



**The International Food & Beverage Alliance Comments
on the WHO Discussion Paper (version dated 25 July 2016) on the
Draft Updated Appendix 3 of the WHO Global NCD Action Plan 2013-2020**

The International Food & Beverage Alliance thanks the World Health Organization (WHO) for the opportunity to submit comments on the proposed menu of policy options contained in the draft updated Appendix 3 of the WHO *Global Action Plan for the Prevention and Control of Noncommunicable Diseases 2013 – 2020 (WHO Global NCD Action Plan 2013-2020)*.¹

The proposed draft Appendix 3 updates two of the six objectives - Objective 3 (risk factors) and Objective 4 (health systems). Our comments are confined to Objective 3 and specifically to the menu of interventions proposed to address the “Unhealthy Diet.”

We are committed to helping develop and implement effective interventions to improve diets. In general, we support many of the proposed interventions – to reduce salt intake and sugar consumption; replace trans fats and saturated fats with unsaturated fats; eliminate industrially produced trans fats; provide small and/or reduced portion sizes; increase the consumption of fruits and vegetables; improve nutrition labelling and promote nutrition education – as they reflect the core of our work and we believe them to be effective interventions.

Furthermore, we welcome the refinement of the existing interventions in Appendix 3 to the extent they help to define the scope of the intervention and provide guidance for implementation. However, in several instances, we believe the proposed implementation guidance may pose certain challenges. In such event, we have proposed an alternative approach to implementation.

Specifically, we fully support the approach to address “Unhealthy Diet” with an overarching and enabling action aimed at implementing the WHO *Global Strategy on Diet, Physical Activity and Health* and the WHO *Recommendations on the Marketing of Foods and Non-alcoholic Beverages to Children*. The actions identified in these strategies for our industry – on product formulation and innovation, nutrition information to consumers, responsible marketing and the promotion of healthy lifestyles - are the very actions IFBA members have been implementing voluntarily on a global basis since 2008 when our CEOs came together and adopted a set of public commitments in support of these strategies.

¹ IFBA is a group of eleven global food and non-alcoholic beverage companies - The Coca-Cola Company, Ferrero, General Mills, Grupo Bimbo, Kellogg, Mars, McDonald’s, Mondelēz International, Nestlé, PepsiCo and Unilever - that share a common goal of helping people around the world achieve balanced diets, and healthy, active lifestyles. IFBA is a non-commercial, non-profit making organization, in special consultative status with ECOSOC. For more information about IFBA, please visit www.ifballiance.org or contact us at secretariat@ifballiance.org

INTERNATIONAL
FOOD & BEVERAGE
ALLIANCE

Since that time, we have reformulated and developed thousands of products with less fat, sugar, calories or salt; virtually eliminated industrially produced trans fats from our product portfolios; increased ingredients considered beneficial for good health, such as fibre, whole grains, fruits, vegetables and low-fat dairy; and fortified commonly consumed foods with calcium, vitamins and minerals to address micronutrient deficiencies. We are reducing calories by offering small and/or reduced portion sizes and providing portion guidance. We provide consumers with clear, fact-based nutrition information using a variety of tools and media, including on-pack labelling, point-of-sale materials, company websites and social media apps. We have adopted responsible marketing practices, restricting the marketing of foods high in fat, sugar and salt to children everywhere our products are sold around the world. We support nutrition literacy and education initiatives in communities where we do business and in our workplaces to promote healthy eating awareness and behaviours conducive to a healthy, active lifestyle.

We support the proposed interventions to reduce salt intake and replace trans fats and saturated fats with unsaturated fats through voluntary industry reformulation initiatives and labelling schemes. IFBA members have worked in collaboration with governments and NGOs in Argentina, Australia, Brazil, Canada, France, the U.K. and U.S.A. among others on a variety of effective reformulation initiatives, including the reduction of trans fat, sodium, sugar and calories.

We also support the proposed intervention to eliminate industrial trans fat from the food chain. In May 2016, IFBA announced a commitment to phase out industrially produced trans fats globally by the end of 2018. We would propose that the same approach for reducing salt intake by engaging industry in a voluntary reformulation process, which has proven to be highly successful, be employed for the elimination of trans fat. We have taken the lead in our industry in this area and are committed to working with the WHO, Member States and others to help facilitate the implementation of such an approach. IFBA stands ready to support effective measures to ensure a level playing field in this area.

Similarly, we support Member States efforts to gradually reduce sugar consumption. However, we question the implementation of a category-specific tax to achieve this goal. Taxes meant to discourage the consumption of a particular ingredient in a particular product are known to have mixed results, and can lead to unintended consequences and market distortions that can undermine the objective of the tax. In our view, further work is still needed to assess the impact of fiscal measures on diet and health outcomes before such a measure is proposed. In the alternative, we would propose that implementation of an intervention to reduce sugar consumption be based on the evidence of what does work – product reformulation, small and/or reduced portions, front-of-pack labelling and public education campaigns aimed at promoting healthier diets and physical activity.

We welcome interventions to improve nutrition labelling. The product label is a principal source of nutritional information for consumers and forms the cornerstone of any policy framework to address poor dietary intakes and to promote healthier eating habits. By the end of this year, IFBA members will implement a common approach to nutrition labelling globally which includes: i) full information on the content of key nutrients in line with Codex Alimentarius recommendations; ii) mandatory labelling of

calories on front-of-pack as a percentage of recommended daily intake; and iii) where possible, the same indication for other key nutrients of public health concern, including total fat, saturated fat, sugars and salt.

We also support the proposed intervention to promote nutrition education through public education efforts and media campaigns. IFBA members have a long and successful history of collaboration with Member States and civil society in community and workplace initiatives aimed at promoting nutrition education and increasing the understanding of the role nutrition, eating habits and physical activity plays in a healthy life. We are committed to continuing and expanding these efforts.

We believe behaviour change is fundamental to achieving the goal of helping consumers build balanced diets and a healthy lifestyle. However, achieving behaviour change is a challenging and lengthy process and will require the resources and expertise of all stakeholders. We welcome the opportunity to share our expertise on marketing, nutrition science and consumer behaviour with Member States and other stakeholders in a collaborative effort to create and support public education campaigns.

We are committed to helping find solutions to the prevention and control of NCDs. We understand the critical role of our industry in these efforts and believe through the proposed interventions in Appendix 3 on product formulation and innovation, portion control, nutrition literacy and labelling, restrictions on the marketing of foods high in fat, sugar and salt to children and public education on diet and physical activity, we can work together to achieve the objectives of the WHO *Global Action Plan for the Prevention and Control of Noncommunicable Diseases 2013-2020*.

30 August 2016