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**WORLD HEALTH ORGANIZATION**

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**Date:** 25 February 2004

**From:** Liz Shrapnel

Personal Assistant to Dr Marc Danzon, WHO Regional Director for Europe

**To:** Office of ADG/NMH/HQ

**Attention:** Madame C. Legales-Camus

**cc:** Y. Charpak, DTH, NFS, FOS

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**Number of pages:** 5 (including this one)

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**Comments on WHO draft strategy on diet, physical activity and health**

Please find attached comments from the Federation of Bosnia and Herzegovina.

BOSNA I HERCEGOVINA  
FEDERACIJA BOSNE I HERCEGOVINE  
FEDERALNO MINISTARSTVO ZDRAVSTVA



BOSNIA AND HERZEGOVINA  
FEDERATION OF BOSNIA AND HERZEGOVINA  
FEDERAL MINISTRY OF HEALTH

Ref.No 01-37-1502&04  
Sarajevo, February 26, 2004

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**WHO REGIONAL OFFICE FOR EUROPE**  
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21000 Copenhagen

**Dr Yves Charpak**  
Senior Policy Advisor to the Regional Director

**SUBJECT Comments of Federation of Bosnia and Herzegovina on the  
WHO Draft Strategy on Diet, Physical Activity and Health**

Dear Dr Charpak,

I refer to the letter dated on February 12<sup>th</sup>, sent by dr Marc Danzon, WHO Regional Director, regarding the Global Strategy on Diet, Physical Activity and Health.

Please, find endorsed the comments of Federation of Bosnia and Herzegovina on the Who Draft Strategy on Diet, Physical Activity and Health.

Sincerely yours,

  
**MINISTER**  
Zorica Ljubic

BOSNA I HERCEGOVINA  
FEDERACIJA BOSNE I HERCEGOVINE  
FEDERALNO MINISTARSTVO ZDRAVSTVA



BOSNIA AND HERZEGOVINA  
FEDERATION OF BOSNIA AND HERZEGOVINA  
FEDERAL MINISTRY OF HEALTH

Ref.no:01-37- 1502/04  
Sarajevo, February 26, 2004

## **Comments of Federation of Bosnia and Herzegovina on the WHO Draft Strategy on Diet, Physical Activity and Health**

Federation of Bosnia and Herzegovina expresses its gratitude for the possibility to comment on the WHO draft Global Strategy on Diet, Physical Activity and Health, as it was decided by the recent WHO Executive Board meeting.

Federation of Bosnia and Herzegovina supports the strategy and finds it important and essential to promote global health. The Background to the Strategy expresses the need for global collaboration in order to tackle the global etiology and outcomes. Chronic diseases like heart disease, diabetes, stroke, cancers and respiratory diseases account for 59% of the 56.5 million disease-related deaths annually, and much of the global disease burden is related diet. While the U.S., with 65% of adults overweight, is the world leader, the obesity problem is global. In 1995, there were an estimated 200 million obese adults worldwide. By 2000, that number had increased to over 300 million. It is well known that the poor are at the highest risk for NCDs. To promote health in these sectors, global efforts and investments should be made.

Some question the scientific basis of the Strategy. Nutrition and other health professionals in Federation of Bosnia and Herzegovina have examined this issue. We must emphasize that we should search for more research and evidence, but we do find the current evidence extremely strong and we do have a firm basis for the needed strategy, its tools and actions. Of course, Federation of Bosnia and Herzegovina recommends monitoring the scientific data and advances over time, after the adoption of the Strategy.

Some would like to address the problem of under-nutrition and less so that of obesity and non-communicable diseases (NCDs). It is true that the strategy was developed to address NCDs. Nevertheless, the tools presented in the strategy should be applied to address micronutrient deficiencies and undernutrition, as well. Contrary to conventional wisdom, the obesity epidemic is not restricted to industrialized societies. In developing countries, it is estimated that over 115 million people suffer from obesity-related health problems. Moreover, it is well documented that even obese people could have micronutrient deficiencies. Consumption of high nutrient density foods and a wholesome diet are needed to both decrease the rate of NCDs and combat micronutrient deficiencies.

