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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

Specific comments

WHO has made substantial progress through FENSA and this discussion paper to delineate mechanisms for identifying and managing potential conflicts of interest. There are some important limitations to the effort to date which WHO should address before advancing the document to the Executive committee. Paragraph 4 describes the Technical consultation from October 2015, that "brought together experts from different fields such as nutrition, health systems, NCDs, legal, economic and social sciences. In addition, a diversity of stakeholders, including public officials from the six World Health Organization (WHO) regions, experts from non-governmental organizations (NGOs) and from multi-stakeholder initiatives, academic researchers, lawyers and experts from other United Nations (UN) agencies working on the area of "Partnerships," participated." The report about this technical consultation does not identify the participants nor describe their disclosures of potential conflicts of interest. In WHO's encouragement of transparency elsewhere in the Discussion paper (paragraphs 18, 25, 26) WHO should disclose the names and organizations of the participants in the Consultation, and their disclosures of potential conflicts of interests. This is essential to establish that the contributions of the members of the Consultation were not made for the purpose of their own further involvement, i.e., a conflict of interest.

The description of experts in paragraph 4 is insufficient to assess their competence for the task, e.g. experts in 'social science' is insufficient to know what type of social science expertise WHO obtained. More

importantly, there are two perspectives not represented in the list of experts that should have been represented. One is the editors of medical and health science journals. These editors have longstanding and leading-edge experience with conflicts of interest, especially with regard to managing potential conflicts of interest of private sector, and their organizations, e.g. International Committee for Medical Journals Editors, have stated, evaluated and evolved policies . Note that editors use disclosure as the predominant mechanism for managing conflict of interest, and rarely exclusion.

One element of disclosure that has become more common recently is non-financial conflict of interests such as personal relationships, academic associations, professional non-financial COI, political affiliations, non-financial affiliations, religious views, intellectual, personal opinion . While still less common than disclosure of financial potential COI, the requirement to declare non-financial COIs is increasing. The value of such disclosures is not as well studied as financial COI, and some have argued it adds to already cumbersome disclosure without proven value . Still WHO needs to consider non-financial disclosures carefully as non-state actors benefit in prestige and fundraising, and benefit from paid travel for WHO related work.

The second perspective not represented at the Consultation is the private sector. Paragraph 1 of the Discussion paper states the 65th WHA recommendation for “a supportive environment for the implementation of comprehensive food and nutrition policies.” The private sector in one of the 4 types of non-government actors defined in the introductory paper. It is implausible that comprehensive policies involving food and nutrition can be developed without the perspective of the private sector. The private sector is the primary user of natural resources for production of food, has infrastructure for distribution of food (especially in highly populated urban areas) understands consumer interests and preferences needed for sustainable provision of preferred foods, has technical expertise on food safety, food contamination, product development including nutrient interactions and organoleptics, and directly interacts with government on trade, tariffs, subsidies, participation in government sponsored food aid, and provision of nutritious foods in health care settings.

In paragraph 5, WHO proposes ‘a methodology’ for management of COI. For transparency, WHO should disclose alternatives that might be considered and the strengths and weaknesses of each, showing how it arrived at the particular methodology proposed. Similarly, in paragraph 6 WHO states it has reviewed the scientific literature on conflicts of interest but has not disclosed its sources or conclusions. Paragraph 6 also states it considered comparison of corporate tactics between the tobacco and food and beverage industries, but fails to include examples of productive industry self-regulation, e.g., the European pledge ([http://www.eu-pledge.eu/sites/eu-pledge.eu/files/reports/EU\\_Pledge\\_2015\\_Monitoring\\_Report.pdf](http://www.eu-pledge.eu/sites/eu-pledge.eu/files/reports/EU_Pledge_2015_Monitoring_Report.pdf)). This suggests a bias against the private sector in the Consultation, one the private sector could not defend against, having not been invited.

Paragraph 9 uses the term “unduly influence” which begs the question of what due influence is. Information and analysis are needed for decision-making and policy development. Support of government to obtain facts and undertake analysis empowers good decision making and should be considered due influence in the development of policy. Disclosure of COI is critical; transparency of interaction of government with all non-state actors is critical; but exclusion of parties from due influence is simply institutional ignorance. Similarly, in paragraph 13, it is unreasonable and unhelpful to expect any government person to be not influenced by the information provided to them. This paragraph should be reworked to limit only influence that is not aligned with mission of the involved government body, and disclosure plus transparency can be the main tools to limit influence not aligned to mission.

## 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