

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

Comments by Sight and Life www.sightandlife.org

Contact: eva.monterrosa@sightandlife.org

We congratulate the committee on encouraging feedback from diverse stakeholder groups. We appreciate the idea of the Intergovernmental Panel on Nutrition and would like to see it established in 2015.

Question 1. Do you have any general comments on the draft Framework for Action?

Comments on Chapter 1 and 2.

- A definitions section at the beginning of the document would be useful as some of the terminology may be new to readers or there could be more than one interpretation of certain terms referred to throughout the document – even beginning with ‘food systems’.
- An actual and tangible framework appears to be missing. A pictorial depiction of the actual framework would be valuable.
- While inclusive engagement is necessary for good governance it does not guarantee governance. Accountability and transparency measures that are decided jointly are crucial components for improving governance.
- Financing for nutrition must also consider what the costs are for implementing nutrition specific interventions. This is often the bottle neck as few countries may know the process for scale up and what that would cost.
- There should be an encouragement to explore innovative financing models.

Comments on Chapter 3

- Overall, we suggest that the Food System and Food environment section be synthesized as some paragraphs are redundant. If it is important to keep these sections separate, than a clear definition/differentiation would be important.
- The traditional supply chain is the primary way through which rural communities source food; however, low-income consumers living in cities rely largely on the modern supply chain. We encourage the committee to qualify this statement.
- It is important to create a balanced view of the opportunities and challenges of both a modern and traditional supply chain. We would encourage the committee to further unpack the concept of modern supply chains and specify what those chains refer to. Fruits, vegetables, meats, and pulses move through modern supply chains. For example, lack of cold chain in developing countries accelerates nutrient losses and food waste.

- Nutrition and health goals should be the primary function of any food system. Other services rendered by the food system include biodiversity, water conservation, humane treatment of animals, and climate stability. Climate change will be a critical input towards food system redesign. Therefore, we believe that shifting the discussion from “trade-offs” to “priority actions” that improve nutrition goals would be a more valuable approach.
- We would appreciate the committee providing clarity on the following statement: “Food system-based policies which work to reduce malnutrition via increased purchasing power stand a better chance of success when implemented within a broader pro-poor context, including social protection and other measures to reduce risk.” It is currently simply text that is hard to interpret or understand. Examples would be beneficial.
- While diverse diets are necessary for achieving good nutrition and health, other approaches including supplements are needed when it is not physically possible or culturally acceptable to consume sufficient quantity of nutrient dense foods. Groups that are especially vulnerable to nutrient deficiencies are infants and young children and pregnant women and the elderly. Emergency situations exacerbate underlying deficiencies but are not the only instance when supplements are necessary. Clarifying the statements made on page 17 is important for validating the interventions outlined by the committee to reduce stunting and improve maternal nutrition.
- Fortified foods should be part of a diverse diet, particularly in places where fruit, vegetables, and animal source foods are too expensive for low-income families. Food fortification is a proven and cost effective strategy for alleviating micronutrient deficiencies in the population and should be a priority.
- Indicators for nutrition quality should be defined and clarified.
- Resilience strategies are favored over emergency responses.
- Under the priority actions, please clarify what is meant by ‘affordable nutritionally enhanced foods’? Does this mean fortification?
- It appears that the food environment section is aimed at addressing NCDs, while the food system section is aimed at food value chain, rural livelihoods, and malnutrition. This separation seems unnecessary and contradicts earlier statements made in the FFA that a systems view is the most appropriate. Please consider integrating most of the points found in 3.1.1. in to 3.1.
- Workplaces that facilitate breastfeeding should also offer on-site quality daycare so women can breastfeed rather than feed breast milk.
- Section 3.2 “Improved targeting, using a nutrition lens to identify individuals, households and/or communities who are most nutritionally vulnerable, may help.” Please clarify who will be helped by improved targeting.
- “Ensuring universal coverage” Please clarify what universal coverage should be ensured?

- Please clarify the term “sustainability” in reference to food-based dietary diversity. Perhaps a more appropriate term in this context would be long-term strategies for food and nutrition security. From an environmental perspective fortified food may be more sustainable than diverse diets, in precarious agro-ecological zones.
- Section 3.3. “Nutrition should be fully integrated into each of the building blocks of health systems. This includes, for example, the strategies for human resources, essential medicines, governance, information and monitoring, health system financing, and service delivery”. The priority action is unclear.
- There is compelling scientific evidence to replace iron-folic acid in pregnancy with multiple micronutrient supplements.
- 3.3.4 Nutrition education and behavior change is a priority action throughout. A separate section that addresses behavior change emphasizes a distinction that shouldn’t exist and could be confusing to policy makers. Therefore, we encourage the committee to integrate each of the paragraphs on nutrition education into the appropriate sections in the document.
- 3.3.6. This section should be separated into two as food safety belongs with food system discussions and antimicrobial resistance with infections and health.
- Section 3.4 “Trade policies”. We recommend that this section be moved to section 2, as part of the institutional policies that create an enabling environment. Also, the section on incentives has already been previously addressed.
- Under the priority actions and the regulating of marketing should be included that countries should not only regulate but also monitor and enforce.
- Under the priority actions and the regulation of marketing should be included that countries should implement the International Code of Marketing of Breast-milk Substitutes.

Chapters 4 and 5:

- The private sector should be urged to achieve the commitments of the Rome Declaration.
- Implementation challenges will be too large for countries to deal with on their own. A global network that brings together practitioners, scientists, and policy makers to address implementation should be created. This network works in coordination and support of local implementation teams. Such a network would provide an ideal platform for enhancing local capacity development.

Question 2. Does the Framework for Action adequately reflect the commitments of the Rome Declaration on Nutrition, and how could this be improved?

- The Rome Declaration on Nutrition 2014 emphasizes improvements in the food system. The FFA document, on the other hand, appears to emphasize equally the role of the food and health system. At times the document reads as though sections have been written separately by experts at FAO and WHO and integration is lacking. We would encourage further editing and review from experts who work in both the food and health systems. Furthermore, various redundancies and the use of different terms to describe similar concepts may give rise to confusion and we believe this should be avoided.

Question 3. Does the Framework for Action provide sufficient guidance to realize the commitments made?

- The FFA document provides a checklist of priority actions and encourages countries to embark on an assessment or landscape analysis. In our opinion, however, it does not offer guidance on how to implement these actions.

Question 4. Are there any issues which are missing in the draft Framework for Action to ensure the effective implementation of the commitments and action to achieve the objectives of the ICN2 and its Declaration?

- In light of the comments above, technical advisory groups (TAG) at country level who are familiar with implementing programs should be encouraged. It would be easier to coordinate international support through TAG.

/ENDS