Some opponents to the strategy claim that there is no need for restriction and/or regulations on marketing products, especially to children. In Federation of Bosnia

and Herzegovina there is a wide use of sophisticated and non-sophisticated marketing techniques. The industry recognizes that good marketing techniques lead to greater consumption of products, greater profit and frequently, overconsumption. Children, deluged with marketing messages targeted especially to them are misled. The effect of health promoting messages has been diluted by the mass marketing of the food companies. Ministries of health and others who are engaged in health education cannot compete with the budget used by the industry for marketing.

Unhealthy food items are cheaper than healthier foods in Federation of Bosnia and Herzegovina. Thus, the poor get the worst of choices. Healthy diet is not accessible for them and thus education and labeling cannot suffice. In fact, the poorest members of societies are actually encouraged to make unhealthy choices because the least healthy choices are the only ones they can afford. In the current global environment, taxation and pricing ("price control") are tools to increase the accessibility of people from low socioeconomic status to a healthier diet.

When unhealthy food is subsidized it is more consumed by the populations. Federation of Bosnia and Herzegovina supports linking agricultural policy, including subsidy programs, to the health of our population. A gradual and well-coordinated change can have a minimal negative impact on the farmers and economics while making a substantive effect on health. These changes can change the preferences of farmers and hence, promote health even better.

Experience from the USA shows that putting an emphasis on "personal responsibility" is not effective alone. We do agree with the importance of individual responsibility, but emphasize that public strategies and actions are needed to make the healthier choices accessible, easier and more natural. This is especially important for children who cannot decide themselves. Also, many families have no access to healthier foods and thus putting the burden on the family is impractical. In health promotion and public health policy both incentive and restrictive measures are essential. We find the Strategy balanced and credible in this aspects.

Accessibility and affordability are important issues. Currently, unhealthy choices are the cheapest and easiest. As was stated above, the least healthy foods are the cheapest and are consumed by the poorest in society.

Some claim that there are no "good" or "bad foods" and that there are only "good" or "bad diets". In fact, food companies spend enormous amount of money on marketing because they want people to eat more of their products. The produced food items are not tailored pieces in a puzzle and are not intended to form a healthy diet. Each food industry markets its products. In Federation of Bosnia and Herzegovina we are promoting food items and not only a good diet. We view the Strategy as an important tool for us.

From our experience in Federation of Bosnia and Herzegovina, it is clear that the industry, when being guided by the health authorities, has the willingness and the capabilities needed to promote health. It is better when food companies appreciate their responsibility and their ability in promoting health. They are well experienced and carry out thorough investigations in order to devise effective marketing programs that could be used to improve health. The Federation of Bosnia and Herzegovina's industry is involved in many national tasks like fighting obesity, decreasing salt, decreasing fat and sugar content of food items, etc. Still, some companies do not

even seem to be expected to share the responsibility for the outcome when the populations consume their products.

The Finnish experience has taught us all that a sustained and comprehensive national action can generally lead to a much healthier diet and greatly reduce the rates of NCDs. The Finnish strategy, which is well documented in international health literature, is very much in line with the Global Strategy, thus providing strong evidence for the proposed Strategy.

A global WHO strategy would be a great support to many countries, including Federation of Bosnia and Herzegovina. We agree that this Strategy can make the right environment that will empower people to resume responsibility for their health. The strategy is a lever that mobilizes national policy and creates the conditions that motivate and change attitudes and behaviors of the individuals. The Strategy, with its menu-like offering of tools, provides the member states with the options to use in their settings.

Again, we thank the WHO-secretariat and will make all the efforts needed to promote healthy diet, physical activity and health and to reduce NCDs.

MINISTER  
Toma Lucic

