



**The International Food & Beverage Alliance Comments on the
Interim Report of the WHO Global Coordination Mechanism on NCDs Working Group
on how to realize government’s commitments to engage with the private sector
for the prevention and control of NCDs**

The International Food & Beverage Alliance (IFBA) wishes to thank the World Health Organization (WHO) for the opportunity to provide comments on the Interim Report (dated 29 July 2015) of the WHO Global Coordination Mechanism on NCDs (WHO GCM/NCD) Working Group responsible for making recommendations on how Member States can engage with the private sector to realize the commitments adopted by governments in paragraph 44 of the Political Declaration of the High-level Meeting of the General Assembly on the Prevention and Control of Non-communicable Diseases in September 2011 (the Political Declaration).¹

General Comments

We believe that the private sector has both an incentive and a responsibility to be part of the global solution on NCD reduction and prevention. We understand the unique contribution our industry can make to this effort and have committed our time, resources and expertise to make a positive and strong contribution toward improving global health. We are pleased that the Working Group has recognized that private sector entities are key contributors to the public health agenda. Namely, as manufacturers of innovative and safe food and beverages, technical expertise in formulation, developers and contributors to nutrition education, nutrition science, consumer understanding and supply chain expertise. Indeed, our industry can make important contributions to positive health outcomes and we strive to work collaboratively with the public health community to do more.

We also believe good health is good business and are strongly committed to ensuring our businesses create and preserve the long-term sustainability and health of the environment and communities we serve.

We are making progress on the public health agenda, but recognize that there is much more work to be done if the goals of the Political Declaration and the WHO Global Action Plan on the Prevention and Control of Noncommunicable Diseases 2013-2020 are to be met. We all recognize no one entity can accomplish these goals alone. The United Nations has repeatedly emphasized that multisectoral actions and collaborative multistakeholder engagement represent the most cost-effective ways to address public health challenges. NCDs are a multifactorial problem, and as the Interim Report states, all non-

¹ IFBA is a group of eleven multinational 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.

State actors, including philanthropic foundations, academic institutions, NGOs and civil society are important in generating effective, national NCD responses.

We welcome the Working Group's recommendation for a whole-of-society approach and the establishment of national multistakeholder mechanisms for engaging with the private sector in realizing the actions outlined in paragraph 44 of the Political Declaration.

Many of the recommendations in the Interim Report reflect the initiatives or strategies our members have been working on for many years individually, and collectively, since 2008 when our CEOs came together and pledged to take action in support of the goals of the 2004 WHO Global Strategy on Diet, Physical Activity and Health, in the following areas:

1. Innovate to create products that increasingly make available food and non-alcoholic beverage choices that help people eat healthy, balanced diets;
2. Provide clear, fact-based nutrition information to consumers;
3. Market responsibly to children everywhere our products are sold around the world;
4. Promote balanced diets and healthy, active lifestyles in communities around the world and in our workplaces.

We thank the Working Group for recognizing the efforts of our industry in these areas.

Our strategy and commitments are global by design and provide a framework for implementation of regional, national and local strategies. Public health challenges vary country by country as do consumers' consumption habits and behaviours. There is no single "healthiest" product formulation internationally that will address the dietary needs of all consumers around the world. Effective interventions aimed at achieving positive health outcomes must be tailored to address local challenges and needs.

For many years, IFBA members have been collaborating with governments and NGOs on a variety of initiatives aimed at helping people the world over to achieve a balanced diet and healthy, active lifestyle. We have shared examples of successful collaborations that have demonstrated measureable progress with the Working Group in our previous submission.² And, we continue to explore additional engagement opportunities.

Let us be the first to say, we recognize and respect the fact that policy creation is the exclusive prerogative of governments. We view our role as contributing to the evidence base upon which policies are set. We welcome the Working Group's recommendation that governments should consult with stakeholders on policy from the outset. We support the establishment of a multistakeholder working

² [IFBA's Submission on the WHO's Discussion Paper for the GCM](#)

group that can facilitate the acceptance of the science based evidence and framing of public policy. After there has been open exchange and transparent dialogue with all interested parties, about the science on any given topic, it would be the distinct and clear right of governments to set and establish policy.

Addressing the Bottlenecks and Challenges

We recognize the bottlenecks and challenges that have hindered progress in realizing the commitments of the Political Declaration and welcome many of the recommendations proposed by the Working Group designed to address these challenges and strengthen the private sector's contribution to NCD prevention and control.

