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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

In general, the paper and tool address issues that EPHA and public interest researchers and organisations have long identified; that there is an inherent conflict of interests for producers of health-harmful products, including food and drink products, which incentivises them to intervene in policy-making with the aim to derail and delay public interest policies, programmes and measures.

In particular, we highlight the wealth of research evidence demonstrating that "self-regulation" and voluntary approaches have largely failed to demonstrate public health benefits. In contrast, these approaches are shown to have been a successful tactic to halt, water down and delay effective measures, including regulatory and fiscal measures. As a result, diet-related chronic disease prevalence continues to rise to unprecedented levels. Diet has become the number 1 risk factor in the global burden of disease.

We therefore call for all levels of government to review the evidence on effectiveness "self-regulatory" approaches, and respond as appropriate by phasing out such platforms and switching focus to real-world, health-maximising implementation of the identified best-buys to reduce prevalence, morbidity and mortality related to non-communicable diseases.

The toolkit focus on public health evidence, transparency, monitoring and evidence are therefore appropriate to guide governments in this evaluation.

Specific comments

Please see a summary of the evidence of (lack of) effectiveness of self-regulation for public health here:  
<https://epha.org/briefing-paper-i-self-regulation-a-false-promise-for-public-health/>

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### 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