FIA Response to WHO Consultation on the Draft First Report of the
WHO Independent High-Level Commission on Non-Communicable Diseases (NCDs)
(Version dated 1 May 2018)

Introduction:

Food Industry Asia (FIA) wishes to thank the World Health Organization (WHO) for the opportunity to comment on the “Draft First Report of the WHO Independent High-Level Commission on Non-Communicable Diseases (Version dated 1 May 2018)”, and provide feedback on behalf of the food industry in Asia through the e-consultation process.

FIA is a non-profit industry association established in Asia to represent the view of the food industry as a trusted partner for multi-stakeholder dialogue.

The goal of FIA is to harness the expertise of major food and beverage companies and respond to the region's complex challenges in food safety, regulatory harmonisation and health & nutrition. Our members share common values on the responsible promotion of balanced diets and lifestyles.

Together, we work with a broad range of stakeholders in Asia to promote the role of public-private partnership (PPP) as a cost-effective mechanism for delivering positive socio-economic outcomes. At the heart of our philosophy lies a belief that the private sector can play a more positive role in civil society on many of the complex challenges associated with health & nutrition. To this end, FIA is committed to working collaboratively with governments, policy makers, civil societies and academia throughout Asia, either directly or through existing local industry groups.

Industry Commitments and Actions to Tackle Non-Communicable Diseases (NCDs):

To facilitate better collaborative action to tackle NCDs, we highlight three examples where FIA works with the public sector and civil societies that adhere to the UN SDGs’ call to foster and develop inclusive partnerships:

1. Responsible Marketing to Children

   In line with the 2010 WHO Recommendations on the Marketing of Foods and Non-alcoholic Beverages to Children, FIA recognises the role of responsible marketing and we support these recommendations with continued commitment to strengthen and adapt self-regulatory measures.

   FIA is playing an important role in the implementation and monitoring of this commitment in Asia by driving adoption in the region and working with governments to codify the policy into national guidelines. This approach was designed within a framework in which robust industry-led standards which can be easily incorporated in regional and national regulatory policies to create a system responsive to the unique needs of different countries. In Asia, FIA and our members are driving these self-regulatory commitments that are effective and measurable at the national level in Singapore, India, Malaysia, Thailand, and the Philippines, through multi-stakeholder partnerships.
2. **Front of Pack Guideline Daily Amounts (GDA) Nutrition Labelling**

Front-of-pack GDA labelling is a valuable tool that was developed based on sound science, seeking to provide simplified nutrition information to facilitate consumer understanding and guide their purchase decisions. FIA has worked with its members to promote this voluntary scheme in Asia and “Fast Facts on Packs”, FIA’s Guideline Daily Amounts (GDA) Nutrition Labelling Report published in 2016; which, revealed that significant progress has been made in driving the awareness and adoption of the GDA nutrition labelling scheme as an industry initiative to tackle obesity and NCDs by encouraging consumers to make better food choices. FIA has worked closely with governments in the region including India, Thailand and Taiwan to promote this science-based nutrition labelling scheme.

3. **ARoFIIN**

The Asia Roundtable on Food Innovation for Improved Nutrition (ARoFIIN) was convened by the Health Promotion Board, an agency of the Ministry of Health in Singapore, A*STAR (Singapore’s lead government research agency), Singapore Institute for Clinical Sciences (SICS) and FIA. ARoFIIN was set up to leverage multi-stakeholder partnerships by bringing together experts from across the government, academia, industry, and civil society to initiate and sustain a regional, multi-stakeholder dialogue on tackling the double burden of malnutrition through the role of food innovation and nutrition education. The food industry is constantly innovating and reformulating their products to reduce salt, fat and sugar.

In June 2017, ARoFIIN launched findings from a study carried out by the Economist Intelligence Unit – *Tackling Obesity in ASEAN – Prevalence, Impact and Guidance on Interventions*. Commissioned by ARoFIIN, the study responds to the challenges and threats posed by obesity in the region. The aim of the report is to guide policymakers, health organisations and industry to collectively tackle the rising threat of obesity in the region.

