



## Briefing note

### Management of potential conflicts of interest in nutrition policy

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#### Background

Nutrition policy increasingly aims to incentivise a healthy food supply – in particular, reductions in salt, fat and sugar content of food – and promote food environments that support healthy diets. In this context, private sector actors such as the food industry can add valuable insights, particularly regarding technical aspects of designing and implementing nutrition policy that targets food composition, marketing and retail. In Fiji's draft Food and Nutrition Security Policy, it is planned that the private sector will be represented on the Technical Working Group.

However, conflicts of interest have been identified for many food industry actors regarding policy for addressing diet-related non-communicable diseases (NCDs), as such policy aims to reduce consumption of unhealthy (often highly profitable) foods. The member states of the World Health Organization (WHO), including Fiji, have recognised the importance of ensuring that food and nutrition policy making is protected from undue influence of commercial and other vested interests, in the Global Action Plan for the Prevention and Control of NCDs, 2013 – 2020.

This briefing note summarises current best practice for identifying and managing conflicts of interest for nutrition policy making.

#### Identifying and preventing potential conflicts of interest

Preventing conflicts of interest can be facilitated by the inclusion of a transparent and actionable framework that ensures integrity in the conduct of the multisector platform. This can be achieved by including the following in the policy document:

1. Communication of policy goals and stakeholder roles
  - a. Clear policy goals and objectives, with respect to the public interest
  - b. Articulation of rules and partner roles and responsibilities
  - c. Articulation of appropriate roles of different stakeholders at different points in the policy process (e.g. establishment of policy objectives and instruments, policy design, and planning for implementation)
2. Transparency mechanisms
  - a. A mechanism to mandate disclosure of interests of all stakeholders, including a statement of the types and consequences of conflicts of interest that may occur
  - b. Procedures for public reporting of Working Group decision making processes
  - c. Procedure for internal complaints regarding potential conflicts of interest
  - d. Clear statements of the evidence base relating to the policy decisions
3. Balancing representation
  - a. Inclusion of groups acting in the public (consumer) and public health interest, such as academics and other members of civil society (eg. NGOs)

#### 4. Strategies for mutual accountability and monitoring

- a. Processes for monitoring policy implementation and outcomes, with respect to public health nutrition goals
- b. Regular independent review of declarations of interest and transparency
- c. Public communication to relevant audiences about activities and outcomes relating to risk management for conflicts of interest (below) in a transparent and timely manner

#### Developing a strategy for risk management

Prevention of Col should be the primary strategy, however having written procedures for being able to identify if a potential or real conflict of interest is occurring by a particular stakeholders or sector is essential. The policy should include:

- A pre-defined risk assessment approach, stating clearly who is responsible for:
  - Profiling and performing due diligence and risk assessment of policy stakeholders
  - Documenting the differences in interest of stakeholders, and how they align with overall policy goals
  - Balancing risks and benefits – i.e. determining the benefits a particular sector or stakeholder provides for the nutrition policy, including consideration of the Ministry's reputation, the nutrition policy implementation, and policy coherence with other government policies and objectives
- A clear statement of a systematic process for engagement or disengagement with stakeholders who have a conflict of interest, with options including:
  - Public acknowledgement and affirmation after public disclosure of interests, including perceived conflicts of interest, may suffice without any further action required
  - Behaviour modification, such as the conflicting interest (eg. Financial), non-participation in decisions or policy debates for which a Col exists
  - Mutual dialogue and negotiation among all stakeholders; for example, a process to reach consensus regarding the management of the stakeholder with the [apparent] conflict of interest
  - Different options for stakeholder exclusion, including: restricting decision making on specific initiatives; excluding participation on specific initiatives, temporary exclusion from the multi-sector/stakeholder platform; permanent exclusion.

#### Further information

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