

Work Programme of the UN Decade of Action on Nutrition, 2016-2025

FEDERALIMENTARE COMMENTS ON THE FIRST DRAFT (dated 27 January 2017)

1) GENERAL REMARKS

FEDERALIMENTARE, the Italian Food & Drink Industry Federation, would like to thank the UN Standing Committee on Nutrition (UNSCN) for the opportunity to comment on the first draft of the work program of the UN Decade of Action on Nutrition. Such Decade of Action will have an effect on several issues of interest to FEDERALIMENTARE, particularly regarding the role of the private sector in contributing to improving nutrition. In order to effectively achieve the Decade of Action's goals, we believe that the private sector should play a key role in helping people everywhere to achieve and maintain balanced diets and healthy lifestyles. Given the complex nature of nutrition and health issues, it is essential to involve all stakeholders and develop holistic and sustainable solutions. We believe that real progress can be made only through a constructive, transparent engagement between Governments, international organizations, the private sector and civil society. Therefore, FEDERALIMENTARE is ready to continue working collaboratively with Governments, consumers and all other relevant stakeholders to help provide the products and information people need to achieve healthy and nutritionally balanced diets.

From our side, we would like to draw attention in particular to the "Mediterranean Diet", which has been officially declared in 2013 by UNESCO as "Intangible Cultural heritage of Humanity" whose principles Federalimentare has always sustained are an important model, and still an absolutely valid one, despite the globalization of the markets and, as claimed by some, the changing habits of the younger generations. The concepts in SDG 3, SDG 12, SDG 2 are interconnected and imply a commitment on sustainable nutrition¹ and sustainable supply chain² as pre-requisites. The Food Industry is an essential part of the whole process and Federalimentare, as one of the supportive entities of the Mediterranean diet and of food Innovation, can play a substantial role. The starting point stems from the basic concept that we all eat foods, rather than nutrients or ingredients, so the promotion of patterns and lifestyles is by far more relevant than the simplistic distinction among single components within foods. The Institute for Human Right and Business stated that business itself could prosper when providing the right conditions and the right opportunities³. In this sense and considering the challenge of a growing world population, we offer our expertise and collaboration, through the Italian food system, to the ongoing programs supporting a better exploitation of local production, providing support particularly when it comes to small local producers. The message must be conveyed that a balanced diet means eating a full variety of foods in moderate quantities and combining the diet with a healthy lifestyle. This is where the food industry must show its actual commitment.

A combined and joint action at local level could offer educational packages focused mainly on Food safety, Innovation and Nutrition, with the involvement of relevant Institutions such as for example EFSA, FAO, WHO, Academies and relevant industry at national and International level. Effective co-ordination would be needed among National Governments, for example also through exchange programs for students and professors in order to facilitate the most suitable transfer of knowledge.

2) SPECIFIC PROPOSALS CONCERNING THE FIRST DRAFT

Action Area 1: Sustainable, resilient food systems for healthy diets

FEDERALIMENTARE supports the emphasis on the importance of integrating food safety into nutrition policy and notes the significant contribution that food processing can give to improving the general food safety levels.

Food science provides the scientific basis to ensure a safe food supply – from storage to processing, transportation, distribution, and consumption. Innovations in processing, monitoring conditions, and testing foods for contamination prevent food-borne illness. Pasteurization of milk is just one of many examples of processes that reduce the risk of food-borne illness and extend shelf life.

Transparent, science-based policy environments that also engage the private sector and encourage innovation are critical to achieve success in this area.

Action area 3: Social protection and nutrition education

FEDERALIMENTARE fully agrees with the statement in paragraph 30, that “*Knowledge and education empower people to make informed healthy dietary and lifestyle choices.*” In fact, we concretely support fact-based and scientifically evidence-based nutrition labeling systems that helps consumers to make well-informed choices about balanced diets. The **Reference Intakes (RIs)** Front of Pack Nutrition Labelling system, developed by the food industry in dialogue with the European Commission and subsequently recognized by EU Regulation No 1169/2011 on the provision of food information to consumers, was developed precisely with the aim of giving at-a-glance information to consumers on how much energy and nutrients are in their foods, allowing them to evaluate a product’s place in the daily diet and therefore compose a balanced diet that fits their individual needs and lifestyles. We believe that it is essential to correctly inform and educate consumers about nutrition and healthy lifestyles, but without imposing unnecessary limits to their fundamental freedom of choice and without interfering with their food habits and traditions. There are no “*good foods*” or “*bad foods*”, but only “*balanced diets*” or “*unbalanced diets*”, on the basis of how foods are combined and according to the habits and traditions of the various countries. It is clear that truly balanced diets should not put aside foods that, consumed in the right quantities and with the correct frequency, contain micro and macro nutrients which are essential for a balanced diet. The criminalization of individual foods, the distinction between salvific and harmful foods are not the answer: indeed, they make matters worse, often in connection with the economic interests of other sectors.

The nutritional relevance and scientific evidence of simplistic labelling systems, examined from a public health perspective, is not demonstrated (i.e. see ANSES Opinionⁱ, February 2017, <https://www.anses.fr/en/content/nutrition-information-programmes-inadequate-evidence-substantiate-their-relevance-public>)

More information about the Reference Intakes system is available here: <http://referenceintakes.eu/>

Action area 4: Trade and investment for improved nutrition

FEDERALIMENTARE suggests to revise the draft work program in order to better reflect the value of trade as a key enabler of food security and a driver of sustainable growth. As the draft work program itself notes, “*Trade has substantially increased the availability of and sometimes access to food...*” The second half of the statement implies that trade could “*negatively impact the human right to adequate food,*” when, in fact, developing and implementing science-based standards for international trade is a critical component of advancing food safety, food security, food waste, nutrition, and other relevant related issues.

Paragraph 35 recommends specific policy tools Governments might consider implementing “*through appropriate trade agreements and policies.*” With regard to “*fiscal tools, such as taxation,*” FEDERALIMENTARE would like to underline that even the *WHO Commission on Ending Childhood Obesity* (pg. 15) found that there is “*limited evidence*” indicating that the imposition of fiscal measures will be effective in tackling obesity. Analysis of selective taxes where they have been implemented in the past (see in particular the cases of Denmark and Finland) shows uncertain effects on discouraging consumption of foods and non-alcoholic beverages high in fat, sugar, and salt. Even the tax more recently introduced in Mexico as a measure to reduce obesity, does not appear to have caused any meaningful change in the caloric intake of the Mexican population.

References

1. Foods 2016,5, 82; doi: 10.3390/foods5040082
2. Science 2014, 6; doi 10.1126/science.1248526
3. <http://eprints.glos.ac.uk/id/eprint/3935>