**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.**

We regret that the vast majority of our comments on the ICN2 zero draft, submitted during the first e-consultation, have not been incorporated into the revised declaration. While we appreciate the reference to the right to food in the opening paragraph, the overall declaration still fails to be grounded in human rights. No mention is made of nutrition as core element of the human right to adequate food and nutrition and corresponding State obligations to respect, protect and fulfill this right. The elimination of malnutrition is considered to be imperative for “ethical, political, social and economic reasons”, but not because it is a human rights obligation of States. As in the previous draft, there is no acknowledgement or analysis of the systematic violations of human rights, including violations of women’s rights, child rights, and people’s access to natural resources, in which malnutrition is rooted. The detrimental impact of malnutrition on the enjoyment of other human rights is equally not considered. Women’s rights and the essential role of women in food production and nutrition (including through breastfeeding) are also overlooked.

We recommend, in addition to the specific changes outlined below, that reference is made throughout the document to the “right to adequate food and nutrition” to emphasize the links between food and nutrition and the fact that nutrition is a core element of the right to adequate food.

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

***Multiple threats of malnutrition are a major challenge to sustainable development and the universal enjoyment of human rights***

4. Acknowledge that malnutrition, including undernutrition, micronutrient deficiencies, overweight and obesity, as well as noncommunicable diseases caused by unbalanced diet, restricts the full realization of human rights; has high socioeconomic and other costs for individuals and families, communities and states; threatens their health and wellbeing by impacting negatively on human physical and cognitive development; compromises the immune system; increases susceptibility to communicable and noncommunicable diseases; and poses heavy burden on societies by restricting the attainment of human potential and reducing productivity.

5. Recognize that the root causes of malnutrition are complex and multidimensional and grounded in systematic violations of the right to adequate food and nutrition:

* Lack of year-around access to sufficient food, adequate both in quantity and quality, affordable and culturally acceptable, and respective access to natural resources (including land, water and seeds), decent employment and living wages, and social protection, are key determinants; compounded and often aggravated, in a vicious cycle, by non-potable water, poor sanitation, food borne and parasitic infections, and ingestion of harmful levels of chemical contaminants due to unsafe food supplies;
* Poverty and rising levels of inequality are major contributors to malnutrition in both rural and urban areas.

6. Acknowledge that different forms of malnutrition co-exist within most countries; while dietary risk affects all socio-economic groups, large inequalities exist in nutritional status, exposure to risk and adequacy of dietary energy and nutrient intake, between and within countries.

7. Recognize that trade, foreign direct investment, subsidies, and tax policies, in addition to environmental and societal changes often have an impact on dietary and physical activity patterns, leading to higher susceptibility to obesity and noncommunicable diseases through increasingly sedentary lifestyles and greater availability and consumption of unhealthy, highly processed food, that is high in fat, especially saturated and trans-fats, sugars, and salt/sodium.

8. Recognize that climate change is negatively impacting the quantity, quality and diversity of food grown and is therefore posing a major threat to food and nutrition security. Recognize that the dominant agro-industrial model of food production is a major contributor to climate change and eco-destruction, and that a move towards human rights-compliant and sustainable production models, based on agro-ecological peasant farming, is urgently needed.

9. Acknowledge that current food systems, based on agro-industrial modes of production, are being increasingly challenged to provide safe and nutritious food for all to enable healthy diets, due inter alia to constraints posed by resource and ecological sustainability, large food losses and waste, unequal distribution and trade distorting economic measures, including unilateral coercive economic measures.

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

***A vision for global action to end all forms of malnutrition***

11. Reaffirm that:

a) the elimination of malnutrition in all its forms is a human rights obligation of States as well as an imperative for ethical, political, social and economic reasons, paying particular attention to the special needs of children, women, elderly and disabled people;

b) a coordinated action of different actors, at international, regional, national and community levels which aims at advancing the realization of the right to adequate food and nutrition should be supported, through cross-cutting policies, programmes and initiatives in the food system, as well as health, social protection, education, research, energy, trade, rural development, water, sanitation, hygiene, consumer protection, transport, urban planning, and the environment;

c) global and national policy coherence in line with the right to adequate food and nutrition, related human rights,and food sovereignty is needed among relevant sectors, including in trade and investment agreements, in investments and incentives for agricultural production, food processing and distribution;

d) the risks linked to higher and more volatile prices for agricultural commodities , caused *inter alia* by liberalization of agricultural markets, monopolistic market structures, food speculation,export subsidies and bio-fuel policies and their consequences for global food security and nutrition, need to be managed;

e) improvements in diet and nutrition require strengthening the legislative and regulatory framework for the production and marketing of food, food safety and quality control at national, regional and international levels, including enhanced engagement of the Codex Alimentarius Commission, increased participation of Member States and adherence to the Codex and other UN Standards and Guidelines.

