



**UN Standing Committee on Nutrition (UNSCN) Online Consultation:
Maximizing the Impact of the UN Decade of Action on Nutrition**

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Introduction

The Grocery Manufacturers Association (GMA)¹ thanks the UN Standing Committee on Nutrition (UNSCN) for the opportunity to comment on maximizing the impact of the UN Decade of Action on Nutrition.

The Decade of Action will impact a number of issues of interest to GMA, particularly regarding the role of the private sector in contributing to improving nutrition. To truly achieve the Decade of Action's goals, we believe all facets of society, including the private sector, have an important role to play in 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.

GMA welcomes the international effort through the Decade of Action 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.

In fact, GMA is deeply committed to and has actively undertaken industry and multi-stakeholder initiatives that contribute to improving nutrition. Our initiatives include actions to:

- Provide consumers with a greater variety of products, including through reformulation;^{2,3}
- Label products with fact-based and easy to understand nutrition information on the front of packages, supplemented by a robust educational and media campaign to help consumers interpret this information and make informed dietary decisions;⁴
- Limit marketing to children and in schools;⁵ and

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.

² GMA Health and Wellness Survey: <http://www.gmaonline.org/issues-policy/health-nutrition/providing-innovative-and-healthy-choices/product-reformulation/>.

³ GMA infographic: http://www.gmaonline.org/file-manager/Health_Nutrition/GMA-health-and-wellness-survey-infographic-fullsize.jpg.

⁴ GMA Facts Up Front: <http://www.factsupfront.org/>.

⁵ Children's Food and Beverage Advertising Initiative: <https://www.bbb.org/council/the-national-partner->

- Promote balanced diets and healthy lifestyles,⁶ as in our support and active participation in U.S. First Lady Michelle Obama’s “Let’s Move” campaign.⁷

To maximize the contributions of all stakeholders and achieve the goal of eradicating hunger and preventing all forms of malnutrition worldwide, GMA suggests further work to:

- **Improve the evidence base regarding effective interventions:** While the evidence of the cost of malnutrition is well-established, industry and governments need to better understand how to identify factors that most influence healthy diets and lifestyles, implement effective interventions, and measure success in actually changing consumer behavior and improving health.
- **Integrate comprehensive approaches to foster healthy diets, lifestyles, and sustainable food systems:** Effective nutrition interventions must take into account total dietary consumption, as well as lifestyle factors. Public policies should take into account differences in patterns of consumptions and should align with other priorities across the food chain (e.g., food safety; food waste; access to markets) and, ultimately, support sustainable development.

Industry Contributions to Improving Nutrition

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. We believe it is critical for work on the Decade of Action to incorporate the knowledge, expertise, and resources of all relevant stakeholders, including by acknowledging and building upon the success of industry commitments, some examples of which are described below.

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;

[program/national-advertising-review-services/childrens-food-and-beverage-advertising-initiative/](http://www.gmaonline.org/news-events/newsroom/first-lady-michelle-obama-addresses-grocery-manufacturers-association-scien/).

⁶ See Healthy Weight Commitment Foundation: <http://www.healthyweightcommit.org/>.

⁷ GMA press release: <http://www.gmaonline.org/news-events/newsroom/first-lady-michelle-obama-addresses-grocery-manufacturers-association-scien/>.

- 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 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, 2015⁸ 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)⁹, 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 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.¹⁰

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

⁸ Kees, J. and Fitzgerald, M. P. (2015), [Who Uses Facts Up Front? A Baseline Examination of Who is Using Standardized Front-of-Package Nutrition Disclosures](#). Journal of Consumer Affairs, 50: np.

⁹ Smith Edge, Marianne et al. [The Impact of Variations in a Fact-Based Front-of-Package Nutrition Labeling System on Consumer Comprehension](#). Journal of the Academy of Nutrition and Dietetics, 114: 843 - 854.e8.

¹⁰ Kees, J., Royne, M. B. and Cho, Y.-N. (2014), Regulating Front-of-Package Nutrition Information Disclosures: A Test of Industry Self-Regulation vs. Other Popular Options. Journal of Consumer Affairs, 48: 147-174.

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 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.

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 total diets rather than individual ingredients or specific foods is consistent with consumer behavior and thus more 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. Rather, there is sound science supporting categorization of “good diets” and “bad diets,” based on consumption of nutrients from all sources.

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 Principles¹¹ participants commit that in advertising primarily directed to children under age 12 (“child-directed advertising”) they will depict only healthier or better-for-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.¹² 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.

¹¹CFBAI’s Core Principles and other program materials are available on CFBAI’s website at www.bbb.org/kids_food.

¹² A Report on Compliance and Progress During 2013 (Dec. 2014), available at <http://www.bbb.org/globalassets/local-bbbs/council-113/media/cfbai/cfbai-2013-progress-report-dec-2014.pdf>.

Conclusion

GMA is committed to working collaboratively to achieve the goals of the Decade of Action on Nutrition. We appreciate the opportunity to consult on maximizing the Decade of Action's impact, and we hope our comments demonstrate the depth and breadth of industry's commitment and experience.

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