



# Nutrition International's Principles of Engagement with the ultra-processed food industry

The purpose of these Principles of Engagement (PoE) is to:

- 1) Articulate Nutrition International's position and guide interactions with the ultra-processed food industry (UPFI)
- 2) Clarify our position on this issue with external partners and governments
- 3) Create alignment and consistency of application internally

## **DEFINING ULTRA-PROCESSED FOOD AND THE ULTRA-PROCESSED FOOD INDUSTRY**

Ultra-processed foods (UPF) are formulations made mostly from low-cost, ultra-processed raw materials, including modified starches, hydrogenated fats, added sugars and salts, emulsifiers, preservatives, etc. They are of industrial origin and are typically energy-dense and high in salt, sugars, trans-fats, food additives and preservatives. They are hyper-palatable, have a long shelf-life, are designed and manufactured for maximum profit, and are highly branded and marketed to consumers, including children, adolescents and caregivers.

The UPFI refers primarily to multinational corporations and their proxies (including industry associations, multi-stakeholder groups, foundations, etc.) that produce, market, lobby, advocate for, and sell UPF and sugar-sweetened beverages.

## **WHY DOES NUTRITION INTERNATIONAL NEED PRINCIPLES OF ENGAGEMENT WITH THE ULTRA-PROCESSED FOOD INDUSTRY?**

Building a world that works for everyone starts with good nutrition. Well-nourished populations are healthier and more productive: their children achieve more in school, enjoy greater health and resilience to disease, and ultimately earn and contribute more to their nation's economic growth and development.

Conversely, malnutrition and the rise of overweight, obesity, and non-communicable disease undermines wellbeing at every turn, threatening the health, education and prosperity of current and future generations. The diseases of malnutrition add strain to overburdened health systems and rob individuals, families and communities of their lives, health and potential. And this is all preventable.

Nutrition International's vision is a world where everyone, everywhere, is free from all forms of malnutrition and able to reach their full potential. Only then can we break the intergenerational cycle of poverty and build a more equitable and stable world that works for everyone.

UPF consumption is expanding rapidly and globally, and with it, the incidence of overweight and obesity and their associated diseases (i.e. diabetes, heart disease, cancer). This proliferation of UPF, as driven by commercial interests, represents a clear and present danger to the people we serve, and to achieving our vision. Clarifying our posture and principles of engagement with the UPFI is, therefore, a concrete and necessary step to safeguard Nutrition International's reputation as an honest broker and expert ally to governments, and to position Nutrition International to proactively advocate for conflict of interest-free nutrition policy and regulatory spaces.



## ABOUT NUTRITION INTERNATIONAL

Nutrition International has been a global nutrition leader for more than 30 years, working to improve the nutrition, health and wellbeing of vulnerable women, adolescent girls, and children. We are at the forefront of the global nutrition effort, conducting cutting-edge research and delivering lifesaving nutrition interventions that put the needs of those we serve at the centre of all we do.

We work in more than 60 countries globally, generating data and evidence, supporting policymakers and institutions to make informed decisions, and working alongside governments as an expert ally to ensure their programs successfully deliver the right nutrition interventions at scale in a targeted, cost-effective way. Because we are driven by evidence, focused on results, and serve as an expert ally to governments – we must be free from conflict of interest, and clearly seen as an actor whose reason for being is to maximize public good (and public health in particular).

### WHY IS THIS AN IMPORTANT ISSUE NOW?

The face of malnutrition is changing globally – and rapidly so. While levels of undernutrition remain stubbornly high, overweight and obesity are now also on the rise, especially in Africa and Asia. Left unchecked and unaddressed, the global costs of overweight and obesity are predicted to reach USD \$3 trillion per year by 2030 and more than USD \$18 trillion by 2060.<sup>1</sup>

While the drivers of overweight and obesity are multifaceted, one key contributing factor is clear: the increasing consumption of unhealthy foods that are cheap, and calorie-dense but nutrient poor, otherwise known as UPF.



UPF now makes up over 50% of the calories consumed in some high-income countries, and low- and middle-income countries are on track to achieve similar levels over the next decade. With high-income market consumption now plateauing, the UPFI is deploying multiprong strategies to grow consumption and drive profitability. This is easiest for them to do in markets with lower consumer awareness about unhealthy foods, and weak to no regulations governing the marketing and sale of unhealthy products. Some tactics used by the UPFI to grow market share include:

- The development and production of hyper-palatable (high in fat, sugar, salt), calorie-dense, nutrient-poor, and inexpensive UPF.
- The intentional marketing of these foods to children and young people, with the goal of establishing early eating habits and influencing household purchases.
- Intentional lobbying activities with governments to reduce, delay and water down regulations related to the UPFI. This includes regulations related to consumer information, food ingredients and marketing practices, as well as proposing self-monitoring mechanisms and voluntary guidelines.
- Efforts to dilute, obscure and obstruct legitimate science, with the goal of creating uncertainty, and focusing public health policies away from consumption-related activities. This includes the creation of industry-funded research groups that produce pro-UPFI reports and obfuscate clear evidence.
- The creation of public-private partnerships, multi-stakeholder groups and corporate social responsibility relationships to build goodwill and whitewash their corporate activities.
- Aggressive and disingenuous engagement in policy, regulatory and other normative dialogues spaces, leading to the normalization of the UPFI in nutrition policy spaces.

