World Health Organization (WHO) Online Consultation
Regarding Proposed Revisions to Appendix 3 of the WHO Global Action Plan on
Non-Communicable Diseases (NCDs)
Submitted via email: September 1, 2016

Introduction

The Grocery Manufacturers Association (GMA)\(^1\) thanks the World Health Organization (WHO) for the opportunity to comment on the proposed revisions to Appendix 3 of the WHO Global Action Plan on Non-Communicable Diseases (NCDs).

GMA shares the WHO’s objective of improving public health. We agree that nutrition is a critical component of combating NCDs. We know NCDs are serious and complex issues influenced by a variety of factors, and we share the view that prevention and treatment requires consistent, coordinated, whole-of-society approaches. Finally, we believe that real progress can be made by constructive, transparent engagement between governments, the private sector, and civil society.

In fact, GMA is deeply committed and has actively undertaken efforts to advance industry initiatives to contribute to improving nutrition. Our initiatives include actions to:

- Provide consumers with a greater variety of products, including through reformulation;\(^2,3\)
- Label products with fact-based and easy to understand nutrition information on the front of packages, supplemented by a robust educational and media campaign to help consumers interpret this information and make informed dietary decisions;\(^4\)
- Limit marketing to children and in schools;\(^5\) and
- Promote balanced diets and healthy lifestyles,\(^6\) as in our support and active participation in U.S. First Lady Michelle Obama’s “Let’s Move” campaign.\(^7\)

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1 Founded in 1908 and based in Washington, D.C., GMA is the voice of more than 300 leading food, beverage and consumer product companies that sustain and enhance the quality of life for hundreds of millions of people in the United States and around the globe.
General Comments on Policy Options to Address NCDs

Consumers must be encouraged to adopt a balanced diet – eating a wide variety of foods in the right proportions to achieve and maintain a healthy body weight. Focusing on total diets rather than individual ingredients or specific foods is consistent with consumer behavior and thus more likely to be effective over time. Finally, there are wide differences in perception regarding terminology on “healthy” and “processed.” In order to be useful, all terminology must be defined with science-based underpinnings, and a common language must be shared amongst stakeholders. Processing in itself brings tremendous value to the food supply by keeping food safe, nutritious, and accessible, so it would not be appropriate to broadly describe processed foods as “unhealthy.”

GMA believes that all public health policies must be based on scientific evidence. National-level policies not based on science undermine international norms and standards, including those set by the Codex Alimentarius, and impose direct and indirect costs that could limit improvements to public health. Furthermore, interventions that fail to address total dietary consumption and lifestyles (including ways to encourage less sedentary behavior) are unlikely to impact meaningfully the incidence of obesity and NCDs.

Specific Responses to the Proposed Revisions to Appendix 3

GMA offers the following observations on selected actions and interventions described in the “Unhealthy Diet” section of Appendix 3, Objective 3.

- Overarching/Enabling Actions: GMA supports the goals of the WHO Global Strategy on Diet, Physical Activity, and Health and the WHO recommendations on the marketing of foods and non-alcoholic beverages to children.

We note the 2010 WHO Set of Recommendations on the Marketing of Foods and Non-alcoholic Beverages to Children formally recognized industry-led self-regulation as an effective means of reducing the impact of food marketing on children. U.S. companies have voluntarily taken concrete steps to help drive changes in the marketplace and improve the types of products advertised to children. In 2006, the U.S. Council of Better Business Bureaus (BBB) and leading U.S. food and beverage advertisers created the Children’s Food & Beverage Advertising Initiative (CFBAI).

Under CFBAI’s Core Principles participants commit that in advertising primarily directed to children under age 12 (“child-directed advertising”) they will depict only healthier or better-for-you foods. The participants agree to CFBAI oversight and to be held accountable for failure to comply with their commitments. CFBAI extensively monitors covered media for compliance and requires participants to submit detailed self-assessments annually. Each year

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8CFBAI’s Core Principles and other program materials are available on CFBAI’s website at www.bbb.org/kids_food.
CFBAI publishes a compliance and progress report. It has found outstanding compliance every year.

