**Invitation to an open discussion on the ICN2 Framework for Action zero draft to implement the Rome Declaration on Nutrition**

**1,000 Days contributions**

**13 August 2014**

Thank you for the first draft of the zero draft of the Framework for Action (FFA) and the opportunity to comment.

We applaud the inclusion of malnutrition in all its forms and believe that it is of paramount importance to not only treat and prevent the occurrence of malnutrition but also build sustainable food systems to ensure long-term impact.

**Please consider the following comments for subsequent drafts:**

1. **Do you have any general comments on the draft Framework for Action?**
2. **Do you have any comments on chapter 1-2?**
   1. **Critical 1,000 day “window of opportunity”:** We welcome the inclusion of the critical 1,000 day “window of opportunity” from a woman’s pregnancy to her child’s second birthday throughout the document. However, we urge you to include a statement in the opening paragraph regarding the critical importance of the 1,000 day window and improving maternal, infant and young child nutrition. It should be noted that the evidence that demonstrates the significant impact that focusing on nutrition during this time came to light only relatively recently (i.e. through the *Lancet* series on maternal and child undernutrition in 2008) We suggest adding the following to **Paragraph 1 in the Introduction section on Page 1**:

***“Moreover, science has revealed that nutritional needs change over the life course, and that nutrition early in life—particularly during the 1,000 days between a woman’s pregnancy and a child’s second birthday—has an enormous impact on a human being’s physical and cognitive development and long-term health.”***

* 1. **Framework for Action (FFA):**
  2. **Paragraph 2:**
     1. While important that the FFA and Decade of Action on Nutrition are endorsed and led by the United Nations General Assembly and taken forward by Member States, equally important is offering clear channels for partners to engage in these processes. Please add the following to the end of **Paragraph 2: “…and give clear options for partners to engage.”**
  3. **Decade of Action on Nutrition:** Thank you for establishing the Decade of Action on Nutrition, we recommend the following in order to make it as successful as possible:
     1. Establish and cultivate Special Envoys and champions (governments, faith leaders, SUN leaders, celebrities and athletes) to push for nutrition in relevant international processes and agreements, including:
        1. Actively ensure that nutrition features prominently in the Sustainable Development Goals (SDGs)
     2. Host an ICN3 in 5 to 10 years, as well as conduct a 5 year review to ensure that we are on track to meet the 2020 Nutrition for Growth targets, 2025 World Health Assembly global nutrition targets and the nutrition component of the 2030 SDGs.
     3. Establish/Create global and local campaigns on nutrition and breastfeeding, in a coordinated way
  4. **2.3 Financing for improved nutrition outcomes**
     1. We agree that “more money for nutrition” is needed but also “more nutrition for the money”.  This is to recognize that current and future investments in agriculture, social protection, water and sanitation, etc. should be better harnessed and maximized to contribute to improved nutrition outcomes.

**2.1 Enabling Environments**

**a. Paragraph 1:**Thank you for recognizing the importance of creating an enabling environment to successfully combat malnutrition and, while we find all fours key elements outlined as important, **we suggest adding a fifth: Resources.** The ability to find and utilize resource is critical for country-level actors to fully understand and implement priority action to combat malnutrition.

**2.2 Better Governance for Nutrition**

1. ***Coherent government-endorsed policies with explicit targets and situation-specific strategies:*** Thank you for including the importance of conducting regular consultations to develop appropriate strategies to combat malnutrition, however, consultations should be developed in collaboration with all interested stakeholders and through participatory processes. Please change the following sentence to read: **“**The development of appropriate strategies should **be developed in collaboration, through participatory processes,** among all implementing partners…”
2. ***Institutional arrangements that encourage effective multi-sector working*:** In order to ensure effective multi-sector coordination, countries must **enshrine a high-level focal point for global nutrition and principal level representatives from each ministry** with defined responsibilities to ensure continued nutrition coordination across government and civil society. Further, the high-level focal point for nutrition should have the ability to work effectively across relevant government ministries to coordinate and track budgets for greatest possible nutrition impact.
3. **Do you have any comments on chapter 3 (3.1 Food systems, 3.2 Social Protection; 3.3 Health; 3.4 International trade and investment)?**
   1. **Food Systems:** 
      1. Thank you for including the “do no harm” principle under the trade section, however, we recommend including a sentence in the section on food systems on government’srole in reshaping the food system. Please add the sentence: **“Governments should take responsibility for leadership on nutrition by developing food policies that *at a minimum* do not harm people’s nutrition and ideally one that is aimed at improving nutrition status.”**
      2. Thank you for including the economic argument for reductions in undernourishment, however, income growth is **not** directly linked to reductions in undernourishment. Please remove this sentence and change the paragraph to read: **“For income growth to improve diets, it must be accompanied by specific actions to improve dietary adequacy and quality to reduce malnutrition in all its forms.”**
      3. We applaud the recognition of the important role that women have in improving the nutrition status of the households and in particular, how raising women’s incomes has important implications for nutritional outcomes. Please also include the important role that improving women’s land and property rights have on improved household food security and nutrition (<http://www.landesa.org/wp-content/uploads/Landesa-Issue-Brief-Land-Rights-and-Food-Security.pdf>).
      4. Please include bio fortified foods promotion, and the importance of developing local nutritious varieties and promoting locally available and affordable foods to improve the food environment in-country.
   2. **Social Protection:**
      1. **Priority actions on social protection: 1,000 day window**
         1. We applaud and welcome the inclusion of the 1,000 day “window of opportunity,” andon the need to give special attention to the “first 1,000 days”.  However, the point could be further strengthened by defining this critical period, as well as including a mention of the importance of pre-pregnancy. Please revise the point to read:

**“While special attention needs to be given to the 1000 days between pregnancy and age two when vulnerability to nutritional deficiencies is greatest, children’s nutrition after age two and before they attend school requires continued attention.  Moreover, it is important to address the nutritional needs of women *before* they enter pregnancy, in many cases starting in adolescence, in order to maximize health outcomes for both mother and child in the 1,000 day window and beyond.“**

* 1. **Health:** 
     1. **Nutrition education**: We suggest adding another priority action on nutrition education that includes informing and communication on the importance of balanced, nutrient-rich diets in schools, communication for behavior change of consumers / users in food waste and losses post-harvest.
  2. **International trade and investment**
     1. We applaud the inclusion of a “do no harm” policy be adopted in international trade and investment. Please also include how availability of and access to healthy foods will be ensured, i.e., through nationally appropriate combinations of imports and domestic production, and investments in food production, especially by smallholders.

1. **Do you have any comments on chapter 4-5?**
   1. **Accountability Mechanisms**
      1. We applaud the inclusion of a possible FAO/WHO global trust to mobilize resources for nutrition, and recommend that such a trust be hosted at the World Bank. Additionally, RESULTS UK is carrying out a research that looks at the optimal aid architecture for the Nutrition sector that might be useful as such a trust is explored (Please contact Steve Lewis, [steve.lewis@results.org.uk](mailto:steve.lewis@results.org.uk), and Tena Nevidal, [tena.nevidal@results.org.uk](mailto:tena.nevidal@results.org.uk), for more information).
      2. We also recommend changing the last sentence be changed to read: “The trust fund will produce **an annual report** on the status of funds received and expenditures incurred, **and provide technical assistance and support for countries and implementing organizations.**”
      3. Mechanisms for monitoring and accountability: this framework appears in a vacuum. Please be explicit about how it will connect with other plans that countries have already developed and how it will be a part of an integrated framework with other international initiatives, such as REACH and SUN.