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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

Thank you for the opportunity to provide comments on safeguarding against possible conflicts of interest in nutrition programs.

The Global Obesity Centre (GLOBE) is a research group based in the Centre for Population Health Research at Deakin University and a WHO Collaborating Centre. Our vision is to catalyse improvements in population health, with a focus on obesity, through innovative research that empowers people and enables healthier environments.

We welcome the clarity the discussion paper brings to managing conflicts of interest and encourage WHO to promote the need to be proactive in this area to Member States. We also encourage WHO to provide Member States with examples throughout of how the organization manages their own conflicts of interest as a guide, but also for transparency. See the example given on pg 8 of the Introductory paper.

Specific comments

18.6 It will be difficult for low and middle-income countries to afford independent monitoring and

accountability. WHO could assist here.

22. The objective of step 2 is unclear. Suggest changing to 'Develop a profile of external actors and the proposed engagement. Also, a tendering process where Member States initiate engagement is likely to be of lower risk than one where external actors initiate.

23. Member States should be encouraged to consider risks and benefits that are not immediately obvious by (1) running scenarios and (2) seeking trusted advice

26. Some guidance on who relevant audiences may be would be helpful

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

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

This is a well-constructed paper that offers an excellent introduction to Member States for managing conflict of interest.

Examples would help convey meaning throughout the paper. The appendices are useful in this regard but the paper would also benefit from examples in other places. For example, institutional conflict of interest could be illustrated using an example where a tobacco company sponsored exercise equipment installed as a healthy city initiative.

What the paper means by nutrition programmes needs to be made clearly. The paper refers to ethical, legal and regulatory instruments but nutrition programmes is likely to include other activities like social marketing campaigns.

Specific comments

Under appropriateness of role (pg 7), examples of where COIs are likely to occur are needed. Manufacturers, sellers or promoters of Breast milk substitutes would be a good example. Also, some guidance is needed for Member States on how to manage the complexity of large companies would manufacture, sell and/or promote goods that contribute to unhealthy diets and to healthy diets.

The Mailon paper (appendix 3) doesn't appear in the reference list.

Comments on the "[Tool](#)"

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

The tool is practical and its step by step guidance will be appreciated by Member States. The example in the appendices are particularly helpful and building a bank of examples over time and making these available on a WHO website would enhance the utility of the tool and its use by Member States.

The tool needs to address the role of social media in conflict of interest. For example, if staff members 'like' external actor's promotions or pages, does that constitute a conflict of interest?

How do Member States manage multiple engagements by a single state actor? For example, the National Authority may have engaged with an external actor on a public health nutrition goal which a COI but that doesn't preclude a COI when they are engagement on a different public health goal.

The issue of saturation needs to be addressed. How do Member States manage when they need to conduct due diligence on multiple external actor's at the same time?

Specific comments

Page 3. It would be helpful to provide some information on who should be making the decisions in figure 1. Governments is broad and the 'the national authority' is not clearly defined.

Page 4. There is no “no” option for step 4.

Page 4. Replace analysist with analysis in step 3

Page 9. It would be good to link financial contributions to accountability by discussing disclosure of financial contributions in step 6

Page 10 Of the ethical impacts, impact on integrity seems a higher priority than impact on reputation so impact on Integrity could be impact 1.

The introductory paper refers to public health and nutrition impacts but the technical impacts in the tool refers just to nutrition intervention effectiveness. Perhaps public health could be added to this impact.

Table 2 could be replaced with a ‘see-saw’ figure to illustrate the balancing test.