12. Recognize that:

a) States have an obligation to create an enabling international environment for the realization of the right to adequate food and nutrition, including through aligning their trade, investment, development, agricultural, energy, and other policies with the right to adequate food and nutrition.

International cooperation and official development assistance for nutrition should be aligned with human rights, with a focus on tackling the underlying causes of malnutrition, and, as appropriate, support and complement national nutrition initiatives and measures;

b) achieving the right to adequate food for all requires sustainable, equitable, accessible and resilient food systems;

c) food and agriculture (including crops, livestock, fisheries and aquaculture) systems need to be addressed holistically by public policies, including the resources, investment, environment, people, institutions and processes with which food is produced, processed, stored, distributed, prepared and consumed;

d) while private investments and markets will continue to influence the supply of and access to nutritious food, responsible public investments and tax policies, as well as necessary market regulations in food, agriculture and other sectors are crucial to overcoming malnutrition;

e) nutrition improvement requires the access to balanced and diversified diets, meeting nutrient requirements of all age groups and all groups with special needs, avoiding excessive intakes of saturated fat, sugars and salt/sodium, and removing trans-fat;

f) food systems need to promote healthy dietary patterns by providing year-round access to fresh/ locally-sourced,safe and nutritious foods including fruits, and vegetables, pulses, whole grains and animal source foods such as fish, while limiting the consumption of processed foods that negatively affect nutrition and health;

g) food systems need to address and prevent infectious and zoonotic diseases and to tackle antimicrobial resistance;

h) food systems should be sustainable and based on agro-ecological production methods, and all components for food production, processing and distribution (including land, soil, seeds, fertilizers, water, energy, harvesting, storage and transport) should be made accessible to small-scale food producers, in particular women and other marginalized groups, and managed sustainably, with due attention to environmental impacts;

i) efforts should be made to reduce post-harvest losses and food waste throughout the food chain including consumption, as these can significantly contribute to reducing sustainability and nutrition security;

j) the United Nations system and the international financial institutions must work more effectively together in a coherent manner to create an enabling environment for the realization of the right to adequate food and nutrition and enhance international cooperation to support national efforts to accelerate progress in addressing malnutrition.

1. **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 overweight and 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 in line with the right to adequate food and nutrition and food sovereignty;

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

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;

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.

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

* Nutritional well-being for all, to us, must be seen at the same time as one of the central objectives of human rights-based development and one of the basic pre-requisites for the realization of all other human rights and human dignity.
* Nutrition goals must be reflected, therefore, in all policies and programs related to the social determinants of nutritional well-being such as those related to access to productive resources (land, water, and seeds); environment-friendly food production, in line with agro-ecological principles; accessibility to affordable diverse, safe, and healthy diets; adequate living income; healthy environment; basic health care; water and sanitation; and social security and care.
* This requires adequate governance of nutrition at all levels, and multisectoral coordination to guarantee nutrition is adequately taken into account throughout the life cycle as well.
* Policies, programmes and investment in the field of nutrition must be people-centred. Small-holder farmers, including fisherfolk and livestock farmers, and other small-scale food producers as well as groups most affected by malnutrition must be at the centre of international and national efforts aimed at reshaping food systems - as beneficiaries as well as designers and implementers of such systems.
* In line with the on-going discussions on investments, we recognize the magnitude of the investments done by small scale producers themselves and propose public support to small-scale, diversified farming, in line with agro-ecological principles, food production geared towards local and regional markets, and to the provision of affordable, healthy, safe, and culturally adequate diets. No public investments or subsidies should be provided to agro-industrial initiatives.
* It is fundamental to institute public regulation of private corporate sector activities in food production and other food systems-related processes, as well as other fields that negatively impact on the enjoyment of the right to adequate food and nutrition, such as land grabbing, abusive use of agrochemicals, monopolizing of agricultural inputs, patents on life, publicity of food to children, marketing of breast milk substitutes, and marketing of ultra-processed and junk food.