39</sup> Other countries in the EU may well have organs (e.g. the FSA in the UK) and/or strategies (e.g. the NAOS in Spain) that perform a similar function relating to NPA, but are not set up as multi-stakeholder platforms as such so were not considered as part of this exercise.

Another aspect which can be used to judge the extent to which the EU Platform has acted as an inspiration for national platforms is looking at the level of cooperation between the EU and national platforms; this has been very low. Most national platform representatives stated that there had been no cooperation between platforms and that they were not aware of any joint initiatives. In the case of Poland, as an example of cooperation, the interviewee only mentioned that they had recently presented the “Keep fit” Polish programme at an EU Platform meeting.

It is important to note that even those national platforms that have more access to the Platform (e.g. Italy and Poland), because they have representatives that attend meetings, stated that there is little “formal” cooperation. This confirms the fact that being in contact and interacting with the EU Platform and accessing information on its activities has been mainly a result of national platforms’ interest or disposition to do so.

In general, there is a very positive attitude towards increasing cooperation between the EU and national platforms. There is the perception that enhanced cooperation would allow them to share best practice.

### **6.15.3 Conclusions**

The EU Platform appears to have inspired the creation of four national platforms, but a lack of cooperation between the EU Platform and national platforms means that its impact on national platform’s ongoing process and activities has been limited.

National platforms with similar characteristics to the EU Platform currently exist in six Member States (Germany, Hungary, Italy, Netherlands, Poland and Portugal). In four of these countries (Portugal, Hungary, Italy and Poland), the EU Platform has had an inspirational effect in the development of national platforms. The inspiration has mainly come from having the EU Platform as a point of reference, or taking up issues or lessons learned from the EU Platform. However, the level of cooperation between the EU Platform and national platforms has generally been very low. Being in contact and interacting with the EU Platform and accessing information on its activities has been mainly a result of national platforms’ interest or disposition to do so. National platforms generally looked favourably upon increased cooperation with the EU Platform.

## **6.16 EQ 3.4: Are there differences in policies/policy developments between Member States with national Platforms and Member States without national Platforms?**

### **6.16.1 Results from the national authority interviews**

When asked if any of the activities of their national platform had any impacts on recent policy developments and/or regulatory initiatives in their country, High Level Group representatives of the four countries with a national platform stated that there was a general influence. In one case, the national platform was part of the national action plan for fighting obesity (Germany), and the Polish representative mentioned that the Programme POL-HEALTH consulted with research institutions and organisations associated in the Polish Platform on Diet, Physical Activity and Health before final approval by the Minister of Health. In the case of Portugal, the national Platform had an influence on the regulations relating to salt and on the “Fruit at School” Programme. However, differences in policies in countries without a national Platform such as Austria were not visible.

### **6.16.2 Results from the national platform interviews**

In order to answer this question (see desk research sub-section 6.16.3), one key aspect that was explored in the interviews with the six national platforms was the impact of national platforms on recent policy developments in each Member State.

Apart from in Italy and Poland, the other four national platform representatives that were interviewed said that the national platforms had had some influence or indirect impact on policy development.

- In particular, the Hungarian interviewee explained that it was not possible to say if there is “a *definite change*”, but that the information policy-makers get via the national platform influences their views and institutional priorities. As an example, the interviewee said she had attended a meeting in a Ministry about salt where the platform offered to develop the educational programme. In this way, the Ministry would avoid spending its resources on the campaign and could use them for other activities. Through the provision of information, she saw the platform as a means of helping national authorities to decide what to prioritise and where to put their money.
- The Portuguese interviewee mentioned that the national platform had had an impact on laws regarding the salt content of food and that it also cooperated with the Ministry of Education on programmes such as “Fruit at school”.
- The German interviewee said there has been an influence given that the platform works directly with the Ministry of Health, a founder and member of the platform.
- The Dutch interviewee explained that the national platform is part of the national policy of the Ministry of Health and, as such, is one important way the government uses to tackle the problem of obesity. He added that Ministries for Education and Health leave a lot to the Platform: “*they don’t make rules, regulations, but leave it to the Platform*”.

In Italy, the interviewee explained that it is still too early to identify the influences or effects of the national platform on policy developments. This is mainly due to the changes experienced in the Italian

political system (i.e. governments shifting and merging together with the separation of the Ministry of Health) and the lack of a formal meeting point for all stakeholders to coordinate actions and a monitoring system to measure impacts. The Polish interviewee emphasised more the effects of the EU than of the national platform on the development of his country's NPA policy saying that *"we adjust our legislation in Poland to European regulations. It is mainly related to the food safety. The guidelines on diet and nutrition produced by the EU were very helpful in this respect"*.

The evidence collected suggests that, in these countries, the level of interaction between the national government and the national platform is high. This is mainly due to the fact that national authorities are founders or key stakeholders of national platforms. Cooperation is present particularly when it comes to developing education programmes or information campaigns. However, it is not very clear what level of importance is given to nutrition and obesity issues *vis-à-vis* other policy issues in each country, and whether national platforms have contributed to putting these high on the political agenda.

### 6.16.3 Conclusions

While national platforms have in general terms had some influence or indirect impact on NPA policy development in their countries and the level of interaction between national governments and national platforms tends to be high, there does not appear to be a direct correlation between NPA policy development and the existence of a national platform. The fact that a Member State has set up a national platform does not necessarily guarantee a more developed NPA policy. Equally, Member States with no national platform do not necessarily have a lower-level NPA policy than Member States with national platforms.

**In relation to this evaluation question, it is worth noting that WHO Europe was at the time of writing carrying out an extensive profiling exercise of Member States' NPA policies which could help shed some more light on whether countries with or without national platforms tend to have more or less developed NPA policies. Unfortunately, as this study was not complete at the time of writing, it was not possible to reproduce or use any of the information contained in the study here.**

## 6.17 EQ 3.5: Is it possible to observe any impact on other policy areas of the EU or national Platform activities?

### 6.17.1 Results from the national authority interviews

The nine national authority representatives were asked if the EU or national platform activities had any impact on other policy areas in their country. They were generally not of the opinion that the activities of the EU platform had had any effect or influence on national policies in their country in areas other than NPA policy, e.g. media or education. No examples of the impact of the national platforms on other national policy areas were provided either.

### 6.17.2 Results from the national platform interviews

As regards the impact of national platforms' activities on other national policy areas, only one example was provided by one of the six interviewees. In the Netherlands, the interviewee mentioned there has been some impact on marketing regulations given that no marketing is allowed to children under seven years old.

For the other examples provided, it was not clear in the interviews whether there was a *real* impact. When asked about this, some interviewees said there were impacts, but then provided examples that had more to do with cooperation than impact. For example, interviewees stated that there is cooperation with other areas, particularly with the Ministries of Education to develop education programmes for children and/or parents (e.g. "Fruit at school" programme in Portugal, physical activity programmes for companies in Poland etc.). In Poland, there has also been cooperation with the media, particularly at the local level where cable TV operators have agreed to air some of the clips developed by the national platform.

No examples were provided in relation to the impact of the EU Platform on other policy areas.

### 6.17.3 Conclusions

The impact of national platforms on other policy areas appears to be limited; only one concrete example relating to marketing was provided by an interviewee. It is also unclear whether the EU Platform has had an impact in this respect as no examples were provided. The lack of examples in this area could be a result of multiple factors, including difficulties in tracing policies back to the EU or national platforms and/or the limited knowledge of the working of the EU Platform and cooperation with it.

## 6.18 EQ 3.6: To what extent has knowledge generated by the Platform been communicated to the right people, in the right way, at the right time?

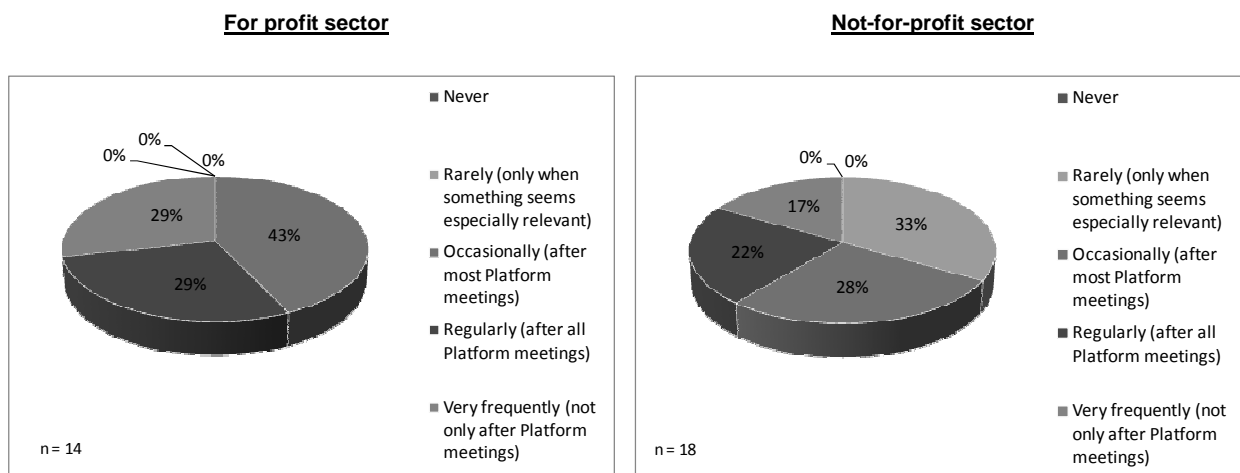
### 6.18.1 Results from the Platform member questionnaire analysis and follow-up interviews

In the questionnaire, Platform members were asked to rate and comment on both their internal and external communication efforts relating to Platform activities; results showed that communication on the Platform by Platform members was particularly limited externally, but also internally, notably in the case of not-for-profit members. ***For more findings as to members' external communication activities and the differences of opinion of for-profit relative to not-for-profit members, please refer to EQ 4.4.***

In relation to their **internal communication** efforts, just under 50% of questionnaire respondents stated that they disseminate information generated / discussed in the Platform to relevant member organisations or companies, or to their usual stakeholders either 'very frequently (not only after Platform meetings)' or 'regularly (only after Platform meetings)'. However, the largest proportion of respondents (34.4%) said they did so only 'occasionally (after most Platform meetings)'. Industry tends to disseminate information internally about the Platform more frequently than the not-for-profit members:

- Nearly 29% of for-profit members stated that they disseminate such information 'very frequently', another 28.6% said they did so 'regularly' and close to 43% admitted to doing so only 'occasionally'. No industry respondents said they did so 'rarely' or 'never'.
- Whereas among the not-for-profit respondents, while 16.7% said they did so 'very frequently' and just over 22% answered 'regularly', over a quarter (27.8%) admitted to only doing so 'occasionally' and a third (33.3%) stated they did so 'rarely'. No not-for-profit respondents said they 'never' did so.

**Figure 18 - How often do you disseminate information generated / discussed in the Platform to relevant member organisations or companies, or to your usual stakeholders?**



The channels most used by members for disseminating information internally include: e-mail, newsletters, meetings and annual reports.

In relation to internal communication on the Platform, it was stated by six members that CIRCA is not accessible enough. It was said that all documents are being sent to the members at the same time, resulting in an overload of information. The password protection of the documents was also seen as not user-friendly. In addition, it was stated that information before meetings as well as afterwards is being passed on to members too late. The late availability of Platform meeting minutes, which in some cases were only published on CIRCA more than three months after Platform meetings, was especially mentioned in this context. Moreover, the professionalism and objectivity of the individual taking the minutes (and therefore the objectivity of the minutes themselves) was questioned. Another point raised was the fact that external speakers are not being given the chance to review minutes after the meetings they contributed to.

A lack of internal communication was also perceived with regard to information about individual members' activities. One member mentioned that especially organisations working in the same fields should be appropriately informed of each other's activities. The Platform's annual report, which does contain information on individual member's activities, was considered to be too long and too technical. In line with this, one member suggested dividing the annual report into sections corresponding with the four activity areas of the Platform, to increase its user-friendliness.

Moreover, in relation to this evaluation question, members commented on the **external communication of Platform achievements**. The majority of Platform members (15) stated in the

interviews that external communication of the Platform should be improved. In fact, four not-for-profit as well as five for-profit members stated in the interviews that the Platform should have a better communication strategy as *“results are not communicated to the outside world”*. A better communication of the Platform’s results was considered important as, since the Platform is *“seen as an experiment, there is a need to communicate the result of the experiment so people can repeat it in a similar sort of way.”* According to one member, the lack of a communication policy had led to a situation where the communication about the Platform depends on which Platform member journalists speak to, meaning that instead of sending out key common messages, members will report on the Platform from their point of view. One member mentioned that there had been attempts to develop communication campaigns, but members disagreed on the content of key messages. In another case, the communication of the Platform activities was taken up as a commitment which then did not develop further as the organisation felt that it did not have enough resources to meet the monitoring requirements involved.

In terms of some of the target groups that it was felt would benefit from more communication about the Platform, six interviewees stated that information could be disseminated better to Member State and local levels: *“At local or Member State level there is a lack. DG SANCO should involve Member States more and involve also local contact points.”* A need for a stronger involvement of the European Parliament was also mentioned in four interviews: *“The Parliament for example doesn’t have a clue we exist. There is no presence of the Platform there, no lobby.”* Another member also supported this view, stating that *“we met with MEPs recently and they had never heard of the Platform. They were interested in labelling and PA and what was happening on a voluntary basis.”*

### **6.18.2 Results from the national authority interviews**

National authority representatives stated a variety of opinions when asked if they felt that they and/or other relevant actors in their country were effectively and regularly informed about the activities of the EU Platform, but the general opinion was that the EU Platform should increase its communication efforts. It was stated only twice (out of a total of nine interviews) that the amount of information provided was sufficient. A need for a broader distribution of results was mentioned, as well as an official protocol from meetings on the internet, to have a common reference point for stakeholders. The need for regular progress reports regarding the commitments was also mentioned. It was also stated that other organisations, such as NGOs, are often not aware of the EU Platform and that communication efforts should be strengthened with regard to these groups.

### **6.18.3 Results from the national platform interviews**

All interviewees said that they were not effectively and regularly informed about EU Platform activities or discussions. Many were not very sure about how the EU Platform works and there were some misunderstandings about how commitments are elaborated and maintained. In this respect, the German representative said: *“It would be good if there was work together with national level as initiatives only from EU level don’t make sense. It would be good to explain how the Platform works. It doesn’t make sense to have projects from both sides, but work together/cooperate so that resources are pooled and better used”*.

The most informed platforms were the Italian and Polish ones and, to a lesser extent, the Hungarian platform. As explained previously, this is mainly because they themselves have been active in following

the Platform's process, attending meetings, getting reports, etc. However, they still agree that there is no information provided from the EU Platform to stakeholders. They usually obtain information from the Platform's website and through participating in meetings and reading reports elaborated by their representatives.

All the national platform representatives thought it would be good to receive more information from the Platform and become more engaged in it. Some made suggestions on how to improve information sharing. The Italian and Dutch representatives both said it would be useful to have a short newsletter (once a month or every three months) that can be disseminated at national level to all the actors. The Italian interviewee also suggested that it would be good (both for the national and the EU Platform) to focus every year only on a certain number of topics in each area in order to avoid having too many different commitments, activities and projects at the same time which are very difficult to monitor and follow.