We too, face bottlenecks and challenges, including a number of scientific, technical and consumer barriers, regulatory frameworks which stifle rather than stimulate and incentivize innovation, a lack of awareness of the substantial contribution the food and non-alcoholic beverage industry can, and has made, in support of WHO strategies and a general lack of trust of the private sector.

There is no quick fix or one-size fits all solution to these challenges, but we are committed to helping develop effective interventions as well as creating an environment of transparency and trust through multistakeholder dialogue and collaborative agenda-setting.

Achieving collaborations that engage the private sector requires a systematic approach and an enabling environment, led by governments. Defining the role and expectations of the private sector is a critical first step.

Regulatory Frameworks

While acknowledging the progress of the private sector to date, the Working Group also expresses the view that current efforts from the private sector will be insufficient to enable governments to attain the NCD-related targets, and recommends the establishment of strong national regulatory frameworks, both statutory and self-regulatory, aligned with NCD targets, for each of the five action areas identified in paragraph 44 of the Political Declaration.³

While we recognize the implicit advantage of statutory regulation when it comes to ensuring an effective level playing field across the whole industry, we also believe the ability to take a flexible approach to regulation provides significant benefits in responding to the challenges.

³ 1. Marketing to children; 2. Promoting more foods consistent with a healthy diet; 3. Reducing the use of salt to lower sodium consumption; 4. Promoting and creating an enabling environments for healthy behaviours among workers; and 5. Improving access to pharmaceuticals and other health technologies for NCD prevention and control

A range of feasible policy options – including self-regulatory and co-regulatory approaches – need to be identified, and their benefits and costs, including compliance costs, assessed within an appropriate framework.

Self-regulation has its place in the policy mix – it is cost-effective, measureable, flexible and can quickly respond to societal concerns. It has the ability to harness industry knowledge and expertise to address industry-specific and consumer issues directly. In low- to middle-income countries where there is little capacity to develop regulations, monitor and enforce compliance, credible voluntary initiatives, like IFBA’s Global Policy on Advertising and Marketing Communications to Children (the IFBA Global Policy) or the marketing pledges, or salt reduction and calorie reduction initiatives, represent a valid starting point and have proven to be successful.

For example, our approach on marketing to children has succeeded in realizing the policy objective of reducing children’s exposure to products high in fat, sugar and salt in Australia, Canada, the EU and U.S.A. ⁴ In the U.S.A., the Healthy Weight Commitment Foundation, a national, multi-year, multistakeholder effort led by CEOs, designed to help reduce obesity, especially childhood obesity, resulted in the removal of 6.4 trillion calories from the marketplace in just five years. ⁵ As the Interim Report notes, the salt reduction initiatives undertaken by governments and industry around the world have proven effective, are increasing and present a good starting point for government engagement with industry.

The 2010 WHO Set of Recommendations on the Marketing of Foods and Non-alcoholic Beverage to Children provides a variety of approaches for implementing the policy objective of reducing the impact on children of the marketing of foods high in fat, sugar and salt – statutory regulation, industry-led self-regulation and various co-regulatory mechanisms. We believe a blend of these approaches should be considered.

Hybrid co-regulatory schemes, led by governments are increasingly emerging as a credible approach to setting standards for marketing to children and appear capable of delivering meaningful outcomes. This multistakeholder approach results in a codified industry commitment, applicable to all advertisers in a given market, under the auspices of an advertising standards authority. Critical to the success of this approach is the involvement of all stakeholders, including civil society and non-industry actors in developing the code and advertising standards and the monitoring and enforcement mechanisms. This approach offers some advantages for governments. The advertising standards authority provides guidance, pre-publication advice and training for the industry to ensure advertising stays within the guidelines. It is responsible for monitoring compliance and has the ability to act quickly in adjudicating

⁴ See [IFBA's Submission on the WHO's Discussion Paper for the GCM](#), 12-13

⁵ See [IFBA's Submission on the WHO's Discussion Paper for the GCM](#), 6

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consumer and competitor complaints and enforcement. In many instances, the advertising standards authority involves consumers' organizations in its processes.

For example, in Singapore, the Children's Food and Beverage Advertising Guidelines were the result of a public-private partnership led by the Health Promotion Board of the Singapore Ministry of Health and were negotiated in a multistakeholder committee including industry representatives, the Consumers Association of Singapore and the Advertising Standards Authority of Singapore (ASAS). The guidelines will form part of the Singapore Code of Advertising Practice (SCAP) and came into force as of 1 January 2015 for all advertisers in Singapore and will be enforced by ASAS. Similar examples of hybrid co-regulatory schemes can be found in China, India, Malaysia, the Netherlands, Norway, Poland and Romania.

