

August 2024

**HON. ASST. SEC. AZUCENA M. DAYANGHIRANG, M.D.**

Executive Director, National Nutrition Council  
Department of Health

Dear Hon. Asec. Dayanghirang,

Greetings from the European Chamber of Commerce of the Philippines (ECCP)!

The Chamber and its Food and Beverage Committee understand the urgency of addressing the country's triple burden of malnutrition namely, undernutrition, micronutrient deficiencies, and overnutrition, among children and adolescents. Additionally, these prevalent challenges are further exacerbated by factors such as food insecurity and lack of awareness. Recognising the imperative to underscore the implementation of relevant policies, we hope to remain a staunch partner of the government in achieving the country's nutritional outcomes through the proper development of the Philippine Nutrient Profile Model (PNPM).

Indeed, addressing these nutritional deficiencies is not only a health priority but also a socio-economic imperative for sustainable development. Nutrition, by and large, serves as a significant determinant of human capital which, in turn, becomes a major factor of economic productivity. In line with this, the ECCP welcomes the progress and improvements that have been made on the latest version of the PNPM. However, it is equally critical for us to continue to push for more thorough analyses and evidence-based findings on specific provisions that are inconsistent with local and international food regulations and on the proposed guidelines. Failure to do so may only prove to inadvertently cause negative effects and halt the country's progress towards a healthier society.

Hence, the ECCP respectfully **supports the technical points embedded in the position paper presented by the concerned stakeholders of the Philippine Milk and Dairy Industry**. *Specifically, the Chamber wishes to highlight the following key points:*

- 1) Expanding the list of "Excluded Food Products" to include food products whose identity and composition are regulated (2024 FDA Citizen's Charter), noting that some food products are prescribed to contain certain ingredients and nutrients in accordance with the Philippine National Standards, Codex Standards and Guidelines which are adopted and enforced by the Philippine FDA (Administrative Order No. 132 s. 1970);
- 2) Recognising the nutritional value of a food product or food category in consideration of its contribution to the total dietary and nutritional requirement per day while being evaluated per hundred gram of the product;
- 3) Using "added sugars" instead of "total sugars" to align with existing WHO guidelines on sugars intake and WHO EU, SEAR and WPR NP Models which do not prescribe thresholds on naturally occurring sugars;
- 4) Enforcement of the existing thresholds on industrially produced trans-fats, in accordance with the National Policy of the Department of Health on the Elimination of Industrially Produced Trans-fatty acids for the Prevention and Control of Non-Communicable Diseases (DOH AO No. 2021-0039) and WHO Trans-fats REPLACE Program; and

- 5) Deleting the use of Non-sugar sweeteners (NSS) in the list of nutrients of concern and recognising the efforts of the legislators and regulators in enforcing the rules for the use of NSS with reference to the Codex Standards on Food Additives (CXS 192-1995) and Codex Guideline on Nutrition and Health Claims (CAC/GL 23-1997).

Upon studying and reviewing the current version of the PNPM, we believe that these revisions are necessary to ensure that our guidelines remain relevant, unbiased, rooted in scientific rationale, and consistent with regional and international standards as we continue to address the aforementioned triple burden of malnutrition and advance towards safeguarding the country's nutrition outcomes.

The ECCP remains steadfast in its commitment to be a staunch partner of the government, in our shared goal of endeavouring for a more balanced and effective regulatory framework that will shape public health and industry practices. We thank you in advance for the kind consideration and we look forward to a fruitful collaboration. For more information, please feel free to reach out to our Advocacy Department via [advocacy@eccp.com](mailto:advocacy@eccp.com).



**Helen Grace Baisa**

Vice President, ECCP

Chairperson, ECCP Food and Beverage Committee