

From: Coordinator-UICC Director's Office
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Sent: Friday, 10 May 2002 11:07

To: dietandhealth@who.int

Subject: Comments on Draft report - WHO & FAO Expert
Consultation Diet,

Nutrition and the Prevention of Chronic Diseases

Dear Dr Puska,

On behalf of UICC please find attached the comments on
the Draft report of
the joint WHO & FAO Expert Consultation, Diet, Nutrition
and Prevention of
Chronic Diseases.

Thank you.

Kind regards,
Isabel Mortara

**Comments on the Draft Report of the
Joint WHO & FAO Expert Consultation
Diet, Nutrition and the Prevention of Chronic Diseases**

15 April 2002 on behalf of UICC

NGO Statement: International Union Against Cancer
Subject: Draft Report of the Joint World Health Organization (WHO)/Food and Agriculture Organization (FAO) Expert Consultation on Diet, Nutrition and the Prevention of Chronic Diseases

It is a privilege to be here today. I would like to thank the Chair for his excellent summary of the draft WHO/FAO report and congratulate those who produced this report. I speak on behalf of the International Union Against Cancer (UICC), an association of 290 Cancer Organisations in over 90 countries.

We have reviewed the DRAFT Diet, Nutrition and the Prevention of Chronic Diseases Report of the Joint WHO/FAO expert consultation with an eye particularly for the relevance of this report to cancer and to the programs of the UICC and the implications of the dietary recommendations for UICC's own guideline recommendations.

1. The WHO/FAO draft report encompasses many chronic disease conditions other than cancer. The sections that do focus on cancer prevention appear to be in broad agreement with the conclusions of the UICC Statement on Diet, Nutrition and Cancer Control. Both reports emphasize the uncertain state of scientific knowledge about diet and cancer while identifying some topics for which there is significant weight to the evidence.
2. The WHO/FAO draft report asserts that as much as 30% of cancer deaths may be preventable by dietary factors, the same estimate upon which the UICC has established its priority for nutrition and cancer. Consistent with the approach articulated in the UICC statement, the (WHO/FAO) draft report distinguishes the nature of the problem in developed nations from that seen in less developed regions.
3. The diet and nutrition recommendations relative to cancer cause and prevention of the WHO/FAO differ modestly from the recommendation guidelines of the UICC. All of the topics except one covered in the draft report are incorporated into the UICC guidelines. Both sets of recommendations emphasize promotion of fruit and vegetable intake, avoidance of food contamination, limitation of alcohol intake, preference for fish and poultry intake over other meats, control of salt intake, obesity reduction and, exercise. The two guidelines unequivocally differ only with respect to the WHO/FAO draft report recommendation for avoidance of hot (thermally) foods and drink. The evidence cited in the draft report to support inclusion of that recommendation is scant and not compelling except with respect to oesophageal cancer in Japan and South America.
4. The draft report nutrition recommendations omit several features that were incorporated in the UICC document, the UICC recommendations linking scientific association with practical action. For example, the draft report recommends minimizing exposure to contaminants in foods whereas the UICC guideline makes a similar recommendation and describes the food preservation and preparation practices that will help achieve the nutritional goal.
5. The (WHO/FAO) draft report may have inappropriate specificity. For example, "**Chinese**"-style salted fish should be eaten only in moderation' may be a proper recommendation for those populations for whom it is relevant. For most populations, however, this will not be a very useful guideline to achieve a desired low level of salt intake. The draft report also specifies 400g/day of fruits and vegetables as the recommended minimal intake level. There is little scientific basis justifying this specific recommended level.

6. The WHO/FAO draft report includes discussion of the importance of formation of partnerships to achieve globally nutrition and chronic disease control goals. The cancer prevention recommendations included in the report might have benefited from review and synthesis of the several published guideline statements and recommendations of other potential partner organizations.

In summary, the background information and general discussion of the significance of diet and nutrition relative to the cancer problem in the draft report are excellent. Many of the nutritional recommendations are well justified by the available evidence. Some of the draft report recommendations, however, are inappropriately specific and, in other instances, too broad to guide either cancer control practitioners or the public about how cancer risk may be modified by dietary change.

In the end, three groups have to be persuaded by the evidence, and enthused to act accordingly: professionals, policy-makers and the public. This report bridges the gap between the first two groups. The challenge now is to turn the report's recommendations into meaningful and achievable action, which will be effective in persuading the third group – the public - to eat healthy. This report should be a springboard to action and should be used to advocate appropriate research, education and information adapted to local needs and to encourage a change in attitudes and behaviour at the grassroots level.

It will be important to have partnerships with many stakeholders including non governmental organisations at international, regional and local levels. UICC will be pleased to cooperate in this effort.

UICC appreciates being kept informed about the WHO/FAO effort. This report will be most useful and will be taken into account when the UICC recommendations are next reviewed and updated.

I would like to thank the Chairman for this opportunity to comment on the report and look forward to sharing the final report with our Member organisations throughout the world.