Response to the Consultation on the Member State-led
Draft Outcome Document for WHO Global Conference on NCDs
August 2017

ACKNOWLEDGEMENT

Food Industry Asia (FIA) wishes to thank the World Health Organization (WHO) for the opportunity to participate in the consultation on the draft Montevideo Roadmap 2018-2030 on NCDs as a Sustainable Development Priority (“Draft document”) to be presented as an outcome document of the WHO Global Conference on non-communicable diseases (NCDs), to be held in Montevideo, Uruguay, 18-20 October 2017.

OVERALL COMMENTS

NCDs pose a significant threat to populations across the world, including the Asian region, where a number of people suffer from malnutrition in all its forms. FIA recognizes the urgency to address the issue of NCDs and welcomes the goal of the WHO Global Conference on NCDs to enhance policy coherence by involving all stakeholders to address the issue.

FIA is particularly encouraged by the draft document’s recognition of the significant role of non-State actors (Para 31) in promoting the highest attainable standard for public health. As a non-profit industry association established to represent the view of the food industry in Asia, FIA is a staunch advocate of multi-stakeholder dialogue and we endorse the draft document’s call for meaningful participation of the private sector in Asia. The industry take its role in complementing the efforts of governments to achieve SDG 3.4 (Para 32) and fully support governments in their actions towards addressing NCDs as a development priority in the context of achieving SDG 17 (Para 33).

Our experience with multi-stakeholder collaborations and public-private partnerships has proven the value of constructive engagement.

In Asia, we believe that the private sector can significantly contribute in both the debate and the solution to the complex and multifactorial issue of the double burden of malnutrition and NCDs. Given the complexity and multifactorial causes of malnutrition and NCDs, it is essential that all stakeholders work together in a coordinated and inclusive manner to develop holistic, feasible, impactful and sustainable solutions for all.

We note the draft document’s assertion of industry’s interference in regulatory and fiscal measures. Our industry is committed to actively work with all stakeholders in the development and implementation of effective interventions necessary to address the shared concern of NCDs. We welcome any opportunity to address this particular observation on the industry (Para 3), as we strive to sustain our industry’s current actions and ensure our future plans to contribute in helping address NCDs and malnutrition in Asia.
In this response to the public consultation on the draft document, we would like to highlight a constructive case for engagement.

We would also like to provide comments on two specific points in developing the actions in the Roadmap: first, the need to consider the variabilities in the Asian context with regards to setting policy, and second, the importance of full analysis and impact assessment in fiscal policy development.

**INDUSTRY COMMITMENTS AND ACTIONS**

FIA supports a number of areas the draft document has iterated as part of the solutions to achieve SDG 3.4, where the industry has been and will be committed to playing a bigger role to address NCDs collaboratively with the governments and other stakeholders. These areas include:

a. Increasing the availability and affordability of healthy, nutritious food (Para 22),  
b. Enabling healthier food choices (Para 22),  
c. Engaging with the private and public sector (Para 24)  
d. Reformulating products to provide healthier options that are affordable and accessible and reducing the impact of the marketing of unhealthy foods and non-alcoholic beverages to children (Para 26),  
e. Meaningful participation of private sector in building coalitions and alliances for the prevention and control of NCDs (Para 32).

We also welcome the promotion of health literacy, specifically in the school environment and through public awareness campaigns (Para 20).

In line with the commitments made by the International Food & Beverage Alliance (IFBA) and the Consumer Goods Forum (CGF), FIA has been championing in Asia the initiatives of product formulation, nutrition labelling, responsible marketing to children, and promotion of healthy lifestyles, among others.

Below we detail three of our initiatives in Asia to promote nutrition education through front-of-pack labelling and improve food environments through responsible marketing practices.

1. **Promoting GDA labelling systems to facilitate consumers in making informed choices**

Our members are aware and already responding to the increasing need by consumers for ways to manage their calorie intake. Consumer awareness of the calories provided by a food or beverage product is essential and we are committed to providing transparent, easily accessible and meaningful nutrition information to help consumers make healthier choices that meet their needs.