Building Trust

As stated in our previous submission, we continue to be limited by the level of mistrust aimed at the private sector. We must begin to find ways of working and trusting each other and take action to identify common areas of opportunity and collaboration. We are concerned that this general attitude and negative characterization could have a detrimental impact as governments seek to engage and align private sector incentives with national NCD responses. It is critical to the success of this effort and the public health at large, that the WHO and governments see industry as a willing and effective partner. We have examples of successful multistakeholder collaborations, led by governments such as the U.K. Public Health Responsibility Deal and the EU Platform on Diet, Physical Activity and Health, that can be shared with governments as best practice models. We are convinced that much can be accomplished with a structured multistakeholder dialogue, and as the Working Group has recommended – clarification of the role of the private sector in its contribution to the implementation of national NCD responses.

Knowledge-sharing

IFBA members are committed to sharing best practice models throughout the industry and helping to influence and involve SMEs in the prevention and control of NCDs. We worked to help establish two regional alliances, involving regional and local industry contributors, founded on the same principles as IFBA and with the same commitments on product formulation and innovation, nutrition labelling, responsible marketing and promotion of healthy lifestyles: the Gulf Cooperation Council Food and Beverage Alliance (GCC FBA) in 2009 and Food Industry Asia (FIA) in 2010. In 2011, the Consumer Goods Forum, a collaboration of more than 400 retailers, manufacturers and service providers across 70 countries, adopted resolutions on nutrition and health based on the IFBA commitments.

In an effort to promote the best practice model on marketing to children around the world, IFBA members introduced regional and national pledges, based on the core tenets of the IFBA Global Policy. The aim of these pledges is to encourage domestic players to follow our lead and improve the types of

foods and beverages marketed to children. Currently, marketing pledges have been implemented in 50 countries by more than 30 regional and local food companies.

We welcome the recommendation to foster linkages between multinational companies and the domestic private sector, particularly small and medium sized enterprises, to facilitate the transfer of knowledge and skills on how to progress the actions called for in paragraph 44 of the Political Declaration. We have led our industry to implement these initiatives on a global basis and believe our experience can be drawn upon to support successful initiatives at the regional and national level.

We support the establishment of repositories and knowledge-sharing mechanisms at national, regional and global levels. Unfortunately, evidence from the private sector is often too easily discredited, when in fact, given our significant research and development capacity, there are real opportunities for collaborative research. We would like to find new and relevant ways to leverage and collaborate on the science needed to improve health, including ways in which we can benefit from the research and evidence undertaken by academic institutions, and remain open to this discussion with the WHO GCM/NCD.

We welcome the opportunity to share our expertise of nutrition science and consumer behavior in furtherance of the collective goal of achieving workable solutions. We are willing to collaborate on the establishment of a global repository of best practices on product reformulation, salt reduction, nutrition labelling, responsible marketing practices and workplace wellness programmes.

Reducing the impact of marketing of unhealthy foods and non-alcoholic beverages to children

IFBA companies have made responsible marketing to children a critical part of their effort to promote balanced diets and healthy, active lifestyles. In 2008, members voluntarily adopted a global approach restricting how and what they advertise to children. This approach promotes product innovation, reformulation and choice, and through education and communication, the benefits of healthy diets and physical activity among children.⁶

The IFBA Global Policy is in line with the policy objectives of the 2010 WHO Set of Recommendations on the Marketing of Foods and Non-alcoholic Beverages to Children and is designed to reduce the impact on children of the marketing of foods high in fat, sugar and salt and ensure that our marketing communications are aligned with the promotion of balanced diets and healthy, active lifestyles.

⁶ Under IFBA's Global Policy, members either commit to only advertise better-for-you products to children under 12 years or not to advertise at all to children under 12 years. Currently, the policy applies to advertising and marketing communications on television, in print and online. In September, 2014, the policy was enhanced and by the end of 2016, the policy will cover significantly more media and ensure that marketing communications for products that do not meet nutrition criteria are not designed to appeal primarily to children under 12 years.

