



**Comment to the Department of Health and Human Services (HHS)
Stakeholder Listening Session on the World Health Assembly**
Submitted May 13, 2022

Introduction

The National Milk Producers Federation (NMPF) and the U.S. Dairy Export Council (USDEC) thank the Department of Health and Human Services (HHS) for the opportunity to provide written comments and participate in the August 18 listening session on the Member State working group on strengthening World Health Organization (WHO) preparedness and response to health emergencies.

NMPF develops and carries out policies that advance the well-being of dairy producers and the cooperatives they own. The members of NMPF's cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of dairy producers on Capitol Hill and with government agencies. NMPF provides a forum through which dairy farmers and their cooperatives formulate policy on national issues that affect milk production and marketing. NMPF's contribution to this policy is aimed at improving the economic interests of dairy farmers, thus assuring the nation's consumers an adequate supply of pure, wholesome, and nutritious milk and dairy products.

USDEC is a non-profit, independent membership organization that represents the global trade interests of U.S. dairy producers, proprietary processors and cooperatives, ingredient suppliers and export traders. Dairy Management Inc. founded USDEC in 1995 and, through the dairy checkoff program, is the organization's primary funder.

Comments on the World Health Assembly

The National Milk Producers Federation and the U.S. Dairy Export Council fully support robust U.S. leadership at the World Health Organization to promote improved global public health outcomes, as well as to advance American public health, economic and foreign policy goals.

As producers of dairy products that nourish Americans and people around the world, the U.S. dairy industry has long championed science-based nutrition policy. Numerous dietary guidelines in the United States and globally recommend consumption of dairy as a leading source of critical nutrients, particularly for women, children, and aging and vulnerable populations.

Research continues to demonstrate the critical nutrition contributions of milk, cheese, yogurt and other dairy products. WHO's work and policy recommendations must take this evidence into account and deliver transparent, inclusive, evidence-based outcomes regarding dairy consumption. U.S. dairy can, and must, be a partner in proactive, "whole of society" strategies to improve nutrition and achieve the UN Sustainable Development Goals.

Unfortunately, several World Health Assembly agenda items do not reflect the evidence in support of dairy consumption and have been advanced without meaningful member state and stakeholder engagement. Evidence does not support limiting or discouraging consumption of nutrient-dense dairy foods, for example by imposing unjustified taxes, warning labels, and/or marketing restrictions that may confuse or mislead consumers (for example, as in the decision point on digital marketing in document EB 150(7)).

We encourage the United States to work with like-minded member states at the WHA on EB 150(7)) to seek edits that ensure the decision includes considerations of national context, reflects Member States' international obligations, and avoids re-opening the WHO Code of 1981 and 2016 WHO Guidance which already apply broadly to all marketing practices, including those in a digital format.

Conclusion

The COVID-19 pandemic has underscored the critical importance of prioritizing WHO's core work of emergency preparedness and response, among other public health objectives. Reforms that focus WHO on its core mission can also improve WHO's work in areas like nutrition and non-communicable diseases.

The U.S. dairy sector urges the United States to ensure all WHO work is conducted transparently, in accordance with WHO's core mission and member state oversight; that WHO demonstrates true openness to engagement with all stakeholders; and that all WHO recommendations and workstreams advance science and evidence-based approaches, adhering to guidelines for good regulatory practice.

Thank you again for the opportunity to provide our thoughts on these vitally important matters. We thank HHS for continuing its practice of seeking public input on issues related to the World Health Organization, and we look forward to continued dialogue.

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