To this end, FIA in 2012 launched region-wide guidelines on the consistent use of voluntary front-of-pack nutrition labelling in the form of percentage Guideline Daily Amounts (GDAs). The *FIA GDA Toolkit* provides an industry guide to help its members and small and medium-sized (SMEs) to apply the logo in various markets.

The scheme is voluntary for all manufacturers and retailers, with support for its implementation provided by FIA and national trade associations in each country. It is intended to result in nutrition labelling that is:
• Clear, meaningful and understandable, thereby empowering the consumer to make informed dietary choices;
• Applied in a consistent manner: recognising that for some products, full nutrition information may not be relevant or feasible;
• Science-based and non-discriminatory;
• Based on the use of Guideline Daily Amounts: GDAs;
• Supported by nutrition labelling education programmes that help consumers achieve positive behavioural changes.

Our members have already made progress in rolling out these voluntary labels on their key brands across Asia and we have increased penetration in all countries as of 2015. *Fast Facts on Packs*, FIA’s *Guideline Daily Amounts (GDA) Nutrition Labelling Report* released in 2016, reveals that significant effort has been made in driving availability and awareness of GDA nutrition labelling as an industry initiative to tackle obesity and other NCDs. The findings showed that out of the 13 FIA members surveyed across 19 Asian markets, 85% had rolled out GDA labelling, and more widely across more product categories.

FIA members have achieved 52% adoption growth in Asia and 58% in Southeast Asian countries since making a collective commitment to adopt a front-of-pack GDA labelling approach in Asian markets based on a common set of criteria in 2010, as one of many industry-led initiatives to tackle the growing incidence of obesity and NCDs in the region.

2. **Responsible marketing**

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. Industry-led self-regulation has formally been recognised as a means of implementing the policy objective of reducing the impact on children of the marketing of foods high in fat, sugar and salt in the 2010 WHO Recommendations.

In 2008, the International Food and Beverage Alliance (IFBA) members voluntarily committed to restrict how and what they advertise to children globally. FIA is playing an important role in the implementation and monitoring of this commitment in Asia by driving adoption beyond FIA member companies to local companies and working with governments to codify the policy into national guidelines. This approach was designed within a framework in which robust industry-led standards can be easily incorporated in regional and national regulatory policies to create a system responsive to the unique needs of different countries.

The self-regulatory approach is continually monitored globally to make sure of its compliance. In the latest 2016 Compliance Monitoring Report, it reported that IFBA members globally have continued to demonstrate a high rate of compliance, in this seventh year of compliance monitoring – 97% for television advertising, 99.8% for internet advertising and 100% for print advertising in child-directed media.

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 public-private partnerships.
For instance, in Singapore, the Ministry of Health, Health Promotion Board, Advertising Standards Authority of Singapore, the Singapore Manufacturing Federation (SMF), the World Federation of Advertisers, and FIA collaboratively developed the Singapore Code of Advertising Practice (SCAP) in 2014. The SCAP is comprehensive in scope, applicable to all advertisers in Singapore, and based on common nutrition criteria on certain product categories that distinguishes between products that may and may not be marketed to children.

We believe that self-regulation is cost-effective, measureable, flexible, and can quickly respond to societal concerns. We continue to increase our outreach to relevant stakeholders in Asia to further improve our implementation of industry practices in this area and our approach to self-regulation.

3. **Fostering public private partnerships that tackle malnutrition in Asia**

The double burden of obesity and under nutrition has become an emerging threat to public health and healthcare systems in Asia. It requires immediate action driven not only by governments and regulators, but by innovations in the food industry driven by the private sector, as well as scientists and academics, operating in the region.

One area where public-private cooperation can be further explored is on building up the knowledge and capacities of stakeholders, particularly policymakers, on the causes and drivers of NCDs.

The Asia Roundtable on Food Innovation for Improved Nutrition (ARoFIIN) was set up in January 2015 to leverage public-private partnerships to bring together experts from across government, academia, industry, and civil society, to initiate and sustain a regional, multi-stakeholder dialogue on the role of food innovation in tackling obesity and chronic disease. ARoFIIN was convened by the Health Promotion Board (HPB) (agencies under the Ministry of Health), A*STAR (Government-backed research agency in Singapore), Singapore Institute for Clinical Sciences (SICS) and Food Industry Asia (FIA).

