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Are the responses approved or endorsed by your organization?

Yes

## Comments on the "[Discussion paper](#)"

General comments : Please comment on the clarity and comprehensiveness of the approach

Alliance for Food & Health Response to

World Health Organization (WHO) Public Consultation:

“Approach for the prevention and management of conflicts of interest in the policy development and implementation of nutrition programs at country level”

Submitted via email: September 24, 2017

Introduction

The Alliance for Food & Health (AFH) thanks the World Health Organization (WHO) for the opportunity to provide comment on the draft “Approach for the prevention and management of conflicts of interest in the policy development and implementation of nutrition programmes at country level.”

AFH is a multi-stakeholder platform that integrates the food and agriculture community in the global health community’s efforts to reduce morbidity and mortality from food and nutrition-related Non-communicable diseases. AFH brings together individuals from both the global health and the food and agriculture communities for a cooperative dialogue about the link between food and agriculture and public health that synthesizes existing research and thought leadership in a rigorous and iterative process to develop innovative, actionable recommendations for all stakeholders to combat nutrition-related non-communicable diseases (NCDs).

The distinctive AFH model is mission-focused, transparent, balanced, action-oriented, and based on

scientific evidence. AFH governing principles ensure transparency and balance among activities and stakeholders, from the leadership level to funding. AFH participants value trust and the opportunity to learn from one another. AFH's system of checks and balances facilitates the development of consensus and minimizes stakeholder group biases to develop collective, actionable, recommendations.

#### Specific Comments

AFH would like to comment on the draft WHO Discussion Paper (version dated 11 September 2017) entitled "Draft approach on the prevention and management of conflicts of interest in the policy development and implementation of nutrition programmes at country level" and the accompanying Introductory Paper and the Proposed Decision-Making Process and Tool.

These documents raise concerns that Member States may significantly restrict engagement with one of the non-State actors: the private sector. This appears to contradict the 2030 Agenda for Sustainable Development, Sustainable Development Goal (SDG) 17: Revitalize the global partnership for sustainable development. Specifically, SDG 17, calls for, "A successful sustainable development agenda requires partnerships between governments, the private sector and civil society. These inclusive partnerships built upon principles and values, a shared vision, and shared goals that place people and the planet at the centre, are needed at the global, regional, national and local level." It envisions a revitalized and enhanced global partnership that brings together governments, civil society, the private sector, the UN system, and other actors, and mobilizes all available resources to achieve the SDG targets.

Restricted engagement appears contradictory to SDG 17; it specifically can weaken attempts to provide sustainable solutions to the NCD crisis by excluding a key stakeholder group that possesses both deep working knowledge of food and agricultural systems and of global health systems. Working through United Nations (UN) frameworks and decision-making tools to manage Conflicts of Interest (COI) including the identification of interests and objectives, should serve as the mechanism to enable, rather than prohibit, partnerships with Non-state actors.

A positive example of private sector and multistakeholder engagement with the United Nations in advancing the SDGs are the United Nations Global Compact (UNGC) Action Platforms. UNGC has developed a portfolio of Action Platforms to advance responsible business activities and fill emerging gaps in meeting the SDGs. Each Action Platform will convene business, Global Compact Local Networks, leading experts, civil society, Governments and UN partners to solve complex and interconnected issues, explore new market opportunities and innovate around the SDGs.

"Health is Everyone's Business," the health platform, examines the interconnected nature of how we live, eat, work, play and organize our communities, and the subsequent impact on our climate, health and wellbeing, to meet SDG 3, "Ensuring healthy lives and promoting well-being for all at all ages. Equitable access to clean water, clean air, healthy and nutritious food, and affordable quality healthcare are underlying drivers for long term health and well-being, as is the opportunity to live in health-promoting communities – in cities, schools and workplaces. Long-term health contributes to poverty alleviation, sustains social and economic development and is a prerequisite for educational attainment. This makes health everyone's business.

In creating AFH, our work has been guided by COI literature from peer reviewed journals and other respected sources. For example, the U.S. National Academy of Science recommended specific approaches for creating the Dietary Guidelines for Americans (DGA), which is a report that provides nutritional and dietary information with the intention of promoting health and preventing disease in the United States.

The U.S. National Academies identified a set of values to enhance the integrity of the DGAC selection process:

1. Enhance transparency;
2. Promote diversity of expertise and experience;

3. Support a deliberative process;
4. Manage biases and conflicts of interest; and
5. Adopt state-of-the-art processes and methods.

Another article in Health Policy (Health Policy 112 (2013) 172– 178) recommends:

1. Full disclosure of all relevant financial interests should be required, and only those applicants who would be directly affected by the work of the panel financially should be considered ineligible.
2. Consideration of potential biases—including, but not limited to, political, ideological, religious, philosophical, financial, and so forth—should not be a factor in eligibility for the pool of experts to be drawn upon as advisers, except as specified in the previous criterion.
3. To satisfy existing inclusionary criteria from organizations such as WHO, EFSA, and others, subject-specific scientists from all geographic and ethnic backgrounds, both male and female, should be encouraged to apply, and the pool of such candidates should be large and broad enough to ensure that no relevant expertise is excluded from consideration.
4. Eligibility should be extended to candidates from all sectors including, but not limited to, academia, professional societies, government agencies, nongovernmental organizations, and private-sector institutions.
5. To ensure transparency and public trust in the selection process, eligibility and selection criteria should be made clear and available for anyone wishing to see them.

Notably, both sources specifically support including diverse expertise and sectors, including the private sector.

AFH was founded on the idea that multi-stakeholder engagement is critical to reducing morbidity and mortality from food and nutrition-related NCDs. We have included suggestions in this submission from our experience and peer-reviewed literature. Although the issue of Conflict of Interest presents a challenge to fighting NCDs, we believe it is better to include all stakeholders within clear safeguards to ensure our deliberative processes maintain their integrity and promote health for all.

Submitted by:

Rebecca Hamel & Eric Trachtenberg  
Co-Chairs, Alliance for Food & Health (AFH)

Specific comments

## Comments on the "[Introductory paper](#)"

General comments : Please comment on the clarity and comprehensiveness of the introductory paper

Specific comments

## Comments on the "[Tool](#)"

General comments : Please comment on the clarity and practical value of the tool

Specific comments