Introduction

The Grocery Manufacturers Association (GMA)\(^1\) thanks the World Health Organization (WHO) for the opportunity to comment on the draft outcome document for the October Global Conference on Non-Communicable Diseases (NCDs).

The conference will impact a number of issues of interest to GMA, particularly regarding the role of the private sector in contributing to improving nutrition and health. To truly achieve the Sustainable Development goals, we believe all facets of society, including the private sector, have an important role to play in supporting economic growth and development and helping people everywhere achieve and maintain healthy diets and lifestyles. Given the complex nature of nutrition and health, it is essential that all stakeholders work together to develop holistic, sustainable solutions. We believe that real progress can be made by constructive, transparent engagement between governments, the private sector, and civil society.

General Comments

GMA welcomes the multiple ongoing international efforts to place nutrition at the heart of sustainable development, and we agree food security and nutrition are essential to achieving the Sustainable Development Goals (SDGs). Industry stands ready to continue working collaboratively with governments, consumers, and other stakeholders to help provide the products and information people need to eat healthy, balanced diets.

The food and beverage industry’s many contributions to global efforts to improve nutrition and combat NCDs are guided by science-based principles that include:

- Providing a range of nutritious product choices and marketing them in ways that promote healthy lifestyles;
- Emphasizing the importance of achieving a balance throughout life of physical activity and nutrition;
- Improving awareness and understanding of nutrition and energy balance;
- Undertaking responsible advertising practices, taking into account the special needs of children;

\(^1\) Founded in 1908 and based in Washington, D.C., GMA is the voice of more than 300 leading food, beverage and consumer product companies that sustain and enhance the quality of life for hundreds of millions of people in the United States and around the globe.
Communicating clearly through labeling, packaging, websites, brochures, and in-store communications to enable consumers to make informed choices; and

Partnering with other stakeholders in these endeavors.

The food and beverage industry has undertaken significant initiatives across all of these areas, in particular on new and reformulated products, packaging innovations, enhanced nutrition information, communications to promote healthy lifestyles, and partnerships aimed at promoting physical activity and nutrition education. We provide further detail on these efforts in the appendix to this document. We have made real progress, but the work is not done, and we are committed to continuing our efforts and to work in collaboration and partnership with governments, the WHO, and other stakeholders in this endeavor.

Specific Responses to the Montevideo Roadmap

Multi-stakeholder Approaches

To maximize the contributions of all stakeholders and achieve the goal of reducing the burden of NCDs worldwide, GMA recommends the Montevideo roadmap should more explicitly acknowledge and call for countries to build on the knowledge, expertise, and resources of all relevant stakeholders, including the private sector. The food and beverage industry has a long and successful history of engaging on nutrition and health issues at national, regional, and global levels. In fact, key public health initiatives, such as the development of salt reduction strategies, could not have been achieved without constructive engagement between health authorities and our industry.

Multiple WHO and UN strategies recognize that effective responses to improve health require whole-of-society approaches and increased collaboration of governments, civil society, and the private sector. While the draft Montevideo roadmap appears to support this approach, GMA believes references to a presumed conflict between private and public objectives (such as paragraphs 3 and 24) are misplaced and do not support the common understanding of shared goals and responsibilities. Paragraphs 31-33 of the draft roadmap should be revised to include benefits of engagement with all stakeholders and should not single out the private sector for any specific or limited terms of engagement. GMA firmly believes that transparent, equitable public-private collaboration is mutually beneficial and creates shared value to achieve common goals.

Evidence-based Policies

GMA recommends the Montevideo conference and roadmap focus on improving the evidence base regarding effective interventions that improve health outcomes. While the evidence of the cost of NCDs is well-established, industry and governments need to better understand how to identify factors that most influence healthy diets and lifestyles, implement effective interventions (regulatory or otherwise), and measure success in changing consumer behavior and improving health.

GMA welcomes the emphasis in paragraphs 5, 6, and 23 on identifying “cost-effective” and “evidence-based” interventions but suggests the WHO specifically reference the importance of
impact-assessment and commit to policy recommendations that are based on good regulatory practice (including transparent stakeholder consultation, cost/benefit analysis, and assessment of alternatives to regulation). Further, GMA notes that the United States and others have raised concern about the lack of evidence to support recommending selective taxes as cost-effective ways to combat obesity, including recommendations to tax sugar-sweetened beverages as in paragraph 15. Consistent with the WHO’s determination that taxing sugar-sweetened beverages is not a “best buy” policy, GMA recommends the reference be removed.

GMA requests the draft roadmap (e.g, in paragraphs 17, 19, 22, and 30) be revised to reflect that consumers must be encouraged to adopt a balanced diet – eating a wide variety of foods in the right proportions to achieve and maintain a healthy body weight. Focusing on individual ingredients or specific foods is inconsistent with evidence and consumer behavior and thus less likely to be effective over time. There is no agreed scientific basis to classify individual foods as “healthy” or “unhealthy” according to their nutritional composition or their “commercial” status. Rather, there is sound science supporting categorization of “good diets” and "bad diets," based on consumption of nutrients from all sources.

