

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

Comment Form

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

- The importance of sovereignty and sustainability regarding agricultural practices is needed to be more emphasised as well as the emergency need for the protection of biodiversity.
- As part of the right of everyone to have access to sufficient, safe, **healthy**, and nutritious foods, there needs to be the reaffirming of the importance of traditional diets from the world.
- There needs to be more emphasis on human rights approach and the urgent need for the protection of breastfeeding as the first way to guarantee the right to adequate food among population.
- As part of the root causes of malnutrition, the intake of ultraprocessed foods high on sugar, fat, saturated fat, trans-fats, and salt/sodium has become one element that is directly linked to malnutrition as a cause, it would be proper to integrate it as such.
- Regarding trade practices, there needs to be recognized the need for **fair trade** practices.
- Importance of participation of civil society organizations for the public interest needs to be integrated in the document.
- Among agricultural practices there needs to be the **exclusion of genetically modified organisms**, especially in those countries where they represent a severe threat to their sovereignty.
- In commitment to action, conflict of interest needs to be approached.

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

- Paragraph 4, instead of unbalanced diets- **unhealthy diets**.
- Paragraph 5, as part of the root causes, point one would need to integrate in line 3, where ... “vicious cycle, by **lack of breastfeeding**, non-potable water, poor sanitation, food borne and parasitic infection, and ingestion of **ultraprocessed foods high on sugar, fat, especially saturated and trans-fats, and salt/sodium**.
- Paragraph 7. “Recognize that environmental, societal changes, **and marketing practices of unhealthy foods, especially those directed to children** often have an impact on dietary and physical activity patterns....

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

- Paragraph 11, subsection a)... “paying particular attention to the special needs of children, women, elderly and disabled people; **emphasizing the human rights approach**.
- Paragraph 11, subsection b)... “a coordinated action of different actors, **where civil society is a key actor**, at international.... as well as health, **breastfeeding**,
- Paragraph 11, subsection c)... “including in **fair** trade and investment agreements...”
- Paragraph 12, subsection a)... “support and complement nutritional **effective** initiatives and measures”
- Paragraph 12, subsection c)... at the end of the subsection, after consumed add the following; “assuring local agricultural practices, promoting sustainable practices, and the exclusion of genetically modified organisms, especially in those countries where they represent a severe threat to their sovereignty.
- Paragraph 12, subsection d)... “appropriate market **and price** regulations in food”...
- Paragraph 12, subsection f)... “while limiting the consumption of processed foods that negatively affect nutrition and health, **including breastmilk substitutes for infants**”
- Paragraph 12, subsection h)... “food systems should be **self-sustainable**...”



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

Add **“and diabetes and other chronic diseases”**

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;

Add after public policies **“free from conflict of interest”**

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;

Add **“with the full support to small and medium local producers”**

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;

Add **“adequate collaboration”**

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;

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

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.

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

Policies and investment must be implemented entirely for the public interest, without conflict of interest.

It is crucial agricultural systems to be exempt from genetically modified organisms, especially in those countries where their presence implies a severe threat to the sovereignty of the country. Countries need FAO support.

Small and medium local producers need full support from governments and international entities like FAO and WHO.

Documentation that may be of support: WHO Recommendations on the marketing of foods and non-alcoholic beverages to children and the marketing of feeding products for infants and young children,

International Code of Marketing of Breastmilk Substitutes and subsequent relevant WHA resolutions,

Convention on the Rights of the Child from the Committee on the Rights of the Child, General Comment No. 16 (2013) on State obligations regarding the impact of the business sector on children's rights.