

WCRF International Comments on the draft WHO European Region Food and Nutrition Action Plan 2014 – 2020, version 01 dated 26/3/2013 Submitted to WHO Regional Office for Europe, May 23 2013

About World Cancer Research Fund International

WCRF International and its network of four cancer charities¹ is dedicated to the prevention of cancer through healthy diets,² nutrition, physical activity, and weight management. Its mission is to empower people to make choices today to prevent cancer tomorrow. It does this by:

- 1. Financing cutting-edge research on diet and cancer. Since 1982, the WCRF network has funded over £85 million worth of research, including research by the WHO Agency, IARC – the International Agency for Research on Cancer.
- 2. Bringing together the scientific research on the relationship between diet and cancer through a continually updated rigorous review process.³
- 3. Communicating this evidence to scientists, health professionals and policymakers around the world.
- 4. Providing science-based information about healthy eating through the four charities. This information is targeted at supporters, health professionals, children and their families. The WCRF International Academy also educates young scientists about the relationship between diet and cancer.
- 5. Conducting activities to advance policy at all levels of society. This includes communicating its set of evidence-based policy recommendations for the prevention of cancer.4

Raising funds through the network of four cancer charities as a means of financing the above activities.

Unique in its focus on prevention, WCRF International works in collaboration with the Union for International Cancer Control (UICC) and other NGOs, as well as the scientific community, in advancing the goal of preventing and controlling NCDs.

³ WCRFs 'Continuous Update Project' is an ongoing review of cancer prevention research that builds on the WCRF/AICR report Food, Nutrition, Physical Activity, and the Prevention of Cancer: a Global Perspective (2007), a comprehensive analysis of the literature on food, nutrition, physical activity and cancer. Available at: http://www.dietandcancerreport.org

4 WCRF/AICR. Policy and Action for Cancer Prevention (2009). Available at:

¹ American Institute of Cancer Research (AICR); World Cancer Research Fund UK (WCRF UK); Wereld Kanker Onderzoek Fonds (WCRF NL); and World Cancer Research Fund Hong Kong (WCRF HK).

² Includes alcohol

http://www.dietandcancerreport.org/

Comments

WCRF International is pleased to have been given the opportunity to comment on the draft WHO European Region Food and Nutrition Action Plan (FNAP) 2014 – 2020, version 01 dated 26/3/2013.

The draft Food and Nutrition Action Plan is to be welcomed as a follow-on to the previous action plan. WCRF International welcomes the way the draft draws and builds on, and is consistent with, existing EURO and global strategies and action plans in the area of NCDs and nutrition. We also support the objectives of the draft Action Plan, as stated in the conceptual overview (page 2).

Beyond these general comments, we have ten more specific comments on the draft FNAP.

- (1) **Physical activity.** Clarification is needed on whether physical activity is included in the draft FNAP. Early in the document it states "Although it is generally accepted that food safety has very strong links with nutrition as well as physical activity and also impact on nutritional health they will not be covered in this document." And yet there is a paragraph on physical activity included (3.2.5).
- 2) Consistency of the conceptual overview with the main text. The wording on Page 2 ('conceptual overview') should be 100% consistent with the text contained within the body of the FNAP. This is not the case in this current version. For example:
 - The wording of the vision is different between pages 2 and 7 (we favour the vision on Page 2).
 - The mission on page 2 is not included in the main text
 - There is an aim included in the main text that should feature in the conceptual overview.
 - The wording of the goal is different between pages 2 and 7. We favour the vision on Page 2, but would recommend some different wording (see point 3 below).
 - The wording of the objectives differ between page 2 and the main text see also Point 3, below.
 - In the overarching principles section in the main text, the right to food does not come out as strongly in the section on human rights as might be expected from the conceptual overview.
 - 3) **Goal.** We would recommend the inclusion of wording that emphasises the role of policies and interventions as part of 'integrated action'
- 4) **Mission**. It is not clear how the mission is related to the goal on page 2. In addition, the mission to guarantee "universal access to balanced and healthy foods" is somewhat problematic people may have access but still