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This policy is global, applied in every country where IFBA companies market their products, and has proven effective in helping to drive change in the marketplace. For example, during 2013, participants in the U.S.A. Children's Food and Beverage Advertising Initiative implemented many recipe changes, leading to reductions in calories, sugar or sodium and increases in fruit, dairy, whole grains or nutrients of concern.⁷

Under IFBA's Global Policy and many of the regional and national marketing pledges, companies who advertise better-for-you products to children under 12 years use company-specific nutrition criteria based on reputable international and national guidelines. Dietary recommendations differ from country to country, and therefore it is not practical to have a common set of nutrition criteria at the global level, although we are moving towards adopting uniform nutrition criteria on a regional or national basis. Pledges covering Canada, the EU and the U.S.A. have agreed common nutrition criteria, and in September 2014, IFBA members committed to establish common nutrition criteria (using the EU Pledge as model) as part of ongoing efforts to expand and enhance regional and national pledges on marketing to children.

Producing and promoting more food products consistent with a healthy diet

We are committed to support the WHO and governments in efforts to address global public health nutrition efforts. IFBA members have been working successfully in collaboration with governments and NGOs around the world in multistakeholder initiatives to reduce salt, saturated fats and calories and to remove trans fat while also encouraging efforts to step up positive nutrition including the addition of whole grains, fruits and vegetables across the diet.

As part of our global commitment to help consumers around the world achieve balanced diets and healthy, active lifestyles, IFBA members have been working over the years to help citizens improve their dietary quality and manage their caloric and sugar intake, by formulating products with less or no sugar, using low- and no-calorie sweeteners and other ingredients as alternatives to sugars and reducing calories by offering smaller portion sizes and providing portion guidance. We are also providing consumers with easily-accessible nutrition labelling information which we believe is a key component of any diet and health improvement strategy.

We are extremely encouraged and believe that the SaltSmart Consortium, a multistakeholder working group, established by the Pan American Forum for Action on NCDs (PAFNCD) in 2012 and committed to reducing salt consumption and promoting healthier diets across the Americas, is a best practice example

⁷ The Council of Better Business Bureaus, *The Children's Food & Beverage Advertising Initiative, a Report on Compliance and Progress During 2013*, December 2014.

of a successful intervention at the regional level, which can be replicated to address other key nutrients of public health concern, and specifically calorie reduction.⁸

Promoting and creating an enabling environment for healthy behaviours among workers

We all recognize that workplace initiatives can yield significant benefits in reducing both the personal and economic burden of NCDs. Supporting employees to get and remain healthy not only increases productivity but can also help to reduce healthcare costs and some of the burden on the public health system. All IFBA members have workplace wellness programmes in place. Varied in approach, they offer: information and resources on nutrition, fitness, mental health and stress management; preventive health initiatives, including onsite clinics, health risk assessments and personalized improvement programmes; healthy dining choices; opportunities to increase physical activity in the workplace, including onsite fitness centers and exercise rooms and fitness classes. All members offer smoking cessation programmes. Many of the programmes have been recognized as “leaders” in employee wellness. The programmes are replicable and IFBA members are prepared to contribute these best practice models to a global repository.

Achieving successful engagement with the private sector with the objective of realizing the actions outlined for industry in paragraph 44 of the Political Declaration will require a coherent and sustained alignment of efforts, “win-win” based terms of reference, an agreed set of actions, sharing of knowledge and replication of best practices, transparency and accountability and measured progress towards stated objectives. We look forward to the unique challenge ahead and remain optimistic about the ability to work collaboratively in an effort to improve the lives of the consumers we all serve.

15 September 2015

⁸ In May 2012, IFBA members joined with industry, governments, civil society and academia in Brasilia, for the first meeting of PAFNCD, convened by WHO’s Regional Office for the Americas, and established the SaltSmart Consortium. The Consortium provides a platform for dialogue and common action, accelerating the implementation of science-based and technically feasible interventions in response to the Political Declaration. Participants have committed to implement a common, stepwise approach to dietary salt reduction in the Americas with the aim of realizing PAHO’s goal of reducing salt intake to less than 5 grams per person per day by 2020. In 2013, the Consortium endorsed the implementation of the Five-Year Multi-Stakeholder Strategic Plan (2013-2018), aimed at among other objectives, accelerating and expanding the reach of social awareness of dietary salt consumption and healthy eating and advancing the harmonization of targets and timelines for reducing salt/sodium and launched Salt-Smart Americas: A Guide for Country-Level Action. In October 2014, the Consortium agreed regional targets for key food categories. Mondelēz International, Nestlé and Unilever serve as the industry representatives on the steering group for the Consortium.