



Invitation to an open discussion on the political outcome document of the ICN2

Comment Form

Personal information

Name: Dr. Pamela A. Byrne
Organization: Abbott Nutrition
Location: Dublin, Ireland
Email: pamela.byrne@abbott.com

Key: *italics represent direct copy of text from the Rome Declaration*

Standard text represents our own comments

1. General comments on the Draft of the Rome Declaration on Nutrition.

Abbott Nutrition supports the vision for global action to end all forms of malnutrition as set out in the draft Rome Declaration on Nutrition. We concur with the view that the root causes of malnutrition are complex and multidimensional and that a coordinated action of different actors at international, regional, national and community levels should be supported.

2. Specific comments on the paragraphs related to the multiple threats that malnutrition poses to sustainable development (paragraphs 4-10).

The multidimensional aspect of malnutrition is such that no one stakeholder can offer solutions nor engage in single initiatives that will address its root cause. Abbott Nutrition agrees with the intent of paragraphs 4 – 10 and would add that malnutrition is a global problem and exists both within developed and developing countries and is prevalent in community and hospital settings.



Specifically in relation to Paragraph 7 (also related to 12e) Abbott Nutrition believe it maybe an oversimplification to call for avoidance of sugars, saturated fat, trans-fat, and sodium on a policy level. The science is evolving and so are the molecules themselves. For example, isomaltulose, this is a sugar that is slowly digested and appears to have metabolic benefits.

3. Specific comments on the vision for global action to end all forms of malnutrition (paragraphs 11-12).

On the behalf of the FeedM.E Global Study Group (a consensus of nutrition thought leaders from Asia, Europe, the Middle East, and North and South America), we would like to highlight the importance of addressing a prevalent and under-recognized form of malnutrition which is disease related malnutrition. There is evidence indicating that up to 50% of people entering into hospital settings are malnourished¹. Evidence also exists that illness-associated loss of lean body mass whilst in hospital delays functional rehab after hospital discharge and can preclude full recovery even after 5 years² leading to reduced quality of life and increased healthcare costs arising as a result of readmission. It is also accepted that 15-44% of older people are at risk of malnutrition in the community³. The FeedM.E Global Study Group believes that these are important aspects that need to be considered in the Declaration.

Proper nutritional interventions have been associated with reduced risk of adverse clinical outcomes and reduced health care costs. The FeedME Global Study Group recommends published recommendations to address this global health problem. These include risk screening at admission, prompt nutritional intervention and monitoring the response to the prescribed nutrition care plan both during hospitalization and after discharge from the hospital.

We concur with the statements in paras. 11-12 and would makes the following comments related to trade, regulatory, food safety and security.

¹ Stratton, Rebecca J and Elia, Marinos. The Skeleton in the Closet: Malnutrition in the Community. Encouraging Appropriate, Evidence-based Use of Oral Nutritional Supplements, Annual Meeting of the Nutrition Society and BAPEN, 13-14 October 2009

² Herridge MS, Tansey CM, Matte A, et al. Functional disability 5 years after acute respiratory distress syndrome. *N Engl J Med*. 2011;364:1293-1304

³ Guigoz Y, et al. *Clin Geriatr Med*. 2002;18:737-757



It is appropriate for stakeholders to focus on the areas of its competencies and where experience can offer policy guidance to support the development of appropriate global policy which in turn can be adopted within national regulatory frameworks. Abbott Nutrition would advocate the development of such policies through inclusive fora such as Codex for the development of harmonised standards and WTO in the development of an efficient trade environment.

In considering global food security it is appropriate to consider the adverse effects of supply chain shocks on the availability of global food. The reform of comprehensive agricultural policies such as Europe's Common Agricultural Policy (CAP) and the US Farm Bill has heralded a new era of market led food production in the absence of traditional government led intervention in the marketplace. This new era of laissez faire agricultural markets will take some time to settle during which supply and demand shocks may have greater impact on global food security. This is a new consideration in global food security policy.