- prefer unhealthy foods and choose to consume unbalanced diets. The issue is not just one of access, but also acceptability of healthy foods.
- 5) **Introduction.** The introduction would be strengthened by the inclusion of text that references the significant expansion of evidence for policy action on food and nutrition since the publication of the previous action plan, including much greater evidence of what works.
- 6) **Scope.** The scope is not clear at present. It may be clearer if articulated in the form of a graphic which presents the scope of the nutrition problems addressed in the document, and the policy areas covered (e.g. the food information environment, the food market environment etc).
- 7) Clarifying and operationalising the objectives. We very much welcome the inclusion of specific objectives as a way of focusing action. We have specific recommendations that might serve to improve the communication of these objectives:
 - Objective 1 could read "Strengthen (or improve) governance for dietrelated health..." that way it is clear that meeting this objective will require action by Member States and the Secretariat.
 - We would suggest that Objective 2 should read "To reduce exposure (and inequalities in exposure) to modifiable diet-related risk factors for non-communicable diseases..."
 - Objective 3 would be strengthened by specific reference to the evaluation of *strategies*, *policies and interventions*.
- 8) Setting out of objectives in the main text. It would be helpful for each of the objectives to be set out in the main text, with supporting text that describes why the objectives have been chosen. This could then be followed by a set of policy options or approaches for Member States, and then a list of available tools to implement these policies. This would ensure a consistent narrative between the objective (e.g. reduce exposure to risk factors), the available policy options (e.g. marketing restrictions), and the available tools (WHO Set of Recommendations and/or nutrient profiling).
- 9) Paragraph 3.2, on Tools for Addressing Objective 2. We strongly welcomes this objective, as well as the "tools" approach to providing more specific actions for Member States (although also see comments above in point 8). However, we recommend Paragraph 3.2 is considerably revised to make it a more useful Paragraph for Member States. Initially, we find it confusing that the tools listed are a mix of objectives and policies, and also overlap with each other. For example, "marketing" is not really a tool. Nor is "Increased intake of vegetables and fruits." And while the latter is an objective, the sub-paragraph on "marketing" describes a tool to achieve an objective that is not clearly articulated (e.g. reduce impact of marketing

of HFSS foods to children). "Food reformulation" would also appear to overlap with "salt reduction." See our comments above for a suggestion on how to improve the structure of this paragraph. Given the growth of evidence in this area, we recommend that policy options are set out and a tool is provided for each policy area, as follows:

- Nutrition labelling standards & regulations on the use of claims on foods
- Offer healthy foods in specific settings and set nutrient-&-food based standards
- Use measures to address the affordability of food
- Restrict food advertising and other forms of commercial promotion
- Improve the quality of the food supply
- Set rules to create a healthy retail environment
- Harness all sectors and stakeholders to ensure coherence through the food supply chain
- Inform people about food and nutrition through public awareness
- Nutrition counselling and advice in primary care
- · Give nutrition education and skills

WCRF International would be happy to provide insights into the evidencebase for each of these policy actions to promote healthy diets.

10) Paragraph 3.3, on Tools for addressing Objective 3. Even though evaluation is mentioned in Objective 3 in the Conceptual Overview on Page 2, the title of this objective no longer includes evaluation, and evaluation is not mentioned in the subsequent text. We strongly recommend that evaluation is brought back into this objective, and that a clear tool is provided to help guide Member States text in evaluating their policy actions. This is essential in order to build the evidence base.

Fur further information please contact:
Corinna Hawkes (Head of Policy and Public Affairs) c.hawkes@wcrf.org
Jo Jewell (Policy and Public Affairs Manager) j.jewell@wcrf.org
WCRF International, 22 Bedford Square (2nd Floor), London, WC1B 3HH
+44 (0) 20 7343 4200