

The International Food & Beverage Alliance (IFBA) Comments on the Draft First Report of the WHO Independent High-level Commission on Non-communicable Diseases (Version dated 1 May 2018)

Introduction

The International Food & Beverage Alliance (IFBA)¹ thanks the WHO Independent High-level Commission on Non-communicable Diseases (HLC) for the opportunity to submit comments on its draft First Report.

Recognizing the global burden of NCDs and the need for bold and innovative recommendations on how countries can accelerate progress towards the SDG targets in general and SDG target 3.4 in particular, IFBA welcomes the initiative of the WHO Director-General to establish the HLC.

IFBA further thanks the HLC for the opportunity to participate in the HLC Technical Consultation, held on 21-22 March 2018 in Geneva, and hopes that the additional comments hereinunder will constitute useful inputs towards the finalization of the HLC's First Report.

Global commitments to prevent and treat NCDs

Since 2008, IFBA has made and has been implementing a set of global commitments² in furtherance of the objectives of, among others, the WHO *Global Strategy on Diet, Physical Activity and Health*, the *WHO Recommendations on food and non-alcoholic beverage marketing to children* and the WHO *Global Action Plan for the Prevention and Control of Noncommunicable Diseases 2013-2020*.

These commitments – on product formulation and innovation, responsible marketing, the provision of nutrition information to consumers and the promotion of healthy lifestyles – are fully aligned with the call to action on the private sector expressed by Heads of State and Government in the 2011 *UN Political Declaration on the prevention and control of NCDs* (paragraph 44³).

IFBA is working to scale these commitments internationally, including by promoting their adoption and implementation by the broader food and beverage industries. For example, the IFBA commitments have been extended to a much wider set of food and beverage manufacturers and retailers through

¹ IFBA is a group of twelve international food and non-alcoholic beverage companies - The Coca-Cola Company, Danone, 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, 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

² <https://ifballiance.org/commitments>

³ http://www.who.int/nmh/events/un_ncd_summit2011/political_declaration_en.pdf

their adoption by The Consumer Goods Forum.⁴ This effort continues at national level, where IFBA is promoting the launch of product reformulation and innovation agreements, responsible marketing codes and nutrition labelling schemes in many countries worldwide.⁵

IFBA recognizes the primacy and primary responsibility of Government in setting policy and in providing political leadership to address the burden of NCDs. IFBA therefore notes with regret that progress towards fulfilling the four time-bound commitments included in the Outcome Document of the 2014 High Level Meeting of the United Nations on NCDs has been disappointing.

IFBA would welcome recognition in the HLC Draft First Report that it would be beneficial to expand the scope of the periodic WHO and UN progress reports on NCDs, so as to include perspective on progress that is being made by non-State Actors. Currently, such progress reviews are focused solely on Member State action, which, while of primary importance, does not reflect the full extent of action on NCDs being taken across society.

Recommendations

Prioritization

IFBA supports Recommendation 1 and wishes to express its support in particular for recommendation 1 (a) 2): *Reducing sodium and eliminating artificial transfat*. IFBA companies have been working to reduce sodium in their products globally and participate in a wide range of government-led sodium reduction initiatives at national and regional level. IFBA companies have also made a specific commitment to reduce industrially produced transfats in their products to nutritionally negligible levels by the end of 2018⁶. On 14 May 2018, IFBA further lent its support the launch of the WHO roadmap to phase out industrially produced transfats from the global food supply by 2023⁷.

In agreement with the HLC Draft Report that “health in all policies, whole-of-government, cross-sectoral approaches are critical to addressing NCDs” (paragraph 29), IFBA underlines the need for collaborative, government-led, multi-stakeholder action for successful sodium reduction and industrial transfat phase-out efforts, as well as broader product reformulation and innovation initiatives.

The private sector

IFBA strongly welcomes Recommendation 2: Increase engagement with the private sector. As the Draft HLC Report notes, “to influence health outcomes, stakeholders outside traditional health sectors must be brought together and engaged” (paragraph 36).

⁴ <https://www.theconsumergoodsforum.com/initiatives/health-wellness/about/our-commitments/>

⁵ https://ifballiance.org/uploads/ifbaResource/report/5a8300f0b402b_IFBA%20Progress%20Report%202015-2016.pdf

⁶ <https://ifballiance.org/commitments/product-formulation-and-innovation>

⁷ https://ifballiance.org/uploads/press/pdf/iTFA_IFBA_Statement_11.05.18.pdf

As also noted in paragraph 36, “the 2011 Political Declaration on NCDs called for engagement with the private sector, especially in the areas of food and non-alcoholic beverage production and marketing”. Sharing the assessment that only limited progress has been made in this area, IFBA strongly welcomes the Commission’s consideration that “a fresh working relationship must be established with the food, non-alcoholic beverage, restaurant, technology and media industries, with the aim that all countries benefit from public-private partnerships that promote health and behavior change” (paragraph 38).

In this context IFBA suggests further emphasizing the importance of Paragraph 44 of the UN Political Declaration on the prevention and control of NCDs, already referenced in paragraph 36, as a global roadmap for the private sector that should be actively and meaningfully supported by governments. This roadmap should be re-iterated and could be strengthened in future UN resolutions, e.g. the planned Outcome document of the forthcoming 2018 UN High Level Meeting on NCDs.

In addition, IFBA would encourage the HLC to consider further broadening the range of industry sectors listed in paragraph 38, with which government engagement should be stepped up. Retailers – and the full agro-food value chain - the entertainment industry, the sports sector, the transport and mobility sectors, the construction industry – these are all examples of economic operators that should be, yet today rarely are, included in whole-of-society approaches.

IFBA recognizes the need for responsible marketing practices, especially with regard to children (paragraph 39). IFBA’s global commitment on marketing to children⁸ is aligned with the WHO Recommendations on food and non-alcoholic beverage marketing to children. IFBA does not advocate for self-regulatory approaches as a substitute, but as a complement to proportionate and effective policy and regulatory frameworks. In addition, IFBA believes that more emphasis could be placed on the opportunity to leverage marketing – and the skills and consumer insights of the private sector – to promote recommended food groups and, more broadly, behaviors.

IFBA nonetheless urges caution with regard to the use of the term “health-harming products” (Recommendation 2 b) and c)). The use of this terminology in Recommendation 2 in conjunction with the language in paragraph 39 referring to food and beverage products with a high content of fat, sugar or salt, leads to a possible understanding that such products are “health-harming”. While high-fat, sugar and salt products should be consumed thoughtfully and as part of a balanced diet, it would not be appropriate to classify such products as “health-harming”, presumably in the same category as tobacco products or alcohol beverages.

Accountability

IFBA welcomes Recommendation 4: Strengthen accountability for action on NCDs, and supports the call to simplify existing NCD accountability mechanisms created since 2011 (Recommendation 2 b) and paragraph 46)

⁸ <https://ifballiance.org/commitments/responsible-marketing-to-children>

In addition, IFBA suggests that the HLC Report call for greater attention to be paid to the need to track and include in global progress reporting NCD-related actions undertaken by non-State Actors. IFBA suggests that the HLC Report advocate for the inclusion of a meaningful progress reporting tool for non-State Actor contributions based on Paragraph 44 of the UN Political Declaration on NCDs, in the framework of relevant UN mechanisms, such as the UN Decade for Action on Nutrition, the periodic WHO and UN stocktaking reports and other future mechanisms that may be established in the context of the SDGs. Such an approach would encourage a broader range of non-State Actors to take action and to measure progress - and might inspire governments to increase engagement with the private sector.

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