We appreciate the opportunity to make this statement on behalf of the IBFAN, the global network working to stop misleading marketing by the baby feeding industry and to safeguard public health policy setting from commercial influence.

We welcome the Action Plan’s many references to safeguards, including on child feeding and conflicts of interest. However, the Plan falls short in some areas and we fear the good recommendations may be lost.

This is important given the pressure on EU MSs to break down barriers to trade, to use a ‘light touch’ in health policies that affect trade, and to work in partnerships with the food and drink industries to ‘persuade’ rather than ‘regulate’ them. In this context, voluntary Corporate Social Responsibility and ‘multi-stakeholder’ approaches are promoted as the smart ‘win win’ option that will grow markets globally and build consumer ‘trust.’ The Action Plan acknowledges the importance of Government leadership and that self-regulatory approaches have loopholes, but it should also highlight the lack of evidence that such strategies work and the risks that they could exacerbate the problem.

For example on the question of the role of corporations in consumer behaviour change –WHO should explicitly call for no food and drink sponsorship in schools – in line with Action 3 of the EU Action Plan of Childhood Obesity 2014-2020. The call for schools to be free from ‘marketing’ is welcome, but it is not enough. Corporations are skilled at blurring the lines between marketing and education. Since the risks of such involvement are even greater in infant and young child feeding all the WHA Resolutions (and especially no 49.15, 58.32, 61.20, 65.6 calling for avoidance of Conflicts of Interest) should be highlighted and the appropriate role of the baby food industry defined: to produce safe products and follow the International Code and WHA Resolutions.

Thank you

1 http://jpubhealth.oxfordjournals.org/content/early/2011/02/06/pubmed.fdr008.full