Trade policy plays a crucial role in ensuring that damaging effects of food supply shocks can be reduced through improved and simplified trade flows and appropriately managed and non-trade distorting public food inventories. This policy development must reflect the different stages of agricultural development within regions and countries and be inclusive and reflective of natural production advantage and disadvantage. Climate change policies must become a part of this dialogue so that climate change impact reduction initiatives align with trade facilitation and simplification as well as ensuring no indirect negative impacts on providing a secure and nutritious food supply. Inclusive and integrated policy development involving all stakeholders is crucial to a successful outcome.

Food safety is an essential element in managing food demand shocks. Harmonised standards for food safety, product definition and testing procedures are an expectation of global consumers. However the policy reality differs to the extent that products acceptable in some jurisdiction become unacceptable in other jurisdictions due to interpretative differences rather than underlying concerns with the safety of food. The principles of Codex in developing a

harmonised approach to food, its safety, its nutritional adequacy and its characterisation must be upheld and promoted as the single global standard that countries, industry and advocates can support. Once their involvement is facilitated in the development of such standards, the resultant products should be readily acceptable globally.

In addition, please see above our comments in relation to paragraph 12e. In relation to paragraph 12f – Abbott Nutrition believes that it will be difficult for food systems to limit the consumption of processed foods that negatively affect nutrition and health. Perhaps this paragraph could be reworded to reflect that food systems should provide the advice/tools, based on scientific evidence, for consumer to make the healthy choice.

4. Specific comments in the appropriate fields relating to these commitments (paragraph 13):

Commitment a): eradicate hunger and all forms of malnutrition, particularly to eliminate stunting, wasting and overweight in children under 5 and anemia in women; eliminating undernourishment and reversing rising trends in obesity;

Commitment b): reshape food systems through coherent implementation of public policies and investment plans throughout food value chains to serve the health and nutrition needs of the growing world population by providing access to safe, nutritious and healthy foods in a sustainable and resilient way;

Aligned policy development creates the environment for functional and effective food supply chains which are appropriate to meeting the needs of a growing global population spread across varying demographics. Participation of all supply chain actors is essential to ensure supply chains are optimised and structured in a manner appropriate to local needs and infrastructure.

Trade policy built on harmonised global standards is an integral part of an effective global supply chain. The challenges of climate change and its varying effects and stage of effect across



countries must be reflected within this policy development. In all elements of this policy development, actors must balance the need to develop food production systems within countries with the opportunities presented by liberalised and facilitated trade flows.

Commitment c): take leadership to shape and manage food systems and improve nutrition by strengthening institutional capacity, ensuring adequate resourcing and coordinating effectively across sectors;

Abbott Nutrition believe that it is important to make sure that all stakeholders are consulted in the shaping and management of food systems and that is important to increase institutional capacity so that all actors across sectors have the required resources.

Commitment d): encourage and facilitate contributions by all stakeholders in society and promote collaboration within and across countries, including North-South, South-South and triangular cooperation;

Abbott Nutrition believe that it is important to facilitate contributions by all stakeholders in society. There should be clear guidelines regarding the criteria which are applied to define a stakeholder to be consulted – this will ensure trustful partnerships are built between all stakeholders. This is important in developing strong and sustainable collaborations.

Commitment e): enhance people's nutrition, including people with special needs, through policies and initiatives for healthy diets throughout the life course, starting from the early stages of life, before and during pregnancy, promoting and supporting adequate breast feeding and appropriate complementary feeding, healthy eating by families, and at school during childhood;

The role of policy is to present a clear, unified message on appropriate nutrition to global consumers. This must be science based with local demographics reflected adequately along with global best practice so that consumers are presented with optimal nutritional solutions. Healthy



eating policy must be informed by scientific principles where the nutritional needs of consumers take precedence over all other interests. Such policy development will require the involvement of all stakeholders and actors to ensure successful engagement.

Commitment f): adopt and implement a Framework for Action that should be used to monitor progress in achieving targets and fulfilling commitments;

Monitoring and evaluation of all actions is important to demonstrate implementation. Abbott Nutrition would welcome the opportunity to collaborate with others to define the framework for monitoring.

Commitment g): integrate the objectives of the Framework for Action into the post-2015 development agenda including a possible global goal on food security and nutrition.

Integration of the objectives will ensure that nutrition and food security is a goal that all actors can commit to so Abbott Nutrition would be supportive of this action.

5. We would also appreciate your vision on policies, programmes and investment that might help translate such commitments into action.