The Hungarian representative suggested that national platforms could be observers in the EU Platform so that they share information and best practice. The German and Dutch interviewees agreed that this was a good idea too. However, the problem that most of these interviewees raised in relation to this idea was the lack of resources available to them to be able to travel and attend meetings. The Hungarian interviewee also suggested that it would be interesting to form a network with other national platforms to learn from each other.

It is worth noting that this issue was also raised by one of the Platform's former members, saying that they would have liked to have an "observer status" as in this way they could still have passed information to their members and kept informed of the activities of stakeholders. That said, this for-profit member left the Platform because it had not submitted a new commitment.

It is important to note that the representative of the Italian platform mentioned that the EU Platform's activities and pieces of information are too complicated to follow, in terms of the quantity of available information, the variety of subjects they tackle and the lack of a systematic communication. This matter should be taken into account when thinking about how to enhance communication and cooperation with national platforms.

#### **6.18.4 Results from the interviews with observers**

Both observers agreed that the knowledge generated by the Platform has not been disseminated effectively. Communication and information issues are not only related to the knowledge generated but also to the existence of the Platform itself. One interviewee mentioned that "*unless someone tells you about it, you are unlikely to come across it by chance*". She suggested raising the Platform's profile and the "*benefits that come out of the Platform*". In addition to this, she said she had to "*dig through each of the commitments to work out the achievements. There have been a lot, but they are just not obvious*".

The other observer claimed that there is a need of a more transparency and communication between the Platform and the HLG. She suggested having a newsletter or an open website for both groups to put information in it.



### 6.18.5 Conclusions

Communication of the knowledge of the Platform **externally** to the right people outside of the Platform, in the right way, at the right time has been limited, and there was near consensus among Platform members, observers and interviewed national platforms and national authorities that more needs to be done in this respect. In fact, over a quarter of Platform members favoured the development of a better communication policy. In terms of particular target groups, communication about the Platform at MS and local level was considered to be particularly lacking. However, as the findings under EQ 4.4 suggest, while many members saw potential for wider dissemination of information externally, some not-for-profit members were concerned about what information should be disseminated and whether there were indeed concrete successes that could be communicated externally.

The knowledge generated by the Platform was also not that frequently communicated **internally** (among members of the Platform and their respective member organisations), though levels of internal communication were higher than external communication and the for-profit sector tended to communicate more internally than the not-for-profit sector. Moreover, a quarter of members felt that communication by the Platform to members could be improved in terms of its user-friendliness, inclusiveness and timeliness.

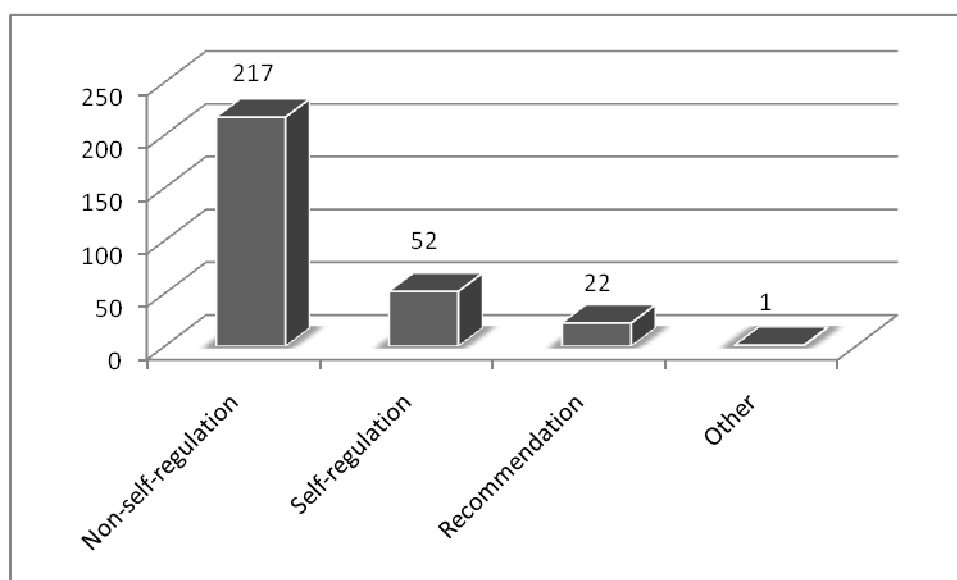
## 6.19 EQ 3.7: What was the impact of self-regulation commitments on EU or national regulatory initiatives?

### 6.19.1 Results from the database analysis

As a first step to looking to respond to this question, an analysis of the proportion of self-regulation and non-self-regulation commitments undertaken within the framework of the Platform was carried out.

Less than 20% of commitments (active and inactive commitments since 2005, amounting to 292 commitments in total) are self-regulation commitments, with almost three quarters of commitments being non-self-regulation commitments. A minority of commitments (22) have been classified as Recommendations, to reflect commitments made by associative Platform members who recommend that their member organisations follow certain guidelines<sup>40</sup>.

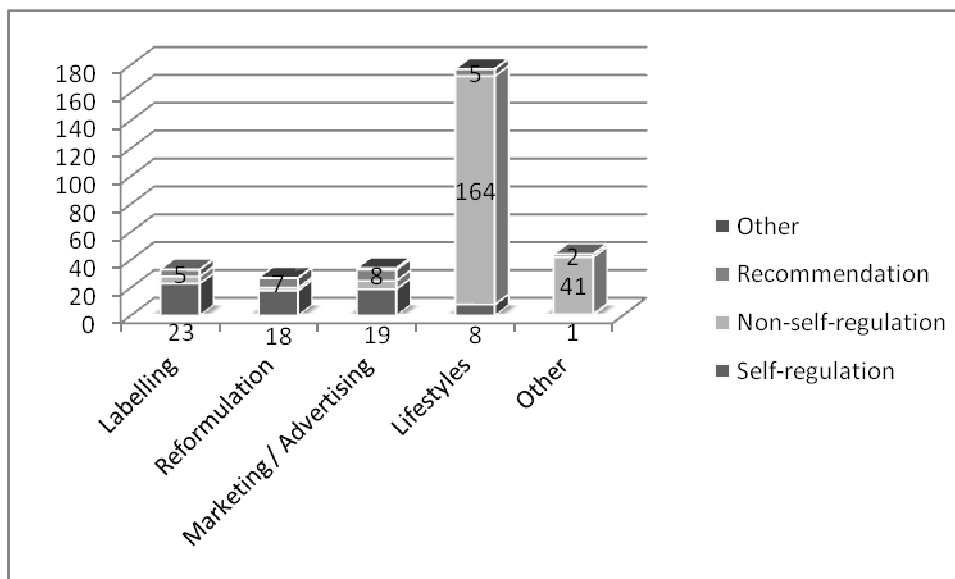
**Figure 19 – Self-regulation / non-self-regulation commitments (active and inactive)**



<sup>40</sup> One commitment consisted of two different areas. As it is self-regulating in one area and non-self-regulating in the other it is here counted as “other”.

The low number of active and inactive self-regulation commitments in relation to non-self-regulation commitments since 2005 has stayed fairly constant between 2006 and 2010<sup>41</sup>. The graph below shows that a large number of commitments in the Lifestyles area are not-self-regulating, whilst the proportion of self-regulating commitments in the other activity areas is higher. It should be noted that whilst this graph is based on a total of 292 active and inactive commitments since 2005, some commitments fell under more than one activity area and were counted multiple times, resulting in a total number of areas counted of 315.

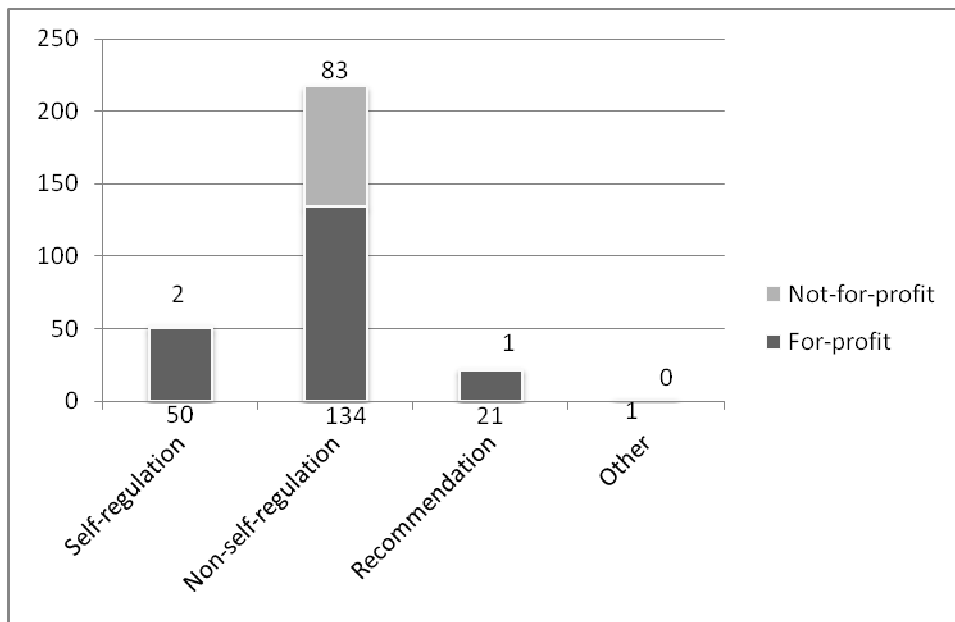
**Figure 20 – Self-regulation / non-self-regulation commitments by activity area**



<sup>41</sup> It should be noted that the graph refers to the commitments active in a given year, rather than started in a particular year. E.g. a self-regulation commitment running from 2005 – 2009 will be counted for each of the years it was active in.

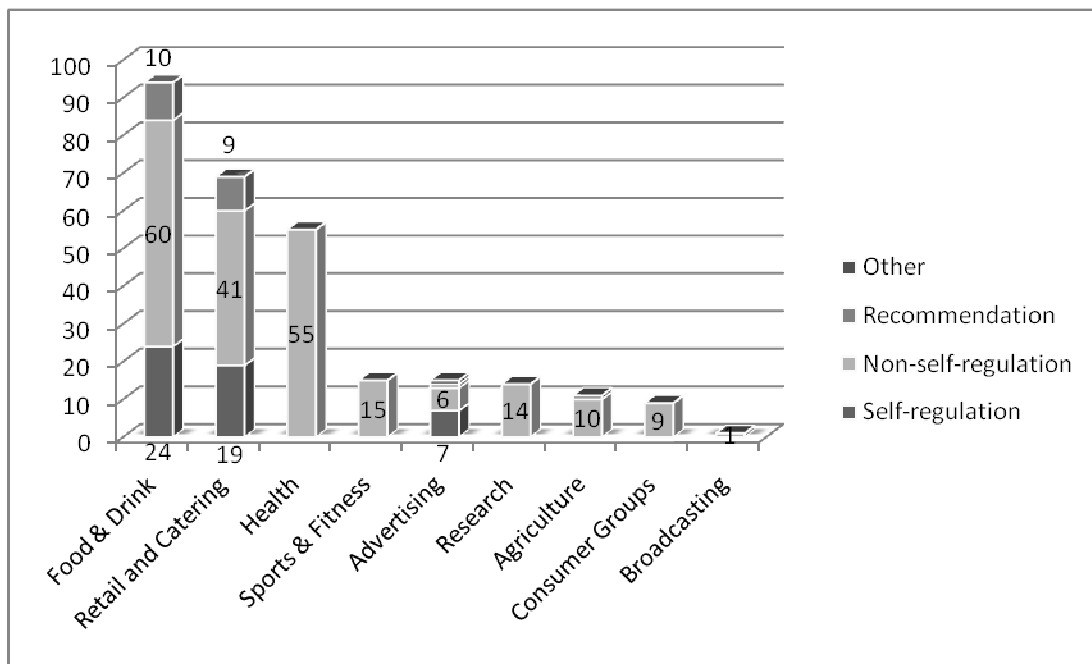
The graph below shows all Platform self-regulation/non-self-regulation commitments (including active and inactive commitments) since 2005 by profit/not-for-profit members. The number of commitments made by not-for-profit organisations is highest in the field of non-self-regulation, and only two out of 52 self-regulation commitments were made by not-for-profit organisations.

**Figure 21 – Self-regulation / non-self-regulation commitments by profit / not-for profit organisations**



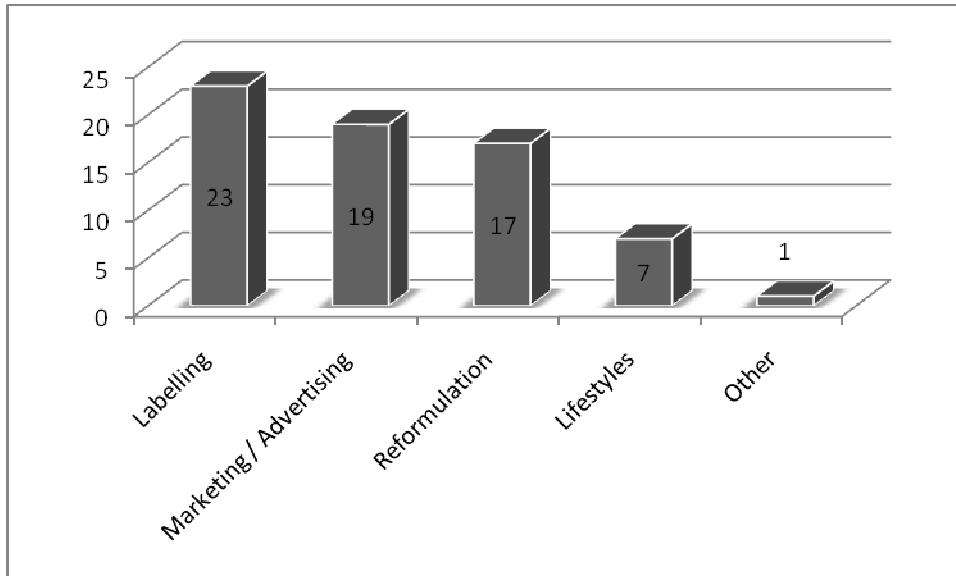
The graph below shows all self-regulated/non-self-regulated commitments (active & inactive) since 2005 broken down by sector. The sector for the nine commitments (active & inactive) from organisations in the Member States category was not provided and is therefore not reflected in this graph, resulting in a total number of 283 commitments presented. The number of non-self-regulating commitments is highest in the Food & Drink, Retail & Catering and Health sectors, and lowest in the Advertising sector.

