

International Food & Beverage Alliance
Submission to inform the Special Rapporteur’s forthcoming thematic report on “Food, nutrition and the right to health.”

The International Food & Beverage Alliance (IFBA) welcomes the opportunity to provide input on the OHCHR Special Rapporteur’s forthcoming thematic report to the General Assembly on “Food, nutrition and the right to health.”¹

Since IFBA’s inception 15 years ago, we have supported WHO, UN and Member State strategies through a series of substantial and progressive actions aimed at improving global health and nutrition, including most recently, the adoption of the first-ever collective commitment by the food industry to implement globally set standardized targets for sodium reduction in manufactured foods and the adoption of the WHO’s objective to eliminate industrially produced trans fat from the global food supply by 2023. IFBA members are committed to providing consumers with fact-based, transparent consumer nutrition information to encourage food and beverage choices that are part of a balanced and healthful lifestyle. By providing consumers with a variety of options along with clear, factual nutrition guidance on packages, our companies are responsibly meeting consumers’ desires to eat and drink responsibly, by offering smaller portion sizes and providing portion guidance.

IFBA also believes solutions to health & nutrition challenges should take a holistic approach and consider multiple and varied causal factors including physiology, genetic pre-disposition, psychology, dietary habits, socioeconomics, lifestyle and the external environment. Therefore, tactics should be broadened and take into consideration broad spectrum of drivers of obesity, including, but not limited to what we eat.

We believe that the UN and Member States have, and will continue, to benefit from the expertise and contributions of the private sector, and we appreciate the opportunity to provide input on **Key Questions 2 & 3 regarding legislative or regulatory measures to improve food and nutrition and simultaneously address undernutrition and diet-related non-communicable diseases:**

An effective response to the double burden of malnutrition will require a whole-of-society approach and collaboration of all stakeholders. As leading food and non-alcoholic beverage manufacturers, we recognize the responsibility our industry has and the contribution we can make to this effort. IFBA members have adopted a variety of measures aimed at improving food and nutrition, including by innovating and improving the nutrition of our foods and beverages; empowering consumers to make

¹ IFBA is a group of seven international food and non-alcoholic beverage companies – The Coca-Cola Company, Ferrero, General Mills, Grupo Bimbo, Kellogg’s, Mondelēz International, and PepsiCo– 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.

informed choices through clear, nutritional information on product labels, online and at point-of-sale; restricting advertising to children and ensuring any child-directed marketing is compatible with healthy behaviors; and promoting healthy, sustainable living through a range of company initiatives. We are fully committed to helping shape a healthy, sustainable food system and recognize that even greater efforts are needed to improve global health outcomes and affirm the right to health. The following interventions reflect IFBA's commitments and represent the core of our work to improve nutrition and address the double burden of malnutrition:

1. Behaviour change is fundamental to consumers' adoption of healthier diets. However, successfully changing consumer behaviour is difficult to achieve as it requires a whole-of-society approach. We believe public-private partnerships among governments, civil society and business, beyond the food and beverage sector and including the media industry and tech companies, are critical to developing comprehensive strategies aimed at improving nutrition education and literacy and implementing media campaigns aimed at motivating new behaviours. IFBA members have a wealth of expertise in nutrition science, market research, marketing and consumer insights. We are committed to sharing our expertise and participating in collaborative efforts to help achieve this intervention.

