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Scope\_of\_Activities: International

Mandate\_of\_the\_Organization: Coalition of consumer organizations concerned with  
health issues relating to the increasing globalization of the food supply

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Comments: Taken from the IACFO president's statement of April 2002:

of physical activity. Poor diets coupled with a sedentary lifestyle needlessly increase the rate of heart disease, stroke, cancer, diabetes, osteoporosis, obesity and dental disease. The costs to society, in terms of premature death, disabilities, health care expenses, and lost productivity, are enormous.

This effort by the WHO has broad support from civil society. This document is based on a letter supporting the WHO's effort which has been endorsed by dozens of national public health organizations, consumer advocacy groups, regional and local health agencies, as well members of industry. Endorsers include the President of the Russian Public Health Association, the Consumer Guidance Society of India, the American Association of State and Territorial Directors of Health Promotion and Public Health Education, the Dole Food Company, and the International Racquet, Health Club and Sports Association. All of these diverse entities support the WHO's efforts in this area.

## II. Nutrient Recommendations

We appreciate the careful review of the literature that has been undertaken by the authors and believe that this information will be very useful to both international and national public health agencies, as well as non-governmental public health and consumer organizations.

The nutrient intake goals, as expressed in section four of the draft, generally are well-chosen. We strongly endorse the recommendations concerning saturated and trans fatty acids, cholesterol, sodium chloride, and free sugars. We question, though, whether the quantity of fruits and vegetables (400 g/day) is sufficient. We also question the lumping of fruit juices in with free sugars. Also, the committee should include a recommendation of dietary fiber (e.g., 25 g/day) and should recommend that grain products (e.g., bread, rice, pasta, breakfast cereals, etc.) be consumed as whole grains. Overall, the report should emphasize that the best diets are plant-based, and that any meat and dairy products consumed should be low in saturated fat. The committee should consider providing more specific dietary recommendations for different age/sex groups. We endorse the recommendation for one hour a day of physical activity.

The report fails to consider that over-consumption of free sugars may exert diverse effects by displacing more nutritious foods. For instance, drinking soft drinks in place of fat-free (or other) milk would reduce intake of calcium (and other nutrients) and possibly increase the risk of osteoporosis. Cakes and cookies might replace fruits from the diet.

We support the recommendations in the draft report to civil society and the food industry. The recommendations to these sectors will result in public health benefits by facilitating dietary improvements and increases in physical activity.

We also support the recommendations in the draft report to national governments and international agencies. We hope that the final WHO report, like the draft report, will contain concrete policy recommendations to those bodies. With regard to those matters, we have the following specific comments:

#### A. Recommendations to National Governments

We support all of the bulleted recommendations in this section of the draft report. However, we believe that the report should more directly call upon governments to adopt appropriate new policies to engineer, as much as is feasible, good health into their societies. The report should emphasize the diversity of societal factors that contribute to the development of obesity, osteoporosis, cardiovascular diseases, and cancer. These factors range from the ubiquity of fast-food restaurants and vending machines (that offer unhealthful foods) to suburbanization (which promotes a sedentary lifestyle and dependence on automobiles). In addition, crime and violence, inadequate physical education in schools, and television viewing all discourage outdoor physical activities by both adults and children. Governments should be encouraged to take public health concerns into account when reviewing public policies that pertain to these areas.

We have the following comments on the specific recommendations in the report:

#### &#61623; Regulation of Food Quality, Advertising, and Labeling

We suggest that the first bulleted recommendation be expanded to require fast food and other chain restaurants to provide nutrition information, including calorie content on menus and menu boards as well as more complete nutrition and ingredient information on food wrappers, containers, and in brochures.

With regard to the third bulleted recommendation we strongly endorse food labeling as a means of improving diets. Thus, all packaged foods should bear nutrition labeling. As suggested in the draft report, simple symbols should be placed on healthful foods (as defined by government agencies) to facilitate the modern consumer's chore of choosing foods in a confusing marketplace. The recommendation should therefore be restated to

television or World Wide Web pages commonly viewed by significant numbers of children.

We also support the recommendation in this section regarding fiscal pricing policies. We suggest that the recommendation specifically call for the establishment of pricing policies (including taxes or other assessments) for soft drinks or other foods high in calories, saturated or trans fat, or added sugars, to fund campaigns and other programs that promote good nutrition and physical activity. In addition, such funds could be used to subsidize the cost of nutritious foods. Furthermore, we suggest that the report recommend that national governments eliminate taxes on the purchase of exercise equipment, weight management programs and other products and services that have been demonstrated to improve nutritional habits and increase physical activity.

#### &#61623; Physical Activity

We support the recommendations in the draft report. We agree that national governments should be called upon to promote mass transit, bicycling, walking, and other modes of transportation that involve physical activity. We suggest that governments build or strengthen infrastructures for safe, enjoyable places for people to engage in physical activity (bicycle lanes, recreational facilities, running paths in parks, etc).

#### &#61623; Nutrition Education

We agree with the recommendations in this section of the draft report. We believe that national governments should provide ample funding for mass media campaigns that promote good nutrition and physical activity. We also agree that educational materials supplied by industry or that contain advertising, be scrutinized carefully and used only if they present unbiased educational information. We further agree that governments should develop culturally appropriate nutrition and physical activity programs for population sub-groups that are at particular risk of chronic disease related to dietary patterns.

We also suggest that an additional recommendation, to require instruction in nutrition and weight management in health professional, medical, and teaching curriculums, be added to this section. Lastly, we suggest that the report recommend that all elementary and secondary schools provide ample nutrition and physical education to their students.

## B. Recommendations to International Agencies

We support the recommendations in the draft report. In addition, we suggest that the following recommendations be included:

- The Codex Alimentarius Commission should develop standards for the mandatory labeling of calories, saturated and trans fats, sodium, and added sugars and standards for quantitative ingredient labeling of fruits, vegetables, and whole grains;

- The WHO should examine the impact of both existing international trade agreements, as well as agreements currently under development, on the ability of governments to regulate advertising and labeling of food; and

- The WHO should examine the need for new international agreements and conventions to ensure the development of sound nutritional practices within the international food trade.

## IV. Integrated Strategies for Action

The draft report in section 6.4 indicates the importance of “enabling environments.” If anything, that section should be expanded and emphasized. Considering that the trajectories of most nations’ diets have been toward animal products, soft drinks, and refined grains, all of which contribute to serious and widespread chronic illnesses, national policies should be implemented to forestall such changes. Fiscal and other policies, including taxes, should be used to improve diets. For instance, modest taxes on soft drinks, butter, and other relatively non-nutritious foods could be used to fund a variety of health activities: mass-media dietary-change campaigns, bicycle paths, and community athletic facilities. The prices of more-nutritious foods could be reduced by either taxes on less-nutritious foods or by direct subsidies to consumers (e.g., rebates at grocery stores).

Presently, the prices of meat and dairy products do not reflect such externalities as depletion of groundwater, pollution of streams with untreated animal manure, and soil erosion and pesticide pollution of streams due to the growing of feed grains. Such costs should be incorporated into food prices; the higher prices would reduce consumption, improve health, (and marginally reduce pollution). To the extent that costs are internalized through taxes, the revenues could be used to subsidize the purchase of whole

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