

Response to consultation for the Decade of Action on Nutrition
14th February 2017

Feedback from the Scaling Up Nutrition Civil Society Network Steering Group and Country Alliances in Uganda, Nepal, Zambia, Zimbabwe, Guatemala and Sierra Leone.

1. Does the work programme present a compelling vision for enabling strategic interaction and mutual support across existing initiatives, platforms, forums and programmes, given the stipulation of Res 70/259 that the Decade should be organized with existing institutions and available resources?

The work program presents a comprehensive and compelling vision for strategic interaction. We welcome the succinct and focused nature of the document. The 6 action areas and the modalities of implementation largely overlap with existing initiatives. In particular, we welcome the focus on:

- Integrating and building upon existing initiatives and coordination mechanisms.
 - Commitment to tackling all forms of malnutrition.
 - The provision of an inclusive and multi-actor and multi-sector focus
- The establishment of a global accountability framework and mechanism for all sectors and constituencies.

The existing initiatives mentioned are primarily focused around health and nutrition, but given the emphasis on sustainable healthy diets, we recommended identifying and pursuing relationships with agriculture, food security and social protection platforms and financing mechanisms.

2. What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition?

Financial resources

We welcome the reference to the World Bank investment framework for achieving international targets in relation to stunting, anaemia, breastfeeding and wasting. We also welcome recognition of the importance of advocacy for increased resource mobilisation in support of national nutrition plans. However, there is a need to give recognition to the urgency and timeline for investment necessary to close the funding gap.

Time bound targets

The focus on time bound targets is welcome but it may be useful to include reference to measurable targets and indicators too in order to refine target development.

Response to consultation for the Decade of Action on Nutrition
14th February 2017

Multi-actor platforms

Multi-stakeholder Platforms, especially those promoted by the Global SUN Movement, must be strengthened to enable them to fully comply with their nature or rationale (to discuss and mobilize the financial support and political commitment of governments, donors, civil society, UN and business). These should be established so that they can fulfil specific goals and objectives particularly with regard to inter-sectoral alignment in support of health and nutrition.

Recommendations:

Page 2:

Stimulating the effective translation of the ICN2 commitments and the 2030 Agenda for Sustainable Development into concrete, nationally-determined policies, programmes and costed plans;

43. While many countries have already developed food and nutrition policies, they could raise the level of ambition, improve the design, focus on priorities for action, urgently allocate additional resources and develop a road map with time-bound measurable operational targets and associated indicators to ensure that they are going to achieve the nutrition targets of the ICN2 and the SDGs. An increased focus on equity in resource allocation is recommended.

Human resources

We welcome mention of financial resources but note that human resource capacity has been overlooked. Commitment to addressing malnutrition at the global, national and organizational levels is foundational, but will prove insufficient without a concurrent investment in strengthening the human resource capacity, both technical and functional, to implement effective nutrition interventions.

To the best of our knowledge, human resource capacity assessments in the nutrition sector consistently conclude significant gaps. However, there have been few, if any, strategic, systematic, coordinated and resourced responses to address the gaps. We suggest that attention is given to the human resource capacity gap in country and the need to ensure that national assessments of the capacity need are undertaken and resourced strategies to respond to these.

This should then encourage existing provision to be strengthened, for example support to community health workers, training of dietitians and nutrition advisors. Further, many nutrition interventions, are often implemented by personnel from other disciplines, including public health, nursing, agriculture and economic development. Such personnel usually have little or no formal training or guidance on how to address the complex problem of malnutrition (both under- and over-nutrition) and few have been empowered to lead from where they stand.

Response to consultation for the Decade of Action on Nutrition
14th February 2017

In-service training is essential to help build human resource capacity in the short-term while professional public health nutrition pre-service training opportunities are expanded.

Capacity assessments and resulting resourcing of capacity strengthening strategies, will help countries to create & implement nutrition education and training programmes (in-service and pre-service) to reduce human resource gaps.

Recommendation:

43. While many countries have already developed food and nutrition policies, they could raise the level of ambition, improve the design, focus on priorities for action and urgently allocate additional financial and human resources. They should include a road map for strengthening the capacity to implement these nutrition policies and strategies, with measurable targets. They should also develop a road map with time-bound measurable operational targets and associated indicators to ensure that they will achieve the nutrition targets of the ICN2 and the SDGs.

