



CONSEJO GENERAL
DE COLEGIOS OFICIALES DE
Dietistas-Nutricionistas

Call for comments on the draft WHO Guideline

Fiscal policies to promote healthy diets

Authors: Eduard Baladia, Manuel Moñino, Martina Miserachs, Giuseppe Russolillo.

On behalf: Consejo General de Colegios Oficiales de Dietistas-Nutricionistas and Academia Española de Nutrición y Dietética

Contact email: presidencia@consejodietistasnutricionistas.com

Last update: 25/01/2023



Overall clarity of the guideline

The guideline is written clearly enough, and its sections help to accurately understand the work carried out and the conclusions/recommendations reached.

Considerations and implications for adaptation and implementation of the guideline

Recommendation 2:

For recommendation 2 “WHO suggests implementation of a policy to tax foods inconsistent with a healthy diet”, a conditional recommendation has been determined due to “a very low certainty evidence from a limited number of real-world policy evaluations”.

While this is the general application in GRADE low certainty = conditional recommendation, we would like to highlight and remind that, although evidence is classified as low certainty, under some specific conditions strong recommendations can be done. This is summarized in chapter 14 of the WHO handbook for guideline development – 2nd ed. (ISBN 978 92 4 154896 0) © World Health Organization 2014 (14. Strong recommendations when the evidence is low quality). As contextual factors on this recommendation mention, it may affect the equity, human rights, and it is pivotal to highlight that it is foreseen with a good acceptability and feasibility.

We would like the Development Group to reflect more on whether this a Life- threatening situation. There is evidence on how unhealthy foods pose human health at risk and threaten the wellbeing of society. We believe that despite the evidence is low certainty, the potential adverse effects of taxing unhealthy foods are inappreciable. We believe that “A very high value is placed on an uncertain but potentially life-preserving benefit” and therefore a strong recommendation and not conditional should be made. It must be taken into account that many of the observational evidence on nutrition policies is generated only after they have been implemented in one or several countries. Facilitate decision making could help to provide “real world” evidence to increase certainty of the impact of policies.



However, the same would not happen with recommendation 3 on subsidies, which involves a significant investment of economic resources. We believe that policy makers should have more certainty about the impact of this kind of policies, thus in this case we would leave the recommendation as conditional.

Context and setting-specific issues that have not yet been captured

No comments. If possible, it would be of interest to include the Policy Paper of European Federation of the Associations of Dietitians (EFAD) on The Use of Fiscal Measures on Food to Improve Food Environments as part of the background that supports the relevance of fiscal policies.

https://www.efad.org/wp-content/uploads/2022/09/Fiscal_measures_policy_paper_ESDNPH_2022.pdf

Errors of fact or missing data

In the “Executive summary” ==> The evidence ==> Taxation of SSBs: it is mentioned that “on the outcomes of price change of taxed beverages and purchases of taxed beverages were large and significant, which allowed for the upgrading of the certainty of the evidence for these outcomes” ==> however, the level of certainty assigned it is not mentioned.

In the “Executive summary” ==> The evidence ==> Subsidy on foods that contribute to a healthy diet: it is mentioned that 10 studies were RCT, and later that the certainty of the evidence was “very low”. It would be interesting to recall at this point what risks of bias downgraded the certainty of evidence.