



The International Food & Beverage Alliance Comments on the Draft Implementation Plan for the Recommendations of the WHO Commission on Ending Childhood Obesity

The International Food & Beverage Alliance (IFBA) commends the WHO Commission on Ending Childhood Obesity (the Commission) for the work it has undertaken over the last two years culminating in a draft implementation plan for the recommendations on ending childhood obesity contained in the Commission's report adopted by Member States in May, 2016. We thank the Commission for the opportunities to provide our comments online and in-person throughout the development of the report and now on the draft implementation plan (the Draft Plan).¹

General Comments

Obesity is a complex problem driven by multiple social, economic and environmental factors. We all recognize that no single intervention or single actor can prevent the rise of the growing obesity epidemic. As the Commission notes, success will depend on a comprehensive integrated set of interventions, a whole-of-government and whole-of-society approach led by government and a commitment to act from all stakeholders.

IFBA and its members are deeply committed to helping find meaningful solutions to the complex challenge of childhood obesity. We look forward to working with the WHO, Member States and other stakeholders as we all turn to implementing the recommendations of the Commission.

As leading food and non-alcoholic beverage manufacturers, we recognize the responsibility our industry has and the contribution we can make to this effort and have committed to do our part with a multi-faceted approach based on product formulation and innovation, nutrition information, responsible marketing to children and the promotion of healthy lifestyles.

We provide consumers choice with a wide range of products and help them in composing a balanced diet. IFBA members have developed policies to reduce sugar, fat and salt and increase key nutrients considered beneficial for good health. We continue to innovate to create products that increasingly make available food choices that help people eat healthy, balanced diets. We are reducing calories by offering small and/or reduced portion sizes and providing portion guidance.

Empowering consumers to make informed dietary decisions to meet their individual nutritional needs is a key element of our approach. We provide clear, fact-based nutrition information using a variety of

¹ The International Food & Beverage Alliance (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, Mondelez International, Nestlé, PepsiCo and Unilever - that share a common goal of helping people around the world achieve balanced diets, and healthy lifestyles. For more information, please visit www.ifballiance.org



tools and media, including on-pack labelling, point-of-sale materials, company websites and social media apps.

We are working to promote healthier lifestyles and diets to children by voluntarily restricting the marketing of foods high in fat, sugar and salt and focusing on the promotion of physical activity.

We support nutrition literacy and education initiatives in schools and communities around the world and in our workplaces to promote healthy eating awareness and behaviours conducive to a healthy, active lifestyle.

Specific Comments

II. Interventions

1. Actions to improve the food and physical activity environment

IFBA members share a common goal of helping consumers around the world to achieve balanced diets and healthy lifestyles and fully support the Commission's position that "children and families need to be empowered to make healthier choices about diet and physical activity." (pg. 10)

The recommended actions on product formulation, the provision of nutrition information and public education campaigns, front-of-pack labelling systems, restrictions on marketing to children and the promotion of healthy diets and healthy lifestyles in schools and communities are all actions we support and have been implementing on a voluntary basis for many years. These actions form the core of the 2008 commitments made by our CEOs to the WHO in support of the 2004 WHO *Global Strategy on Diet, Physical Activity and Health*.

Regarding recommendation 1.2 to tax sugar-sweetened beverages - as mentioned in our earlier submissions, we would recommend that this action be approached with caution. An analysis by the McKinsey Global Institute of 74 interventions to address obesity that are being discussed or piloted around the world found that the highest-impact intervention areas are portion control and product reformulation.² In our view, further work is still needed to assess the impact of fiscal measures on diet and health outcomes before specific actions in this area are recommended.

We have concerns about recommendations 1.4 on nutrient profiles and 1.6 on a standardized global nutrient labelling system, as we do not believe that a single unified standard can be defined to identify "unhealthy foods" at a global level, regardless of their role in the overall diet and without taking due account of local dietary and cultural specificities.

² Richard Dobbs, et al. *Overcoming obesity: An initial economic analysis*. McKinsey Global Institute. November 2014.



Changing consumer behavior is fundamental to the goal of ending obesity and there is little evidence to show that taxes or other forms of discrimination against certain foods and beverages will achieve behavior change or improve consumers' diets.

2. Actions in community settings to reduce the risk of obesity through the life-course

The Draft Plan notes that the success of programmes to improve the nutrition and physical activity of children and adolescents depends on the engagement of a number of stakeholders.

We believe the private sector has a role to play in promoting healthy lifestyles in the communities we serve and in 2008 committed to collaborate with governments, civil society and other stakeholders to help raise consumer awareness on balanced diets and promote greater physical activity and healthier lifestyles.