Community and other actors

There is no mention of local community versus frequent mentions of the global community. However, in order for the decade for action to be impactful and successful, mobilization and awareness at community level of the Nutrition Decade and why it is relevant will be important. We highlight the importance of engaging parliamentarians. In addition, while many actors are mentioned, faith leaders also play a crucial role and as such should be added to the list under the last bullet point on page 4.

Recommendation: One suggestion for this is on page 2: *Promoting coherence of national, regional and international policies across multiple sectors to combat all forms of malnutrition, including through improved monitoring and reporting of relevant policy impact at community, with special attention paid to the impact of policy implementation on women, national, regional and global levels;*

Evidence collation and generation

We welcome the mention of evidence collection and evidence based advocacy along with engaging academic institutions. However, we feel this area could be strengthened earlier on in the document as follows.

Recommendations: Additional to point 15. *The nutrition decade will engage with academic institutions to encourage continual evidence collection, long-term research and accessible dissemination of research findings for the use of all stakeholders (including the community) in ending malnutrition.*

Response to consultation for the Decade of Action on Nutrition
14th February 2017

The private sector and regulation:

The role of the private sector could be highlighted during the nutrition decade. Further articulation of the importance of government regulation and legislation to protect public interests in relation to food and nutrition multinationals in the private sector in particular would be welcome.

Socio-cultural context and traditional and indigenous foods

The contribution of indigenous and traditional foods is not mentioned in this document. We recommend mentioning the importance of these foods and how necessary an understanding of the socio-cultural foundations of food and nutrition in any given context are. We know that eating habits are often not rational and informed by many aspects of culture and we would be wise to reflect that in this document. Limited attention is given to the socio-cultural influences on diet and nutrition and the importance of understanding the role of traditional and indigenous foods in local diets.

Recommendations: *Knowledge and education delivered with sensitivity and understanding of the socio-cultural context empowers people to make informed healthy dietary and lifestyle choices, to improve infant and young child feeding practices and care, and to improve hygiene and health-promoting behaviour. Lifestyle and behaviour change is an important objective of nutrition education within the context of understanding traditional and indigenous food systems, and awareness of quality food and positive traditional behaviours. It can also help reduce food losses and waste and boost sustainable resource use as well as encouraging positive nutritional outcomes.*

Action Areas

Page 3, 13. Mention of the peri-urban environment could be made.

Recommendation: Facilitate action across rural, urban and peri-urban areas and populations alike;

Page 4, 17. The focus on local action is welcome as is the localised approach. However, it is important to mention the value of civil society inclusion and advocacy here.

Recommendation: *17. The Nutrition Decade will foster national, regional and global policy dialogue to facilitate and enhance rapid local action, which in turn aims to maximize impact at all levels. A localised approach that involves civil society will be important to ensure Member State ownership of initiatives and policies; to adjust to the different political structures and environments in which nutrition initiatives need to be taken; to address the vast geographic and socio-economic differences within a given society; and to ensure that solutions are equitable, inclusive, people-centred and 'leave no one behind'.*

Response to consultation for the Decade of Action on Nutrition
14th February 2017

Action area 1: Sustainable, resilient food systems for healthy diets

Emphasising food systems, aflatoxins and antimicrobial resistance and smallholder farmers is very welcome. However, the following could also be referenced:

- The impact of climate change and variability on sustainable food systems.
- The ability to purchase food is not referenced. Following on from this, the action area seems to reference the private sector without mentioning them.
- The role of market vendors, cooperative modes of production and sale may be two examples worth highlighting.
- It may also be useful to consider the role of the market and the impact of the market challenges and failures which impact many agricultural communities. The role of government intervention in mitigating negative outcomes may be useful to highlight.
- Other livestock diseases and risks many of which are linked to climatic change and variability.
- The role of women given that women produce half of the food consumed globally and represent an estimated 43% of smallholder farmers¹ specific attention should be given to their role both as farmers and agricultural employees.

Action area 2: Aligned health systems providing universal coverage of essential nutrition actions

The focus on UHC is welcome. However, it would be good to see:

- attention given to identifying and managing different forms of malnutrition.
- Evaluation of human resource capacities particularly in terms of additional support for community health workers and the availability of dieticians and nutrition advisers in the country.

