



The International Food & Beverage Alliance

Comments on the Draft for Negotiations of the UN Committee on World Food Security's

Voluntary Guidelines on Food Systems for Nutrition

The International Food & Beverage Alliance (IFBA) ¹ offers the following comments on the Draft for Negotiations of the Voluntary Guidelines on Food Systems for Nutrition (VGFSyN).

We welcome many of the changes made in this draft from Draft One, including the specific guidance on front-of-pack labelling and the recognition of the critical importance of multistakeholder collaborations. We, are however, disappointed at the emphasis around the use of fiscal and some regulatory measures, for which, to date, there is little evidence of the impact on public health, and the lack of recognition given to the significant and successful contributions the food and beverage industry has made, and continues to make, through voluntary collaborations with governments, to improve global health.

General Comments

IFBA fully supports the CFS's objective to "contribute to transforming food systems and promoting sustainable food systems to ensure that the food that contributes to sustainable healthy diets is available, affordable, accessible, safe and of adequate quantity and quality..." as set out in paragraph 24.

IFBA members are committed to providing access to safe, convenient and nutritious foods and beverages and helping consumers achieve healthy, balanced diets. We are leveraging our scale and expertise across the areas it can have the greatest impact – agriculture, climate, water, products, packaging and consumers - to help build a healthy, sustainable food system.

We also support the "systemic, multisectoral, science- and evidence-based approach" the CFS has taken in developing the voluntary guidelines (paragraph 32.a). Sustainable food systems cross all sectors and all stakeholders and interventions aimed at transforming or promoting the food system must be supported by strong evidence of what works and why.

We appreciate the CFS's aim to provide a framework that brings all stakeholders involved in food systems "together to ensure healthy diets for everyone." (paragraph 33). We welcome the recommendation that governments facilitate "an inclusive and transparent dialogue" ensuring the

¹ IFBA is a group of twelve international food and non-alcoholic beverage companies – The Coca-Cola Company, Danone, Ferrero, General Mills, Grupo Bimbo, Kellogg's, Mars, McDonald's, Mondelēz International, Nestlé, PepsiCo and Unilever – who share a common goal of helping people around the world achieve balanced diets and healthy, active lifestyles. IFBA is a non-commercial, non-profit making organization, in special consultative status with ECOSOC.

participation of all stakeholders working with or in food systems, including the private sector (paragraph 3.1.2.b).

Creating a healthy and sustainable food system to combat malnutrition in all its forms and ensure healthy diets for all will only be achieved by governments, civil society and the private sector working together in partnership. Multistakeholder partnerships are critical to achieving the transformative change we are all seeking. As leading food and beverage manufacturers, we recognize the responsibility we have to help end hunger and create a sustainable food system to feed a growing global population and have committed to do our part.

Specific Comments

Promote evidence-based solutions through the voluntary guidelines

In keeping with the CFS's objective to have a set of guidelines that are science- and evidence-based (paragraphs 25 and 32.a) – an objective we wholly support – and to further strengthen this guidance, we would recommend that references to establishing, promoting or strengthening regulatory and legislative frameworks, or nutrition standards or national food-based dietary guidelines should be specified to be “*evidence-based*” in each instance. Accordingly, we would propose the following amendments:

Paragraph 3.1.3.a: “Governmental actors should establish or strengthen ***evidence-based*** regulatory and legislative frameworks to govern private and public sector activities related to food systems...”

Paragraph 3.2.4.d: “Governmental actors should promote ***evidence-based*** regulatory instruments and incentives to promote reformulation...”

Paragraph 3.2.4.e: “Private sector actors should strive to meet public health goals aligned with ***evidence-based*** national food-based dietary guidelines...”

Paragraph 3.5.1.b: “Governmental actors should develop ***evidence-based*** nutrition standards...”

Refer to industrially-produced trans-fat, as per WHO wording

We note the intention to provide a set of guidelines “promoting policy coherence” (paragraphs 19, 25, 33, 3.1.1.a). In this regard, we would point out that in several instances the VGFSyN refers to limiting or eliminating the intake of “trans fats.” One of the World Health Organization’s priority targets in its 13th General Programme of Work - a target adopted by IFBA members - is the elimination of “*industrially-produced trans fats*,” as distinguished from naturally occurring trans fats, from the global food supply by 2023.² For the sake of consistency and policy coherence, we would recommend that references in the VGFSyN to “trans fat” be changed to “***industrially-produced trans fat***” (paragraphs 20, 22, 3.2.4.e).

Create incentives for local food retailers

We support the recommendation in paragraph 3.3.1 e) that governments and consumer associations incentivize local food retailers to increase the availability of nutritious foods. However, we believe the recommendation to allow governments and, particularly, consumer associations, to “**regulate**” food retailers is an overreach and propose the deletion of the word “**regulate**” in this paragraph.

Ensure consistency with key Political Declarations, including 2018 PD on NCDs

In several instances, the VGFSyN recommends the use of fiscal policies and regulatory measures to restrict the marketing of products high in fats, sugar and salt (3.2.4.d) or to promote the affordability of healthy diets and nutritious food (paragraph 3.3.2), but omits to acknowledge the fact that government-led and industry-led voluntary industry initiatives have proven to be very effective in improving the nutrition of products and transforming food and beverage portfolios, improving the nutritional composition of products marketed to children and increasing nutrition literacy. We recommend that these two paragraphs be re-worded to also include a reference to voluntary industry initiatives:

Paragraph 3.2.4.d: “Governmental actors should promote *evidence-based* regulatory instruments and incentives **and government-led voluntary industry initiatives** to promote reformulation...”