Following the study, ARoFIIN convened a series of follow-up workshops with academia, civil society, government bodies and industry, to recommend and develop scalable country-specific solutions and interventions which are now in the final proposal stage.

**General Comments:**

FIA is encouraged by the recommendations set out in the Draft First Report which seem to be inclusive, with discussions on increasing engagement with the private sector by establishing relationships across multiple industries with the aim of all countries benefitting from PPPs promoting health and behaviour change. We are in agreement with the view put forth in the Draft First Report that effective PPPs are important to successful NCD responses, especially in strengthening the infrastructure and capacity of primary health systems, and that countries are encouraged to enter PPPs to complement international collaboration.
Specific Comments on the Four Recommendations:

Prioritization
FIA supports *Recommendation 1* and the narrowing of focus to deal with a few key issues where measurable outcomes can be achieved. From the perspective of the food industry, we wish to highlight that many of our member companies are already committed to recommendation 1 (a) 2): *Reducing sodium and eliminating artificial trans-fat*. Many of our members have been working to reduce sodium in their products globally and participate in a wide range of government-led sodium reduction initiatives at a national and regional level. Initial findings from the reformulation study carried out by FIA in Singapore show that food companies see this as one of their key priorities alongside sugar reduction, addition of fibre and fortifying their products with vitamins and minerals.

Increasing Engagement with the Private Sector
FIA is also encouraged by *Recommendation 2: Increase engagement with the private sector*. Paragraph 36 of the Draft First Report stated that “the 2011 Political Declaration on NCDs called for engagement with the private sector, especially in the areas of food and non-alcoholic beverage production and marketing.” As previously stated, FIA has been driving the development and implementation of voluntary responsible marketing pledges in Asia. However, we acknowledge the consideration that “a fresh working relationship must be established with the food and beverage, non-alcoholic beverage, restaurant, technology and media industries, with the aim that all countries benefit from public-private partnerships that promote health and behaviour change” (paragraph 38), ahead of regulatory and legislative measures should the engagement with the private sector fail to achieve public health goals (paragraph 39).

While in support of this collaborative approach suggested in the Draft First Report, FIA would like to express its concern with regard to the use of the term “health-harming products” (*Recommendation 2 b) and c)*. The use of this terminology in Recommendation 2 in conjunction with the description of certain food and beverage products with “high content of fat, sugar or salt” (paragraph 39) could result in the association of such products as “health-harming”. Although high fat, sugar and salt (HFSS) products should be consumed in moderation, we suggest that classifying such products as “health-harming”, and therefore putting them in the same category as tobacco products and alcoholic beverages, would be inappropriate, particularly where foods high in fat, salt or sugar may be an important source of essential nutrients.

Financing
FIA supports the view in *Recommendation 3 a) 1 and 3* calling for more government funding to tackle NCDs as well as carrying out an auditing process on the effectiveness of policies that have a bearing on NCDs. A study commissioned by ARoFIIN and carried out by the Economist Intelligence Unit (EIU) in 2017, titled “*Tackling Obesity in ASEAN – Prevalence, Impact and Guidance on Interventions*” found the data on obesity prevalence in the region is uneven and often absent across the ASEAN region. This contributes to the constraints in policy-making, which can in turn lead to untargeted programmes or interventions.
Accountability

FIA welcomes Recommendation 4: Strengthen accountability for action on NCDs and supports the call to simplify existing NCD accountability mechanisms created since 2011 (Recommendation 2b) and paragraph 46).

Moreover, FIA proposes that the Draft First Report calls for more attention to be paid to the need for the tracking and inclusion of global progress reporting NCD-related actions undertaken by non-State Actors. FIA suggests that the Draft First Report put forth for consideration, the inclusion of a meaningful progress reporting tool for contributions made by Non-State Actors based on paragraph 44 of the UN Political Declaration on NCDs, in the framework of relevant UN mechanisms. This would encourage a broader range of Non-State Actors to take action and measure progress – potentially inspiring governments to increase its engagement with the private sector to combat the global public health challenges.