**Figure 22 – Self-regulation / non-self-regulation commitments by sector**



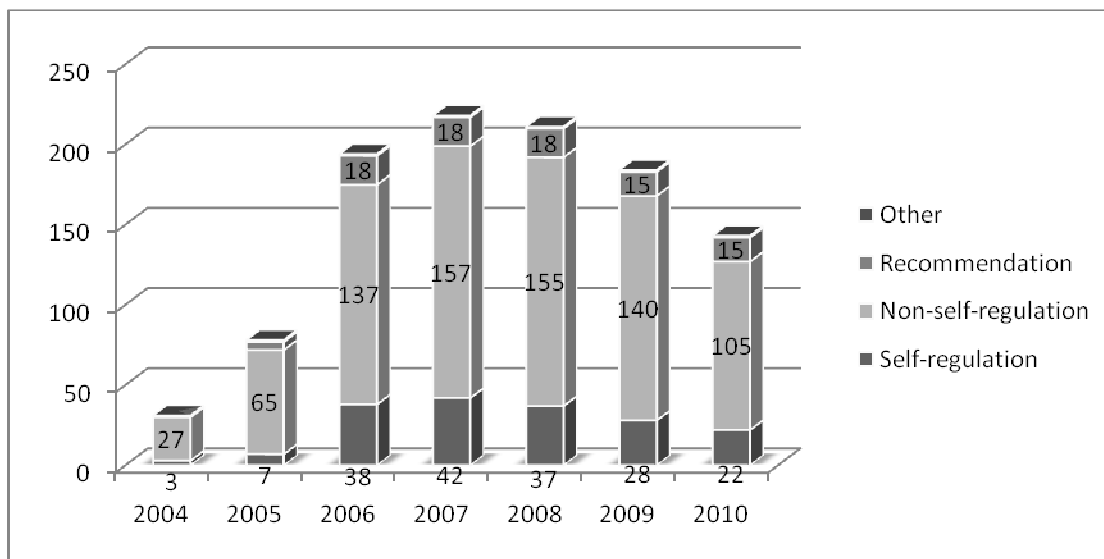
As shown by the graph below, out of all active and inactive self-regulation commitments since 2005 (amounting to a total of 52 commitments), just under half are in the field of Labelling (23). However, the spread across labelling, marketing & advertising and reformulation is fairly even, while the smallest number of self-regulation commitments is in the lifestyles area (seven commitments). It is important to note that a number of commitments fell under more than one activity area, resulting in a total of 67 areas counted (relative to 52 active and inactive self-regulation commitments in total).

**Figure 23 Self-regulation commitments by activity area**



The graph below shows all active and inactive self-regulation/non-self-regulation commitments (amounting to a total of 292 commitments) since 2005 over time. The end-date for six of the commitments, which all started in 2006, was not provided. They were therefore counted as active in 2006 only. The low number of self-regulation commitments in relation to non-self-regulation commitments has stayed fairly constant between 2006 and 2010<sup>42</sup>.

**Figure 24 – Self-regulation / non-self-regulation commitments over time**



### 6.19.2 Results from the national authority interviews

The nine national authority representatives were asked to state their view of self-regulation commitments and their impact at national and EU level.

When asked about the impact of self-regulation commitments, most representatives stated that self-regulation commitments are used in their country, are seen as a useful tool and in some fields work better than regulation. Reasons for this included that self-regulated commitments are based on mutual agreement and less prone to conflicts than legislation. In one case (Germany) it was mentioned that having self-regulation commitments as EU initiatives are a useful argument for having self-regulation commitments at national level. Consumer groups and NGOs were seen by one interviewee to have a critical view of self-regulated commitments and in some cases are also reluctant to agree to self-regulated commitments. It was also stated that self-regulation commitments on EU initiatives should be more concrete, in particular with a view to providing guidance to Member States in general and also

<sup>42</sup> It should be noted that the graph refers to the commitments active in a given year, rather than started in a particular year. E.g. a self-regulated commitment running from 2005 – 2009 will be counted for each of the years it was active in.

national Platforms. This was mentioned especially with regard to the area of advertising to children, where the interpretation in Member States is often very different from one to another. In cases like this, it was felt that the EU should set common standards to avoid loose interpretation.

### 6.19.3 Conclusions

The overwhelming majority of commitments undertaken by Platform members since the onset of the Platform have not been self-regulation commitments (74%). Where self-regulation commitments or recommendations, i.e. commitments made by associative Platform members who recommend that their member organisations follow certain guidelines, have been made, they have tended to be in the area of food and drink (34 commitments) and retail and catering (28 commitments). Over time, the number of self-regulation commitments undertaken by members has remained relatively constant. That said, it is important to note that behind these figures (notably the recommendations) lie initiatives that may concern a large number of actors with a wide geographical scope and large market share. As such, the potential impact of some, if not all, of the self-regulatory commitments is high (see Case Studies Section 2 for more detailed analysis of commitments' potential impact in the areas of marketing/advertising to children and food/drink reformulation).

The two case studies on marketing/advertising to children and food/drink reformulation provide insights on the impact of self-regulation commitments on EU and national regulatory initiatives. No regulation has been developed at the EU level in the area of reformulation. However, this does not seem to be a direct effect of the commitments, but rather a product of the prevalent political climate and the challenge of attempting to set EU-wide standards on a large variety of company-specific products. At the same time, a few European countries (notably the UK, Sweden and Norway for advertising/marketing to children and the UK for reformulation) have actually passed regulation in one or more areas covered by self-regulation (SR) commitments in the last few years. Regulation at EU level in the area of advertising/marketing to children can be found in the EU's Audiovisual Media Services Directive (AVMSD)<sup>43</sup> which provides guidance in Articles 12 and 27, in particular, on the protection of minors (see Advertising/Marketing Case Study Sub-section 3.3). The evaluation found no conclusive evidence that the Platform commitments have in any way affected other MS regulators' decision (not) to regulate, despite some case study interviewees being of the opinion that SR commitments had slowed / brought to a halt legislative efforts in the two areas reviewed. National authorities saw SR commitments as a useful tool since it is based on mutual agreement so less prone to conflict, and in some areas this works better than regulation. The industry/NGO and expert interviewees for the two case studies seemed to share this view, some seeing SR as a complement to regulation, but others being in favour of governments providing more guidance, notably in the area of reformulation (see the Interview Analysis sections in the two Case Studies).

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<sup>43</sup> [http://ec.europa.eu/avpolicy/reg/tvwf/index\\_en.htm](http://ec.europa.eu/avpolicy/reg/tvwf/index_en.htm)

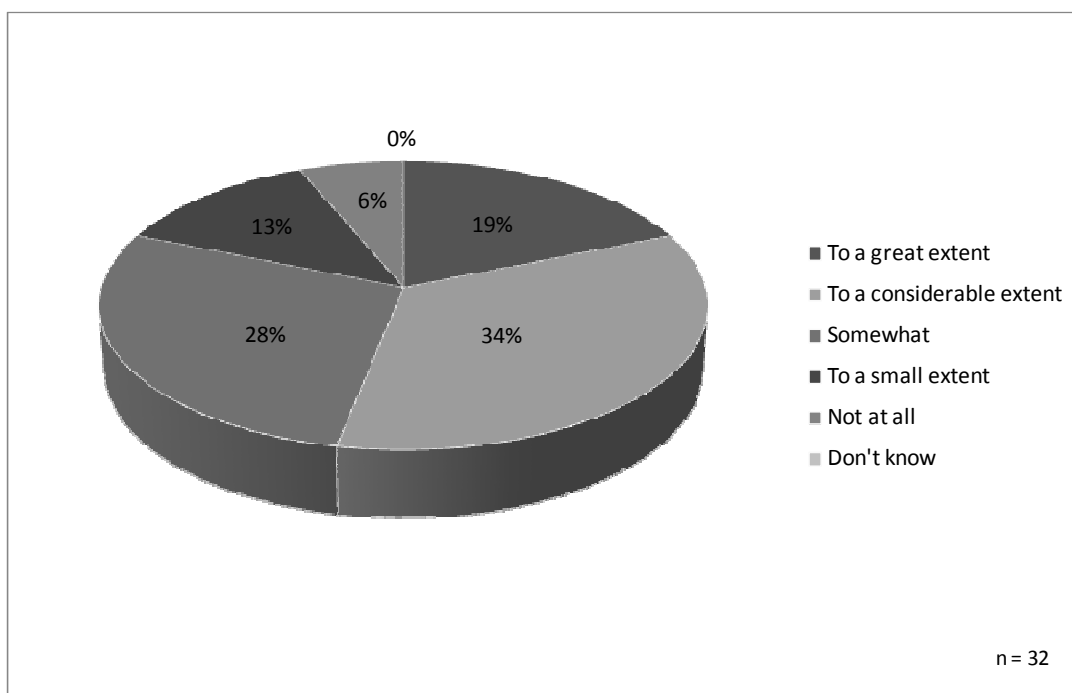


## 6.20 EQ 4.1: Has the Platform contributed to a changed / increased / improved dialogue between the involved sectors and to a better understanding of each others' positions?

### 6.20.1 Results from the Platform member questionnaire analysis and follow-up interviews

Over a third of respondents (34.4%) had observed that the Platform had led to a better understanding among members of each other's positions 'to a considerable extent', but only 18.8% found this to have been the case 'to a great extent' and 28.1% thought this was 'somewhat' the case.

**Figure 25 - Have you observed that the Platform has led to a better understanding among members of each other's positions?**

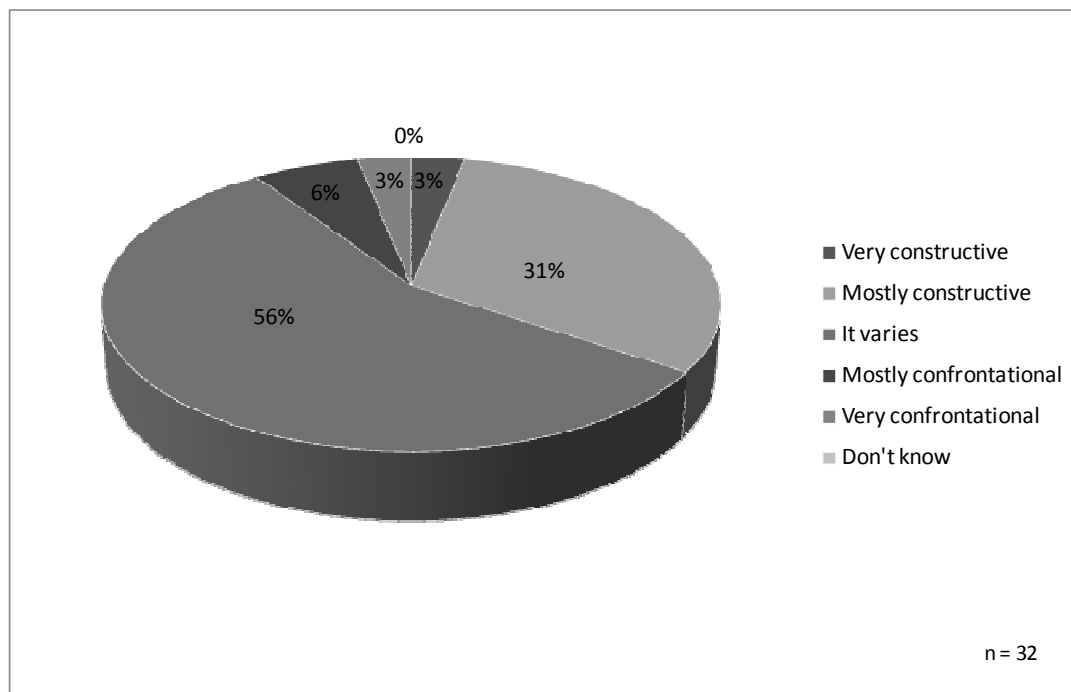


The not-for-profit respondents were less positive in their responses to this question than industry:

- Just over 72% of not-for-profit respondents stated that it had led to a better understanding among members either 'to a considerable extent' or 'somewhat'.
- On the other hand, 64.3% of industry respondents judged that it had done so either 'to a great extent' or 'to a considerable extent'.

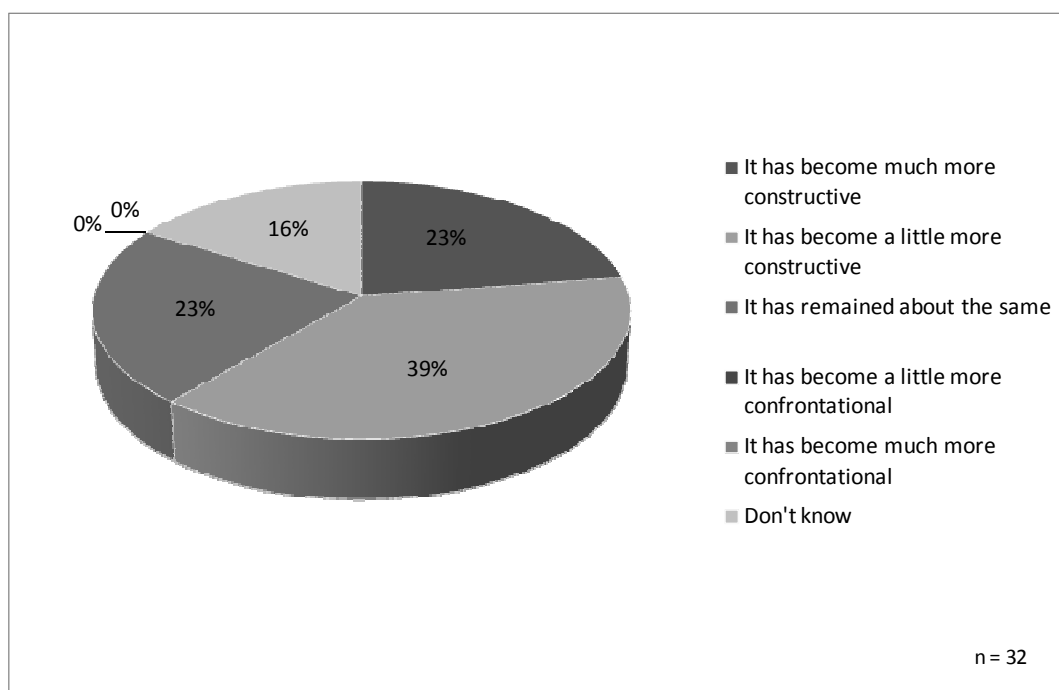
Over half of respondents (56.3%) described dialogue between different sectors in the Platform as being variable. Only 3.1% found it 'very constructive' and 31.3% said it was 'mostly constructive'. Few respondents found it to be 'mostly confrontational' or 'very confrontational'. Half of industry respondents described the dialogue as being 'mostly constructive', compared to 77.8% of not-for-profit respondents describing it as variable.

**Figure 26 - How would you describe the dialogue between different sectors in the Platform today?**



Over half of respondents were of the view that the dialogue between different sectors had evolved positively since 2005, with 22.6% saying 'it had become much more constructive', 38.7% stating that 'it had become a little more constructive' and 22.6% judging that 'it had remained about the same'.

**Figure 27 - How has the dialogue between different sectors in the Platform evolved since 2005?**



Industry perceived the evolution in dialogue slightly more positively than the not-for-profit members:

- Close to 36% of industry respondents found that the dialogue 'had become much more constructive', while the same proportion stated that 'it had become a little more constructive'.
- Only 11.8% of not-for profit respondents stated that 'it had become much more constructive' and just over 41% judged that 'it had become a little more constructive'.