Paragraph 3.3.2: “Governmental actors should consider fiscal policies *and government-led voluntary industry initiatives* to promote the affordability of healthy diets...”

While IFBA does not oppose regulation per se, it is a question of what type of regulation is appropriate, proportionate and workable and what the ultimate impacts will be. There are many views as to the effectiveness of such measures on diet and health outcomes. In our view further work is needed to assess the impact of these measures before fiscal policies are recommended and activated.

In addition, in the spirit of the CFS’s stated intention to integrate existing frameworks for action adopted in the context of the UN system (paragraph 28) into the VGFSyN, it should be noted that neither the 2018 *Political Declaration of the third high-level meeting of the General Assembly on the prevention and control of non-communicable diseases* nor the 2019 *Political Declaration of the high-level meeting on universal health coverage* considered taxation to be an appropriate measure.

Encourage multi-stakeholder approach, including private sector

Section 3.5 recommends a variety of policies and tools to be undertaken by governmental actors, UN agencies, civil society organizations, medical and health practitioners to provide education and information on a variety of issues, including healthy diets, nutrition literacy and to promote social and behavior change, yet fails to include the private sector in any of these actions. IFBA members have been working in collaboration with governments and civil society organizations for many years in programmes aimed at improving the health and well-being of people around the world. We have a wealth of expertise in nutrition science, market research, marketing and consumer insights. We believe mass media and public education campaigns can benefit from our expertise and welcome the opportunity to participate in collaborative efforts with governments and other stakeholders in these efforts. We

would, therefore, recommend the inclusion of the **private sector** in paragraphs 3.5.1.g and h, 3.5.2.a and b, and 3.5.3.b.

Support the adoption and enforcement of advertising codes of conduct

We recognize the need for responsible marketing practices and support the recommendation to limit marketing to children (paragraph 3.5.1.b). IFBA’s *Global Policy on Marketing Communications to Children*, which applies in every country where IFBA members market their products is aligned with the WHO *Set of Recommendations on food and non-alcoholic beverage marketing to children*, and prohibits the marketing of any products to children under 12 years of age that do not meet specific nutrition criteria, based on accepted science-based dietary guidance. This policy has led to positive changes in the nutritional composition of foods marketed to children – foods are now lower in sugar, sodium and saturated fat and provide more whole grains, non-fat dairy, fruits and vegetables. Paragraph 3.5.1.b recommends the restriction of marketing, especially to children, aged 18 or younger. There is a broad academic consensus that by the age of 12, children have developed the skill sets necessary to understand the persuasive intent of marketing communications and are able to appraise commercial messages critically. Therefore, we recommend that paragraph 3.5.1.b be re-framed, as follows:

“Governmental actors should develop **evidence-based** nutrition standards **and support the development of robust codes of conduct on the** marketing (including digital marketing), promotion and sponsorships exposure, especially of children aged 12 or younger, **of foods high in saturated fat, sugar and salt**, in accordance with **national legislation and taking into account existing best practice in the private sector.**”

Promote easy-to-understand, objective, fact- and science-based FOPLs

We note the specific guidance the VGFSyN provides on front-of-pack labelling systems (FOPL) and support the recommendation to align FOPL with national public health and nutrition policies and food regulations, as well as relevant WHO and Codex Alimentarius guidelines (paragraph 3.5.1.d). We believe FOPL is a valuable and complementary public health tool with the potential to encourage behavior change by helping consumers make informed dietary choices and improve their eating habits and stimulate product development and reformulation. IFBA members provide clear, objective, fact- and science-based nutrition information on our products, online and at point-of-sale. Globally, we have implemented an easy-to-understand approach to nutrition labelling to give consumers easy access to the amount of calories, sugar, sodium and other nutrients in each serving or portion and how each contributes to daily nutritional needs for a balanced, healthy diet. At the end of 2018, 98% of IFBA members’ products globally displayed nutritional information on-pack; 97% of products displayed GDAs on pack; and 91% of products displayed calories front-of-pack.³ In addition to our global commitment, IFBA members participate in regional and national voluntary FOPL initiatives around the world. In keeping with the CFS’s guiding principle to provide a set of guidelines that are science- and evidence-

³ Eleven of twelve companies reporting on nutritional information and front-of-pack labelling; nine companies reporting on GDAs.

based, we would suggest adding the following sentence to paragraphs 3.2.4.d and 3.5.1.d: ***“Any FOPL system should be easy-to-understand, objective, fact- and science-based.”***

Make proportionate, applicable and enforceable recommendations on sale and marketing of foods and beverages

In paragraph 3.5.1.d, the VCFSyN recommends the consideration of complementary policies prohibiting the sale or marketing of foods with high energy density with minimal nutritional value “in public places or near schools, including kindergartens and child care facilities.” We believe the reference to ***“public places”*** is far too broad and should be deleted. We further believe that, in accordance with other comments above, the phrasing “foods with high energy density with minimal nutritional value” should be replaced with the more objective and more broadly accepted notion of ***“foods that are high in saturated fat, sugar and salt”***.

IFBA is fully committed to increasing our engagement with governments, civil society and other stakeholders and working in collaboration to ensure the achievement of the 2030 Sustainable Development Goals of zero hunger and good health and well-being for all.

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