These actions demonstrate that the global fight against malnutrition is being actively undermined by the UPFI.

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<sup>1</sup> World Health Organization (2024, March 1). Obesity and Overweight <https://www.who.int/news-room/fact-sheets/detail/obesity-and-overweight#:~:text=Obesity%20can%20lead%20to%20increased,the%20risk%20of%20certain%20cancers.>



Meaningful progress is only possible when those shaping nutrition policies, programs and practices are focused on improving nutrition security for all as their primary goal. The UPFI is designed to maximize profit as a primary goal, not public good. As such, the UPFI has no legitimate role in the nutrition policy space, especially where key standards, rules and regulations are being discussed and defined. It cannot be productively included in the shaping of global, regional and national policies related to nutrition, nor in the shaping or financing of nutrition programs.

### **SAFEGUARDING THE NUTRITION POLICY SPACE**

To limit the impact of the UPFI in nutrition policy spaces, nutrition policymakers must work together to define strong and consistent regulations and principles of engagement. The United Nations, governments, global nutrition organizations like Nutrition International, civil society, and academic institutions also have a critical role to play in safeguarding policy spaces and upholding principles of engagement with the UPFI.

Nutrition International is deeply committed to limiting any engagement with the UPFI that signals, in substance or appearance, a legitimate role for the UPFI in nutrition policy spaces. We do this because we serve as an expert ally to governments, and we support nutrition policymaking and new evidence generation. We will engage with partners on the role of the UPFI in nutrition, but our focus will be to consistently advocate for nutrition policy spaces to be evidence-based, conflict-of-interest-free, and driven by public good.

The following PoE more fully articulate the approach we will take moving forward.

### **PRINCIPLES OF ENGAGEMENT**

- 1. Protect the policy space.** We believe that to build a stronger, more principled, and united nutrition community, it must be free from conflict of interest – particularly in nutrition policymaking spaces.

As a not-for-profit organization dedicated to serving people affected by malnutrition, we will avoid normalizing the UPFI's participation in nutrition policymaking spaces. What that means is:

- a) We will not knowingly take any action that legitimizes the role of the UPFI in nutrition policy spaces
- b) We will actively work to ensure that the global, regional and national policy spaces where we engage are protected from the undue influence of the UPFI
- c) We will advocate with our partners for stronger, aligned and clear principles of engagement
- d) We will carefully monitor the policy processes, cycles and stakeholders that Nutrition International engages with to identify potential conflicts of interest
- e) We will advocate for the exclusion of the UPFI and their enablers in all nutrition policy fora, and will not participate in policy processes, stakeholder groups or nutrition conferences that include such actors
- f) We will engage in discussions and debate on the role of the UPFI in nutrition
- g) We will deprioritize participation in policy dialogues/global conferences led by other entities where PoE and boundaries with the UPFI are weak or not present



**2. Preserve and uphold our neutrality and freedom from conflict of interest.**

We serve as an honest broker and expert ally to governments. We cannot do that if we are – or are seen to be – representing, advancing, advocating for, or benefiting from the UPFI. We will therefore avoid all forms of engagement with the UPFI that undermine the integrity of our work or the faith that governments have in Nutrition International’s evidence-based approach.

What that means is:

- a) We will not accept any form of financial support from the UPFI and their enablers (e.g. industry associations, umbrella groups, foundations, and research groups funded or governed indirectly by the UPFI, etc.)
- b) We will not engage in other activities with or around the UPFI that risk harming our reputation as an honest broker. This includes program and policy collaborations, joint communications activities, paid or unpaid roles including governance positions, research collaboration, etc.

**3. Reinforce country efforts to address growing UPFI-related malnutrition.**

We will reinforce government-led public-health nutrition approaches by supporting:

- a) Government-led action to protect the food environment through pro-nutrition policies and regulatory, legislative, and tax frameworks
- b) Increased prioritization of investment towards primary healthcare and prevention – including adolescent and maternal nutrition and the first 1,000 days.
- c) Public education and awareness about the importance of healthy diets and the harm of consuming unhealthy foods. This would include increasing the agency of young people in schools through nutrition education, as well as working with local civil society, advocating for sugar, sodium, and trans-fat reduction etc.