2. IFBA members are working continuously to improve the nutrition of their foods and beverages and positively influence the diets of people around the world. We have removed trillions of calories and thousands of tonnes of sodium, fat and sugar from the marketplace and added thousands of products compatible with a healthy and balanced diet.² Our goal is to make meaningful and measurable changes without sacrificing functionality, quality, food safety and consumer acceptance. Experience has shown that consumers need gradual reductions and time to adjust to new foods to prevent them switching to a less healthy product alternative. Most recently, we launched the first-ever collective commitment by the food industry to implement globally set standardized targets for sodium reduction in manufactured foods by 2025 and 2030. We adopted the WHO's objective to eliminate industrially produced trans fat (iTFAs) from the global food supply by 2023 and are well on our way to achieving that goal. We also committed to share our knowledge on iTFAs reduction with the broader industry and SMEs and in June 2022, published a practical guide, based on state-of-the-art research, to help food manufacturers phase out iTFAs from bakery and confectionery foods. We have worked successfully with governments around the world to improve global health through public-private partnerships, including strategies to reduce salt, saturated fats and sugar and know much more can be achieved with a focus on increasing the opportunities for public-private partnerships.

For years, IFBA members have been reformulating and innovating products to include more whole grains, fibre, fruits and vegetables, nuts and pulses and low-fat dairy. We have also been working to alleviate undernutrition and reduce the risk of malnutrition by fortifying commonly consumed products with essential micronutrients, delivering hundreds of billions of servings of micronutrient-fortified foods and beverages. Food fortification or nutrient enhancement is widely recognized as among the most impactful nutrient interventions.

In addition, food processing in itself plays an essential role in providing a safe, secure, affordable and nutritious food supply to populations around the world. It also serves to preserve or enhance nutrient

² [2020 IFBA Progress Report](#)

content; ensure that in addition to being safe, food is edible and palatable; prolongs shelf-life; provides access, regardless of economic status, to affordable and convenient products; and reduces food waste. The ability to efficiently distribute affordable, shelf-stable, nutrient-dense foods highlights the critical role processed foods play in delivering healthy, sustainable diets.

3. Front-of-pack labelling (FOPL) is an additional strategy to help consumers make healthier choices and informed food purchases. IFBA's policy on nutrition information, "Principles for a Global Approach to Fact-based Nutrition Information," is an easy-to-understand approach to nutrition labelling to give consumers easy access to the amount of calories, sugar, sodium and nutrients in each serving or portion and includes a commitment to display calories front-of-pack.³ Beyond that commitment, IFBA members support and participate in many different voluntary and government endorsed FOPL schemes around the world. We need public-private partnerships to leverage consumer insights to determine the public health impact of FOPL and help inform the policy-making process.

4. We fully recognize and support the need for responsible food and beverage marketing practices, particularly to children. IFBA and its members have a long and successful history of adopting and implementing voluntary industry initiatives aimed at improving the landscape around children's advertising.

Our Global Responsible Marketing Policy sets a common global standard for all members (many individual members go beyond) and prohibits the marketing of any products to children under 13 years of age that do not meet specific nutrition criteria, based on accepted science-based dietary guidance. Some members have chosen not to market their products to children under 13 years of age at all.

IFBA's approach to responsible marketing, which has been in place since 2008, has evolved and been strengthened over time to accommodate a changing media environment and to address the content of our marketing communications. In 2022, the policy was strengthened yet again with, among other things, the adoption of a set of common global nutrition criteria which govern which products can be marketed to children under 13 years of age. The IFBA policy and regional and national responsible marketing pledges are monitored for compliance by third parties and supported with proper enforcement mechanisms by independent self-regulatory organizations (SROs).

The IFBA approach has proven to be effective, highly adaptable to the unique needs and conditions of different countries, and has led to positive changes in the marketplace:

- the nutritional composition of foods marketed to children has improved – foods are now lower in salt, sugar and saturated fat and provide more whole grains, non-fat dairy, fruits and vegetables, while other products such as chocolates, candies, potato crisps, soft drinks and ice creams are no longer marketed to children. For example:
 - in Canada, under industry's Canadian Children's Food and Beverage Advertising Initiative, between 2007 and 2015, sugar in cereals was reduced 17-60%; no product

³ <https://ifballiance.org/publications/nutrition-information-commitments/>

advertised had more than 200 calories; and kids' meals contained fruit, yogurt and low-fat milk. ⁴