Some comments showing the development of a better understanding and the evolution of the dialogue include:

*"For example, at the beginning there was an ideological discussion about regulation vs. self-regulation. The ad [advertising] industry needed to better explain that it doesn't believe that this is an 'either or', but SR [self-regulation] should complement regulation (rather than substitute it). The subsequent Advertising Roundtable led to a better understanding of advertising self-regulation among all parties to the extent that it led to a consensus view about what makes advertising SR effective".*

*"Familiarity and lively, open discussions have broken down some of the initial scepticism and mistrust that de facto exist between industry and some civil society stakeholders".*

*Source: Member questionnaire*

*Many members had never spoken to each other or had never taken any interest in what others were doing. The Platform has broken some prejudices between consumers, retailers, NGOs, and between big players particularly. It has helped everybody understand each other's positions.*

*Source: Platform member interviews*

The interviews with both for-profit and not-for-profit organisations supported the view that while organisations are generally positive about the fact that the Platform provides a forum for dialogue with organisations they might otherwise not communicate with, there is not enough dialogue between different sectors: *"The discussions are often one-way and there is no dialogue between sectors. Organisations cooperate within sectors but there is no understanding of other positions."* As another member said, cooperation between different organisations depended very much on shared or common interests, particularly when it comes to cooperation between not-for profit and for-profit members. The fundamental difference between for-profit and not-for-profit members was also highlighted by one member in the interviews: *"Non-profit and for-profit members have different motivations and starting points, as ultimately for-profit members want to make money. There might be a better understanding of positions, but members still want to achieve different things."*

Along these same lines, for-profit members in particular highlighted the possibility of working with organisations from other sectors and the need for a stronger joint approach was also mentioned in the interviews. The Platform is seen by them as a *"vehicle by which different stakeholders can better explain their positions and their activities"* and that it has *"contributed to opening up channels of communication"* between members.

In their comments, for-profit and not-for profit members also mentioned some stagnation in the dialogue between members saying that *"it can be a bit exasperating to go over the same issues again without seeming to make much progress"*, and that *"it is always the same NGO activist group(s) making the same points"* and that *"the main obstacle remains the discussion on 'taboo' topics relating to industry's activities."*

NGOs were also seen to have a negative and sceptical approach to the dialogue, which was seen by five for-profit and one not-for-profit member as the main factor affecting the quality of the dialogue in a negative way. However, one not-for-profit organisation stated in the interview that *“the critical voice of NGOs is essential – otherwise industry can get away with the most ludicrous statements!”*

According to the interviews, other factors affecting the quality of the dialogue are:

- The quality and level of knowledge of the representatives presenting the member's commitments
- The extent to which speakers know the subject they address
- The extent to which all members try to be fair and objective
- The quality of input by experts - DG SANCO has fed into the process some very good presentations.
- The opportunity for NGOs to have pre-meetings before Platform meetings to discuss what they would like to put on the agenda
- Open mindedness and ability for industry actors not to come with pre-conceived ideas

The role of the former Director-General of DG SANCO in chairing the Platform was also mentioned in the interviews by a number of for-profit and not-for-profit organisations as affecting the quality dialogue in a positive way: *“The chair has done a remarkable job in many respects, but he has also identified the areas of in depth discussion to avoid the trap of remaining on the surface. When you get into more in depth, people start to discuss substance rather than pre-conceived ideas.”*

There were also mixed views on the quality of discussions in the Platform. One not-for-profit member claimed in the questionnaire that discussions about commitments are limited and that usually meetings are about presenting actions and their monitoring results, and not about discussing their relevance. The interviews with Platform members supported this view, and one member stated that there is not enough time to define individual positions as too many issues in too many different fields are being presented; participating in a dialogue in a field outside of an organisation's issue area is therefore difficult. In the interviews it was also mentioned by two members that while facilitating a dialogue on the Platform is important, discussions in the Platform have to be recorded as action points and followed up on to ensure that commitments really evolve.

## **6.20.2 Results from the interviews with observers**

When asked how they would describe the nature of the dialogue between Platform members and if it had lead to a better understanding of each other's positions, both observers agreed that the most positive aspect of the dialogue process had been having all sectors “sitting in the same room”. One particularly pointed out that *“although they may not agree on ways to tackle obesity, at least they are trying to get to the same place, they have similar goals”*. She judged this as one of the most successful aspects of the Platform. On the other hand, even though she was concerned about some of the *“motivations”* of certain groups that are involved, this would not matter that much *“if in the end the goal is achieved and there are positive outcomes”*.

The other observer was more negative about this idea, saying that even though *“privates and NGOs are in the same room, you don't feel like there is a joint mission”*. However, she also explained that it was *“helpful”* that all sectors were there to *“discuss certain things and see where you stand”*. In this sense,

one of the most successful aspects of the Platforms so far has been that it has “*kept nutrition and obesity on the agenda at government and other stakeholder levels*”. In her view, it is not clear where else discussions with the private sector and NGOs could have taken place.

The first observer also described the dialogue between members as “*challenging*”, given that members “*challenged each other in a good way*”.

### 6.20.3 Conclusions

One of the strengths of the Platform is bringing people with different viewpoints together in a same forum to discuss and exchange views, and this has clearly contributed to an enhanced dialogue and a better understanding between members. A clear majority of both industry and not-for-profit members thought that the evolution of the dialogue since 2005 had been positive, and that overall, it had become more constructive and less confrontational. The majority of Platform members agree that the process has led to a better understanding of each others’ positions, but only less than 20% of members (mostly from industry) felt that this had been the case ‘to a great extent’.

While the Platform has led to further and improved dialogue, the nature of this dialogue can still be somewhat confrontational and cross-sector co-operation continues to be the exception rather than the norm. Only about a third of Platform members described the dialogue as ‘very’ or ‘mostly constructive’, whereas the majority thought that the quality of the dialogue varied significantly. A number of factors affect the quality of the dialogue, ranging from the quality of the chair and speakers to the attitude of members.

## 6.21 EQ 4.2: Has the Platform met the expectations of its members?

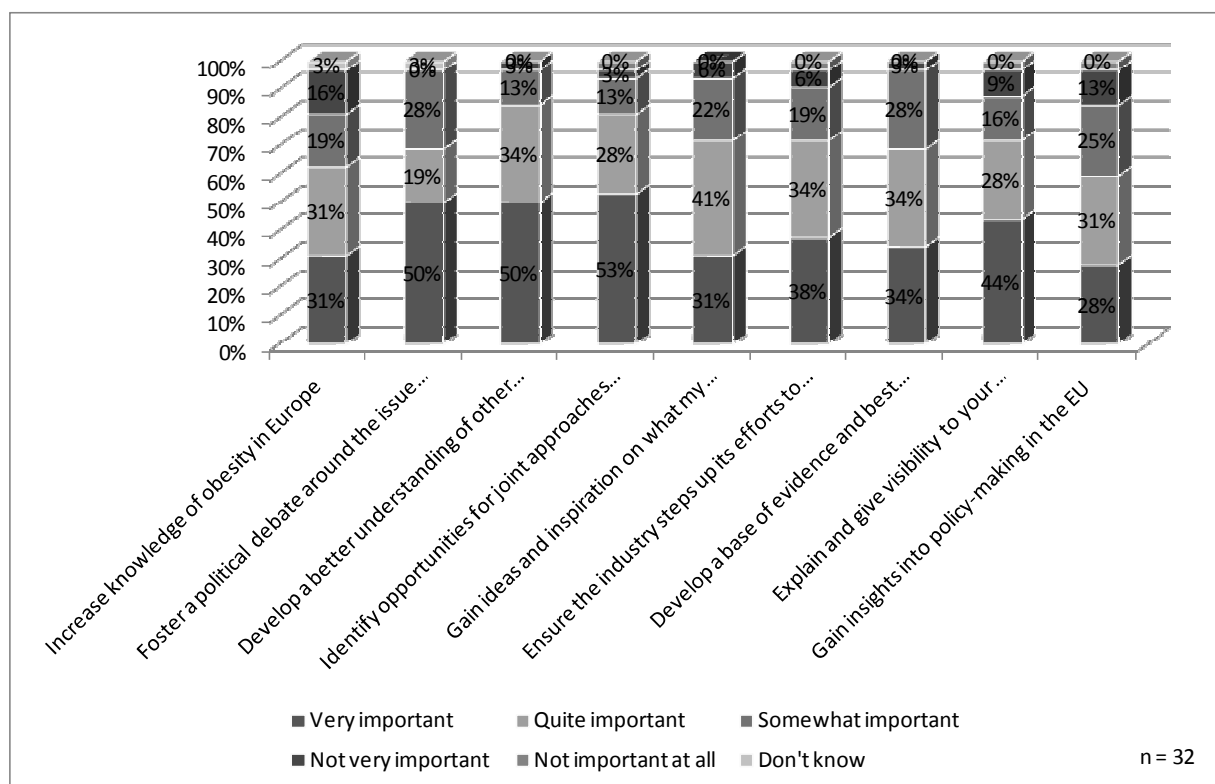
### 6.21.1 Results from the Platform member questionnaire analysis and follow-up interviews

#### Members’ initial expectations

Platform members were asked what their initial expectations were when they decided to join the Platform. Half of respondents felt that the following were ‘very important’ aspects for their organisation:

- ‘Develop a better understanding of other stakeholders’ situation and positions’
- ‘Identify opportunities for joint approaches and synergies between the activities of different actors’
- ‘Foster a political debate around the issue of obesity’

**Figure 28 - What were your initial expectations when you decided to join the Platform?**



Close to 44% of respondents found the following 'very important' for their organisation: 'Explain and give visibility to your organisation's efforts to combat obesity' and just over 40% found this aspect to be 'quite important' for their organisation: 'Gain ideas and inspiration on what my organisation might do to counter obesity'.

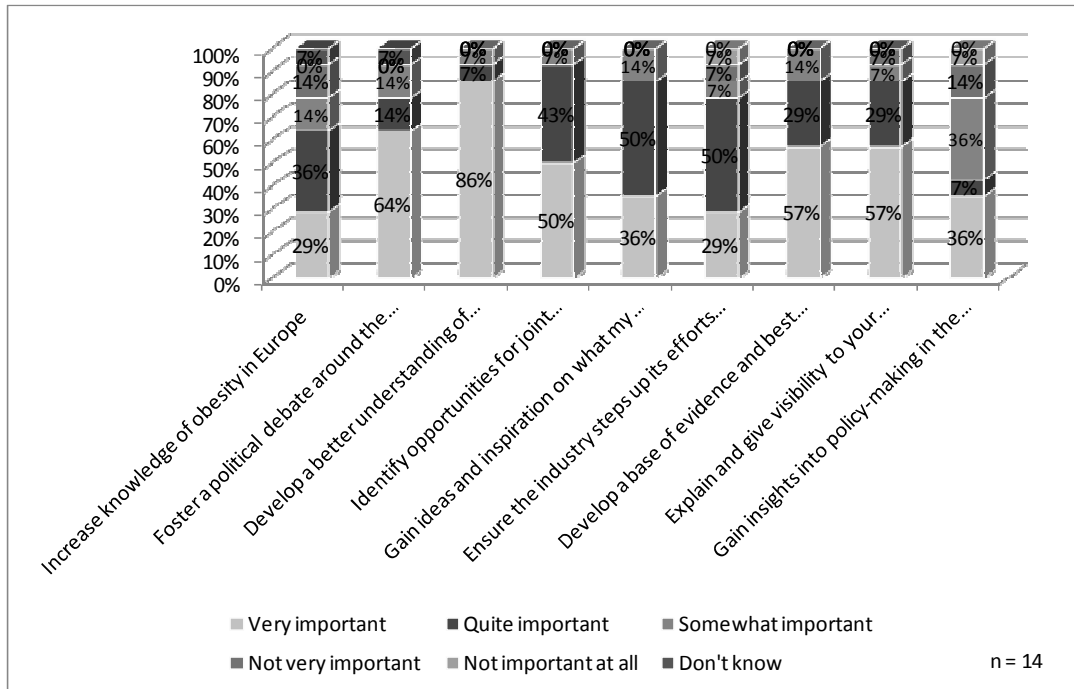
While certain aspects were clearly 'very important' for industry, not-for-profit responses were more mixed in their opinions. What each group judged to be 'very important' tended to differ, but both groups appeared to agree on the high importance of 'Identifying opportunities for joint approaches and synergies between the activities of different actors' as an initial expectation for their organisations:

- A very high proportion of for-profit respondents found the following aspects 'very important': 'Develop a better understanding of other stakeholders' situation and positions' and 'Foster a political debate around the issue of obesity', with 85.7% and 64.3% of respondents, respectively, stating this opinion.
- Over half of industry members found these three aspects to be 'very important' for their organisations: 'Identify opportunities for joint approaches and synergies between the activities of different actors', 'Develop a base of evidence and best practice through monitoring activities', 'Explain and give visibility to your organisation's efforts to combat obesity'.
- 'Gain ideas and inspiration on what my organisation might do to counter obesity' and 'Ensure the industry steps up its efforts to counter obesity' were both perceived as 'quite important' by 50.0% of industry respondents.
- In terms of not-for-profit members, just over 55% stated that 'Identifying opportunities for joint approaches and synergies between the activities of different actors' was 'very important' for

their organisation and 44.4% said the same of 'Ensuring the industry steps up its efforts to counter obesity'.

