

Second Draft of the Rome Declaration on Nutrition

Concern Worldwide, Helen Keller International and the SUN Civil Society Network welcome the opportunity to feedback on the latest iteration of the Rome Declaration. Progress has been made which is welcome, but many significant issues remain to be addressed. We offer the below as organisations committed to realising the best outcome and potential from ICN2 and hope that it proves helpful in finalising the Rome Declaration.

General comments

- In addition to restricting the attainment of human potential and impacts on physical and cognitive development, as the Cost of Hunger Study in Africa¹ highlighted, undernutrition can cost a country as much as 16.5 percent of its GDP. **Outlining the economic consequences of undernutrition is important and further emphasises the urgency and imperative to act.** This omission has still not been rectified in the latest iteration of the Rome Declaration.
- Reference to the World Health Assembly targets is still lacking. **Member States' continued commitment and support of the WHA targets should be explicitly articulated,** as well as recognising the need for commitments that go beyond the WHA 2025 targets.
- **Gender and the issue of equality are not addressed and this omission should be rectified.** Ensuring an end to all forms of gender discrimination, recognising this as one of the greatest causes of undernutrition. Action to end hunger must transform societal norms that result in girls eating last and least, that keeps girls out of school, limits women's income, voice and productivity, and that lead to child marriage. Improving women's status and role, their access to education as well as their access to and control over resources is key (i.e. land, income, agricultural inputs and agricultural services).
- The second draft of the Rome Declaration continues to have a bias toward a food system approach. Many social and environmental factors such as gender, environmental health, optimal caring and feeding practices are key determinants. **Other drivers and determinants of malnutrition need to be acknowledged and addressed. There is significant space and need for further promoting a balance between food systems approaches, nutrition sensitive interventions and nutrition specific interventions.**
- It would be useful to explicitly **mention the three underlying causes of malnutrition (Food, Care and Health)** in the text to show the importance of all three being satisfied if nutritional status is to be improved.
- There is no mention of the vast **transformation that urbanization will have on food systems and nutrition outcomes.**
- We would suggest that mention is made that as food systems change and families, including the poor, utilize commercially produced complementary foods for children, **explicit normative guidance will be required to help countries operationalize and enforce necessary steps to ensure the appropriate marketing of these products for children 6-24 months while at the same time protecting and promoting optimal breastfeeding.** This is an

¹ The Cost of Hunger Study in Africa (COHA) is a project led by the African Union Commission (AUC) and the NEPAD Planning and Coordinating Agency, and supported by the UN Economic Commission for Africa (ECA), and the UN World Food Programme (WFP). COHA is a multi-country study aimed at estimating the economic and social impacts of child undernutrition in Africa.

issue that the WHA is addressing during its 67th Session, thus of utmost importance. See Lancet Series 2013 Paper 4 by Gillespie et. al.

- The Outcome declaration should also push for **having coding for nutrition-sensitive efforts** as a first step towards thinking of normative guidance for nutrition sensitive efforts and to contribute to comparable data across countries.

Specific references

- In relation to the second bullet under paragraph 5, poverty is indeed a major contributor to malnutrition, but also vice versa - **malnutrition is also a contributor to poverty**.
- Point 7 suggest adding – ‘Recognise the environmental, societal changes, **and economic and gender disparities** have an impact on dietary and physical patterns, ...’
- While 12 d) recognises that public investments and appropriate market regulations in food, agriculture and other sectors are crucial to overcoming malnutrition, **the Code on Marketing of Breastmilk Substitutes is conspicuously missing and should be explicitly referenced**.
- Under paragraph 12:
 - o A point should be made on the importance of/encourage the integration of a multi-stakeholder approach to ensure food and nutrition security.
 - o Support the alignment behind national needs from all stakeholders and clear processes for making this happen.
 - o Highlight the importance of diversification and the central role of small holder farmers as the main producers of food.
- Under a ‘vision for global action to end all forms of malnutrition’, the need to support coordinated action of different actors is mentioned as well as the need for global and national policy coherence. **The need and importance of coherence and consistency between the various global frameworks and initiatives on nutrition and food security should also be stressed**, such as the Nutrition for Growth, WHA framework against the 6 targets, and SUN.

Commitment section

- We would encourage additional clarity/specificity on the commitments referenced, there is **still work needed to make them SMARTER**, in relation to what is and will be ‘measurable’ specifically, which also encompasses the timeliness.
- The commitment to action could be strengthened by adding ‘**ensuring universal access to safe drinking water, sanitation, and hygiene for households, schools, and health facilities. WASH is critical to addressing malnutrition, preventing infections and diseases such as diarrhoea**’.
- In commitment section, we further suggest adding a point on:
 - o Generating **more evidence on nutrition-sensitive programming and policies** to inform scale up and integration in policies, strategies, plans of government (multi-sectoral) and various line ministries.
- We support the idea of pushing for a **Decade of Action, but this should not be UN only. It needs to be owned by multiple stakeholders**.

- A commitment should be made to plan for accountability in a way that is aligned with the broader nutrition architecture (e.g. GNR, WHA, N4G) - to ensure efficient monitoring which begins as soon as possible after commitments
- In relation to the above point – a commitment and reference to learn from current experience should be mentioned.