Since December 31, 2013, participants may advertise only foods that meet CFBAI’s category-specific uniform nutrition criteria in advertising primarily directed to children under age 12. CFBAI’s uniform nutrition criteria replaced and are stronger than previously used company-specific nutrition criteria.

Specific Interventions with WHO-CHOICE Analysis

U1: Reduce salt intake by engaging the industry in a voluntary reformulation process
GMA members continually improve the nutritional profile of their products. Between 2002 and 2013, GMA members made available to consumers more than 30,000 healthier product choices by reducing sodium, calories, sugar and saturated fat, and increasing whole grains, fruits, and vegetables. These innovative products include 6,500 product choices with reduced sodium. A 2014 study shows that the food and beverage industry reduced sodium in products purchased by consumers by 16 percent between 2008 and 2013 – a reduction of 28 million pounds of sodium, equivalent to over 100 mg sodium per person per day, with significant decreases appearing in those food categories that contributed the most to sodium intakes in the United States.

Success in cutting sodium consumption will require a holistic approach that includes actions by manufacturers, retailers, and restaurants and addresses consumer behaviors and preferences. GMA and its member companies are committed to continue our efforts to provide consumers with healthful choices, including through dialogue with the U.S. Food and Drug Administration (FDA) on voluntary sodium reduction targets in the United States. GMA believes additional work is needed to determine the acceptable range of sodium intake for optimal health. This evaluation should include research on health risks for people who consume too much sodium, as well as health risks from consuming too little sodium.

U4: Reduce salt intake through implementation of front-of-pack labeling
GMA supports fact-based nutrition labeling that helps consumers make informed choices about balanced diets. Facts Up Front (FUF) is a voluntary initiative created in 2011 by the Washington, DC-based Grocery Manufacturers Association (GMA) and the Food Marketing Institute (FMI). FUF is a simple and easy-to-use labeling system that puts key nutrition facts on the front of food and beverage packages – displaying the calories, saturated fat, sodium, and sugar in each serving.

Almost 90 percent of U.S. grocery sales by GMA members use FUF. GMA members have made significant investments to develop the FUF consumer website (www.factsupfront.org), consumer research, and stakeholder outreach including media campaigns and ongoing consumer education efforts. To continue to improve consumer understanding, GMA and FMI are extending the reach of consumer education efforts through key partnerships with

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groups such as Share our Strength. Share Our Strength’s Cooking Matters program, in support of its goal of “No Kid Hungry,” will feature FUF in training materials for teaching basic nutrition, shopping, and cooking skills to individuals in low-income areas in the United States.

A study published in September, 2015\textsuperscript{10} in the Journal of Consumer Affairs reflects the Facts Up Front communications campaign evaluation survey. The publication provides further support that Facts-Up-Front icons are visible, easy to understand, and helpful to the consumer. Additionally, two important articles on front-of-pack nutrition labeling were published in respected journals in spring 2014. The first article, published in the Journal of the Academy of Nutrition and Dietetics (JAND)\textsuperscript{11}, is based on consumer research GMA commissioned the International Food Information Council Foundation to conduct in 2010 to examine consumer comprehension, ease of understanding, and interpretation of nutrition information in the uniformly formatted, voluntary front-of-package labeling system that was under consideration by GMA and FMI. The research and subsequent JAND article finds that robust front-of-package labeling can significantly improve consumers’ ability to identify and understand a food’s nutrition information, and to make informed choices about their purchases. Several articles in respected journals have found that fact-based front-of-package labeling like FUF significantly improves consumers’ ability to identify and understand nutrition information and make informed choices about their purchases.\textsuperscript{12}

We note there are significant evidence gaps in understanding how label format impacts consumer behavior. There is no agreed scientific basis to classify individual foods as “healthy” or “unhealthy” according to their nutritional composition. Rather, there is sound science supporting categorization of "good diets" and "bad diets," based on consumption of nutrients from all sources. GMA supports the development of science-based global standards in the Codex Alimentarius, for example to establish dietary reference values for individual nutrients. Where science-based standards exist, GMA urges countries to work toward regulatory coherence wherever possible, so as to avoid unnecessary regulatory divergence.

