



**UN Standing Committee on Nutrition (UNSCN) Online Consultation:  
Work Programme of the UN Decade of Action on Nutrition, First Draft**  
Submitted via email: February 17, 2017

## **Introduction**

The Grocery Manufacturers Association (GMA)<sup>1</sup> thanks 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.

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;<sup>2,3</sup>
- 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;<sup>4</sup>
- Limit marketing to children and in schools;<sup>5</sup> and

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<sup>1</sup> 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.

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

<sup>3</sup> GMA infographic: [http://www.gmaonline.org/file-manager/Health\\_Nutrition/GMA-health-and-wellness-survey-infographic-fullsize.jpg](http://www.gmaonline.org/file-manager/Health_Nutrition/GMA-health-and-wellness-survey-infographic-fullsize.jpg).

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

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

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

To maximize the contributions of all stakeholders and achieve the ambitious goals of the Decade of Action, 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.

### **Specific Responses to the Nutrition Decade Work Program**

GMA offers the following observations on selected action areas of the draft work program:

- Action Area 1: Sustainable, resilient food systems for healthy diets  
GMA supports the goals of catalyzing coherent action and innovative food system solutions. We support the action area’s emphasis of the importance of integrating food safety into nutrition policy, and we note the significant contribution of food processing to improving food safety. Food science provides the scientific base that ensures a safe food supply – from storage to processing, transportation, distribution, and consumption. Innovations in processing, monitoring conditions, and testing foods for contamination prevent foodborne illness. Pasteurization of milk is just one of many examples of processes that reduce the risk of foodborne illness and extend shelf life.<sup>6</sup>  
  
Paragraph 23 notes the impact of antimicrobial resistance on sustainable food systems. GMA agrees resistance to antimicrobials presents a challenge in this regard. Transparent, science-based policy environments that engage the private sector and encourage innovation are critical for responsibly managing use of antimicrobials.
- Action area 3: Social protection and nutrition education  
GMA agrees with the statement in paragraph 30, that “Knowledge and education empower people to make informed healthy dietary and lifestyle choices.” GMA supports fact-based nutrition labeling that helps consumers make informed choices about balanced diets. Facts

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[program/national-advertising-review-services/childrens-food-and-beverage-advertising-initiative/](http://www.gmaonline.org/resources/science-education-foundation/).

<sup>6</sup><http://www.ift.org/knowledge-center/learn-about-food-science/world-without-food-science.aspx>

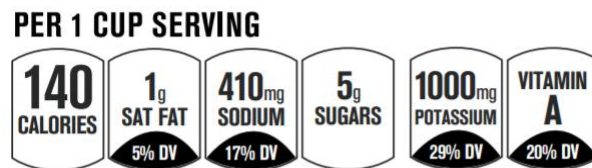
<sup>7</sup><http://www.gmaonline.org/resources/science-education-foundation/>

Up Front (FUF) is a voluntary initiative created in 2011 by the Grocery Manufacturers Association (GMA) and the Food Marketing Institute (FMI).

FUF is a simple and easy-to-use labeling system that aligns with U.S. nutrition labeling regulations and puts key nutrition facts on the front of food and beverage packages – displaying uniform icons showing the calories, saturated fat, sodium, and sugar in each serving. Currently, 106 companies participate in FUF, covering almost 90 percent of GMA members’ grocery sales.

FUF is grounded in nutrition science and research regarding consumer messaging about nutrition, including the U.S. Department of Agriculture’s Dietary Guidelines for Americans. The program was developed following an intensive review of the available scientific evidence regarding dietary patterns and associated health outcomes. FUF has also been designed to be flexible and can accommodate changes to the federal Dietary Guidelines. The system is consistent with a total-diet-based approach to nutrition labeling, in that percent daily values are listed for each nutrient in the context of an individual’s total diet and the contribution of these nutrients from all sources.

The FUF icons (see example below) are designed to allow consumers to quickly see, understand, and use key nutrient information as they peruse store shelves, navigate aisles, and compare products.