Action area 3: Social protection and nutrition education

This area may want to include:

- reference to the importance of nutrition education throughout life.
- emphasise that food production companies should not be in charge of nutrition education programmes.
- integration of nutrition education into broader school curricula

Action area 4: Trade and investment for improved nutrition

Recognising that there is much to mention in this section for which there is probably limited space. It could nonetheless be worthwhile mentioning:

- Commodity markets and their impact on food supplies.

¹ “Enduring farms: climate change, smallholders and traditional farming communities”
www.fao.org/nr/water/docs/Enduring_Farms.pdf

Response to consultation for the Decade of Action on Nutrition
14th February 2017

- The importance of data and evidence in assessing the impact of trade policies such as liberalisation or protective market measures.
- Challenges with the current international system which often decouples trade from food and nutrition policy.

Action area 5: Safe and supportive environments for nutrition at all ages

We welcome attention to breastfeeding and the importance of supportive work environments. It would be good to see the following reflected too:

- The importance of legislation and legal processes in supporting breastfeeding and maternity leave particularly in the workplace.

Action area 6: Review, strengthen and promote nutrition governance and Accountability

This action area could be developed further to include the following:

- National monitoring, reporting and accountability frameworks for nutrition are implemented and include feedback mechanisms that involve civil society and local communities enabling their views to be systematically integrated into national and local processes.
- Open and inclusive dialogues, biennial reports, open access databases and regular tracking are all good measures to ensure well-structured action on nutrition.

Recommendation: 38. *Establishment of multi-stakeholder and multi-actor governance mechanisms should avoid conflicts of interest, have clear and measurable goals and aims to achieve positive nutrition outcomes which are reported on regularly. In addition, any multi-stakeholder or multi-actor platform should have clear processes for identifying, managing and preventing conflict of interest.*

Additional comments and queries:

Equity and equality

We fully support the aim of ‘leaving no one behind’, and the emphasis on reaching the most marginalised and most vulnerable in action areas including those on universal health coverage and social protection. However, the document does not mention any high-burden countries specifically, or reference how little commitment many of them have made to tackle malnutrition. Given the world is off-track against its goal to end malnutrition and hunger because progress has not been inclusive enough it is important to consider how and why discrimination in this area occurs. For example, people may be discriminated against as a result of gender, ethnicity, disability, sexuality, where they live, forced migration and movement, natural and man-made disasters, war and conflict or because of their family’s income. Inequality in malnutrition outcomes is increasing between different regions within countries, between the richest and the poorest, and between rural and urban areas. Discrimination and exclusion are at the root of these inequalities.

Response to consultation for the Decade of Action on Nutrition
14th February 2017

Working with civil society

The Nutrition Decade secretariat would benefit from working closely with civil society in order to keep governments accountable. In each country a strong CSO focal point would be beneficial in garnering support. The evidence based advocacy component is key to ensuring success of the vision of the UN Decade of Action on Nutrition.

Commitments for action

41. How will existing commitments be followed up on? Will existing commitments which aren't SMART be encouraged to be developed further?

42. The ambition seems low for member states.

46. Great to see an effort to record commitments – how will this link with other commitment repositories? When would this be publically available?

Nutrition champions

47. What will the process for identifying, connecting and developing nutrition champions look like?

Governance

69. How will initiatives be coordinated between different actors and platforms?

Questions

What are action networks and how will these complement instead of duplicate existing initiatives?

Has an initial landscape mapping been undertaken?

How will long-term sustainability be ensured?

The document would be more reader friendly if key messages and were highlighted. The document is also too long to maintain the interest of members of government or other leaders. If there is any way of shortening the document that would make it more reader friendly or creating a shorter topline version?

Comments:

There is no mention in the document of a violence free environment so that women and children can enjoy food security without any obstacle.

We feel that treating nutrition as a cross cutting issue for every program of Government or International/National Non-Governmental Organisations would be useful

Response to consultation for the Decade of Action on Nutrition
14th February 2017

3. Do you feel you can contribute to the success of the Nutrition Decade or align yourself with the proposed range of action areas?

We feel that the areas identified in the decade of action resonate well with the collective aims of the 2000 organisations comprising our network and realisation of our strategy as well as the work of the thirty-nine country coalitions we support.

