FoodDrinkEurope’s Comments on the Draft First Report of the WHO Independent High-level Commission on Non-communicable Diseases

FoodDrinkEurope, the European food and drink manufacturing organisation, welcomes the opportunity to express its views on the draft First Report of the WHO Independent High-Level Commission on Non-communicable Diseases (NCDs).

Fully acknowledging the importance of prevention and control of non-communicable diseases in Europe but also worldwide, we wish to put forward the following remarks:

- FoodDrinkEurope supports Recommendation 1, in particular in relation to recommendation 1(a)2) “Reducing sodium and eliminating artificial transfat”. Food formulation and innovation are very high on FoodDrinkEurope’s agenda, as part of its effort to promote balanced diets and healthy lifestyles. Thanks to product reformulation efforts over the past decade throughout Europe, the vast majority of FoodDrinkEurope members have already virtually eliminated trans-fats (TFAs) from partially hydrogenated vegetable oils from their products on a voluntary basis. However, for technical reasons a complete elimination of industrially produced TFAs is not possible. Through its network, FoodDrinkEurope is committed to further encourage and support companies, particularly SMEs, who sometimes still face technological difficulties in achieving this. In this context, FoodDrinkEurope supports the implementation of a recommendation of maximum 2% industrial TFAs of the total fat content of the product sold to the final consumer.

- FoodDrinkEurope strongly welcomes the overall aim behind Recommendation 2, i.e. to “increase engagement with the private sector”. In this regard, we strongly support the idea of adopting multi-sectoral and whole-of-society responses to prevent and control NCDs and we appreciate that the High Level Commission is encouraging countries “to enter into public-private partnerships to complement international collaboration” (paragraph 38). FoodDrinkEurope is one of the founding members of the EU Platform for Action on Diet, Physical Activity and Health, which brings together a large range of stakeholders each contributing towards the fight against obesity and NCDs. At national level, successes have been achieved under national platforms and public-private partnerships, e.g. the EPODE community-based programmes, the Belgian Salt Reduction Agreement and the Danish Wholegrain Partnership, to name a few. FoodDrinkEurope believes that a multi-stakeholder approach is the most viable and efficient way to tackle today’s societal challenges related to health and that all food and drink (alcoholic and non-alcoholic) producers have a role to play and should be engaged in that dialogue.
• FoodDrinkEurope recognises the role of healthy environments that are conducive to the wellbeing of children and where healthy options become the easy option. For this reason, pledges and codes have been developed for responsible commercial communications and sales practices in primary and secondary schools, which are continuously being evaluated and improved where needed in order to promote healthy eating behavior.

• FoodDrinkEurope would however like to express concern with regard to the use of the terminology “health-harming products” in relation to food and drinks (Recommendation 2 b) and c)). Classifying individual foods or ingredients as “health-harming” or “unhealthy” lacks a strong scientific basis; provided that it is safe for consumption, every food and drink can have a role in a balanced diet when consumed in moderation. FoodDrinkEurope believes that behavioural change is key to improve diets and lifestyle. This is why the food industry has for a long time been involved in the field of consumer information and provides - within its capacity and remit - its support to a wide range of initiatives and programmes that aim at increasing understanding of the role of nutrition, eating habits, moderate drinking and recommended physical activity levels.

• FoodDrinkEurope appreciates that the High Level Commission recognises the important role that the private sector plays in innovation and technology development and agrees that engagement with the private sector is critical in the implementation of technical successes.

• FoodDrinkEurope would also like to note that this Draft Report references both the WHO Director General’s Report on preparation for the UN High-Level Meeting (WHO DG Report) and the UN Secretary-General’s Progress Report on NCDs (UNSG Report) in paragraph 26. The original versions of both Reports (DG and UNSG) were prepared at the same time (December 2017), and the UNSG Report mirrored the text and language of the original DG Report, likely in an effort to remain consistent on the topic. However, after further Member State consultation, the WHO released a revised DG report on 19 April, with significant changes to text and tone. It appears that this Draft Report is referencing the original – and now outdated – WHO DG Report, as Table 5 no longer refers to “obstacles,” and the link provided in footnote 12 goes to the outdated DG Report, rather than the more current and revised DG Report. FoodDrinkEurope would therefore recommend that the term “obstacles” in paragraph 26 be replaced with “challenges and successes” to more accurately describe the text in the revised WHO DG Report, and that the link in footnote 12 be corrected to reflect the current WHO DG report and include a reference to both Table 5 (challenges) and the new Table 6 (successes). FoodDrinkEurope would also take this opportunity to encourage the UN to similarly update its Report to ensure it has not relied on an outdated WHO draft as its material basis.

Finally, any recommendations for policies designed to improve the nutrition and diet of consumers must be based on sound scientific evidence and call on the relevant institutions and authoritative bodies to utilize all relevant scientific evidence, including from industry, to inform their decision making process.
The private sector is indispensable if policy-makers wish to scale up action against NCDs. FoodDrinkEurope and its members stand ready to (continue to) be an effective partner that can assist in efforts to address obesity and other diet- and lifestyle-related non-communicable diseases and help Member States achieve their health policy objectives.

As an illustration of the above commitment to improving health and helping to tackle NCDs, we would like to refer to the commitments of FoodDrinkEurope and its members under the EU Platform for Action on Diet, Physical Activity and Health. A snapshot of these actions can be found on our website Eat & Live Well and on our recently launched website in support of the implementation of the Sustainable Development Goals.

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