May 16, 2018

World Health Organization
Avenue Appia 20
1211
Geneva 27
Switzerland

RE: Draft First Report of the WHO Independent High-Level Commission on Non-Communicable Diseases

Dear Sir or Madame:

The Corn Refiners Association (CRA) submits this comment in response to the “Draft First Report of the World Health Organization (WHO) Independent High-Level Commission on Non-Communicable Diseases.” CRA is the national trade association representing the corn refining industry of the United States. CRA and its predecessors have served this important segment of American agribusiness since 1913. Corn refiners produce sweeteners, ethanol, starch, bioproducts, corn oil, and feed products from corn components such as starch, oil, protein, and fiber.

CRA appreciates the opportunity to provide comments on this draft report. With regard to the recommendations in the report, CRA supports Recommendation 2 which encourages engagement with the private sector, especially regarding support for innovations and technology improvements as key areas for collaboration. Further, CRA supports the point made in the report regarding the importance of public-private partnerships to the success of responding to non-communicable diseases (NCDs). We support the notion that countries should be encouraged to enter into such partnerships to complement or further enhance strategies to manage NCDs.

However, while public-private partnerships should be encouraged to respond to NCDs, CRA is concerned by the focus on “health-harming” products, especially as this is not defined in the report. Further, CRA is concerned that such an approach could shift to a single-nutrient approach to address NCDs. CRA does not promote increased consumption of sugars or other caloric sources. At current exercise levels, most Americans need to reduce their intakes of total calories, including calories from sugars and sweeteners. Caloric consumption is now in excess and pushing to eliminate consumption of one nutrient in a person’s total diet is not likely change the total number of calories consumed. Moreover, the human body does not consume each nutrient separately as a diet consists of different foods composed of many interacting ingredients. In cutting back on any one specific macronutrient, such as carbohydrates, there is not adequate guidance on how to replace calories.

NCDs will not be eradicated or significantly diminished by simply limiting consumption of one ingredient. The human body runs efficiently by deriving energy and combining the benefits of the nutrients contained within the diet. History shows how inefficient the single nutrient focus is and there needs to be attention that is more holistic and educates the public about why diet is important (e.g., prevention of diseases, nutrient deficiencies, excess calories, and a means to achieve optimal health). Today, the best way to ameliorate the state of NCDs is to advocate for an overall healthier diet and remain consistent with efforts to educate consumers.
Finally, CRA would like to comment on the limited opportunity for stakeholder feedback on this report, the very rapid turnaround for public comment and the revision of the timeline for the report which was shortened so that there is only one opportunity for public feedback. CRA would like to affirm the benefits of a more open dialogue and opportunity for multiple perspectives to be shared in order for the WHO approach to be optimum for all stakeholders. In the spirit of the recommendation for increased collaborative efforts with the industry, WHO would benefit by allowing time for a more thoughtful review and comment process. For the work on this report as well as other WHO efforts in the future, CRA encourages a more transparent process.

We appreciate the opportunity to provide comments. If there are any questions, please feel free to reach out to CRA.

Respectfully,

John W. Bode
President and CEO
Corn Refiners Association