ARoFIIN is made up of a group of key decision-makers who work towards fostering a conducive forum to support dissemination of science-based information on the causes and drivers of obesity and chronic disease, and improve clarity on the barriers and enablers for R&D and food innovation in the region. This public-private platform gives us the ability to scale up projects at a quicker rate, ease the transfer of technology and skills, and conduct wider outreach and dissemination of knowledge and resources.

In June 2017, ARoFIIN launched findings from a study carried out on its behalf by the Economist Intelligence Unit: “Tackling Obesity in ASEAN – Prevalence, impact and guidance on interventions.” The study commissioned by ARoFIIN, responds to the challenge and threat posed by obesity in the region. Its goal is to help guide policymakers, health organisations and industry to work together and tackle the rising threat of obesity in the region.

**SPECIFIC COMMENTS**

1. FIA suggests a review of the draft document’s proposal to work for the “harmonization of global infectious disease and NCD agendas in both prevention and health systems at the national and global development levels” (para 11).
While we see the value of a harmonised agenda at the national and global development levels in order to leverage on integrated approaches and maximizes resources, Asia is not one homogenous geographic mass but is composed of national economies at significantly different economic development and peoples with diverse cultures that consequently have varying eating habits. As such, the NCD agenda particularly in Asia should be guided by specific national context and driven by national priorities.

The Economist Intelligence Unit (EIU) highlighted that, when assessing the drivers of obesity in the Asian context, a number of Asia-specific factors should be taken into consideration such as economic development status, the cultural and behavioural factors (a higher percentage of unregulated street food), and also the prominent risks of food safety in Asia¹.

FIA supports the view that it is vital that policy decisions are made on evidence-based science that takes into context the local cultural needs.

2. The draft proposes (Para 15) that national NCDs responses consider the appropriate interventions that have the capacity to generate revenues such as those proposed in the draft document, particularly the taxation of certain consumer products (Para 15). These include:

   a. What type of regulation is appropriate, proportionate, and workable for the population?

   b. What will be the ultimate impact of the chosen intervention to the country in the short and medium-term?

There are many views as to the effectiveness of such measures on diet and health outcomes. An analysis by the McKinsey Global Institute of 74 interventions² to address obesity that are being discussed or piloted around the world found that the highest-impact intervention areas are portion control and product reformulation while the EIU ‘Tackling Obesity in ASEAN’ report highlighted that low glycaemic³, low calorie, low fat and low carbohydrate diets, as well as regular exercise, have shown to be the most promising in reducing obesity at both the individual and population levels. In our view, the Roadmap should be enhanced through further work on the required multi-stakeholder action and their implementation at local level.

Food Industry Asia (FIA) agrees that obesity is a multi-factorial issue and supports policy actions and interventions aimed at influencing the behaviour and habits of the population such as improving diet,

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³ The Glycaemic Index (GI) is a ranking of food based on the ability to raise blood glucose level when 50 g of carbohydrate from that food is eaten. They are ranked low, moderate or high GI food based on the results. Low GI food raises blood glucose level slower than high GI food. However low GI does not mean that the food is nutritious.
lifestyles and obesogenic environment². A comprehensive approach which combines a range of tools is needed to reduce malnutrition and obesity-related NCDs.

FIA supports the implementation of coherent policies and making available to countries cost-effective, affordable and evidence-based NCD interventions as concrete actions to reduce inequities and premature deaths from NCD (Para 3). FIA is of the view, as well, that policy interventions developed with inputs and commitments from all stakeholders; and grounded on science-based evidence where all components of the policy support a clear objective, are likewise crucial for effective and sustainable solutions in order to overcome not just the double burden of malnutrition in Asia but also NCDs as a global sustainable development priority. This means a multi-stakeholder approach is required, where the industry, by being part of the solution, can play a key role in supporting the public health agenda.

ABOUT FIA

Food Industry Asia (FIA) is a non-profit industry association established in Asia to represent the food industry as a trusted partner in multi-stakeholder dialogue.

Our goal 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 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, academics and civil society throughout Asia, either directly or through existing local industry groups.

Please visit www.foodindustry.asia for further information.