GMA suggests the draft roadmap be revised to reflect the impact of other interventions, such as improved food safety and nutrient fortification that improve health and nutrition outcomes as part of comprehensive national-level approaches to develop healthy dietary patterns.

**Policy Coherence**

GMA welcomes the WHO’s intent to focus on “policy coherence” and urges that member governments undertake robust, comprehensive review of the impacts of all policies across sectors. GMA hopes that participation in the conference will reflect the necessary inter-ministerial communication and consultation critical for ensuring robust, evidence-based and ultimately effective policy action. The draft roadmap’s repeated references to “policy coherence” should be clarified to ensure cost-effective, evidence-based recommendations are consistent with member states’ domestic legal frameworks and international commitments.

Funding and budgetary concerns provide an example of the need for interdisciplinary approaches, for example to include economic and fiscal experts in consideration of the cost-effectiveness and evidence-base to assess fiscal measures, as well as the net benefit of any such measure and the potential for impacts on other determinants of health including employment and tax revenue. GMA agrees financing for NCD related initiatives must be “adequate, predictable and sustained” (paragraph 14).

GMA shares the WHO’s concerns about the interrelation of poverty to disease. GMA suggests the roadmap (e.g., paragraph 17) take into account the contribution of increased economic growth to alleviating poverty, improving health, increasing food security, and eradicating malnutrition. Further, GMA suggests the draft roadmap be revised to reflect the value of rules-based trade as a key enabler for this sustainable economic growth and development. GMA supports the need to develop cross-cutting disciplines for development of food systems that improve nutrition. For example, science-based standards for food safety are a critical component
of advancing food safety, food security, food waste, nutrition, and other related issues. On this basis, we suggest paragraphs 17, 19, and 22, in particular, take a more holistic view of the impact of global, rules-based trade in food and agricultural products.

**Conclusion**

GMA welcomes the WHO’s commitment to developing cost-effective, evidence-based, multi-stakeholder approaches to reducing the burden of NCDs. While paragraph 13 of the draft roadmap contends NCDs are a low priority across UN agencies and civil society, GMA believes governments, international organizations, and stakeholders have demonstrated consistent and sustained interest in and commitment to improving nutrition. The Montevideo conference is an important opportunity to align evidence-based efforts that leverage each stakeholder’s strengths and resources to accelerate progress and help people everywhere achieve and maintain healthy diets.

GMA is committed to working collaboratively with governments and other stakeholders to improve nutrition outcomes. We appreciate the opportunity to consult on the Montevideo draft roadmap, and we hope our comments demonstrate the depth and breadth of industry’s commitment and experience.

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Appendix: Industry Contributions to Improving Nutrition

To augment the suggestions above and provide further information about industry’s contributions to improving nutrition, GMA includes below some illustrative examples of industry achievements in the United States. These approaches offer important lessons learned that can be considered for implementation of nutrition policies and initiatives in other settings.

**Product Innovation**

GMA has documented efforts by U.S. food and beverage companies to reformulate and innovate products and provide clear nutrition labeling and consumer information. In 2014, GMA published cumulative results (2002-2013) of these efforts by 69 member companies representing about $245 billion in annual U.S. sales (roughly half of U.S. food and beverage sales). Highlights include:

- 94 percent of companies reported nutritional improvements in over 30,000 products and sizes, with reductions in saturated fat, trans-fat, calories, sugar and carbohydrates and sodium;
- 81 percent of companies reported providing enhanced front-of-pack labeling information; and
- 77 percent of companies reported sponsorship of national and local initiatives to improve nutrition education and encourage regular physical activity, investing over $300 million in these activities between 2002 and 2013.

A separate study in 2014 by GMA demonstrated a 16 percent reduction in sodium in member-company products purchased between 2008 and 2013, with decreases appearing in those food categories that contributed the most to sodium intakes in the United States.

To further demonstrate the impact of industry initiatives, GMA offers the example of the Healthy Weight Commitment Foundation (HWCF). Founded in 2009, the HWCF is a partnership between industry, non-governmental organizations, and educators whose aim is to reduce obesity, especially childhood obesity. HWCF members voluntarily pledged to collectively remove one trillion calories from their products (against a 2007 baseline) by the end of 2015. HWCF focuses its efforts on families and schools and promotes ways to help people achieve a healthy weight through energy balance – calories in and calories out.

A study published in 2014 by the American Journal of Preventive Medicine and funded by the Robert Wood Johnson Foundation (RWJF) found that by 2012 HWCF participating companies had collectively cut 6.4 trillion calories, exceeding their 2015 goal by more than 400 percent. Companies achieved this calorie-reduction goal by taking a variety of actions, including innovating lower-calorie products, reformulating products where possible, and reducing portion sizes.
Researchers at the Hudson Institute evaluated the impact of HWCF’s commitments on product sales. The study concluded:

- 82 percent of participating companies’ sales growth was driven by lower-calorie products – over four times the growth rate for higher-calorie products;

- Lower-calorie products’ sales increased $1.25 billion vs. less than $300 million for higher-calorie products; and

- Lower-calorie products accounted for ten of the 15 new products with sales of over $50 million.

