



MISYON NG PILIPINAS SA MGÁ NAGKAKAISANG
BANSA AT IBA PANG SAMAHANG PANDAIGDIG

PHILIPPINE MISSION TO THE UNITED NATIONS
AND OTHER INTERNATIONAL ORGANIZATIONS

GENEVA, SWITZERLAND
47, AVENUE BLANC
TEL. 022 716 19 30
FAX 022 716 19 32

No 0045 / EAM - 2004

The Permanent Mission of the Republic of the Philippines to the United Nations Office and other international organizations in Geneva presents its compliments to the World Health Organization and, with reference to the latter's note ref. C.L.2.2004, has the honour to transmit the attached preliminary comments of the Philippines on the WHO draft global strategy on diet, physical activity and health, for consideration in the revised draft.

It would be highly appreciated if these comments could be incorporated in the draft strategy.

The Permanent Mission of the Republic of the Philippines avails itself of this opportunity to renew to the World Health Organization the assurances of its highest consideration.

Geneva, 2 March 2004



Received in
- 2 MAR 2004
ADG / NMH

**Preliminary comments from the Philippines
On the WHO Draft Global Strategy on Diet, Physical Activity and Health**

1. Paragraph 6 is proposed to be amended as follows to emphasize the role of malnutrition in the development of NCDs

"Malnutrition both of deficiency and excess, is increasingly found in both developing and richer countries. Hyperhomocysteinemia, the result of deficiencies of folic acid and vitamins B6 and B12, may play a significant role in noncommunicable disease even in those with normal cholesterol levels. The latter are especially prevalent in developing countries and the poor in richer countries. An integrated approach to the causes of unbalanced nutrition and decreasing levels of physical activity would contribute to reducing the future burden of chronic noncommunicable diseases"

2. Paragraph 18 :

"The 1988 recommendation to clinicians of the USPHS/NIH and the recent (2003) report of the Joint WHO/FAO Expert Consultation on Diet, Nutrition and the Prevention of Chronic Disease provides updated evidence and recommendations on population nutrient intake and physical activity goals for the prevention of major noncommunicable diseases. The findings confirm that healthy diets and physical activity are necessary for a long and healthy life. The Expert Consultation's recommendation need to be translated into national recommendations, in the light of the local health situation and into dietary guidelines."

3. Paragraph 19 is a generalized statement that has broad range of implications. Although there may be convincing evidence that saturated animal fats cause cardiovascular disease and other NCDs, there is no convincing evidence to show that short- or medium-chained saturated fats do the same. Coconut oil or palm oils, in particular even have evidence to the contrary. There is some credible evidence that suggest these oils are cardioprotective. In this regard, it is recommended that paragraph 19 be modified as follows :

"For diet, the report recommends that population should :

- limit energy intake from fat and shift consumption away from long chain saturated (animal) fats and *trans*-fatty acids towards the medium chain saturated and the mono-unsaturated fats ;
- increase consumption of fruits and vegetables as well as legumes, whole grains and nuts ;
- limit the intake of "free" sugars ,

- limit salt (sodium) consumption from all sources and ensure that salt is iodized ,
 - achieve energy balance for weight control. "
4. Finally, under the same premise as #3, we recommend that paragraph 50 be improved, specifically, the second bullet to read as follows :
- "limit the levels of **long chain saturated (animal) fats, trans-fatty acids, purified or free sugars and salt in existing products.** "

And add a bullet to paragraph 50 with the following information :

- **"limit total dietary calories from carbohydrates and fats to avoid becoming overweight and obese. "**
5. In consideration of the importance of the multilateral trading system and international standards on food safety which can contribute to the implementation of the draft global strategy, it is recommended that the following be included under the section on principles for action :

"Strategies, policies and actions must be consistent with provisions of the WTO Agreement on the application of sanitary and phytosanitary measures and standards and guidelines on food safety promulgated by the CODEX Alimentarius Commission. "