



JAN 5 2004

The Honorable J. W. Lee, M.D.
Director-General
World Health Organization
Avenue Appia 20
CH-1211 Geneva 27
Switzerland

Dear Mr. Director-General:

The United States Government is pleased to once again provide the World Health Organization (WHO) and the Food and Agriculture Organization (FAO) with comments on its Report of the Joint WHO/FAO Expert Consultation on Diet, Nutrition and the Prevention of Chronic Diseases (Report 916) which was co-released in final form by both Organizations in April 2003.

We in the United States Government are taking the opportunity now to review and provide additional comments on the 2003 version of the Report in view of the ongoing discussions within the governance venues of the WHO and FAO, particularly as it relates to WHO's global strategy on diet, physical activity and health. These comments focus on where the U.S. Government's policy recommendations and interpretation of the science differ from those of the WHO/FAO Report. While these comments are illustrative rather than comprehensive, we hope they will contribute to the global discussions that will take place within the WHO and FAO in 2004.

Our comments also reinforce our view that the role the WHO should play as a strict role as a technical agency of the United Nations to provide recommendations based on sound science to help guide Member States as they develop national public health policies appropriate to their own circumstances. Only by employing open and transparent processes that are science-based and peer-reviewed can the WHO and FAO produce a credible product. As we have said before, in our view, the WHO and FAO have not done so with Report 916.

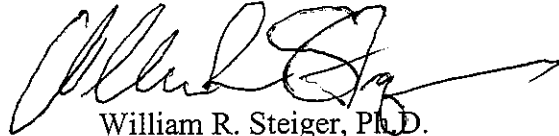
The comments in the enclosed document are an indication of the U.S. Government's continued commitment, under the leadership of Secretaries Tommy G. Thompson and Ann Veneman, to work with the WHO, FAO, and the international community to address the growing challenges of obesity and chronic diseases through evidence-based policies, better

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data and surveillance, and the promotion of sustainable strategies that focus on energy balance, individual responsibility, and strong public health approaches. As with our previous communications on Report 916, our comments represent a consensus reached within the U.S. Government through a full interagency-process.

My staff and I would be pleased to answer any questions or provide additional clarification on the enclosed document. You may reach me at (202) 690-6174. Lou Valdez, Deputy Director for Policy in the Office of Global Health Affairs, here in the Department of Health and Human Services, can also be an additional resource for you (telephone 301-443-1774 or e-mail mvaldez@osophs.dhhs.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'William R. Steiger', with a long horizontal flourish extending to the right.

William R. Steiger, Ph.D.
Special Assistant to the Secretary for
International Affairs

Enclosure

Copy to: Jacques Diouf, Ph.D.
Director-General
Food and Agriculture Organization

**Review of
“Diet, Nutrition and the Prevention of Chronic Diseases”
Report of a Joint World Health Organization (WHO)/Food and Agriculture
Organization (FAO) Expert Consultation (WHO Technical Report Series 916)
by the U.S. Departments of Health and Human Services and Agriculture**

Report 916, entitled *Diet, Nutrition and the Prevention of Chronic Diseases*, is a Report of a Joint WHO/FAO Expert Consultation, which met during the period of January – February 2002. A draft version of the *Report* was released in April 2002, and the final version was published and released in April 2003 by the Directors-General of the WHO and FAO in Rome, Italy. The United States Government (USG), through its Department of Health and Human Services (HHS), provided substantive comments on the 2002 draft version of the *Report* (April 2002).

HHS takes the opportunity now to review and provide additional comments on the 2003 final version of the *Report*, given the ongoing discussions within the governance venues of the WHO and FAO regarding the *Report* itself, and more broadly, the issues surrounding diet, nutrition, physical activity and health, including the WHO’s development of a global strategy on diet, physical activity and health. These comments delineate where the USG’s policy recommendations and the USG’s interpretation of the science differ from those of the WHO/FAO *Report*. They are illustrative rather than comprehensive and are not intended to identify all instances of such differences.

The United States supports the idea of a WHO global strategy on diet, physical activity and health. USG agencies are committed to working with the WHO, FAO, and their Member States in the development of such a strategy. However, the issues surrounding diet, nutrition, and the prevention of chronic diseases are extremely complex. In developing any regional or global strategy, it is incumbent upon United Nations organizations, governments and all stakeholders to ensure the strategy is based on the best possible scientific and public health evidence. Equally important, if countries are to embrace any resulting strategy and implement it effectively, the process for development and implementation must be transparent and participatory.

General Comments

USG agencies have a long history of using science-based reviews to develop public health policies. The success of such activities depends largely on the rigorous and critical nature of the scientific reviews and the development of policies consistent with the results of these reviews. This policy development is generally characterized by two basic traits:

- a) A comprehensive and systematic review of the available evidence. Individual studies are evaluated for scientific quality and merit, and the weight of the overall scientific evidence is based on a hierarchical plan in which intervention trials carry greater weight than observational studies. To the extent possible, this process is well-documented by using criteria accepted by the scientific

