



REPUBLIC OF BULGARIA
MINISTRY OF HEALTH

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TO
MARC DANZON, M.D.
REGIONAL DIRECTOR
WORLD HEALTH ORGANIZATION
Regional Office for Europe

Sofia, February 27, 2004

Re: Global Strategy on Diet, Physical Activity and Health

Dear Mr. Danzon,

Bulgaria supports the Global Strategy on Diet, Physical Activity and Health developed by the WHO and congratulates the WHO Secretariat and experts for the enormous work they have done.

Bulgaria considers the Strategy timely and very important for the promotion of health of the population of all countries worldwide. Bulgaria expects that the Global Strategy on Diet, Physical Activity and Health will be approved by the World Health Assembly in May 2004. Its efficient implementation will be an important factor for reduction in morbidity and mortality of diseases related to nutrition and physical inactivity.

Chronic disorders related to nutrition, such as cardiovascular diseases, cancer, etc., are among the main causes of mortality among the world population, including in Bulgaria.

Bulgaria pursues a national policy for improvement of diet and physical activity of the population, but the solution of these problems demands much more and efficient action to which the WHO's Global Strategy will provide key support.

Problems related to diet and physical activity acquire increasing global importance, therefore international collaboration is required. The WHO Global Strategy, which reflects the positive experience of various countries around the world in promotion of healthy nutrition and physical activity, is of great significance for the support to the efforts of all member countries towards efficient reduction of health problems and diseases related to diet and physical activity, as well as for reduction of the costs and damages caused to society.

Bulgaria considers that the development of the Global Strategy on Diet, Physical Activity and Health is based on sound foundations of convincing scientific evidence presented not only in Report 916 of FAO/WHO, 2002, but also in many other publications and monographs by prominent experts in this field of study. The modern scientific evidence on the hazardous nutrition factors for the occurrence of chronic non-contagious diseases provide a basis for outlining a framework of adequate

directions for changes in diet, which the member countries may utilize taking into account their national nutrition model and their specific nutritional situation. Naturally, science is permanently progressing and the continuation of scientific research on the importance of diet and physical activity for the health is a key factor for the future updating of the Global Strategy.

The Strategy addresses mainly the prevention of chronic non-contagious diseases, but the proposed measures will also help the solution of many of the problems of malnutrition and nutritional deficits among populations of inferior economic status. Furthermore, the poor populations face a higher risk of developing chronic non-contagious diseases related to nutrition, due to which resolution of this problem in developing countries should be given a priority. The Global Strategy pays special attention to the wholesome nutrition of the endangered population groups – pregnant women, nurselings and little children.

Despite the importance of individual responsibility for health, the practice shows that national policies and measures for creating circumstances for healthy individual choice are indispensable. It is especially important to create a favorable environment for healthy choice regarding the children, who do not have an established model of healthy behavior.

The Global Strategy offers a wide range of measures for efficient promotion of healthy diet and physical activity, which are balanced in their nature, and this gives the member countries the possibility to choose those most suitable for the specific circumstances.

The effect of promotional measures can easily be diminished by the mass commercial advertising of foods and drinks by the producer companies, because the state budget is unable to compete with corporate advertising budgets. We support the position, expressed in the Strategy, for special attention and implementation on national level of suitable approaches towards the regulation of foods and drinks marketing and advertising, especially with regard to children, who do not have an established model of healthy behavior.

Practice has shown that consumption of foods containing large quantity of nutritional substances with proven unfavorable impact on health, especially if they present a significant component of the national model of nutrition, can be a crucial factor for formation of unhealthy nutritional habits. We support the idea of the Strategy that food industry should take its share of responsibility for improvement of population's nutrition.

The financial instruments, proposed by the Strategy (taxation, price policies, subsidizing) may be a proper choice for some countries and situations for healthy nutrition promotion. However, a possibility exists that the restrictive financial measures, officially recommended by the Strategy, may be improperly implemented and result in unjustified increase of prices of some foods. On the other hand, the policy of subsidizing is affordable mainly for the richer countries and its implementation will put producers in the countries with restricted financial resources in a strongly disadvantaged and non-competitive situation. Therefore, we consider that, at this stage, under the conditions of the current political and economic situation of the world (existence of non-democratic political regimes, great differences in the economic potentials of various countries) it is still early to include fiscal measures in the Global Strategy for promotion of healthy nutrition. Efficient protection of the health of the population can be achieved by implementation of national coordinated multi-sector food and agricultural policy, without the need to include currently financial instruments that may create conditions for conflicts within and among the member countries. Bulgarian food industry has demonstrated its willingness and

capacity to produce healthier product (for example lower content of salt, fats, sugar, etc.) and thus, to participate efficiently in the promotion of healthy nutrition. There is also a great potential with regard to agricultural policy.

We support the idea of the Strategy that social efforts can be backed up by the use of international regulations and standards, especially those developed by the Codex Alimentarius Committee in accordance with Resolution WHA56.23. However, we recommend that the proposed aspects of expansion of the scope of Codex Alimentarius would be made more precise in accordance with the important functions, as defined by its Statutes, concerning the ingredients and safety of foods, labeling, presentation and advertising of foods, etc.

Bulgaria will make every effort for the development and implementation of a national strategy for improvement of diet and physical activity of its population in accordance with the Global Strategy on Diet, Physical Activity and Health developed by the WHO and with consideration to the national problems and situation.

With best regards

SLAVCHO BOGOEV
MINISTER OF HEALTH