U5: Complete elimination of industrial trans fats through the development of legislation banning their use in the food chain
Food and beverage companies have already voluntarily removed more than 86 percent of trans fat added to food products and will continue reducing partially hydrogenated oil (PHO)-associated trans-fat to levels similar to naturally occurring trans-fat found in the diet.

However, GMA has requested the U.S. Food and Drug Administration (FDA) approve limited and specific PHO uses necessary for the production of safe food products. Examples


of proposed continued uses include use as color and flavor carriers and to deliver consumer-desired textural characteristics that other oils cannot provide, such as flakiness in doughs. PHOs also function as essential processing aids such as pan-release agents so that products do not stick to baking trays and rollers during the manufacturing process.

Other Interventions from WHO Guidance (without WHO-CHOICE Analysis)

U8: Replace trans fats and saturated fats with unsaturated fats through reformulation, labeling, and fiscal and agricultural policies
See response to U5 above

U9: Reduce sugar consumption through taxation on sugar sweetened beverages
GMA notes the WHO Commission on Ending Childhood Obesity found there is “limited evidence” (pg. 15) indicating the imposition of fiscal measures will be effective in tackling obesity. Analysis of selective taxes where they have been attempted in the past shows uncertain effects on discouraging consumption of foods and non-alcoholic beverages high in fat, sugar, and salt.

For example, the “fat tax” created in 2011 by the Danish government to address the country’s rising obesity rates did not decrease obesity but led to potential job losses, increased administrative burdens for companies, and incentivized cross-border shopping. The tax was removed in November 2012, and the planned imposition of a chocolate tax was cancelled. In 2011, Finland introduced a tax on confectionery and ice cream in an effort to curb sugar consumption. Sales of confectionery products initially decreased slightly, but by the end of 2013 sales had returned to pre-tax levels. In September 2015, the Finnish government announced it would abolish the tax from the beginning of 2017.

In January 2014, the Mexican government levied a tax on sugar-sweetened beverages and on high caloric density foods. The tax of one peso per liter on sugar-sweetened beverages increased the retail price of such products by nine to 19 percent. The tax was introduced as a measure to reduce obesity but does not appear to have made a meaningful change in the caloric intake of the Mexican population.

U11: Implementing nutrition education and counseling in different settings (i.e., schools, workplaces, hospitals, etc. to increase the intake of fruits and vegetables)
GMA strongly supports efforts to improve and expand nutrition education. As noted in section U4 above, GMA and FMI are extending the reach of consumer education efforts through key partnerships with groups such as Share our Strength. Share Our Strength’s Cooking Matters program, in support of its goal of “No Kid Hungry,” will feature GMA and FMI’s voluntary front-of-pack nutrition labeling (Facts Up Front) in training materials for teaching basic nutrition, shopping, and cooking skills to individuals in low-income areas in the United States.

In addition, GMA is a founding member of the U.S. Nutrition Labeling Education Consortium (NLEC), a consumer-focused public-private partnership aimed at coordinating
efforts to strengthen public information and education on food, menu, vending, and other nutrition labeling in the United States. NLEC is designed to bring together representatives from the food and beverage industries, health professional organizations, consumer organizations, and others, including potentially government liaisons to coordinate efforts for stronger consumer nutrition labeling education.

U12: Nutrition labeling to improve macronutrient intake and reduce total energy intake (kcal)
See response to U4 above.

U13: Nutrition labeling in educational settings to improve dietary intake
See response to U4 above.

U14: Implement mass media campaign on healthy diets, including social marketing to reduce the intake of total fat, fiber, and salt, and promote the intake of fruits and vegetables
GMA supports the reference in U14 to encouraging “healthy diets.” Did the WHO intend to include fiber as a nutrient to discourage? GMA supports efforts to increase intake of dietary fiber from all sources, and food manufacturers offer a wide variety of products that provide a good source of fiber.

Conclusion

GMA is committed to helping find solutions to the prevention and control of NCDs. We appreciate the opportunity to consult on the proposed revisions to Appendix 3 and respectfully request the WHO take these comments into consideration.

Submitted by:
Melissa A. San Miguel
Senior Director, Global Strategies
Grocery Manufacturers Association
Washington, DC.