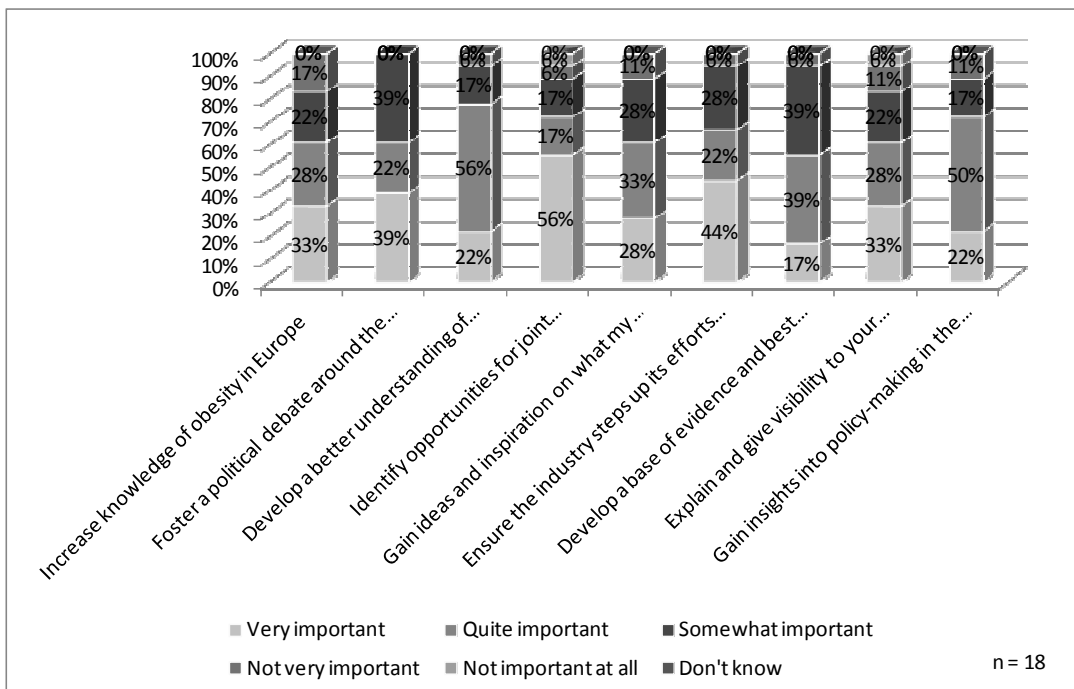
**Figure 29 - What were your initial expectations when you decided to join the Platform?**

**(For-profit sector)**



**Figure 30 - What were your initial expectations when you decided to join the Platform?**

**(Not-for-profit sector)**

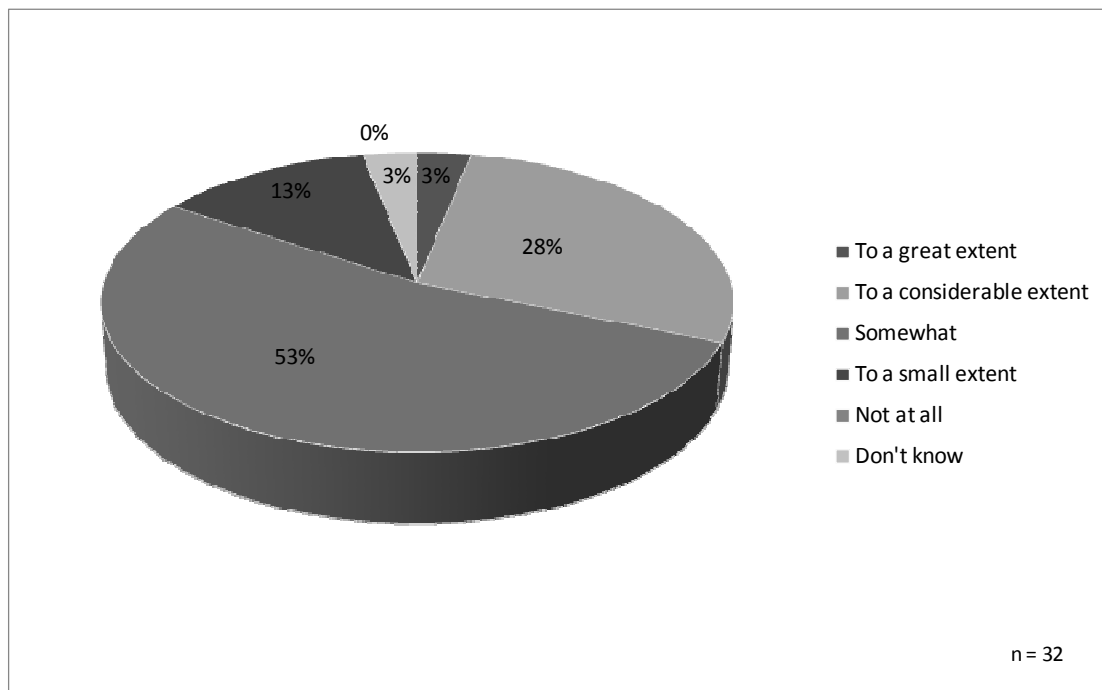


When asked about other expectations they had, both not-for profit and for-profit members brought up very specific things such as: “to find out more about industry strategies”, “achieve an evidence-based consensus on how to combat obesity”, “to raise awareness among parents and educators on the matter of obesity” and “to put food advertising in context as just one element of a complex and multi-factorial debate among others”.

### Meeting members’ expectations

Platform members were then asked to what extent the Platform had met the expectations they had when joining. Over half of respondents stated that the Platform had only ‘somewhat’ done so, while only 3.1% judged that it had done so ‘to a great extent’ and 28.1% ‘to a considerable extent’.

**Figure 31 - To what extent has the Platform met the expectations you had when joining?**



Not-for-profit members were those who felt most strongly that the Platform had only ‘somewhat’ met their expectations, with 66.7% of respondents being of this opinion. Industry respondents felt that the Platform had done more to meet their expectations, with half stating that it had met their initial expectations ‘to a considerable extent’ and 35.7% answering ‘somewhat’.

According to the comments provided by members, not-for-profit and for-profit organisations tended to agree that the expectation that was fulfilled to the greatest extent was that the Platform produced a better understanding of each other’s positions in the debate about how to tackle obesity. In fact, the expectations related to information-sharing and exchange of views has been fulfilled for many of them.

In addition to this, not-for profit members mentioned the following in the questionnaire and interviews as expectations that had been fulfilled:

- ‘It has helped to drive some issues up the agenda of stakeholders and enabled a fuller debate about the issues’



- 'Creating a higher profile for this organisation' / 'Give visibility to our organisation's efforts to combat obesity, overweight, and promote prevention efforts'
- 'Developing partnerships within our own sector' / ' Increase networking'
- 'Gaining insights into EU Policy making'
- 'Gaining insights into what the state of knowledge in other organisations is and bringing their knowledge to the Platform'
- 'Promoting the physical activity sector'
- 'Including doctors' organisations in the Platform which were not included before'
- 'Assuming a "watch-dog" role and flag up potential risks'
- 'The hope to influence industry'
- 'Representing consumers on the Platform (in the case of a representative of consumer cooperatives)'

In the case of for-profit organisations, the questionnaires and interviews, the following expectations had been fulfilled:

- 'Networking with other stakeholders and DG SANCO and some interesting speakers'
- 'Gaining a better understanding of the Commission approach' and "stay informed of the Commission's plans in this field"
- 'Understanding our role in the obesity issue better'
- 'Gaining a better understanding of the role and effectiveness of advertising self-regulation to respond to the obesity challenge'
- 'Increasing communication between complementary industries (e.g. traders and producers)'
- 'Bringing together for-profit and not-for-profit organisations to work on joint commitments as the Platform is a unique opportunity to engage with regulators and NGOs'

In relation to what has not been fulfilled, both the for-profit and not-for-profit members tended to agree on the lack of joint initiatives that involve members from different sectors. Not-for-profit members said that they had been able to work and partner with other organisations in their sector, however this had not been the case with organisations from other sectors, in particular, industry.

For-profit members also commented on the lack of cooperation between not-for-profit and for-profit members which, from their point of view, is due to "little trust" in each other's initiatives and also the "dogmatic" positions on the side of NGOs. This view was also supported in the interviews with Platform members: *"We have delivered on the pledge in a transparent way with good independent data, but it's still met with scepticism and some criticism. There is not much we can do to change that, if some members are intrinsically dogmatic."*

Four not-for-profit members also claimed that one of the expectations that had not been fulfilled was the need to define which are the most relevant and appropriate actions to fight obesity and overweight. In this respect, they are expecting a more robust approach at EU level, deeper discussions regarding

which are the actions that would produce the desired outcomes, and the elaboration of specific policy statements.

That said, one member stated in the interviews that Platform members are themselves responsible for making the Platform as beneficial to themselves as possible: *“If a member really wants to be more efficient, to be more involved and to fulfill more expectations, the Platform is always giving it space. It is up to the members and not to the Platform to fulfill expectations.”*

### **Expectations for the future of the Platform**

Members were also asked to comment on their expectations for the future of the Platform. As regards how they would like to see the Platform develop in the next 3-5 years and what were the main areas or aspects of the Platform that would have to be tackled or improved, both among the not-for profit members and the for-profit ones, there was a great variety in the type of responses.

#### ***The views of the not-for-profit sector***

The not-for profit sector placed a higher share of the responsibility regarding the future of the Platform on the European Commission. At least half of the 16 members that commented on the future of the Platform mentioned that, for the coming years, they expected the Commission to:

- Provide clearer guidance/direction on what type of actions are needed to fight obesity
- Maintain its leadership in the Platform and continue being committed to it
- Promote/Encourage further cross-sectoral cooperation and the implementation of joint initiatives

Another expectation that was commented on by at least four members in this sector was that the Platform could become more focused or specific. In this sense, they would like the Platform to *“generate specific actions in key areas” / “be more concrete in some themes”*. In relation to the specificity of actions, these members also mentioned they would like to see an enhanced link between stakeholders’ *“specific natures”* (particularly if it is a member of the industry or the not-for profit sector) and the type of actions they implement.

Four other members also claimed they would like to see some improvements in the production of “evidence and know-how” through the monitoring system. In particular, they would like the system to provide information regarding the outcomes and impact of the Platform in order to measure the progress and relevance of commitments.

Regarding specific areas for improvement, there were three aspects that were mentioned by at least two members. The three aspects are somewhat related to the monitoring system. According to these members, there is a need to:

- Increase the quality and relevance of commitments and prevent *“small, non-significant contributions”* from being implemented
- Adopt an evidence-based approach, including the definition of operational objectives and expected inputs and outputs

In addition, the following areas for improvement were mentioned in the Platform member interviews by not-for-profit members:

- Show the effectiveness of actions: To show that the Platform has had an impact on activities is also important, as at the moment it is not clear if members actually change their actions after Platform discussions
- Address the imbalance of industry members who have the resources and the power to make an impact, but don't want to make relevant commitments, and NGOs who don't have enough resources and are not influential enough
- Make sure industry steps up its initiatives
- Adjust the focus of the Platform by promoting the physical activity sector more
- Ensure that smaller groups working on specific topics improve the dialogue and engage more
- Develop a common position on the key issues
- More intervention with regard to legislation
- A stronger alignment with WHO recommendations
- A stronger involvement from Member States
- New mandate would have to contain some sort of commitment from European Commission to not force members to join in partnerships and PPPs with industry
- The monitoring should be adapted to stakeholders, the expectations from NGOs and businesses should be different
- Define the role of NGOs more clearly in terms of the "watch-dog" function
- Follow up presentations rather than seeing them as a "one-shot" opportunity
- Ensure that papers for meetings are disseminated in time so that members can prepare better

### ***The views of the for-profit sector***

Among the for-profit sector, the question regarding the expectations for the future of the Platform and the one on the areas for improvement can be treated together given that there was accordance in the issues pointed out by members in both questions. There were mainly three areas where at least more than two members per area (out of the 13 that answered the first question and the 10 that answered the second one) pointed out they were expecting to see some changes. These were:

- An increase in joint commitments that include members of the for-profit and not-for-profit sector
- A less administrative and improved monitoring system that provides the base of evidence and best practice for further actions
- An improved communication / dissemination of information about the Platform and its key achievements, particularly two said this would help increase awareness of the Platform among EU citizens, the European Commission's DGs, Member States and other external stakeholders.

One member pointed out in the interview that the cooperation between not-for-profit and for-profit organisations is problematic because it would undermine the not-for-profit sector's ability to criticise for-profit organisations.

In addition, Platform member interview responses from industry included the following areas for improvement:

- Increase cross-sectoral approaches, especially between the fields of physical activity with nutrition
- Stronger cooperation with DG EAC, especially in the physical activity field
- Issues that have not been resolved should not be discussed again, unless members can agree on lower objectives
- More discussion on content in addition to presentations on commitments
- Increase in triangular networking between EU institutions, stakeholders and Member States for a better synergy of action

It is worth noting that another three members said they thought the Platform “*should continue on the basis of its existing format*” or that it should continue to work as “*an effective forum for discussion and exchange of best practices*”.

#### **6.21.2 Results from the interviews with former members**

Two former Platform members were interviewed and asked about their reasons for leaving the Platform. It appears that in one case, this was due to the fact that, after their initial commitment had expired, they no longer felt it would be sensible to table a new commitment, given that they felt they already “*did everything they could*” on the issue of obesity. The other former member left the Platform due to a change in the organisation’s priorities; in this case the decision had nothing to do with the Platform itself, but more with a change in leadership within the organisation.

It is perhaps also interesting to note that one of the former members that was interviewed explained they were re-shaping their organisation and had plans to re-apply to the Platform. From their renewed membership, they were planning to enhance their visibility in the EU, have a voice in policy shaping, create links and get to know other people working in similar area, pool resources with such people, and inform others on recent research being conducted in their field of work (which is more related to nutrition than to obesity).

#### **6.21.3 Results from the interviews with observers**

When asked how beneficial being a Platform observer had been for their organisations, one observer highlighted as positive the possibility of having a dialogue with the private sector, which they were not able to have within their institution. Being an observer had allowed her organisation know what the private sector was doing regarding obesity.

The other observer said it had been very beneficial too that her organisation could learn about the “*interactions between participants and how to handle them*”. Allowing “*a lot of networking to go on between organisations*” was something she saw as not very relevant to the Platform but yet very beneficial for members.

As regards the main challenges the Platform needs to overcome in the next 3-5 years to remain relevant and useful, one of the observers mentioned the need to maintain the commitment both of the

organisations involved and of DG SANCO. In addition to this, she said she was concerned that some organisations could perhaps do more and that they were not committing as deep as they were capable of. However, she recognised that membership is voluntary and so there is a *“very fine line to tread”*.

The other observer’s comments also related to the issues highlighted before, but she was more emphatic about the need to have commitments that are not *“as voluntary as they have been”*, and that are more in line with the public health agenda and members’ core businesses. In addition to this, commitments should need to be shown to be an effective means of tackling obesity. As a recommendation for the future of the Platform she also suggested ensuring that *“it is left up to the Member States themselves whether they want to be there [in the Platform] as observers or not”*. In her view, *“if this is not possible, then the content of the discussions should be more streamlined, ensuring that country examples are discussed”*.

#### 6.21.4 Conclusions

Platform members had a variety of expectations when joining the Platform. Some of these were very similar for both industry and not-for-profit members, including the desire to foster a political debate around the issue of obesity, and to identify opportunities for joint approaches and synergies between the activities of different actors. However, there were also some differences in members’ expectations, including:

- Developing a better understanding of other stakeholders’ situation and positions seems to have been the single most important objective of industry members, whereas most not-for-profit members rated this as ‘quite’, but not ‘very important’.
- Industry members also emphasised the importance of developing a base of evidence and best practice through monitoring activities, and of explaining and giving visibility to their organisation’s efforts to combat obesity.
- On the other hand, not-for-profit members tended to emphasise that helping to ensure the industry steps up its efforts to counter obesity, and gaining insights into policy-making in the EU, were important factors in their decision to join the Platform.

However, over half of all respondents stated that the Platform had only ‘somewhat’ met their expectations. A majority (57%) of industry members, but only a small minority of not-for-profit members (11%) found that their initial expectations have been met to a ‘considerable’ or even ‘great extent’. The area where expectations by both not-for-profit and for-profit were least met was in terms of the lack of joint initiatives that involve members from different sectors. A lack of trust and the dogmatic approach of some not-for-profit organisations was said not to have helped in this respect. Moreover one of the expectations that had not been fulfilled, according to a few not-for-profit organisations, is the need to define which are the most relevant and appropriate actions to fight obesity and overweight. On the other hand, the expectation that was fulfilled to the greatest extent related to creating a better understanding of each other’s positions in the debate about how to tackle obesity.

The two former members’ reasons for leaving the Platform do not appear to be linked to their expectations not having been met, but to one having a lack of scope/resources for further action in the area (a condition of Platform membership) and the other to a change in organisational priorities. It is interesting to note that one of the two was considering re-joining the Platform.

