

Fields marked with an asterisk (*) are mandatory.

Contact details

Last name: *

Mwatsama

First name: *

Modi

E-mail: *

modi.mwatsama@ukhealthforum.org.uk

Name of government/organization/association if applicable: *

UK Health Forum

Position within organization *

Director of Policy and Global Health

Address of organization

Country *

gbr

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

The discussion paper provides a good general overview and summary of the contents of the other two papers. However, the material is quite technical and hard to understand to individuals who are not ethicists, lawyers or academics familiar with the conflicts of interest literature and terminology.

As it is likely that it could be the only paper that is read by busy officials (who have many other competing priorities), the paper could benefit from the inclusion, early on (on the first or second page) of one or two up-front examples which illustrate exactly what conflicts of interest – are such as Appendix 3, example 1 in the introductory paper.

This would help to make some of the concepts more immediately comprehensible to audiences for whom this is not their primary area of expertise.

Specific comments

It is worth stating up-front in this section in para 24 – that the process of risk management should be on-going for the duration of any public-private interaction.

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

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

This paper helps to flesh out the issues underpinning conflicts of interests in greater detail. The inclusion of examples is welcome. However, as these are short and clear in nature, it would be better for these example boxes to be incorporated directly within the text of the document – as opposed to left to the appendices which may or may not be read. This would help to make some of the concepts more

immediately comprehensible to audiences for whom this is not their primary area of expertise.

Specific comments

The following examples would specifically benefit from being moved from the appendices into the relevant sections of the main document as they are short and succinct:

- Appendix 2
- Appendix 3: Example 1 and example 2.
- Appendix 5: Example A and example B
- Appendix 6

Appendix 5, example a – the abbreviation SSB specifically refers to sugar-sweetened beverages – not all beverages. This should be reflected in the text.

Paragraph 3 on the process of development of the tool:

- This paragraph provides useful background information, but could be moved to the appendices of the document – for those wishing to have more information on the methodology outlining how the tool was developed. The methods will not be the main reason that a member state would access the guidance – they are more likely to be interested in the practical recommendations proposed.
- The paragraph refers to several reviews of the scientific literature which were undertaken. It would be useful for these to be cited eg in the appendix, and links provided to them.

Comments on the "[Tool](#)"

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

This document is very comprehensive.

The material included within section 5, b) principles for prevention of COI – is well written and one of the most useful and relevant components of this paper.

Some of the detail within the general principles – eg the different types of COI, and purpose and forms of engagement sections are contested and also not so easy to understand to those who are not familiar with the technical ethical and legal literature on COIs. Could this information perhaps be transferred to an appendix or glossary of definitions?

Alternatively, it might be worth piloting the tool with some target policy makers for their feedback on how useful this information is and how likely they would be to use it.

Specific comments

The inclusion of a summary flow-chart (Figure 1) at the beginning of the document (page 4) is helpful.

Some questions / suggestions for clarification:

- The first column in red – no, stop – is not clear what purpose this serves. If it is to answer the question, then the arrow should perhaps flow downwards from the question to the stop sign? At the moment the way the flow chart is presented, the answer precedes the question.
- It might be useful to include signposts to the examples of the relevant tools / tables within the main document, space permitting.

Appendix Table 2: Examples of how to categorize aligned and non-aligned external actors

This table is excellent as it provides a clear, simple approach to categorisation. It would enhance the document if this was moved from the appendix to the relevant section within the main document.

Appendix Table 4: Examples of high risk and low risk indicators for the engagement risk profile (STEP 2 – Task 5).

We would recommend that the examples of appropriate activities / roles should be qualified to focus only on recommending implementation of meaningful activities which have been independently developed or assessed and verified by the ministry of health or public health actors (eg professional groups) as being likely to be effective in helping to improve nutrition. Unfortunately many voluntary activities that industry actors have developed (eg marketing pledges) tend to be narrow in their scope and not significant in terms

of their impact on reducing consumption of those products.

Table 6: Examples of mitigation measures (STEP 4-Task 1)

While we recognise the rationale behind the section on “engagement through the policy cycle” in practice, the boundaries between policy making and implementation are never clear, which can make the application of this guidance difficult in practice.

Annex:

Many NGOs and grass-roots organisations are not well resourced, and may therefore not have some of the sustainability and ethics policies requested. We would therefore recommend that Annex: Due diligence questionnaire – should also seek information on the annual turnover, and recommend that this is taken into consideration and help put into context, some of the other information that is requested.

Other:

The document could possibly benefit from a glossary to explain terms eg Whitewash – which are used through the document. This glossary could also accommodate the definitions of different types of COIs and forms of engagement.