Dear Dr. Puska,

Thank you very much for the opportunity to comment on this draft document. Thank you also for inviting me for the Consultation yesterday. It was a good meeting. I have read the document with much interest and would like to offer the following general comments. These represent perspectives of an operational NGO working at the grassroots level in 106 countries over the last 50 years, with the total commitment for Health For All.

General Comments:

1. It is a good document based on well researched scientific literature, but is very western in its orientation and approach. Looking at the substance of the document one gets the impression it will be generally applicable for 25% of the world population, mostly in the West, but not very useful for the other 75%. An effort should be made to make it applicable for the majority of the populations of the member States.

2. This document needs to be placed within the larger context of food as a human right and treated within the key issues of food security and justice in health care.

3. When 1 billion people go to bed hungry everyday and 1.8 billion are currently suffering from malnutrition with the tragic consequences of death, disability, stunted mental and physical growth, the poverty issue becomes pertinent. The issue of production is mentioned in the document, but within the context of poverty, the major problem is that of accessibility (page 10).

4. In terms of policy making, WHO can play a major role by bringing in strong recommendations in the areas of advertising and labelling:

Certain advertisements which are known to be misleading and harmful, especially to children, should be banned.
It is not enough to show percentages of protein, carbohydrates, fat, calcium and aminoacids. Labels must show:

1. Whether the vegetables and fruits have been treated with pesticides and the level of residue on the end product.
2. Whether it is a genetically modified food and if so, what is the percentage.
5. I am happy to see that fish is included in this document. This is good.

6. What is conspicuously missing and should be included, is Algae, which can be locally and cheaply produced, which is loaded with protein and other nutritive values. There are many types of algae, but spirulina is one of them which has been well tested and much scientific documents exist on it. They will be very good for any population, but certainly hold much promise for the two-third world population. I will be happy to elaborate on it if you so wish.

7. Role of the Industry?

   Based on the recently published WHO reports on how industries have infiltrated WHO and trying to influence WHO thinking and policy from within, question must be raised here as to whether they should, in fact, be involved in the policy discussions at all? We believe it is crucial that strong code of conduct and clear guidelines be prescribed especially on monitoring.

8. Our experience in World Vision shows that the role of the "middle man" should be eliminated in the whole food chain, which will cut the cost of food substantially.

9. Since much is published and widely claimed that red wine is good for health, especially in reducing cholesterol, this document should give a review of the available scientific literature and draw conclusions.

10. This document should also speak on the issue of eating practices, especially when it comes to the combinations of certain foods. For example, according to Ayurvedic medicine, milk products should not be eaten along with citric fruit. Protein should not be eaten with carbohydrates etc. which are designed to obtain the best results from combination of foods we eat. This information will benefit populations in both the North and the South.

11. Physical Activity: This document presents one side of the coin, with which I agree. However, what recommendations do we have for that sector of the population whose physical activities far exceed the energy intake and reserve of energy they need to perform those activities? Otherwise it is like asking the postman, at the end of his day's beat to take a walk for half hour for exercise. Some considered recommendations should be included in the document on this issue.

12. Vegetarian Diet (page 57)

   Delete "However, vegetarian diets per se need not be healthful" or at least say something encouraging about the vegetarian diets like
"vegetarian diets can, in fact, be very healthful" Considerable amount of literature exist on this subject.

13. The Chairman's graph on "Overcoming Structural Road Blocks" should be included in this document to provide an overall global context.

14. This document should include a section on "Spices", their nutritive values for vitamin, minerals as well as medicinal values each of them bring. Any diet without spice is "insipid" so lets spice it up!

15. In regard to the section on the Civil Society, I should add that in the NGO world we do make a clear distinction between NOT FOR PROFIT and FOR PROFIT Ngos. Because the motivations are quite different our aims and approaches are very different. Therefore, they should not be lumped together here..

Thank you.

Sincerely,

Dr. Eric Ram
World Vision International
From: Eric Ram [mailto:eric_ram@wvi.org]
Sent: Tuesday, 18 June 2002 21:24
To: puskap
Subject: spirulina/Diet, Nutrition and the Prevention.....

Dear Dr. Puska,

In following up, attached please find a small write up on spirulina as I had promised to send. I hope you will be able to make some use of this material by adding it in the document. With thanks and kind regards, Sincerely, Eric Ram

Malnutrition affects over 226 million children (source UNICEF).
The aftermath of malnutrition (lack of essential vitamins, iron, zinc, essential amino acids, etc…) lead to irreversible damages such as mental retardation, growth problems, blindness and fatal infections. Malnutrition plays a role in more than half of children death over the world, its ravages get extended to the million survivors who will be disabled and chronically vulnerable to diseases.

Malnutrition can only be overcome by allowing extremely poor populations to get a local alimentary autonomy founded on diverse productions covering essential nutritional needs.

Antenna Technologie has developed a spirulina local production system, as a micronutrient complement, responding to the criteria of the International Conference on Malnutrition.

Hundreds of children are already benefiting from spirulina. Antenna's scientific team has initiated the following development and research program:

- Clinical validation of the spirulina effects in Madurai (India) and Bangui (Central Africa). Other clinical trials have been realized in Dakar (Senegal).
- Implementation of spirulina local productions in India, Africa and South America, mostly by establishing partnerships with local organization.

Spirulina

1. Is locally produced at low cost (between 5 an 9$ per Kg).
2. Has a high nutritional value
3. Contains nutrients in an easily digestible form
4. Is easy to grow and safe to consume
5. Can be dried and conserved for years
6. Requires less water than a vegetable garden
7. Provides more than 20 times more protein per hectare than soy.
Antenna Technologie’s approach is sometimes countered by the argument that spirulina is part of the domain of the food and pharmaceutical industries. To this we reply that spirulina is a 100% natural product requiring no processing that adds value on an industrial scale. The seed germs cannot be patented and have little economic significance. Above all, the “kitchen garden” method of ensuring local and low-cost access to micronutrients of high food value is made available to people living in extreme poverty.