Since that time, IFBA members have been working to support hundreds of initiatives around the world including:

- school-based programmes to raise nutrition, health and wellness awareness of school-age children and help teachers and families to promote healthy eating and active living, including, for example, Mondelez International and "Health in Action" in Brazil; the Nestlé Healthy Kids global programme; PepsiCo and "Get Active" in India; Unilever and "A Perfect Fit" in Israel;
- sporting and other athletic events and activities promoting physical activity among children and young people, including, for example, Ferrero's Kinder + Sport global programme; and Grupo Bimbo and the "Futbolito" soccer tournament in Latin America; and
- community-based programmes and targeted marketing and education campaigns that raise awareness and promote behaviour change, including, for example, EPODE (launched in France and now being replicated around the world); General Mills and "Champions for Healthy Kids" in the U.S.A.; Kellogg and the "Vitamin D Mission" in the U.K.; Mars and "Schwer Mobil" in Germany; McDonald's and "Getting Kids Active" in France; and the Healthy Weight Commitment Foundation in the U.S.A..³

We respect that schools are very special environments where healthy lifestyles must be encouraged. IFBA's Global Policy on Marketing Communications to Children which restricts the marketing of foods high in fat, sugar and salt to children also prohibits the marketing of food and beverage products to children in primary schools.

III. Monitoring and accountability for effective progress

As the Commission notes, accountability for "Commitments should be relevant to the mission of the stakeholder involved." (pg. 7). IFBA members are taking concrete action and are prepared to be held accountable against the commitments they have made.

³ Information on these and other initiatives is available at www.ifballiance.org



We support a robust mechanism and framework to monitor policy development and implementation and believe the policy and action planning matrix in Figure 4 for ensuring a whole-of-government accountability provides a good starting point. However, we believe more work is necessary to define what a whole-of-society approach should mean in practice and would suggest that the matrix could also be adapted as a tool for ensuring a whole-of-society accountability.

We agree that government leadership is key to ensuring effective monitoring and evaluation of the interventions. However, in keeping with a whole-of-society approach to implementation of the interventions, this should not preclude non-State actors from having a role in the development of monitoring and accountability mechanisms, provided governments protect the public interest and avoid any conflicts of interest. We believe that accountability mechanisms should be established by multistakeholder agreement.

V. Key roles and responsibilities of stakeholders

The private sector

We appreciate that the Draft Plan recognizes that the private sector can have a positive impact on childhood obesity and that “cooperative relationships with industry have already led to some encouraging outcomes related to diet and physical activity.” (pg. 28)

The Draft Plan calls on countries to engage constructively with the private sector to encourage implementation of policies and interventions. Our experience has proven the value of constructive engagement and wholly support this approach.

IFBA members have voluntarily implemented a number of successful interventions in collaboration with governments around the world to reduce salt, saturated fats and calories and to remove trans fats and progress has been significant. For example, the UK salt reduction initiative, which has resulted in the reduction of average daily salt intakes by 15% since 2001; in Brazil, a technical cooperation agreement with industry focused on trans fat elimination resulted in 95% of products achieving the goal; in Argentina an agreement signed in 2011 to reduce salt used in the preparation of processed foods resulted in a reduction in the country’s personal sodium consumption intake by almost a gram a day within two years. In Canada, industry partnered with Health Canada in the Nutrition Facts Education Campaign (NFEC) to promote healthy eating by helping Canadians make more informed nutrition choices by increasing consumer awareness of – especially parents of children aged 2 to 12 - and use of the “% Daily Value” on the nutrition facts table. Since 2010, the “% Daily Value” messaging has appeared on more than one billion product units in stores across the country and the campaign received 160 million media impressions.

The Draft Plan recognizes that engagement must include not only global entities, but also local and regional operators. We believe this is critical to the success of the implementation plan. IFBA members are global businesses, present in most countries around the world, but in many countries small and medium enterprises dominate the food sector. In our work, in order to address the unique needs of



different countries and optimize the local impact of our overarching global strategy and commitments, we have been establishing local food and beverage industry groups. We have committed to share our knowledge, expertise and best practices in an effort to encourage local manufacturers to join us in adopting a similar diet and health improvement strategy, but believe a multistakeholder approach led by government where government can engage industry as a whole will achieve the greatest impact.

The Draft Plan identifies two actions for the private sector, both of which IFBA members support and have been working on for a number of years:

“a) Support the production of, and facilitate access to, foods and non-alcoholic beverages that contribute to a healthy diet.”

“b) Facilitate access to, and participation in, physical activity.”

We would propose the addition of two further actions to be undertaken by the private sector.

First, the food and beverage industry has a wealth of expertise in nutrition science, market research, marketing and consumer insights. We believe nutrition education campaigns and public education campaigns designed to raise the profile of childhood obesity prevention can benefit from our expertise and we welcome the opportunity to participate in a collaborative effort with Member States and other non-State actors. We would, therefore, suggest the addition of the following action: “c) Contribute to the development and implementation of nutrition education and public education campaigns.”

Second, as the Commission states, “joint ownership and shared responsibility are essential for effective interventions to have reach and impact.” (pg. 6). As mentioned earlier, we believe that local accountability mechanisms should be established by multistakeholder agreement and therefore, suggest the addition of the following action: “d) Contribute to the development of a monitoring and accountability mechanism.”

Final Comments

We are committed to helping find solutions to the prevention and control of childhood obesity. We understand the critical role our industry can play in these efforts and believe that working together in a whole-of-society approach, with governments, civil society and other stakeholders on the implementation of a set of robust and comprehensive integrated set of interventions designed to create healthy environments and the promotion of balanced diets and healthy lifestyles, we can solve this global problem.