



GLOBAL DAIRY PLATFORM

Comments to the WHO Consultation 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” September 22, 2017

Global Dairy Platform appreciates the opportunity to provide comments, albeit, through a relatively short consultation process, to the online consultation for *Safeguarding against possible conflicts of interest in nutrition programmes: “Approach for the prevention and management of conflicts of interest (COI) in the policy development and implementation of nutrition programmes at country level”*.

We agree with the general principle related to COI in the discussion paper that; *“The existence of conflict of interest in all its forms does not as such mean that improper action has occurred, but rather the risk of such improper action occurring. Conflict of interest is not only financial, but can take other forms as well”*. In addition to financial conflicts of interest, other non-financial conflicts of interest such as statements in publications, history of unpaid advisory roles, and organizational affiliations may be equally as strong. Therefore, conflicts of interest can affect any actor engaged in policy development or implementation of nutrition programmes.

Nutrition policy and programmes need to be driven by an open, fair and unbiased dialogue of the available scientific evidence (**Cope and Allison, 2010**). It is equally important to gain a full understanding of where there may be gaps and limitations in evidence to ensure policy is not assumption-based.

While the discussion paper outlines recommendations and procedures to mitigate and/or manage conflict of interest from the private sector interest in the development of nutrition programs at the country level, there is a lack of discussion on the many potential *benefits* of partnerships with the private sector.

The discussion paper rightly points out that engagement with non-state institutions should be “aligned and coherent with other Member State’s policies and objectives such as those related to NCDs and the Sustainable Development Goals”. However, when discussing the Sustainable Development Goals it is important to note Goal 17: Strengthen the means of implementation and revitalize the global partnership for sustainable development. The progress toward Goal 17 states:

“Despite some positive developments, a stronger commitment to partnership and cooperation is needed to achieve the Sustainable Development Goals. That effort will require coherent policies, an enabling environment for sustainable development at all levels and by all actors and a reinvigorated Global Partnership for Sustainable Development.”

Indeed, the United Nations recognizes the role of partnerships in achieving the Sustainable Development Goals, and the role all institutions can have in achieving these goals. Furthermore, the United Nations recognizes that more progress can be made with a stronger commitment to partnership and cooperation.

Following the launch of the SDG’s, Secretary General Ban Ki-moon highlighted the fundamental role of the private sector in advancing the newly-adopted sustainable development agenda noting that; *“Governments must take the lead in living up to their pledges. At the same time, I am counting on the private sector to drive success”*. We are concerned that the proposed approach runs counter to the intentions of Agenda 2030 and the approach being taken by most other United Nations agencies and is not consistent with the principles of good governance.



Public-private partnerships in nutrition make it possible to share resources and expertise; they create greater appreciation for perspectives of various stakeholders within both the public and private sectors; and they can address unmet public health needs that otherwise would be impossible for one group to address (e.g., research needs; product development or reformulation). Public-private partnerships foster collaboration to drive multidisciplinary public health agendas for: 1) improving and sustaining health, 2) choosing healthy eating patterns and 3) using innovative methods to accelerate discovery.

The May 2017 editorial in the *Journal of the American Medical Association* noted, “Given the scale of nutritional challenges worldwide, the scope of industry’s expertise and reach, the diversity across companies and their employees, and the potential to create products that are healthier and more profitable, the food industry is a necessary partner for important research and translational solutions to help address the global nutrition crisis.” (**Mozaffarian 2017**). The editorial goes on to say, “As a corollary, by collaborating with companies, academics, other nonprofit groups, and government can also positively influence the food industry’s perspectives by sharing of expertise on health, sustainability, policy, and public good—including the potential market advantages of incorporating these aims into business strategy” (**Mozaffarian 2017**).

Public-private partnerships are not easy to establish or maintain. Forming clear objectives, building trust among partners is essential for building successful public-private partnerships. In fact, many of the same principles outlined in the WHO draft guidance have been proposed previously as a framework for public-private partnerships for food and nutrition research (**Alexander 2015**). These include, but are not limited to, having a clearly defined and achievable goal to benefit the public, minimizing conflict of interest, and ensuring ongoing, transparent communications between the partnership and the public (**Alexander 2015**). The draft guidance on safeguarding against conflict of interest should be an important tool to facilitate decision making, ensuring that potential partners are aligned with clear goals to first and foremost benefit public health and nutrition, while at the same time being transparent and fulfilling Member States objectives.

Additionally we question the need for this proposed approach in light of the WHO’s own Framework for Engagement with Non-State Actors (FENSA), which is yet to be fully implemented.

We hope that WHO can develop a clear and fair framework that will help manage conflicts of interest and allow all actors to engage in the important work of developing nutrition policy and programmes that can move us forward in achieving the SDGs.

References

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- Mozaffarian D. Conflict of Interest and the Role of the Food Industry in Nutrition Research. *JAMA*. 2017 May 2;317(17):1755-1756.