



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

Comment Form

Personal information

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

Paragraph 3: IDF strongly recommends that it is rephrased to reflect the right of everyone to have access to “**sufficient, safe and affordable nutritious food**”. Affordability of nutritious food is also a key determinant to all forms of malnutrition, both in low- and middle-income countries (LMICs) and in high-income countries (HIC).

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

Paragraph 4: IDF requests that it includes **overconsumption**, defined as population-wide increased consumption of energy intake, **as a form of malnutrition**. This paragraph also needs to specify that, apart from increasing susceptibility to communicable and noncommunicable diseases (NCDs), **malnutrition can also be a direct risk factor for NCDs**: in the case of diabetes, obesity, overweight and overconsumption are among its main risk factors.

Paragraph 5 should clearly state that **poverty is a major contributor of malnutrition in rural and urban areas of both LMICs and HIC**, as it interferes with food availability and affordability.

Paragraph 7: 90% of the adults with diabetes are affected by type 2 diabetes, which has obesity and sedentary lifestyles as its main risk factors. For that reason, we request that this paragraph states that **environment and societal changes lead to a higher susceptibility to obesity, diabetes and other NCDs**.

Paragraph 10 should also note that **maternal overweight and obesity at the time of pregnancy, which is a risk factor for childhood obesity and gestational diabetes, have increased steadily since 1980**. Also, in section e) of this paragraph, IDF would like to highlight that **dietary risk factors may account for more than 10% of the global burden of disease**, given into account that 8.3% of the adult population is estimated to have diabetes in 2013 - 90% of them having type 2 diabetes, which has obesity as one of its main risk factors.

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

Paragraph 11: IDF requests that section a) of this paragraph specifically mentions the **special needs of pregnant women**, as the rising trend of maternal overweight and obesity is leading to a transgenerational transmission of obesity, which is one of factors fuelling the diabetes epidemic in LMICs.

Section c) of the same paragraph should mention that **policy coherence is specially required in regards to the investments and incentives for the production of crops used in high-processed food**, especially sugar.

Paragraph 12: in section c) **food marketing needs to be listed along with production, processing, storing, distribution, preparation and consumption**, as marketing has an obvious impact on nutrition through consumer choices and preferences.

Section e) of this paragraph should also include **avoiding excessive intake of calories**. Section f) should read “**access to safe, affordable and nutritious foods**”, for the reasons explained in paragraph 3.

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;

IDF recommends that this commitment includes **reversing the rising trends in obesity and diabetes**, as did the original document, as well as **eradicate the overconsumption of poorly nutritious foods**.

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;

Assuring affordable nutritious and healthy foods should be part of this commitment, for the reasons previously mentioned for paragraph 3 and 12.

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.

IDF greatly supports the inclusion of a goal on food security and nutrition in the post-2015 development agenda and, therefore, welcomes this commitment.