



ADMINISTRATION DE LA PROTECTION DE
LA SANTE

Cabinet du Directeur général

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NMH NHD

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WHO
Dr Derec Yach
Executive Director
Noncommunicable Diseases and Mental Health
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N/réf. 52-062002.DAD

Dear Dr Yach,

Thank you for your kind letter of 6 May 2002 in which you invite the Belgian Health Ministry to provide comments on the draft revised report 797 on 'Diet, Nutrition and the prevention of Chronic Diseases'.

We have studied the draft as provided on the WHO website in as much detail as possible, given such short time delay, and would at this stage, like to make the following observations:

General remarks

- Belgium is surprised to not discover the same high importance given to physical activity as was the case in the WHA meeting of the week of 13 May in the draft report on 'Diet, nutrition and the prevention of chronic diseases' despite increased physical activity being acknowledged in the draft report as having the highest level of convincing evidence to reduce the risk of developing obesity, diabetes, cardiovascular disease, osteoporosis and certain cancers. Although Belgium realizes that this subject was specifically dealt with in another expert consultation, a closer linkage of the two subjects would seem appropriate;
- The draft report ends with an important number of recommendations to civil society, international agencies, the private sector and industry and national governments. Belgium considers these to be policy recommendations and is not convinced that an expert group composed of scientific experts is best placed to make this sort of recommendations. In fact, the report itself states that it will not address amongst others the social aspects surrounding these issues. Nevertheless, the report recommends a multitude of social measures inspite of a lack of evidence or at least a lack of systematic review as to their effectiveness. Belgium believes there should be a clear separation kept between the aspects of risk assessment and risk management, each requesting their own expertise. The current draft report does not seem to subscribe to this idea which is however commonly accepted in bodies such as the Codex Alimentarius;

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Dr P. ...

- Belgium has serious questions about some of the recommendations to national governments. Examples are the recommendations to:

“Enact or enforce measures for labelling of food products, with respect to their sodium, fatty acid and sugar content, with clear codes, which will enable consumers to readily identify products with high sodium and/or fatty acid content”

“Set more stringent codes of practice on advertising of sugar-rich items, especially to children, and consider introducing fiscal pricing policies on such items....”

On the first example Belgium would like to comment that it is in favour of useful labelling, i.e. labelling which is understood by the consumer. Enacting labelling rules without education and information programmes explaining the reasons for these new labelling obligations will not work. Belgium also believes that stigmatizing certain ingredients is not the right basis for proper nutrition education, and may in fact be counterproductive. The science on the importance of an overall balanced diet is overwhelming and knowledge on how to obtain such a diet should be a priority concern.

The second example makes the same mistake of trying to stigmatise certain ingredients, based on scientific evidence that seems not to reflect the full scientific picture. Moreover the efficacy of banning advertising to solve other problems has yet to be proven, especially if the main problem is the amount of time that children watch TV, with or without advertising. Fiscal penalisation of certain foods in order to try to push consumers into buying the fiscally more attractive and ‘healthier’ option goes against the belief of the Belgian Ministry that consumers are capable of making the right choice when properly educated and informed. Moreover, enough price-elasticity studies prove that for these items, such fiscal policies do not achieve their intended aim.

All foods and ingredients can be part of a balanced diet. One should also not forget the enormous value of the very diverse culinary traditions and the pleasure which is very often associated with eating and drinking. Harmonised diets based on fear for certain products/ingredients would reduce eating and drinking to a rather unattractive, purely functional and neo-puritan exercise. Compliance of consumers to suggestions / rules of this kind have been seriously questioned.

- Belgium strongly believes in a real partnership with all involved stakeholders in order to address the ever increasing problem of chronic diseases. Statements such as “ensuring that the content of educational materials on diet and health are not biased towards the interests of the food industry” seem an ill-conceived start for such a partnership.

The science

On the science base of the report, due to a lack of time needed to have this document and its conclusions studied in detail, we restrict ourselves to some more general remarks from our scientific advisers:

- Several recommendations seem to base themselves on food frequency questionnaires which is a weak evidence base compared to the strength of some of the recommendations;
- Much of the data and experts seem to come from the industrialized US and Europe region. If the report aspires to be useful for the entire world, this shortcoming needs to be addressed;
- Apparently WHO does not consider malnutrition or undernutrition to be on the same priority scale as overnutrition, which we find surprising to say the least;
- It is commonly accepted that the lack of validated comparable data prevents a real public health evidence based policy. A clear strategy on how to support and conduct baseline surveys, using internationally recognized methods, and evaluation of interventions seems to be lacking in the report and its recommendations;
- Based on its experience obtained from a very similar exercise done only two years ago in the EU, the so-called 'Eurodiet' project, Belgium would like to express its surprise that again on this issue scientific and policy controversy is being sought through the establishment of quantitative goals and values rather than providing the next steps as to how to achieve concrete results on areas where there exists scientific consensus, namely the need to give more attention to physical activity and the importance of a higher intake of fresh fruit and vegetables.

In conclusion

Belgium would like to state its concerns over the way in which WHO/FAO expert consultations on such important subjects are currently being held and the lack of involvement of the members of WHO/FAO in these processes. It has questions over the selection procedures used to appoint the experts, their expertise in areas such as policy recommendations and the strength of scientific evidence displayed in the draft report.

At this moment, Belgium would also like to refer to the so-called 'Radenci Declaration' of April 2002, agreed at the end of the International Conference on "Promoting health through Healthy Nutrition and Health Enhancing Physical Activity" in Radenci, Slovenia, of which it feels that the recommendations to various bodies such as public health professionals, academic institutions, civil society, international bodies and political decision makers seem to be a lot closer to achievable and realistic goals in this area.

Yours sincerely,



Albert d'Adesky
Director-General