Nutrition Information and Education

GMA supports fact-based nutrition labeling that helps consumers make informed choices about balanced diets. Facts Up Front (FUF) is a voluntary initiative created in 2011 by the Washington, DC-based Grocery Manufacturers Association (GMA) and the Food Marketing Institute (FMI). FUF is a simple and easy-to-use labeling system that puts key nutrition facts on the front of food and beverage packages – displaying the calories, saturated fat, sodium, and sugar in each serving.

Almost 90 percent of U.S. grocery sales by GMA members use FUF. GMA members have made significant investments to develop the FUF consumer website (www.factsupfront.org), consumer research, and stakeholder outreach including media campaigns and ongoing consumer education efforts. To continue to improve consumer understanding, GMA and FMI are extending the reach of consumer education efforts through key partnerships with groups such as Share our Strength. Share Our Strength’s Cooking Matters program, in support of its goal of “No Kid Hungry,” will feature FUF in training materials for teaching basic nutrition, shopping, and cooking skills to individuals in low-income areas in the United States.

A study published in September, 2015 in the Journal of Consumer Affairs reflects the Facts Up Front communications campaign evaluation survey. The publication provides further support that Facts-Up-Front icons are visible, easy to understand, and helpful to the consumer. Additionally, two important articles on front-of-pack nutrition labeling were published in respected journals in spring 2014. The first article, published in the Journal of the Academy of Nutrition and Dietetics (JAND)3, is based on consumer research GMA commissioned the International Food Information Council Foundation to conduct in 2010 to examine consumer comprehension, ease of understanding, and interpretation of nutrition information in the uniformly formatted, voluntary front-of-package labeling system that was under consideration by GMA and FMI. The research and subsequent JAND article finds that robust front-of-package labeling can significantly

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improve consumers’ ability to identify and understand a food’s nutrition information, and to make informed choices about their purchases. Several articles in respected journals have found that fact-based front-of-package labeling like FUF significantly improves consumers’ ability to identify and understand nutrition information and make informed choices about their purchases.  

GMA strongly supports efforts to improve and expand nutrition education. As noted above, GMA and FMI are extending the reach of consumer education efforts through key partnerships with groups such as Share our Strength. In addition, GMA is a founding member of the U.S. Nutrition Labeling Education Consortium (NLEC), a consumer-focused public-private partnership aimed at coordinating efforts to strengthen public information and education on food, menu, vending, and other nutrition labeling in the United States. NLEC is designed to bring together representatives from the food and beverage industries, health professional organizations, consumer organizations, and others, including potentially government liaisons to coordinate efforts for stronger consumer nutrition labeling education.

We note there are significant evidence gaps in understanding how label format impacts consumer behavior. GMA supports the development of science-based global standards in the Codex Alimentarius, for example, to establish dietary reference values for individual nutrients. Where science-based standards exist, GMA urges countries to work toward regulatory coherence wherever possible, so as to avoid unnecessary divergences.

GMA believes that all public health policies must be based on scientific evidence. International recommendations and national-level policies that are not based on science undermine international norms and standards, including those set by the Codex Alimentarius, and impose direct and indirect costs that could limit improvements to public health. Furthermore, interventions that isolate individual products or nutrients and fail to address total dietary consumption and lifestyles (including ways to encourage less sedentary behavior) are unlikely to impact meaningfully the incidence of obesity and NCDs.

Responsible Marketing

The 2010 WHO Set of Recommendations on the Marketing of Foods and Non-alcoholic Beverages to Children formally recognized industry-led self-regulation as an effective means of reducing the impact of food marketing on children. U.S. companies have voluntarily taken concrete steps to help drive changes in the marketplace and improve the types of products advertised to children. In 2006, the U.S. Council of Better Business Bureaus (BBB) and leading U.S. food and beverage advertisers created the Children’s Food & Beverage Advertising Initiative (CFBAI).

Under CFBAI’s Core Principles participants commit that in advertising primarily directed to children under age 12 (“child-directed advertising”) they will depict only healthier or better-for-

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5 CFBAI’s Core Principles and other program materials are available on CFBAI’s website at www.bbb.org/kids_food.
you foods. The participants agree to CFBAI oversight and to be held accountable for failure to comply with their commitments. CFBAI extensively monitors covered media for compliance and requires participants to submit detailed self-assessments annually. Each year CFBAI publishes a compliance and progress report. It has found outstanding compliance every year.

Since December 31, 2013, participants may advertise only foods that meet CFBAI’s category-specific uniform nutrition criteria in advertising primarily directed to children under age 12. CFBAI’s uniform nutrition criteria replaced and are stronger than previously used company-specific nutrition criteria.

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