Looking ahead over the next three to five years, the following issues were considered of particular importance by members: improving the monitoring system; increasing awareness of the Platform among EU citizens, the European Commission's DGs, Member States and other external stakeholders; increasing ties with MS; demonstrating the impact and effectiveness of actions.

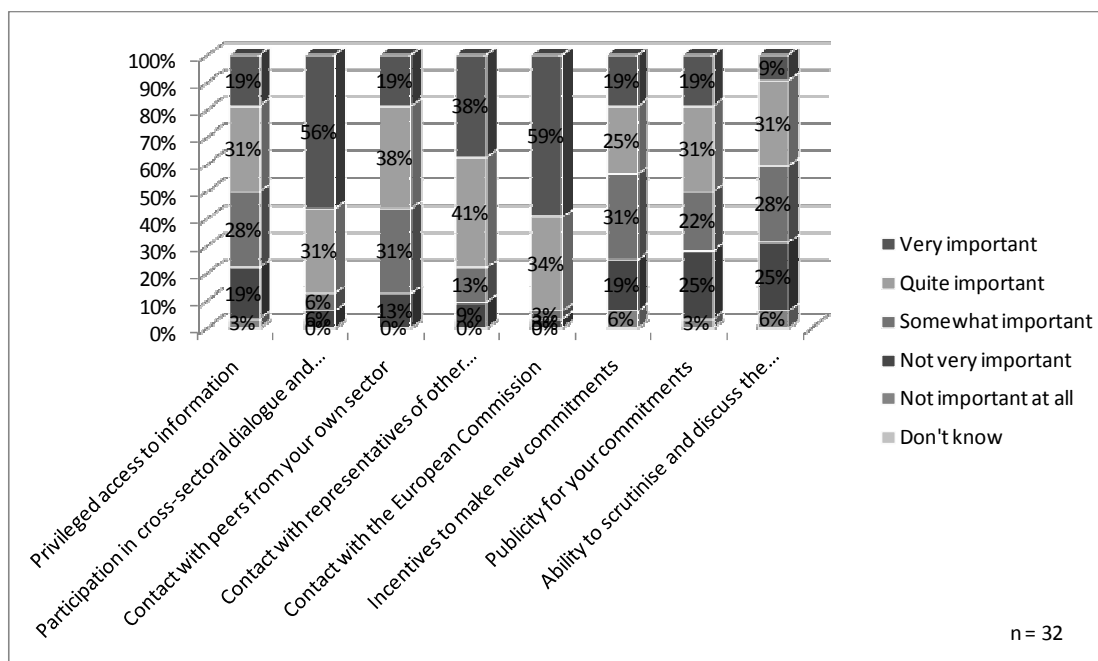
## 6.22 EQ 4.3: What can be considered the benefits of being a Platform member?

### 6.22.1 Results from the Platform member questionnaire analysis and follow-up interviews

Industry and the not-for-profit respondents concurred that some of the main benefits of being a Platform member were:

- 'Participation in cross-sectoral dialogue and mutual learning', with 71.4% of industry members and 44.4% of not-for-profit respondents being of the opinion that it was a 'very important' benefit.
- 'Contact with the European Commission', which was seen by just over 64% of industry and 55.6% of not-for-profit respondents as 'very important'.

**Figure 32 - How important were the following potential benefits for you?**



The two main areas where being a Platform member was considered either 'not very important' or only 'somewhat' important were: 'Publicity for your commitments' and 'Ability to scrutinise and discuss the commitments of others', where over half of respondents were of this opinion and a quarter of these, in each case, stated they were 'not very important'.

Industry had stronger opinions than the not-for-profit members on certain of the potential benefits and both groups had differing views on those that were seen as least beneficial.

Industry respondents had strong opinions regarding the following two aspects in particular: 'Contact with representatives of other sectors' and 'Contact with the European Commission', with all respondents stating that these were either 'very important' or 'quite important'. On the contrary, the 'Ability to scrutinise and discuss the commitments of others' was perceived as only 'somewhat' important to the highest proportion of industry respondents (35.7%). The importance for members of increased contact with the European Commission was also confirmed in the interviews, where a number of members stated that "*knowing what the European Commission's future plans are*" has been a benefit. Being able to show "*what individual sectors are achieving in the fight against obesity*", "*being involved in the European dialogue on obesity*" and "*a unique opportunity for exchanging experiences and information*" were also mentioned in the interviews as benefits. One member also referred to the issue of accountability in relation to the Platform: "*It creates a unique level of publicity, accountability and pressure to deliver.*"

Not-for-profit questionnaire respondents were of the opinion that providing 'Incentives to make new commitments' was either 'somewhat important' (50.0%) or 'not very important' (22.2%). Close to 39% (the highest proportion of respondents) were also of the opinion that 'Publicity for your commitments' was a 'not very important' benefit. In the questionnaire, just three out of the 18 not-for-profit respondents specified "other" benefits of being a Platform member; they related to increased contacts with other European and American NGOs, HLG members and other organisations in the Platform. Additional benefits were mentioned in the responses to the interviews with members, including "*gaining insight into the level of knowledge of other organisations about the issue of obesity*", "*understanding the positions of other organisations in this field*", and "*being more aware of how serious the issue of obesity is*". In the Platform member interviews, one not-for-profit member stated, on the other hand, that convincing their member organisation to dedicate their resources to the work of the Platform is sometimes difficult as the benefits are often not obvious to them.

One member underlined the positive role that not-for-profit organisations have assumed as "guide dogs" rather than "watch dogs", as they fulfil the purpose of delivering information and guiding for-profit members towards relevant commitments. This was seen as a benefit of the Platform.

The Platform member interviews also showed that all current Platform members would join the Platform again, and only a small number of organisations commented on the resources their involvement in the Platform requires. One not-for-profit mentioned that the benefits so far have not been tangible, but that it is still worth being a member as this is the only forum where "*something happens in the field of obesity*".

### **6.22.2 Conclusions**

Participation in cross-sectoral dialogue and mutual learning, contact with the European Commission, and contact with representatives of other sectors were seen as the three main benefits of Platform membership by both for-profit and not-for-profit members. In spite of their disagreements in many other areas, both sides were in complete agreement on this list of most important benefits. Moreover, all current Platform members would join again, in spite of the amount of resources the work on the Platform requires.

Nonetheless, industry members were significantly more positive about the overall benefits of being a Platform member, rating nearly all of the potential benefits listed by the evaluators as at least 'quite important' (with the sole exception of the ability to scrutinise and discuss the commitments of others). Not-for-profit members, on the other hand, showed themselves more sceptical regarding the actual

benefits, and were particularly unenthusiastic about the benefits for them in the Platform providing incentives to make new commitments; privileged access to information; and publicity for their commitments.

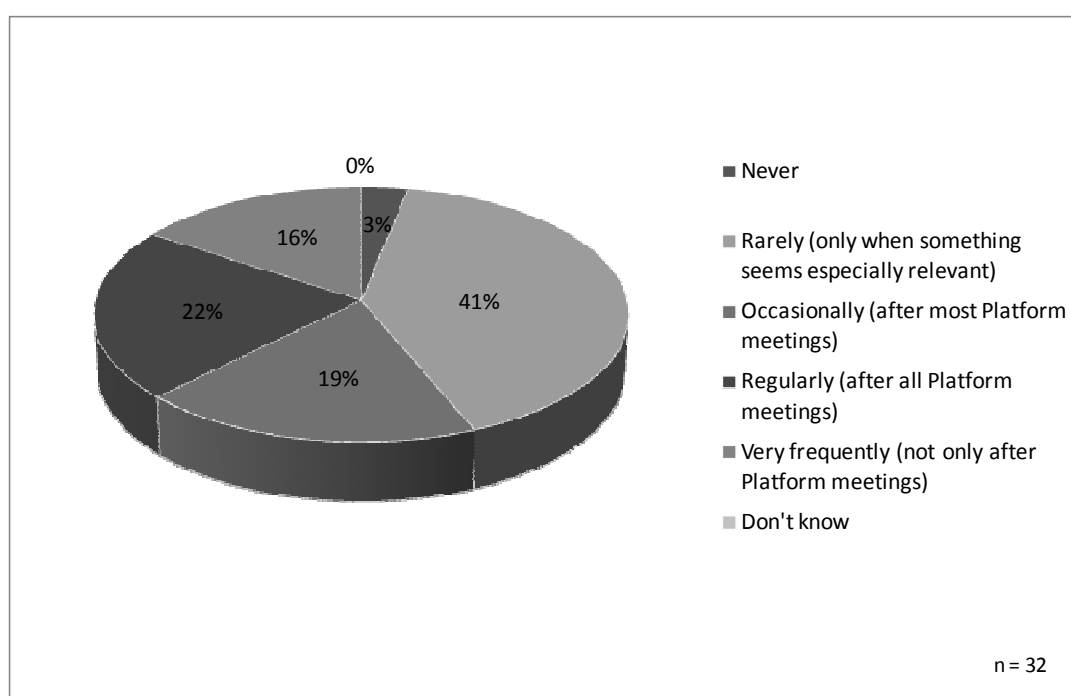
## 6.23 EQ 4.4: How have Platform members used the Platform in their communication activities?

### 6.23.1 Results from the Platform member questionnaire analysis and follow-up interviews

In the questionnaire, Platform members were asked to rate and comment on both their internal and external communication efforts relating to Platform activities; results showed that communication on the Platform by Platform members was particularly limited externally, but also internally, notably in the case of not-for-profit members. **For more findings as to members' internal communication activities, please refer to EQ 3.6.**

In relation to their **external communication** activities, Platform members were asked to state how often they use the Platform in any of their external communication activities (with customers, stakeholders and/or the general public). The largest proportion of respondents (40.6%) said that they only did so 'rarely (only when something seems especially relevant)'. Both industry and not-for-profit members were of this opinion, with the highest proportion in each group (35.7% and 44.4% respectively) judging this to be 'rarely' the case. The tools used to communicate externally include newsletters, email or personal communications, press releases, website, annual report, and conferences.

**Figure 33 – How often do use the Platform in any of your external communication activities (with customers, stakeholders and/or the general public)?**





Members were also asked to give their views on the potential for enhancing the dissemination of relevant information about the Platform and its work to interested audiences. Most of them agreed there is potential to enhance dissemination efforts, however not-for-profit organisations were less positive about it, particularly because they were concerned about what information should be disseminated and about the existence of concrete successes that could be communicated externally. They also raised questions about the audiences that needed to be reached. The following comments illustrate these findings:

*"We have been concerned about proposals to 'promote' the work of the platform given that members have differing views about what it has achieved and what it needs to focus on. It is not possible for the Platform to have a position on something. Care is also needed about how the Platform is used to endorse events or initiatives that not all members value or support".*

*"We first need to carry the assessment of the platform as a whole before we decide to actively communicate on it"*

*"The good story lies in the sector partnership and cross sector partnership, but due to the topic, the [target] audience is more targeted experts/institutions than the general media."*

*"(...) Usually, we are provided with more than enough information. The issue is finding an audience which might be interested in it's work. A lot of the information is very specific, technical, EU focused or locally focused and therefore, our member organisations, per-se, would not be particularly interested in the activities. Furthermore, since there is so much information coming from the platform and regular meetings, it does not provide for a "one shot" focused attention for targeted audiences".*

*Source: Member questionnaire*

As regards enhancing the dissemination of relevant information about the Platform and its work to interested audiences, industry suggested the following:

- 'A more user friendly website' / 'A dedicated website to showcase individual commitments'
- 'Organisation of workshops and dissemination of material'
- 'An RSS feed'
- 'A newsletter in which there are bite-size stories about perceived successful commitments, interviews with stakeholders, forthcoming agenda items, etc.'
- 'More proactive press outreach'
- 'More meetings which are open to the public'
- 'An annual report'

### 6.23.2 Conclusions

Platform members tend only rarely to communicate externally about the Platform, but tended to agree that there was potential for the Platform to increase its dissemination efforts. In the questionnaire, Platform members were asked to state how often they use the Platform in any of their external communication activities (with customers, stakeholders and/or the general public) and the largest

proportion of respondents said that they only did so 'rarely'; this as true for both industry and not-for-profit members. While many members saw the benefits of increasing their external communication efforts, some not-for-profit members were concerned about what information should be disseminated and whether there were concrete successes that could be communicated externally.

## 7 OVERARCHING CONCLUSIONS AND RECOMMENDATIONS

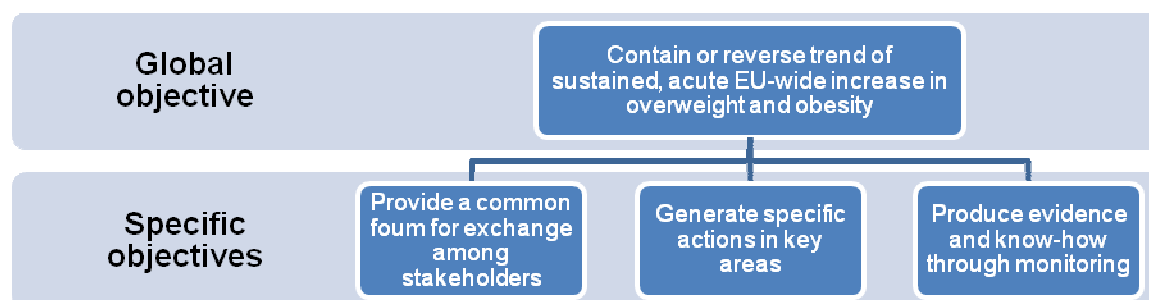
The purpose of this chapter is to build on the conclusions presented above in relation to the 23 evaluation questions by taking a more holistic view of what the Platform has achieved over the past five years, where the main areas for improvement lie and what the focus should be going forward.

In order to assess what the Platform has achieved over the past five years, it is important to look at what it actually set out to achieve in the first place. The purpose of the Platform, according to its founding statement, is to provide a common forum for all interested actors at European level where:

- a) they can explain their plans to contribute concretely to the pursuit of healthy nutrition, physical activity and the fight against obesity, and where those plans can be discussed;
- b) outcomes and experience from actors' performance can be reported and reviewed, so that over time better evidence is assembled of what works, and Best Practice more clearly defined.

The figure below provides an illustration of the Platform's objectives.

**Figure 34 - The Platform's objectives as specified in the founding statement**



As it is too early to judge whether the Platform has had an impact on the global objective specified above (see Section 5 on Limitations), and to do so does not fall within the scope of this evaluation, the question which will be answered in the following chapter is: to what extent has the Platform met the three specific objectives? In order to answer this, but also in an attempt to judge the wider impact of the Platform, the following chapter will present both conclusions, and strategic and operational recommendations around the following four key themes:

1. Dialogue
2. Action
3. Impact
4. The future

Please note that while the first two specific objectives (provide a forum for exchange and generate specific actions) will be dealt with in the initial two thematic sections, the third specific objective relating to 'producing evidence and know-how through monitoring' will be considered in the sections focussing on action, i.e. the commitments themselves, and impact.

## 7.1 Dialogue

This section seeks to conclude on the role and function of the Platform as a place for dialogue.<sup>44</sup> The Platform is a multi-stakeholder forum where members from the for-profit and not-for profit sectors come together to share knowledge and ideas, and discuss their concrete efforts towards healthy nutrition, physical activity and the fight against obesity.

