

13 May 2024

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

Executive Director  
National Nutrition Council

**Dear Assistant Secretary Dayanghirang:**

The European Chamber of Commerce of the Philippines (ECCP) is writing to respectfully provide its inputs on the latest iteration of the Philippine Nutrient Profile Model (PNPM). We sincerely appreciate the opportunity to contribute to this significant discussion.

Considering the current state of malnutrition and health in the country, the ECCP recognizes the importance of developing a Philippine Nutrient Profile Model (NPM). With the primary objective of addressing the local needs of Filipino consumers, the ECCP offers its comments, position, and recommendations on the latest version of the PNPM User's Manual.

**The ECCP believes that retaining the Pan American Health Organization (PAHO) Model as the basis of the Philippine Nutrient Profile Model is inconsistent and inadequate for addressing the specific and unique dietary needs of Filipino consumers. Therefore, we strongly recommend a review and further evaluation of the suitability of the PAHO Model as the basis for the PNPM.** This consideration is essential in achieving our shared goal of addressing specific issues in the country, particularly the double burden of malnutrition.

Furthermore, we suggest **adopting the relevant provisions outlined in the recently issued ASEAN Standards and Guidelines on Marketing to Children.** These guidelines were specifically developed with input from health authorities and nutrition experts, including the DOH-NNC, for the ASEAN region.

We remain steadfast in our commitment to support the Philippine government in advancing the country's nutrition advocacy. Therefore, we emphasise our suggestion for the government to **organise inclusive stakeholder consultations.** These consultations should involve ongoing dialogues and discussions to promote more robust partnerships and facilitate the sharing of knowledge and perspectives on this significant matter. Specifically, we look forward to participating in conversations regarding the developments on the Nutrient Profile Model, particularly its translation into a front-of-package label and the guidelines concerning the marketing of food and beverages to children.

As the government works towards the development and implementation of policies to curb malnutrition, the ECCP and its Food and Beverage Committee look forward to

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working with all relevant stakeholders to ensure that the policies are holistic and comprehensive, and consider the welfare of both the consumers and businesses.

Sincerely,



**Helen Grace Baisa**  
Vice President, ECCP



**Florian Gottein**  
Executive Director, ECCP