- in the U.S.A., in 2017, ten years after the launch of the Children's Food & Beverage Advertising Initiative (CFBAI) all cereals on the product list contained less than 10 grams of total sugars; sugar in yogurts had been reduced by 10-25%; and more cereals provided a half-serving or more of whole grains – 80% in 2017 compared to 20% in 2009. ⁵
- children's exposure to HFSS ads has been substantially reduced over time and the current levels of exposure, as evidenced by several recent studies, are very low. For example:
 - in the EU, between 2009 and 2014, children were exposed to 83% less HFSS ads around children's programmes; 48% less across all programmes; and 32% less ads for EU Pledge members' products, regardless of nutrition criteria. ⁶
 - in the U.S.A., between 2007 and 2017, the number of ads by CFBAI participants for cereals and sweet snacks viewed on children's TV programming had declined by 50% or more while ads for fruit and vegetables had more than doubled (106%). ⁷
 - a recent study by the World Federation of Advertisers and Nielsen in 12 countries around the world concluded that on average only 1.45% of online ads served to children under 12 years of age are for HFSS foods and beverages. ⁸
 - the Nielsen results have been corroborated by a study recently commissioned by the European Commission which showed that just 1.7% of ads that children see online in the EU are for food products. ⁹
 - a 2019 analysis commissioned by the UK government concluded that children under 16 years of age were exposed to just 13.2 seconds (0.22 minutes) of HFSS advertising per day online. ¹⁰
- children's exposure to products compatible with a balanced diet and healthy lifestyle has increased. For example:

⁴ The Canadian Children's Food and Beverage Advertising Initiative, 2015 Compliance Report. Advertising Standards Canada, September 2016. Available: <https://adstandards.ca/resources/library/childrens-food-and-beverage-advertising-initiative-cai/>

⁵ The Children's Food & Beverage Advertising Initiative, Category-Specific Uniform Nutrition Criteria, 2nd ed. 2018 White Paper, September 2018.

⁶ [EU Pledge 2016 Monitoring Report.pdf \(eu-pledge.eu\)](#)

⁷ Willie C. Frazier, III and J.L. Harris, Trends in Television Food Advertising to Young People: 2017 Update, UConnRuddCenter.org, May 2018.

⁸ The Digital Avatar Project used four avatars (simulated consumer profiles) to track advertising activity across 12 markets (Belgium, Brazil, Czechia, Denmark, Ireland, Japan, Mexico, Netherlands, Nigeria, Philippines, South Africa and Spain). Through the findings, Nielsen estimated the general pervasiveness of 'HFSS' advertising, as well as the probabilistic rate of a child's exposure to 'HFSS' advertising. Available:

<https://wfanet.org/knowledge/item/2022/03/29/Only-145-of-online-ads-served-to-children-are-for-'HFSS'-foods>

⁹ Study on the exposure of children to linear, non-linear and online marketing of foods high in fat, salt or sugar, ECORYS, 2021

¹⁰ <https://www.gov.uk/government/consultations/total-restriction-of-online-advertising-for-products-high-in-fat-sugar-and-salt-hfss/evidence-note#child-exposure>

- an analysis of food ads in 2021 by the Better Business Bureau’s National Program, the Children’s Food and Beverage Advertising Initiative, found that the majority of advertising on television featured nutrient-dense foods that positively contribute to children’s diets.¹¹
- regional and national voluntary initiatives based on the core tenets of the IFBA policy have been implemented by non-IFBA members in more than 50 countries.

Conclusion

IFBA members reaffirm our commitment to improving nutrition and addressing the prevention and control of non-communicable diseases, supporting the right to health of the communities in which we operate. We are grateful for the opportunity to provide input to the consultation. We hope this input is helpful and remain at your availability for any further input or clarification.

24 March 2023

¹¹ 2020 CFBAI and CCAI Compliance Report. December 2021. Available: <https://bbbprograms.org/programs/all-programs/cfbai>