Enhancing dialogue is one of the main achievements of the Platform. It is an innovative process that has brought together actors with very different interests who were previously often antagonistic towards each other. Even though the education sector is an area where representation is lacking and the physical activity sector an area that appears to be in need of more visibility (see Evaluation Question 1.2), overall the evaluation results suggest that there is a good representation of a broad range of sectors on the Platform and that the distribution between not-for-profit and for-profit is balanced, providing a good basis for facilitating a cross-sectoral approach to the issue of obesity (see EQ 1.2). The Platform has also led to a better understanding among members from different sectors, notably through a dialogue that has become more constructive and less confrontational over the years (EQ 4.1). In fact, although the Platform did not fulfil all of the expectation of members, the one that was fulfilled to the greatest extent related to creating a better understanding of each other's positions in the debate about how to tackle obesity (EQ 4.2). Moreover, participation in cross-sectoral dialogue and mutual learning, and contact with representatives of other sectors were seen as two main benefits of Platform membership by for-profit and not-for-profit members alike (EQ 4.3).

However, there is still an element of confrontation between for-profit and not-for-profit members (EQ 4.1), and the enhanced understanding has not necessarily translated into greater trust. Joint actions are still very rare (EQ 4.1), and this evaluation has brought to light that industry and NGOs have very different perceptions on a number of issues. Some NGOs in particular have doubts as to whether the dialogue has actually led to a significant change in attitudes. In fact, the expectation of members that was fulfilled to the least extent pertained to the lack of joint initiatives that involve members from different sectors (see EQ 4.2). This dichotomy between increased and better cross-sectoral dialogue and understanding, and a lack of joint action is most likely the result of a lack of trust between the two sectors. In fact, the areas where the monitoring process was perceived as being less effective by the largest proportion of questionnaire respondents related to: 'Enhanc[ing] the trust of other stakeholders in commitments' and 'Better integrat[ing] their commitments with those of other members' (EQ 2.9). The fact that some not-for-profit members are sceptical of industry, and act primarily as 'watch dogs' rather than 'guide dogs' by at times taking on rather dogmatic views may well play a role in limiting any potential for joint action (see EQs 4.2 and 2.1).

The following **strategic recommendations** can be made in relation to this conclusion:

It is recommended that the European Commission continue to encourage cross-sectoral dialogue and build on the enhanced understanding of each others' positions to foster trust and joint action. To do so, the European Commission could look to:

- act as a mediator where differing opinions are expressed;

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<sup>44</sup> This section relates to the overarching evaluation question 4: The role and function of the Platform as a place for dialogue.

- encourage not-for-profit members on the Platform to see their role and act more as “guide dogs” than “watch dogs” to increase mutual understanding between members and their positions and decrease potential areas of conflict;
- consider whether it would add value to create a science group, as in the case of the European Commission’s alcohol forum, to discuss the key contentious issues that come out of plenary discussions, and bring scientific fact and evidence to the debate.<sup>45</sup>
- encourage members not to let their differences keep them from working together to achieve the Platform’s common goals;
- identify areas for joint initiatives and provide support and guidance to actors embarking on such initiatives;
- focus on hitherto under-represented areas, including (but not limited to) education. For example, the European Commission could promote discussion and action in the area of education through plenary debates dedicated to this subject, promote commitments in this field as part of developing more operational Platform objectives (see section on The future), facilitate stronger collaboration with the education sector by encouraging representatives of the education sector to become members of the Platform, and working more with the education sector (possibly at Member State level).
- organise workshops in small groups on given topics to increase informal exchange, build trust across sectors, come to a common cross-sectoral position on given topics and identify areas for joint initiatives. The workshops organised at the outset of the Platform, tended to generate quite a lot of discussion and debate and ended with a summary being drawn up of what was agreed among members of both sectors. Such an informal set-up (in comparison to the formality of the chaired plenary meetings) could well have the effect of increasing multi-stakeholder dialogue and commitments, especially if these workshops are used by the European Commission as a means to encourage more such activity.

However, for such European Commission efforts to bear fruit, both not-for-profit and for-profit members need to make more of an effort to set some of their reservations aside, adopt more constructive attitudes and find areas where common ground can be found and joint commitments made.

The following **operational recommendation** can be made in relation to this conclusion:

- While the area of physical activity is in fact quite well represented within the Platform in terms of the number of members whose core activity lies in this area, there seems to be a discrepancy between this fact and members’ perception of the level of action in the area. In order to increase its profile within the Platform and bring about more action in this area, the European Commission could consider introducing a further area of action entitled ‘physical activity’.

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<sup>45</sup> For example, the alcohol forum’s scientific group recently assessed a number of longitudinal studies to ascertain whether marketing communication has an impact on the volume and patterns of consumption of alcoholic beverages, especially by young people.  
[http://ec.europa.eu/health/ph\\_determinants/life\\_style/alcohol/Forum/docs/science\\_o01\\_en.pdf](http://ec.europa.eu/health/ph_determinants/life_style/alcohol/Forum/docs/science_o01_en.pdf)

Moreover, in order to improve the internal communication flow and contribute to better dialogue, these further operational recommendations can be made:

- The European Commission could facilitate a stronger involvement of relevant Directorate Generals (DG) in the Platform process. In particular, the involvement of speakers from DG Education and Culture (DG EAC) in Platform meetings would be recommended.
- Communication channels should be increased between the High Level Group (HLG) and Platform, such as by allowing HLG member access to the Platform CIRCA, considering integrating the Platform CIRCA with that of the HLG and encouraging more HLG members to attend as observers.
- The European Commission could allow room for discussions on future plenary meeting agendas by asking for input from members on relevant topics and commitments to discuss.
- The presentations to be given by Platform members on commitments during the plenary meetings could be uploaded onto CIRCA a couple of weeks before the plenary meeting in order to provide members sufficient time to review these.
- The European Commission could look into ways to transmit information to members in a more user-friendly way by providing a summary of the monitoring reports, not uploading information onto CIRCA all at once to avoid the receipt of multiple e-mails one after the other.
- The European Commission could send meeting minutes out for review and comment shortly after each plenary meeting, rather than a couple of weeks prior to the next plenary meeting. Experts could be asked to review these meeting minutes as well.

## 7.2 Action

This section will seek to conclude on the relevance, proportionality and implementation of Platform commitments.<sup>46</sup> One of the key characteristics that differentiates the Platform from other multi-stakeholder forums (and even national platforms) is the focus on action, rather than only dialogue. In order to become / remain a member, it is a requirement to make at least one active commitment which seeks to further the goals of the Platform.

Members have tabled a total of 292 commitments since the launch of the Platform in 2005. The majority of actions fall within the 'Lifestyles and education' area (56%<sup>47</sup>), which reflects its relative importance in the fight against obesity and overweight, but a considerable number of commitments have also been made in the other three areas, namely marketing and advertising, reformulation, and labelling (EQ 2.2).

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<sup>46</sup> This section relates to the overarching evaluation question 2: Are the Platform members' commitments relevant and proportionate to the Platform's initial goals and are they implemented effectively?

<sup>47</sup> This figure refers to 56% of the 315 action areas counted as some of the 292 commitments fell within more than one action area (see EQ 2.2).

While it is clear that not all of these commitments are a direct result of the Platform (i.e. would not have happened without it), there are numerous examples of where the Platform process has added value and led to actions that would not have otherwise happened, at least not with the same level of ambition, coverage and timeliness. Two thirds of Platform members provided examples of how Platform membership had inspired them, though many of the cited commitments were not entirely new (or additional) actions, but existing activities that members scaled up, revised or re-framed to turn them into Platform commitments (see EQ 1.3). Thus, it is clear that the Platform has generated a considerable amount of specific actions in key areas, but it is also clear that many of the commitments tabled by members would probably have happened even if the Platform had not existed, albeit often in a different form in terms of content, scope, level of ambition, timeframe, and level of accountability and transparency.

### **The relevance and proportionality of commitments**

The Platform has generated additional actions, but are these relevant and proportionate to the Platform's goals? This evaluation has found clear indications that commitments which are relevant and proportionate (and therefore have the potential for significant impact), co-exist with commitments that are less so.

Just under 40% of commitments have targeted more than 50% of EU Member States' populations (see EQ 2.3), and most active commitments (as at January 2010) made by industry were linked to their core business<sup>48</sup> (see EQ 2.4). Some organisations have commitments which are much wider in scope and potential impact, thereby reaching a larger target group, while other commitments are very inward-facing, focussing on a small target group such as company employees. For example, the case studies have shown that, although they could still be improved, the commitments assessed in the areas of marketing / advertising to children and food / drink reformulation are definite steps in the right direction and have had an impact (see Case Study reports and Impact section below). Just over one quarter of commitments have been either self-regulation commitments (52 out of 292) or recommendations, i.e. commitments made by associative Platform members who recommend that their member organisations follow certain guidelines (22 out of 292). Where self-regulation commitments or recommendations have been made, they have tended to be in the area of food and drink and retail and catering (see EQ 3.7).

That said, the level of action initiated by Platform members is not always proportionate to the objective set out in the founding charter (EQ 2.1); both for-profit and not-for-profit members questioned the extent to which all the commitments are equally relevant to the objective of fighting obesity (see EQ 2.9); and both sectors tend to be critical of each other (see EQ 2.1). Finally, while the majority of actions initiated by Platform members tend to be targeted at specific target groups rather than the general public, and Platform members' actions are intended to address the needs of stakeholders and EU citizens, it is unclear to what extent commitments are actually addressing the needs of stakeholders and potential multipliers, and especially vulnerable or affected groups (see EQ 2.6).

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<sup>48</sup> In this context, the core business of an organisation was defined as the organisation's "main" or "essential" activity, and is essentially the type of activity that generates most of the profit for the organisation. Based on this definition, the core business of the food industry is for example manufacturing and selling/marketing food, rather than educating staff or sponsoring sports events.

The mixed nature of the commitments suggests that more could be done to understand what type of action works best. The monitoring system's aim is to produce evidence and know-how, notably with a view to ensuring the relevance, proportionality and effective implementation of Platform commitments. While a significant number of members accept the need for monitoring in principle, the findings and conclusions presented in relation to EQ 2.9 suggest that this system has not been exploited to its full potential with a view to achieving this aim. In fact, while the monitoring system has succeeded in placing the issue of monitoring high on the agenda of Platform members and has forced members to be accountable in some way, it could be argued that it has developed more into an end in itself, rather than a means of supporting the implementation of commitments. In fact, it has led to some members tabling less ambitious commitments that are easy to monitor, e.g. fewer advocacy and policy commitments which are not easily measurable.

### **The implementation of commitments**

While it did not fall within the scope of this evaluation to assess the implementation of all of the Platform's commitments, making it difficult to draw general conclusions in this respect, the case studies suggest that selected commitments in the areas of marketing / advertising to children and food / drink reformulation are being implemented effectively. The existence of a 'top-down' approach tended to facilitate the implementation of some of the six commitments, while the main impediments to the implementation of the commitments ranged from cultural differences, to the heterogeneity and localised nature of the food offer, to getting employee/subsidiaries' buy-in, to on-site training (see relevant case study report).

Within the context of the commitments' implementation, the issue of the communication of the Platform's achievements (see EQs 3.6 and 4.4) should be raised. It was repeatedly mentioned by members that communication of the knowledge of the Platform externally was limited, and Platform members and external parties are of the opinion that more needs to be done in this respect. In fact, over a quarter of Platform members favoured the development of a better communication policy. Communication on the Platform's achievements is likely to sustain and / or increase the top level buy-in of Platform members and their sub-members going forward, but also encourage members to table more ambitious, relevant and proportionate commitments going forward. However, as the findings under EQ 4.4 suggest, while many members saw potential for wider dissemination of information externally, the fact that members often disagree about the relevance and appropriateness of commitments means it could be difficult to achieve general agreement on what messages should be communicated externally.

The following **strategic recommendations** can be made in relation to this conclusion:

In order to ensure the relevance and proportionality of Platform commitments to the Platform's initial goals, the European Commission could:

- Ensure that a stronger discussion takes place of the content and critical success factors of the commitments, rather than simply on their outputs and outcomes as defined by the member responsible. During presentations on commitments, Platform members should be encouraged to provide more information to enable a critical discussion, rather than just 'selling' their commitment. In order to facilitate this, the European Commission could draw up a template providing guidance on the key areas to cover during presentations, e.g. strengths and



weaknesses of the commitment, challenges encountered and mitigation strategies, key inputs, outputs and outcomes.

- Encourage members to take onboard comments and suggestions from other members on how they could look to revise / better their commitments. The European Commission could develop a follow-up mechanism that summarises relevant points of action relating to a given commitment during Platform discussions and requires feedback from the respective Platform members in terms of the progress made in relation to these points. Any changes made to commitments in response to Platform discussions could also be shown and monitored.
- Encourage members to embark on new commitments that are not necessarily linked to activities they were planning to carry out or are already carrying out, while also ensuring that the majority of each Platform member's commitments are linked to their core business.
- Encourage members to take on ambitious commitments and not be afraid of failure. For example, members should be encouraged to table commitments of a greater scale and geographical coverage or to scale up smaller initiatives. A greater communication effort on the Platform's achievements – see EQ 3.6 and the recommendations on communication below – would provide a greater incentive for this to occur.
- Carry out a survey to attempt to gauge the real needs of the target groups (e.g. children and adolescents, health professionals, educators, etc.) that the Platform is attempting to engage, so as to provide members with orientation as to the kinds of actions that are most likely to meet these needs. The European Commission could then initiate a debate within the Platform as to which target groups should be allocated priority status. Such a debate could benefit from a previous in-depth, comprehensive assessment of the monitoring data to try to gauge the effectiveness of existing actions targeted at different groups (see recommendation on monitoring below).
- Encourage Platform members to attempt to reach vulnerable groups, particularly lower-socioeconomic groups, through local authorities (who are those that are the best placed to deal with these groups) by involving Member States more. Member States could work with Platform members in elaborating/implementing commitments in order to make sure the needs of local audiences are addressed in the proper way.

Moreover, the following can be recommended in relation to the monitoring system:

- One of the main purposes of the monitoring system is to facilitate learning about the effectiveness of different types of commitments. However, nothing has been done to date to try to use the wealth of monitoring data for this purpose. In order to justify the significant effort members put into monitoring, this shortcoming needs to be addressed. The European Commission should organise an exercise / study to cross-analyse all monitoring forms (or at least those that are deemed of sufficient quality based on the scores), in order to present trends, identify good practices, identify areas for joint working, and identify lessons learned with a view to future Platform commitments. Given the amount of data available and the diversity and complexity of the issues addressed, the scope of this study should be defined carefully, and the necessary time and resources should not be under-estimated.

It is worthy of note that in addition to this strategic recommendation related to the monitoring system itself, many of the other recommendations presented in this chapter will go some way to helping the monitoring system achieve its six objectives, namely to: 'Ensure commitments are relevant to the general aims of the Platform', 'Fine-tune commitments (e.g. taking early corrective action)', 'Understand what needs to be done and how (for the commitment to achieve its objectives)', 'Better integrate their commitments with those of other members', 'Enhance the trust of other stakeholders in commitments' and 'Identify and eventually duplicate good practices'.

