

American Association of Naturopathic Physicians
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Mr Derek Yach
Executive Director
Non-Communicable Diseases and Mental Health
World Health Organization
20 Avenue Appie\CH-12111 Geneva 27
Switzerland

RE: Comments on draft report of the Joint WHO/FAO expert consultation on “Diet, Nutrition and the Prevention of Chronic Diseases”

Dear Dr Yach:

The American Association of Naturopathic Physicians (AANP) is the national organization representing over 1800 members in the US. Members include licensed Naturopathic Physicians (ND's) and students in accredited four year , post-graduate naturopathic medical schools. NDs are also licensed in Canada, Puerto Rico, Australia, Great Britain, and the U.S. Virgin Islands. As primary care providers, naturopathic physicians emphasize the importance of diet and lifestyle in the prevention and treatment of disease.

The proposed position paper on diet and NCD clearly states the importance of attention to issues of diet and lifestyle. The evolution of the modern “westernized“ diet has led to increased consumption of refined grains, simple sugars, hydrogenated fats, hormones, insecticides, pesticides and other industrial pollutants. “Fractionated foods” with little nutritional value other than empty calories have become the norm. A review of heart disease, diabetes and cancer death rates around the world gives a clear indication of the negative impact of these dietary changes. The health benefits of traditional diets, when such diets are adequate in overall caloric intake, are indisputable.

Conventional medicine excels in surgical technique, trauma response and emergency medicine as well as treatment of infectious disease. It is less successful in preventing and treating chronic illness. In fact, conventional solutions for chronic disease often lead to further morbidity related to polypharmacy and the inevitable side effects of medications. A dramatic shift in the focus of primary care medicine is required to reverse the rising rates of chronic illness. The cost of medications to treat the ill could potentially bankrupt wealthy countries. The current health care systems goals and methodology are inappropriate, indeed are simply unattainable in developing nations. It is crucial to

develop a health care system that emphasizes prevention and wellness in primary care instead of expensive drug-based treatment of disease.

Money spent on health education and wellness screening will repay the original investment many times over if it effectively promotes healthy lifestyle habits. Education alone will have a difficult time, however, if all the might of the advertising, agricultural and food processing industries are working to encourage unhealthy buying and eating habits in the name of corporate profit.

Based on the above, our organization would like to propose the following additions to your position paper:

Proposal #1: Use tax policy to encourage healthy eating habits.

Encourage increased consumption of healthy foods such as fruits, vegetables, fish, poultry, meat, eggs, legumes and whole grains by making these items tax free. Simultaneously increasing taxes on unhealthy foods such as those with excessive levels of sugar, fat, or alcohol will discourage their consumption. Such policy can be made “revenue neutral” by balancing the reduced taxes for healthy foods with significant increases in those for unhealthy foods. Similar programs are already in effect on tobacco and have been seen to reduce tobacco use, particularly among youth.

Another approach would be to tax the producers of unhealthy foods in order to cover the increased medical costs society will bear in the future from their consumption.

Proposal #2: Use government policy to promote healthful messages in the media.

Mandate free public service announcements on television and in print media, based upon the amount of advertising for unhealthy foods each outlet purveys. Promote policies which prohibit advertising unhealthy food choices in schools and other child oriented environments.

Proposal #3: Encourage the development of primary care doctors who emphasize prevention and wellness.

Naturopathic physicians are trained to address these issues and focus on wellness care and prevention. Licensed in fourteen states in the US, naturopathic physicians have attended four years of premedical undergraduate training and then four years of naturopathic medical school. Health maintenance and disease prevention through diet and lifestyle choices are foundational to naturopathic practice. Naturopathic physicians are the professionals who can change the face of health care. It is in the best interests of governments to support the education and licensure of physicians with the education and training to address the issue of prevention through lifestyle and diet, as well as treatment using inexpensive and non-toxic natural therapies.

The position paper should encourage government to support professions that understand the economic and physical costs of poor diet. Such support could come in the form of increased access to student loans; state support for accredited schools of natural medicine equal to that granted schools teaching allopathic medicine; equal access to internship programs and other training opportunities; and loan forgiveness for public health work after graduation from an accredited school.

In order to protect the public, governments should establish recognized criteria and standards for education in holistic medicine and then support licensure in order to assure that such standards are met by care providers.