

COMMENTS BY THE INTERNATIONAL FOOD & BEVERAGE ALLIANCE ON THE WORLD HEALTH ORGANIZATION'S DRAFT GUIDELINE ON SUGARS INTAKE FOR ADULTS AND CHILDREN

The International Food & Beverage Alliance (IFBA)¹ welcomes the opportunity to participate in the public consultation on the draft "Guideline: Sugars intake for adults and children," released by the World Health Organization (WHO) on 5 March 2014.

GENERAL COMMENTS

We all share a common interest in tackling the problem of noncommunicable diseases (NCDs). In line with the United Nations *Political Declaration of the High-level Meeting on the prevention and control of noncommunicable diseases*, unanimously adopted by Member States in 2011, WHO strategies recognize that the solution requires a whole of society approach, multisectoral actions and the collaboration of governments, civil society and the private sector. We fully endorse this approach. Given the complexity and multifactorial causes of NCDs, it is essential that all stakeholders work together to develop holistic, impactful and sustainable solutions.

IFBA members have been working constructively with WHO and Member States since 2002 on global public health nutrition issues. IFBA was one of the NGOs consulted on several occasions by WHO in the development of the WHO Global Action Plan on the Prevention and Control of NCDs (adopted May 2013). We recognize the important and unique role the food and non-alcoholic beverage industry has to play in these efforts and have been doing our part – in support of the stated priorities of WHO - to:

- Restrict the marketing of foods high in fat, sugar and salt to children;
- Provide nutrition information to consumers;
- Promote balanced diets and physical activity; and
- Reformulate where possible, based on scientific and technological feasibility and accessibility of alternative solutions, and bring to market new products which support the goal of improving the healthfulness of foods and beverages.

We are reducing key ingredients of public health concern – salt, sugar, saturated and trans fats - and increasing ingredients considered beneficial for good health - fibre, whole grains, fruits, vegetables and low-fat dairy; and reducing total calories.

We continually challenge ourselves to scale-up these commitments wherever possible, in an acknowledgement that ever greater efforts are needed to address these pressing issues.

¹ IFBA is a non-profit organization composed of eleven companies – The Coca-Cola Company, Ferrero, General Mills, Grupo Bimbo, Kellogg's, Mars, McDonald's, Mondelez International, Nestlé, PepsiCo and Unilever – who share a common goal of helping people around the world achieve balanced diets and healthy, active lifestyles. For further information, please visit: www.ifballiance.org

IFBA and its members understand that many consumers are increasingly seeking ways to improve their dietary quality and manage their calorie intake, including reducing sugar consumption. To meet these needs, IFBA members have been formulating products with less added sugar, using alternative sweeteners and other ingredients as alternatives to sugars and reducing calories by offering smaller portion sizes and providing portion guidance.

Reducing sugar levels is complex and challenging, both technically and in terms of consumer acceptance. But all IFBA members are making meaningful and measurable changes and have established clear goals in the medium and long term.

In our view, one of the most important factors in maintaining a healthy weight is energy balance, which factors in total calories consumed as well as those expended through basal metabolism and physical activity. Consumer awareness of the calories provided by a food or beverage product is essential and we are committed to providing easily-accessible and meaningful nutrition information to help consumers make choices that meet their needs.

SPECIFIC COMMENTS

The key evidence base for the WHO recommendations was collected and presented through the commissioning of two systematic reviews and meta-analysis on body weight and dental caries.^{2 3}

We acknowledge WHO's re-confirmation of the dietary goal, first established in 1989 and again recommended in 2002, that the intake of free sugars should not exceed 10% of total energy.⁴ WHO has also proposed as a conditional recommendation a further reduction to below 5%.

According to WHO guidelines, the strength of a recommendation is subject to the quality of evidence, balance of benefits versus harms and burdens, values and preferences and resource use.⁵ Conditional recommendations are made when there is greater uncertainty about these factors.

From the evidence presented, it appears there is insufficient scientific support that would justify the lowering of the current WHO guideline on consumption of free sugars to 5%. The evidence is classified by the authors to be of very low quality, "*With the <5% energy cutoff, a significant relationship was observed, but the evidence was judged to be of very low quality.*"⁶

² Te Morenga L, Mallard S, Mann J., Dietary sugars and body weight: systematic review and meta-analyses of randomised controlled trials and cohort studies. *Brit. J. Med.* 2013 346:e7492.

³ Moynihan PJ, Kelly SA., Effect on caries of restricting sugars intake: systematic review to inform WHO guidelines. *J Dent Res.* 2014 93(1): 8-18

⁴ Diet, nutrition and the prevention of chronic diseases: Report of a Joint WHO/FAO Expert Consultation. WHO Technical Report Series, No. 916, Geneva, World Health Organization (WHO), 2003

⁵ Annex 8: Summary of considerations for determining the strength of the recommendations (Quality of evidence)

⁶ Moynihan PJ, Kelly SA., Effect on caries of restricting sugars intake: systematic review to inform WHO guidelines. *J Dent Res.* 2014 93(1): 8-18

We believe that before a recommendation to further reduce free sugars intake to less than 5% of total energy can eventually be made to consumers, this complex matter requires further scientific substantiation and the full engagement and collaboration of the many stakeholders concerned.

IFBA members are keeping abreast of all scientific developments in the field and welcome further solid science and debate on sugars and their impacts on NCDs, and we are firmly committed to making a constructive contribution. We stand ready to support WHO in developing scientifically robust technical guidelines for free sugar reduction. We also stand ready to support WHO in other ways related to total sugar reduction, including the technical aspects of product reformulation, consumer understanding and communication. We believe fact-based consumer education is a key component of any sugars reduction intervention and would propose that WHO consider supporting governments in their efforts to help citizens consume more balanced diets by providing practical, actionable, evidence-based guidance that can be readily adopted by general populations.

FINAL COMMENTS

We are grateful for the constructive engagement we have had with WHO over the years and thank you for the opportunity to provide our comments. We look forward to providing further input in the development of these guidelines.

31 March 2014