Finally, in relation to communicating the Platform's achievements, it is recommended that the European Commission develop a communication policy on the Platform which takes into account the concerns of all parties to ensure that the information that is disseminated is presented in a balanced, transparent manner. By so doing, the European Commission could increase its communication activities about the Platform through means such as: brochures, press briefings on plenary meetings and any other significant developments, RSS feeds, podcasts and/or interviews with stakeholders and on forthcoming agenda items, and more plenary meetings that are open to the public.

One of the key aims of this communication policy should be to communicate on the Platform's main achievements, not only to increase knowledge of the work of the Platform, but also to open up more possibilities for the scaling up of activities by making them more widely known outside the Platform, and to allow for increased buy-in on the part of members by providing a 'reward' for their efforts. The European Commission could organise periodic press conferences to showcase actions from both sectors, develop a newsletter in which there are bite-size stories about perceived successful commitments and/or have a more user-friendly and attractive website that is easy to find via search engines and can be used to showcase individual commitments. Such efforts, along with some of those listed above will allow the Platform to gain more visibility in the media. A good example where such an opportunity was missed was the 25<sup>th</sup> February to 3<sup>rd</sup> March 2010 issue of the European Voice (Volume 16, Number 8) which had a special five-page report on 'Diet and Lifestyle' where a number of EU initiatives were mentioned and senior officials, industry and not-for-profit representatives interviewed, but the Platform was not mentioned at all.

The following **operational recommendations** can be made in relation to this conclusion:

- The current criteria for which monitoring forms are scored (i.e. specificity, clarity, focus and measurability) should be applied separately to each of the categories on the forms (i.e. input, process output and outcome impact indicators) to increase the transparency of the system and also to increase members' understanding of the areas where they need to invest further work. Average scores for each criterion should also be calculated so as to ensure comparability with past results.
- In order to enhance the transparency of the monitoring data provided, members could be requested to state its source. In order to lessen the burden of providing such additional information, the European Commission could provide members with a list of simple options (e.g. internal annual report, external evaluation, own assessment based on informal consultations with member organisations etc.).
- In relation to the strategic objective above on learning about the effectiveness of different types of commitments from the monitoring system, the European Commission could consider creating a further area of action focussing on 'advocacy, policy work and information exchange' in order to provide a better categorisation of much of the work that the not-for-profit sector carries out and facilitate the identification of best practice in this area.
- Where feasible and relevant, individual coaching sessions and / or contact time with the external contractor carrying out the evaluation of the monitoring reports could continue to be organised to attend to individual organisations' needs and ensure better monitoring of their commitments.

### 7.3 Impact

This section will seek to conclude on the impact of the Platform, both in terms of its *commitments* and the impact generated on *policy* at national and European level<sup>49</sup> in order to ascertain what overall impact the Platform has had over the past five years and where the main pitfalls lie.

#### Impact of the commitments

While it was not within the scope of this evaluation to assess the impact of all of the Platform's commitments, the two case studies on advertising / marketing to children and food / drink reformulation allowed for some conclusions to be drawn on the impact of self-regulation commitments in these two specific areas. Based on these two case studies, it can be concluded that Platform commitments in the areas of advertising / marketing to children and food / drink reformulation are having an impact (though more can be done). Moreover, while these commitments may well be playing a part in efforts to combat

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<sup>49</sup> This section relates in part to the overarching evaluation question 3: What is the Platform impact generated in policy at national and European level?

obesity and overweight in Europe, it is too early to make a judgment on the health impact of Platform commitments.

The evaluation team sought (as part of the case studies) to judge the impact of three commitments in each of these two areas based on the available evidence and views expressed by both industry, not-for-profit Platform members and independent experts. For the case study on marketing and advertising to children, based on the three commitments reviewed, it can generally be concluded that self-regulation in this area has been very effective at limiting the *exposure*<sup>50</sup> of children to adverts for high fat, sugar and salt (HFSS) foods, insofar as the quantity of TV advertising during programmes that falls under the commitments' criteria for age, audience proportion, nutritional criteria and mediums has decreased very significantly (see relevant case study Section 4.2 and Table 3). However, this should not be taken to mean that the overall exposure of children to all marketing and advertising for HFSS foods has gone down as drastically as the figures presented by the industry suggest. Instead, it is clear that the impact on exposure (when understood in a broader sense) has been significantly lower. This is due to a number of limitations of the commitments, including the products that are covered and the way in which the restrictions on advertising are defined (e.g. age of target audience, audience threshold etc.). Moreover, the three commitments reviewed generally do not have strong mechanisms to limit the *power*<sup>51</sup> of advertising to children<sup>52</sup>.

In relation to the food / drink reformulation case study, the information provided by industry on the three commitments reviewed (see relevant case study Section 3.2.4), combined with the opinions of expert / not-for-profit interviewees on the impact of these commitments (see relevant case study Section 3.2.1), help to conclude that the commitments in this area are having an impact as:

- The commitments have been undertaken by multi-national corporations with a wide range of products / large market share in given product areas.
- The reformulation effort has affected both existing and new products/recipes in all three cases.
- The number of products/recipes that have been reformulated via these three commitments is significant.
- Reductions in nutrients in given products have ranged between 5% and 80%, with most reductions (for which examples were provided) turning around the 25% to 50% mark.

That said, neither not-for-profit nor industry members are sure whether their actions are contributing to reducing obesity or not (see EQ 2.9). This may be a problem related to the monitoring system, which is not succeeding in showing overall outcomes and impacts, but it could also be a result of some of the commitments themselves which are either not measurable and/or are too broad and intangible. In fact, a number of members pointed to the difficulties involved in monitoring commitments relating to advocacy, research and policy, where setting measurable targets proves challenging. The case study on food / drink reformulation in particular showed that assessing the actual impact of the commitments in this area was difficult in the absence of clear targets, baseline data and comparable data across

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<sup>50</sup> Exposure is defined as the reach, frequency and media impact of the marketing message.

<sup>51</sup> Power is defined as the creative content, design and execution of the marketing message.

<sup>52</sup> Please note that there are other Platform commitments that focus on limiting the power of marketing and advertising in particular, but they did not form part of the case study's in-depth assessment.

commitments on sales, market share etc. Many of the weaknesses of the commitments according to expert / not-for profit interviewees lie in the fact that this information is lacking in the monitoring reports.

Moreover, as the case study on food / drink reformulation suggests, it is still too early to judge the actual health impact of commitments as partially relevant data was only available for the first couple of years following the set-up of the Platform (see relevant case study Section 3.3.2).

### **Impact on policy**

It is not possible to draw any definitive conclusions on the Platform's impact on policy at the European or national level, but it appears to be very limited, as very few tangible examples of the Platform's impact on nutrition and physical activity (NPA) policy or other policy areas were found.

Firstly, there is not enough evidence to determine whether the EU Platform activities (1) have made a difference or not to Member States' work on Nutrition and Physical Activity (NPA) and/or (2) have complemented or interfered with national NPA policies (see EQs 3.1 and 3.2). This would have required an in-depth assessment of each Member State's NPA policies, which exceeded the scope of this evaluation.<sup>53</sup> Moreover, based on the findings and conclusions of the two case studies, the evaluation found no conclusive evidence that the Platform commitments have in any way affected other MS regulators' decision (not) to regulate. Nonetheless, it is possible to say that the broad issues addressed by the EU Platform and NPA policies are often very similar, particularly in the case of reformulation, where the EU Platform is considered to have actually contributed to national activities (see EQ 3.2).

Where the Platform has had an impact is on the development of national platforms in four MS (see EQ 3.3). This, combined with the fact that national platforms have had some influence or indirect impact on NPA policy development in their countries (see EQ 3.4), allows for the tentative establishment of indirect links between the EU Platform and national policy. That said, the overall indirect policy impact is likely to be minimal due mainly to a lack of cooperation between the EU Platform and national platforms once the latter have been created (EQ 3.3), but also the fact that the impact of national platforms on policy areas other than NPA appears to be limited (see EQ 3.5).

Part of the reason for this limited impact on policy may be that little is known about the Platform outside the Platform itself and its members' inner circles (see EQs 3.6 and 4.4). In fact, communication of the knowledge of the Platform externally has been limited, and communication about the Platform at MS and local level was considered to be particularly lacking (EQ 3.6).

The following **strategic recommendations** can be made in relation to this conclusion:

### **Impact of the commitments**

Members should be encouraged to provide clear targets and baseline data and, where feasible, set outcome evaluation measures from the outset for each commitment. A template including the type of information that this should include for each of the four areas of action (and types of commitments – see

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<sup>53</sup> It is worthy of note that WHO Europe was, at the time of writing, carrying out an extensive profiling exercise of Member States' NPA policies, the results of which had not yet been finalised for publication.

recommendation below) could be developed to help ensure a measurement of yearly progress against a baseline and set targets, and comparison of outcomes / impacts across commitments. For example, for advertising and marketing, industry could be asked to provide data on its sales of soft drinks to children when the commitment was first set up and data trends from then on yearly. While other factors can influence sales, and this should be stated, such data would at least provide information on general trends.

In order to better monitor the impact of commitments, an exercise / study to cross-analyse all monitoring forms completed to date, as recommended in the chapter on action above, could serve to identify best practice examples and provide guidance to members going forward. In particular, such a study could help to look at how best to judge the impact of commitments in areas such as advocacy, research and policy, where setting outcome evaluation measures tends to prove difficult.

### **Impact on policy**

Based on the conclusions above in relation to the Platform's limited impact on policy, it is recommended that communication about the Platform and its activities, as well as contact / cooperation with national authorities and national platforms, be increased. To do so may increase the Platform's impact on national NPA (and other) policies; allow the Platform to exert more influence at MS level to seek to broaden EU Platform commitments and thereby their potential impact; and exploit synergies with national platform activities and create opportunities for joint working. Means that the European Commission could employ to do this include:

- Providing national authorities and platforms with a summary of the aims and objectives, fields of work, results and processes of the Platform. This could be in the form of tailored information packs that also include information on specific activities of Platform members within given Member States in order to facilitate a collaborative approach where activities with national Platforms and Member States can link in with EU Platform initiatives and vice versa. This would help increase the strategic added value of the Platform.
- Asking individual national platforms to give presentations at Platform plenary meetings on what they are doing at national level, with which stakeholders they are working, what the main issues being discussed are in relation to their NPA policies, whether and how they are seeking to have an influence on their national NPA policies, etc. They could also be asked to provide some best practice examples and ideas on how joint initiatives could be developed with EU Platform members.
- Organising joint meetings with national platforms. These could take the form of an annual meeting organised with a representative EU Platform committee (of five to ten people) and representatives of all national Platforms, with a view to informing on key national and EU initiatives, exchanging best practice and looking to identify opportunities for joint working. The contents of the discussion could be communicated back to the EU Platform as a whole during a plenary session.

## 7.4 The future

This final section brings together the key conclusions on dialogue, action and impact outlined above and looks to the future of the Platform over the next three to five years<sup>54</sup>. Three evaluation questions in particular relate to this, notably the evaluation questions on the solidity of Platform's founding statement (see EQ 1.1), the clarity and operability of the Platform's objectives (EQ 2.1) and the need (or not) for a new mandate (see EQ 2.8).

The answers to these three evaluation questions lead to the conclusion that the Platform is in need of a renewed mandate which includes new operational objectives. Seventy per cent of industry respondents to the questionnaire had a favourable opinion of the Platform's objectives (EQ 2.1), all industry members either 'strongly agreed' or 'agreed' that the founding statement was solid enough to effectively guide the Platform's work going forward (EQ 1.1) and the majority (62%) of industry members felt there was no need for a renewed mandate (EQ 2.8). However, the majority of not-for-profit members disagreed on all three counts. In fact, a third of not-for-profit respondents stated that the objectives were not sufficiently clear and operational, less than a third of not-for-profit members had as positive a view as industry on the founding statement, and the majority (80%) of not-for-profit Platform members thought that the Platform was in need of a renewed mandate. Given the high level of dissatisfaction among one of the two key groups, something needs to be done in order to allow the Platform to maintain the buy-in of the not-for-profit sector and the Platform's momentum (see EQ 2.8). However, when considering the nature of this renewed mandate, care needs to be taken not to alienate / antagonise one group by ensuring that it is balanced and takes into accounts the needs of both sides.

The following **strategic recommendations** can be made in relation to this conclusion:

A majority of members feel there is a need for a new Platform mandate and not all members are satisfied with the Platform's founding statement as it currently stands. As a result, it is recommended that the European Commission look to defining a renewed mandate that recognises what has been achieved so far, sets priorities for future work, and establishes joint goals and operational objectives in order to ensure cross-sectoral buy-in to the process going forward and continued momentum. This renewed mandate could include:

- A summary of achievements for the first five years of the Platform.
- A list of priorities/objectives for the next three to five years. In order to establish such operational objectives, the European Commission should consult with members and provide further guidance on the type of activities they should be looking to develop in order to meet the Platform's overall goals, e.g. the level of ambition and scope of commitments, whether members should be focusing more on developing new commitments / implementation areas or building on existing ones, the extent to which commitments should be linked to a member's core business, the target groups of commitments etc.

This mandate could set the following as priorities for the future:

- Focussing on the content and relevance of the commitments - see EQ 2.9.

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<sup>54</sup> This section relates in part to the overarching evaluation question 1: How relevant is the Platform in meeting its underlying goals, in particular as a forum for exchange on ongoing individual actions?

- Ensuring more cross-sectoral collaboration – see EQ 1.3.
- Further considering under-represented areas such as education – see EQ 1.2.
- Improving the monitoring system to ensure something is learnt from the process and the dissemination of best practice, but also by setting comparable outcome evaluation measures from the outset to help assess the impact of commitments – see EQ 2.9.
- Undertaking a comprehensive assessment of the effectiveness and impact of the commitments – while this evaluation has gone some way to doing this through the case studies, the six commitments assessed in greater depth represent only the tip of the iceberg.
- Guidance on what type of commitments are the most relevant to the objectives of the Commission's 'Strategy for Europe on Nutrition, Overweight and Obesity related health issues'<sup>55</sup> – see EQ 1.1.
- Developing a balanced and transparent communication strategy – see EQ 3.6.
- Strengthening ties with MS and national platforms to increase the Platform's impact on policy – see EQs 3.1 to 3.5.

This renewed mandate could build on the results of this evaluation, and on the experience and evidence collected through the past five years of work. It could be debated by a working group involving a good cross-section of members.

Finally, as part of this new mandate, a clear reward (such as the communication of the Platform's achievements and key actions) needs to be provided to members in order to avoid Platform fatigue. It needs to be obvious to organisations that the Platform acknowledges their efforts and what is being achieved so that they internally can have a feedback loop where their member organisations or companies see that all that investment is worthwhile to them.

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<sup>55</sup> [http://ec.europa.eu/health/ph\\_determinants/life\\_style/nutrition/documents/nutrition\\_wp\\_en.pdf](http://ec.europa.eu/health/ph_determinants/life_style/nutrition/documents/nutrition_wp_en.pdf)