



**The International Food & Beverage Alliance
Comments on Draft One of the UN Committee on World Food Security's
Voluntary Guidelines on Food Systems and Nutrition**

The International Food & Beverage Alliance (IFBA)¹ thanks the Committee on World Food Security (CFS) for the opportunity to submit comments on the first draft of the Voluntary Guidelines on Food Systems and Nutrition (VGFSyN).

Creating a healthy and sustainable food system to combat malnutrition in all its forms and build a healthier world for people and the planet will require a holistic approach - the collaboration of all stakeholders - policymakers, civil society, the private sector and consumers. It will also require an innovative, evidence-based approach and an integrated set of solutions across multiple sectors - agriculture, trade, health, environment, water, gender, education, finance, transportation and infrastructure.

As leading food and beverage manufacturers, we recognize the responsibility we have to help end hunger and all forms of malnutrition and create a sustainable food system to feed a growing global population, and have committed to do our part.

General Comments

IFBA supports the overall “systemic, holistic and evidence-based approach” the CFS has taken in the VGFSyN. Sustainable food systems cross all sectors and all stakeholders and interventions must be supported by strong evidence of what works and why.

We also strongly support the aim to provide a framework for sustainable food systems that promotes policy coherence and multi-stakeholder collaboration. Sustainable solutions to global health challenges and achievement of the 2030 Agenda will only be created by actors from government, civil society and the private sector working together in partnership.

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.

Since 2008, IFBA has made and has been implementing a set of global commitments, in support of the objectives of, among others, the WHO *Global Strategy on Diet, Physical Activity and Health*, the WHO *Recommendations on food and non-alcoholic beverage marketing to children* and the WHO *Global Action Plan for the Prevention and Control of Noncommunicable Diseases 2013-2020*. These commitments – on product formulation and innovation, the provision of nutrition information to consumers, responsible marketing and the promotion of healthy lifestyles – are fully aligned with the call to action on the private sector expressed by Member States in paragraph 44 of the 2011 *Political Declaration of the third high-level meeting of the General Assembly on the prevention and control of non-communicable diseases*. And we are working to scale these commitments internationally, including by promoting their adoption and implementation by the broader food and beverage industries.

A belief in the power of public-private partnerships is one of the fundamental principles underpinning IFBA's work. IFBA has been working, successfully, in collaboration with governments, civil society and industry for many years to improve global health – in programmes designed to reduce salt, saturated fats and calories and remove trans fats; to improve nutrition literacy; and promote healthy lifestyles. We know, from experience, that collaboration and public-private partnerships can deliver tangible health benefits. We also know there is more work to be done. We welcomed the call in the 2019 WHO *Global Action Plan for Healthy Lives and Well-being for All* for greater collaboration among governments, civil society and the private sector in order to accelerate progress on the health-related Sustainable Development Goals (SDGs). The plan recognized the vital contributions civil society and the private sector make to achieving the SDGs and recommended Member States “*pursue additional opportunities for closer engagement of the private sector.*” We are pleased that the CFS also recognizes the pivotal role the private sector can play and welcome the opportunity to work in partnership to achieve the goal of food security and nutrition for all.

Specific Comments

In several instances the VGFSyN recommends the use of fiscal measures and taxation of “less nutritious” or “highly processed” foods to make nutritious food more affordable (paragraphs 3.3.3.a, 3.3.3.d). 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. Take the example of “highly processed” foods. There is no scientific basis for consistently linking the degree of processing of a food product with its healthiness and no evidence to suggest it would lead consumers to choose healthier diets compared to conventional dietary guidelines based on food groups and nutrients. Food processing is effective in reducing nutrients that are negatively associated with public health risk and which may be overconsumed such as saturated fats, sugar and salt; in creating foods with improved nutrition quality; and increasing palatability and consumer appeal of nutrient-dense foods considered beneficial for good health. Processing also plays a pivotal role in ensuring food security - improving food safety and shelf-life and enabling access to affordable, convenient and nutritious products. We would recommend the deletion of these provisions in favor of a recommendation that would encourage and incentivize industry to develop more nutritious food. Furthermore, in the spirit of CFS's stated intention to integrate existing frameworks for action adopted in the context of the UN system (paragraph 25) into

these guidelines, 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.

The VGFSyN also proposes that States use regulation to promote reformulation, warning labels and taxes of “less nutritious” foods to ensure adherence to national dietary guidelines (paragraph 3.2.3.e). IFBA participates in a wide range of government-led, voluntary initiatives that have led to product reformulations resulting in significant reductions in salt, sugar and trans fats. Globally, we have implemented an easy-to-understand labelling approach 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. IFBA suggests CFS build on the positive steps industry is taking and re-frame this paragraph to recommend that States encourage product reformulation, the provision of relevant nutrition information to consumers, including through product labels, in accordance with the agreed CODEX Alimentarius standards, and support the update of diets that are congruous with national dietary guidelines.

IFBA supports the recommendation to reformulate foods and beverages to reduce sugars, salt and fats (paragraph 3.2.3.f). IFBA members are committed to providing access to safe, convenient and nutritious foods and beverages and helping consumers achieve healthy, balanced diets. We are working continually to innovate and improve the nutrition of our foods and beverages – reducing nutrients associated with public health risk and which may be overconsumed such as sugars, sodium and saturated fat; eliminating industrially produced trans fat; and increasing palatability and consumer appeal of nutrient-dense foods considered beneficial for good health.

In this context, IFBA suggests the CFS consider adding a recommendation to this paragraph encouraging the reformulation of products that not only *excludes* ingredients of public health concern, but also *includes* ingredients considered beneficial for good health – whole grains, fibre, fruits and vegetables and low-fat dairy.

IFBA members are working to alleviate undernutrition and reduce the risk of malnutrition by fortifying products with essential micronutrients, delivering hundreds of billions of servings of micronutrient-fortified foods and beverages. Processing techniques, such as fortification or nutrient enhancement is widely recognized as among the most impactful and cost-effective nutrition interventions, contributing essential nutrients to help prevent deficiencies and their associated health problems in certain populations. The VGFSyN do not address the tangible health benefits to be derived from these techniques and we would encourage CFS to consider including a recommendation encouraging fortification or nutrient enhancement.

IFBA recognizes the need for responsible marketing practices, especially with regard to children (paragraphs 3.4.2.b and c). 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*. Again, in the spirit of CFS’s intention to integrate existing frameworks for action, we would encourage the CFS to consider

recommending that States implement the WHO *Set of Recommendations* by developing robust national policy frameworks that set appropriate standards with due regard to specific national circumstances.

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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