The four critical nutrient icons are always presented together as a consistent set (with limited exceptions for certain beverages and very small packages that may display the icon for calories only). In addition, manufacturers may also include information on one or two “nutrients to encourage” – potassium, fiber, protein, vitamin A, vitamin C, vitamin D, calcium and iron – which the Dietary Guidelines for Americans has determined are under-consumed and are needed to build a “nutrient-dense” diet. Icons for “nutrients to encourage” may only be displayed when a product meets FDA requirements as a “good source” of the nutrient, i.e., when a serving of the product contains ten percent or more of the nutrient’s daily value.

GMA members have made significant investments to develop the FUF consumer website ([www.factsupfront.org](http://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, 2015,<sup>8</sup> 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)<sup>9</sup>, 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.<sup>10</sup>

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 was 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.

– Action area 4: Trade and investment for improved nutrition

GMA suggests the draft work program be revised to reflect the value of trade as a key enabler of food security and driver of sustainable growth. As the draft work program 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 related issues.

We suggest action area four take a more holistic view of the impact of globalization and rules-based trade. Broad-based, sustainable economic growth while reducing inequalities

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<sup>8</sup> 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.

<sup>9</sup> 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

<sup>10</sup> 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.

must be the foundation for stimulating elimination of poverty, hunger, and malnutrition during the Decade of Action on Nutrition and beyond.

Paragraph 35 recommends specific policy tools governments might consider implementing “through appropriate trade agreements and policies.” With regard to “fiscal tools, such as taxation,” GMA notes the WHO Commission on Ending Childhood Obesity found there is “limited evidence” (pg. 15) indicating the imposition of fiscal measures will be effective in tackling obesity. Analysis of selective taxes where they have been attempted in the past shows uncertain effects on discouraging consumption of foods and non-alcoholic beverages high in fat, sugar, and salt.

For example, the “fat tax” created in 2011 by the Danish government to address the country’s rising obesity rates did not decrease obesity but led to potential job losses, increased administrative burdens for companies, and incentivized cross-border shopping. The tax was removed in November 2012, and the planned imposition of a chocolate tax was cancelled. In 2011, Finland introduced a tax on confectionery and ice cream in an effort to curb sugar consumption. Sales of confectionery products initially decreased slightly, but by the end of 2013 sales had returned to pre-tax levels. In September 2015, the Finnish government announced it would abolish the tax from the beginning of 2017.

In January 2014, the Mexican government levied a tax on sugar-sweetened beverages and on high caloric density foods. The tax of one peso per liter on sugar-sweetened beverages increased the retail price of such products by nine to 19 percent. The tax was introduced as a measure to reduce obesity but does not appear to have made a meaningful change in the caloric intake of the Mexican population.

Paragraph 35 also recommends “subsidies for healthy foods (and removal of subsidies for unhealthy foods).” 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.

A total diet approach emphasizes the importance of a varied and balanced diet within calorie needs, and was endorsed by the Academy of Nutrition and Dietetics (AND) in 2013 as the most important focus of a healthful eating style. A total diet approach asserts that there are no inherent “good foods” or “bad foods”. As such there is “no single food or type of food ensures good health, just as no single food or type of food is necessarily detrimental to health.”<sup>11</sup>

- Table 1: Potential topics for the development of commitments and the establishment of action networks  
GMA offers further specific comments on the topics included in table 1.

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<sup>11</sup> Academy of Nutrition and Dietetics. 2013. AND Position. Total Diet Approach to Communicating Food and Nutrition Information. *J Acad Nutr Diet*. 2013;113:307-317.

1. “Food reformulation” – GMA requests the UNSCN and the Decade of Action consider and build on positive industry contributions in the area of product formulation and innovation, some examples of which are described below.

GMA has documented efforts by U.S. food and beverage companies to reformulate and innovate products, as well as to 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;
- 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.
2. "Taxation of food and beverages, pricing policies for sugary drinks and unhealthy foods" – see comments under "Action Area 4" above.
  3. "Marketing food and beverages to children" – 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. GMA recommends the Decade of Action on Nutrition also build on this recommendation. 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 Principles, 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. 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.

4. "Conflict of Interest" – As stated in the introduction to these comments, GMA believes that to truly achieve the Decade of Action's goals, all facets of society have an important role to play. We encourage all participates in the Decade of Action's work to advance real progress through constructive, transparent engagement between governments, the private sector, and civil society.
5. "Combat against antimicrobial resistance" – See comments on "Action Area 1" above.

## **Conclusion**

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

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