In Uganda, we are eagerly waiting to contribute to the success of the Nutrition Decade. In Uganda, we started on the journey whereby, the King of Bunyoro (Traditional Leader) declared a decade of action to end all forms of malnutrition, in 5 District, last year.

In Zambia, CSO-SUN is strategically positioned to handle action Area 6- to ensure commitments for action towards nutrition related policies and dialogue. CSO-SUN spearheaded the formation of the All Party Parliamentary Caucus on Nutrition (APPCON) whose members of parliament MPs including key nutrition champions are advocating nutrition legislation and enhancing political will and accountability to address the burden of malnutrition. CSO-SUN also works closely with the media to keep nutrition relevant and has media trainings to increase accurate nutrition reporting thus creating space for dialogue.

In Sierra Leone and Laos, the civil society platform works closely with government and other SUN networks. Much of the work we do is aligned with the range of action areas proposed.

The civil society network SUN Guatemala is definitely willing to contribute in favour of plans and programs aimed at improving the health and nutrition of the most excluded and discriminated groups in the country and the world, so as to reduce levels of inequity and increase opportunities for sustainable development. Advocacy at all levels is important alongside communication campaigns, monitoring and social audits which could be supported in order to empower the population with information and to promote accountability for actions in favour of health and nutrition.

In Zimbabwe, the CSO Alliance influenced the appointment of a Nutrition Champion who is an MP and a nutritionist by professional and has established coordination mechanisms at both national and sub-national level which will aid in promoting the aims and goal of the decade on action through multi-stakeholder engagements.

Response to consultation for the Decade of Action on Nutrition
14th February 2017

4. How could this draft work programme be improved to promote collective action to achieve the transformational change called for by the 2030 Agenda for Sustainable Development and the ICN2 outcomes? What is missing?

- There is limited attention to human rights provisions in this document. It would be useful to make reference to specific provisions which support good nutrition such as the convention on the rights of the child, relevant economic and socio-cultural rights such as the right to health, rights to water and sanitation and right to food. These are unifying and represent commitment from many member states to which they can be held accountable.
- There is no attention to equity or equality in the work plan.
- There is no attention to adolescent nutrition
- There is no time bound articulated plan within this draft.
- Articulation of how different actors will be engaged and opportunities for them to do so would be welcome.
- Deliberate documentation and sharing of learning throughout the decade of action, should be undertaken if possible.
- A lack of financial resources may delay progress especially where relevant policies exist and implementation is hindered primarily due to financial constraints. If organised with available resources, then some countries will be excluded as they have inadequate resources to support the decade.

5. Do you have specific comments on the section on accountability and shared learning?

The role of civil society needs to be articulated given how crucial it is to enabling countries and their governments to take responsibility for commitments and achievements.

We fully support tracking and reporting progress made by countries in honouring their commitments. It is necessary to establish the mechanism to evaluate the progress of commitments by sector and country and create a mechanism to obtain SMART commitments in order to comply with the actions in each corresponding sector. However, it is not clear what the process might be for tackling countries that do not meet their commitments. A strategy should be put in place to make countries compete to honour commitments in order to encourage success.

We also suggest a collective monitoring tool for SDG II and nutrition related goals such as this pilot on water related goals which the UNU has developed: <http://inweh.unu.edu/sdg-policy-support-system/>

Response to consultation for the Decade of Action on Nutrition
14th February 2017

The Civil Society Network could map and track the commitment and achievements of the Government and report to the WHO/FAO alongside the government. This could be in the form of a shadow report.

There is a need for a system that records information on the interventions undertaken in each sector represented by Multi-actor Platforms (programs, projects, financial execution, lessons learned or successful cases, others) so that this information is collated and can be included in any reporting on achievements. Finally, it would be useful to have a feedback system with recommendations for improving nutrition programming and outcomes in real time.

The open and inclusive dialogue to evaluate progress of nutrition decade, should be done annually at the national level and the outcomes could inform the half-year review process nationally. This will allow voices of the grass-root communities to be amplified for the attention policy makers.

It's imperative that any reporting that includes government commitments should also include the government financial commitment. For example, what is the investment in nutrition related programs and the national budget allocation towards nutrition?

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