Federalimentare Comments on the First Draft Report of the
WHO Independent High Level Commission on Non-Communicable Diseases
(Version Dated May 1st, 2018)

Introduction

Federalimentare, the Italian Food&Drink Association, thanks the WHO Independent High-level Commission on Non-communicable Diseases (HLC on NCDs) for the opportunity to share comments on its draft First Report.

Federalimentare recognizes the importance of fighting NCDs and the need for bold and innovative recommendations on how countries can accelerate progress towards SDG targets, and SDG target 3.4 in particular. Specifically, Federalimentare shares HLC’s objectives in the fight against obesity and the need to provide appropriate nutrition information and education for consumers.

The Italian case history on nutrition

Italy ranks among the healthiest countries in the world not only with relatively low rates for pathologies such as cardiovascular diseases and diabetes, but also with a long life expectancy.

This success is also connected with the adoption of a healthy and balanced diet by Italians, the Mediterranean Diet, recognized as an Intangible Cultural Heritage of Humanity by UNESCO in 2013.

The quality of the Italian food is among the best in the world. Our products, which are the pillar of the Mediterranean Diet, are widely recognized as food excellences, combining great taste with good nutritional qualities: Olive Oil, Parmesan, Parma Ham, Mozzarella, Pasta, and many others.

Moreover, food safety is a top Italian priority. A complex system of rules and regular inspections along the food chain ensure the highest quality for processed food. The Italian authorities dedicate considerable efforts to improve public health also through food safety.

On top of this, Italy pursues a comprehensive nutrition strategy. This includes far-reaching measures and permanent monitoring systems, such as observatories or nutrition platforms under scientific supervision and with participation of stakeholders in order to formulate evidence-based interventions.

From an educational standpoint, the Italian authorities conduct public education policies to encourage healthier lifestyles and commit substantial resources to appropriate consumer information specifically targeted at prevention of NCDs, fighting obesity and other risk factors, particularly among children. Specifically, the Ministry of Education adopts guidelines to discourage selling of snacks and monitoring the number of vending machines in educational institutions. Marketing of food for children is regulated and its impact reduced in consultation with the Industry. Furthermore, the Ministry of Agriculture is promoting fruits and vegetables consumption in schools.
On this front, the food industry is strongly cooperating with the authorities. In 2015, the Italian Ministry of Health signed a memorandum of understanding in collaboration with the representatives of the food industry, aimed at launching a set of voluntary initiatives where each producer sets goals and targets. In this context, the food industry has reduced sugar, saturated fat, trans fatty acids and salt for 5 categories of products, together with a constant effort to reduce serving sizes and provide additional information on labels.

Thanks to such ‘whole of society’ strategy, childhood overweight and obesity in Italy decreased by approximately 13% over the last decade.

Comments on the Draft First Report’s Recommendations

Private Sector

Federalimentare welcomes Recommendation 2(e) “Increase engagement with the private sector”, and confirms the availability of the Italian food industry to participate and offer its contribution to tackle the NCDs issue. Specifically, Federalimentare confirms the Italian food industry commitments on: 1) product formulation and innovation; 2) portion size control; 3) responsible marketing; 4) clear nutrition information to consumers; and 5) promotion of healthy lifestyles.

Should there be an interest on your side, we remain ready to share our best practices and the Italian experience on issues such as nutrition, promotion of healthy diets, prevention of NCDs, food labelling, education and information to consumers.

Federalimentare express its deep concerns on the Recommendation 2(b) “Regulatory and legislative solutions to minimize the production, marketing and consumption of health-harming products”.

Based on the Italian experience, we firmly believe that obesity and related non-communicable diseases are multi-factorial societal issues, requiring solutions based on a "whole-of-society" approach, concentrated particularly on increasing consumer education and encouraging balanced diets and healthy lifestyles.

For this reason, we believe that criminalizing individual foods or nutrients rather than encouraging balanced diets and healthy lifestyles, would prove ineffective in addressing public health concerns such as obesity and non-communicable diseases.

There is no scientific consensus at international level about what may be defined as “healthy” or “unhealthy” food. The application of nutrient profiling schemes that sets the thresholds for sodium, sugars and/or saturated fat cannot take into account the amount of food consumed, so they are calculated on a 100g basis. As a result, thresholds are arbitrarily defined, without a real link to food consumption and health. This means to categorize “good” and “bad” foods just on the basis of their nutrients content, without any consideration of the whole diet and with a real risk to give an over-simplistic information to consumers. As an example, current nutrient profiling models rewards - for instance – food and beverage products with artificial and chemical ingredients while condemns whole milk!

There are not “healthy” or “unhealthy” foods, but only “healthy” or “unhealthy” diets. Everybody agrees on the need to support “healthy diets”, where different foods are consumed in moderation and in small portions, in a diversified and balanced way according to individual needs, age and lifestyle. Moreover, physical activity is always encouraged and recommended.
At this regard, Federalimentare would like to recall that the body of evidence on sugars, saturated fat and sodium demonstrates that prevention – one of the cornerstones of the global response on obesity and NCDs – must be addressed from a holistic perspective rather than focusing on individual nutrients of concern. For instance, available scientific evidence on sugar does not support a causal link between sugars consumption and obesity and associated chronic disease. As an example, while sugar consumption decreased in UK, Australia and Canada, the obesity rate grew in their respective populations.

Therefore, we do not agree that individual food items should be “criminalized” or subject to restrictions, taxations or bans of sort. Unilateral measures based on discrimination of individual foods - such as “health warnings” or “traffic lights” labels, taxation increases and advertising bans or restrictions - will in no way effectively contribute to reducing the impact of NCDs.

Note: On page 6, there is a reference to a document titled “Saving lives, Spending less”, that is not yet available as it will be launched on May 20, 2018. Federalimentare cannot provide comments on this document as the consultation will end on May 16.