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**Subject: Integrated prevention of non-communicable diseases;
Comments on the draft by WHO of a global strategy on diet, physical
activity and health (Document EB113/44 Add.1) and on the WHO draft
resolution EB 113/44 in the version of EB 113.R7**

Dear Madam, dear Sir,

from an expert medical point of view, the Federal Ministry of Health and Social Security supports the above-mentioned drafts.

However, there are objections to the operative part 2 (1), (3) and (4) of the draft resolution addressed to the member states, as far as it requests new structures for the implementation of a multidisciplinary and multisectoral strategy including monitoring and evaluation. In Germany there are already a lot of preventive measures which comply with the requests by WHO (e.g. at the German Forum of Disease Prevention and Health Promotion, child and youth activities by the Federal Centre for Health Education) and which can and should be further developed within the framework of already existing strategies. New strategies would require too much manpower and financial expenditure without being more effective in this way.

We unrestrictively support individual initiatives for maintaining or recovering one's health in connection with the promotion of lifestyles that also include a healthy diet and physical activity (draft resolution, operative part, part 2 (2) and (6), as an essential element within the scope of a global strategy.

The exclusive reference to the scientifically controversial report of the Joint WHO/FAO Expert Consultation on Diet, Nutrition and the Prevention of Chronic Disease (WHO Technical

Report Series, No. 916, 2003) in Document EB 113/44 Add.1 (18) - (21) is not sufficient. All scientific findings, also other reports by WHO and future new scientific findings ought to be taken into consideration in the recommendations for action. In this connection quantity limits for the levels of saturated fats, sugar, salts are provided for the private sector in Document EB 113/44 Add.1 (50) and the introduction of new and more healthy products (see also para. 36 (1)) is recommended. In this context a well-balanced overall nutrition and the different dietary habits and needs in the individual countries are not considered to a sufficient extent. On the one hand, the emphasis should not be on individual products but on the use of all products and thus nutrition in general. Instead of the term „ to limit the levels of saturated fats“ it is therefore suggested to use the term “review the limits ...”. On the other hand the requested alterations also need changes on the part of providers in the nutrition sector, ranging from a reduction of processed foods up to an increase in the number of natural foods which have hardly been processed by their producers.

As it has not been definitely proved from a scientific point of view that advertising inevitably influences dietary habits, it is suggested to replace the word „influences“ in Document 113/44, Add.1, para. 35 (2) by the words “may influence”.

In Document EB 113/44 Add.1 (48) it should be made clear that , within the scope of international standards, “new multi-stakeholder approaches“ do not include any extension of the mandate of the Codex Alimentarius towards issues such as advertising and marketing.

Yours sincerely,



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Division E 21
Multilateral Co-operation
in the Field of Health and Social
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