



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

Comment Form



The following comments have been submitted on behalf of the World Obesity Federation and are endorsed by UK Health Forum.

World Obesity Federation, formerly the International Association for the Study of Obesity (IASO) and International Obesity TaskForce (IOTF), represents professional members of the scientific, medical and research communities from over 50 regional and national obesity associations. Through this global community we work to alert the world to the growing crisis caused by soaring levels of obesity and to drive global efforts to reduce, prevent and treat obesity.

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

Thank you for this opportunity to comment on the revised draft of the political outcome document of the ICN2. Overall, we commend the content and welcome the inclusion of both under and over nutrition within the broader topic of malnutrition.

We are in support of the comments submitted by the World Cancer Research Fund-International and the NCD Alliance, and in addition wish to emphasise our concern about the absence of any implementation plans.

We are also concerned that the declaration lacks any commitment to time bound reporting or monitoring. We call on the Joint Working Group to specify the timeframe for the Framework



for Action (we propose 2015-2025) and the Decade of Action on Nutrition. For the purpose of monitoring and accountability, we recommend that the ICN political outcomes document is ratified / adopted by the UN General Assembly in 2015 and that progress towards implementation of the political outcomes document on nutrition is reviewed by the UN General Assembly once every five years (ie in 2020 and 2025).

These points should be addressed if the declaration is to lead to concrete action being taken, with appropriate accountability.

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

Paragraph 4 - We strongly welcome the acknowledgment of overweight and obesity as a malnutrition problem, as well as the link made between malnutrition to NCDs.

Paragraph 6 – An acknowledgment that different forms of malnutrition can coexist, not only in countries, but within communities, families and individuals, should be added here

Paragraph 8 – We welcome the reference to both food security and nutrition security in this paragraph and suggest further clarification of this difference may improve the paragraph. For example “... therefore posing a major threat to food security (access and availability of sufficient food) and nutrition security (consumption of nutritious food).

Paragraph 9 – This paragraph needs to include recognition of the danger posed to nutrition security by the promotional marketing of highly processed food products whose consumption increases the risk of the development of non-communicable disease.

Paragraph 10e - The link between globalised diets, obesity and the currently growing prevalence of diabetes, CVD and certain cancers should be emphasised in this paragraph.

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

Paragraph 11, general – Under ‘a vision for global action to end all forms of malnutrition’ the paragraphs (11a-e) do not actually specifically refer to good nutrition or protecting and promoting good nutrition to achieve this vision. Furthermore, the vision should be extended to make reference to the role that ending malnutrition will have for the prevention and control of chronic diseases such as obesity, diabetes, high blood pressure, heart disease.

Paragraph 11a – The paragraph would be improved by including an emphasis on both the under- and over-nutrition component of malnutrition in this paragraph



Paragraph 11b – A note recognising the conflicts of interest that can exist when engaging multiple actors should be included here, as well as reference to a health impact assessment for use to support such engagement and consideration across policies.

Paragraph 11c – We welcome the reference made here to Trade, and suggest that the declaration, as noted for 11b, should include reference to a health impact assessment.

Paragraph 11d – Again, there is a need here to refer to potential conflicts of interest

Paragraph 11e – reference to regulatory actions relating to food environments should be made here, or at least reference to the wider strategies that are present on nutrition such as WHO NCD Action Plan, WHO Diet & Physical Activity Strategy, WHO marketing recommendation and WHO Baby milk code.

Paragraph 12a – Add an additional sentence stating that trade agreements should not undermine national efforts to improve nutrition.

Paragraph 12b – This paragraph would be strengthened with the additional wording shown:

achieving the right to adequate **and nutritious** food for all requires **the protection and promotion of** sustainable, equitable, accessible and resilient food systems

Paragraph 12d – We welcome the acknowledgment of the need to regulate different parts of the food system.

Paragraph 12f – While welcoming the reference to access to different types of healthy and nutritious food, we would suggest that additional reference is made to protecting and promoting locally sourced food where possible.

Paragraph 12h – This might be improved with some examples of sustainable food systems, e.g. locally produced food.

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;

Please amend to ‘...overweight and obesity in children...’

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;



Reword to say “Reshape food systems through coherent implementation of public policies and investment plans throughout food value chains **which place** the health and nutrition needs of the growing world population **at the heart of actions** by providing **and protecting** access to safe, nutritious and healthy foods in a sustainable and resilient way;”

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;

Reference to adopting a ‘health in all policies’ approach to improve food security and nutrition security

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;

This should include a commitment to recognise and manage conflicts of interest, undertaken with transparency and accountability.

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;

A true lifecourse approach would require actions that support adult and elderly populations as well. A commitment to support healthy food environments across retail, restaurant/out of home sector and institutions could also be included here.

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

More details should be given here regarding the time frame that the Framework for Action will be working towards.

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.

The objectives of the Framework for Action should also link to the WHO NCD Action Plan and targets, as well as to the Global Strategy on Diet & Physical Activity

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

We are concerned that there is not enough in this document to address the concerns raised by Dr Chan in her speech last year on the need for measures to tackle the activities of ‘Big Food’ and ‘Big Soda’. We therefore suggest that there needs to be some reference to the need for stronger global governance mechanisms to ensure that public health protection is a priority in trade and economic development, and in particular:



- The development of a set of legally binding policy measures, through a framework convention, to protect and promote healthy diets
- The development and implementation of guidelines on conflicts of interest to ensure that public health is retained at the heart of all policies
- The development and implementation of health impact assessments to assess policies in all sectors, as well as health and food specific policies
- The development of stronger inter-government action to implement cross border restrictions on the promotion and marketing of products which undermine nutrition security, especially products which target infants and children.
- The development of stronger inter-government action to protect nutritious food supplies: these include locally-sourced, sustainably produced fresh and perishable foods, appropriate complementary foods and breastmilk.