

Comments received from OEWG members on the Proposal for CFS Engagement in Advancing Nutrition (version sent on 31 March 2016)

Afghanistan

We find the revised draft to be a major improvement over the version that was discussed in the second meeting of the OEWG on 25 February. In particular, we congratulate the team for part IV of the document (Function of CFS Work on Nutrition- paragraphs 13 to 25). The structure, language and content of Part IV is of good quality and presents an interesting roadmap for CFS in its work related to improving nutrition. Each of the above paragraphs conveys a clear message about the outcomes to be expected.

On the other hand, we feel that the early part of the document (paragraphs 1-12) needs polishing and shortening. In its present form, the text is somewhat verbal and diffused. It needs to be tightened and made free of decorative language. For example, paragraphs 1 could be redrafted and paragraphs 5 and 6 could be combined to read as below.

Paragraph 1: This paper proposes a framework for CFS to increase its contribution in improving nutrition. The framework is consistent with CFS mandate and does not impinge on the work of other bodies.

Paragraphs 5 and 6 combined: Nutrition and food security are inextricably linked and CFS is committed to further support governments and other stakeholders in advancing the status of nutrition, including support for the the implementation of the Framework of Action of ICN2, the 2030 Agenda for Sustainable Development and the United Nations Decade of Action on Nutrition. As a global and multi-stakeholder forum, CFS can make meaningful contribution to improving nutrition worldwide through policy convergence, sharing good lessons and practices and reviewing progress. Assistance to countries requires a concerted and coordinated support at all levels from UN agencies and other relevant bodies, including CSOs and the private sector.

In part I, we also suggest adding one or two sentences about UNSCN and its proposed draft Strategic Plan (2016-2020). This is important because UNSCN has been officially transferred from WHO to FAO.

We do not see the need for Part III and suggest its deletion, provided paragraph 11 is absorbed in part I (Background and Context) and paragraph 12 in part II (Vision).

To claim that CFS has a comparative advantage in nutrition is a myth. It is FAO and WHO (to some extent also WFP and UNICEF) that have the comparative advantage in nutrition, which is interpreted to mean accumulated knowledge, worldwide experience, critical mass of professional staff and a robust outreach programme of technical and financial assistance. CFS does not possess any of these. We recommend not to make any reference to comparative advantage. The mandate and the multi-stakeholder nature of CFS are enough justifications for CFS to get involved in matters of nutrition.

As the UN Decade of Action on Nutrition (2016-2025) was proclaimed by the General assembly on the first of April, the last sentence of paragraph 4 can be amended to reflect the jest of operative paragraphs 1 to 4 of the General assembly decision.

Brazil

- 1) Paragraph 2: Identify the source from which the information was taken from. Maybe substitute “in the last 20 years” for “recently” or a more general adverb like “nowadays”. It is important not to work with the SDGs in silos, so we suggest to change the last sentence to “... essential for the achievement of the Sustainable Development Goals”, because they are all interrelated.
- 2) Paragraph 4: Suggested text change. When introducing the UN Decade of Action on Nutrition: “The Rome Declaration and the ICN 2 FFA were endorsed by the UN General Assembly with the proclamation of the Decade of Action on Nutrition 2016-2025”. Here we would suggest to include the resolution’s language regarding its purpose (reinforce international commitments, for example) and also the role of CFS (that is mandated to be involved).
- 3) Paragraph 6: “...CFS is committed to further promote policy convergence and coordination to, within its mandate, support governments and other stakeholders in addressing nutrition.”
- 4) There should not be an explanatory note in the vision. Suggested text for the vision: “A world free from malnutrition in all its forms, where all people, at all stages of life, at all times, have equal access to sufficient, safe, diversified and nutritious food to meet their dietary needs and food preferences for an active and healthy life, with education and information on the nutritional aspects of food for healthier choices, in the context of sustainable and inclusive food systems”
- 5) Table 1, on Policy Convergence. Activity 2. Predict at least one event on nutrition.

CSM (see attachment)

As you can see from the attached document, the main comments relate to the following areas:

- A more inspiring and holistic vision based on human rights;
- A more explicit rationale for the food-system approach to nutrition (early phase);
- A stronger reference to women’s care burden and women’s rights;
- A stronger reference to global coordination, proposing is as a stand-alone function, combined with the integration of the lessons sharing function with the monitoring one;
- The need to address the issue of conflicts of interest in public policy and public policy spaces.

EU (see attachment)

Thanks for giving us the opportunity to react to the revised version of the OEWG proposal for CFS engagement in advancing nutrition.

We find the proposal to be generally good and solid and only have a few minor comments to make:

- In paragraph 4 you mention 'FAO and WHO member states'. It would be more appropriate to refer to 'members' than to 'member states', as the EU is a member (of FAO) but not a 'member state'.
- With respect to the diagram on the top of page 4:
 - Policy guidance (ref. arrow between policy convergence work and lessons and good practice sharing) of the CFS is not only to countries, but also to other stakeholders
 - In reviewing progress only UN reporting is considered, while in our view the CFS should also look at the Global Nutrition Report
- In line with earlier observations from our side, we have a comment on gender (par. 18) – **please see attachment.**

- Paragraph 22: lessons learning could in our view also take place in inter-sessional events. Moreover, we are not completely clear how a CFS outcome document would be prepared and what its status would be.

Germany

1. General remarks

- We welcome the revised draft proposal.
- We emphasize the importance of looking on the demand and supply side of food systems and therefore recommend including nutrition education.

2. Vision

- Para 7: We are missing in the current vision the utilization dimension of food security/the right to food and therefore the link to health and care as the other two underlying causes beside food insecurity (see http://www.ifad.org/hfs/approach/hfs/nutrition/nut_2.htm). Therefore we suggest the following wording: "A world free from malnutrition in all its forms, where all people at all stages of life and at all times have access to, consume and can suitably use and digest adequate food."

The four dimensions of food security:

- o Availability: The supply of sufficient quantities of food of appropriate quality where it is needed.
- o Access: People have secure access to this food so that they can cultivate or purchase adequate food.
- o Utilisation: Food can be used and digested suitably and as needed – this includes healthy preparation, physical health as well as good care and feeding practices as a prerequisite for being able to take up food at all.
- o Stability: The supply of food is stable in the long term – therefore also if regional crop failures occur.

3. Functions of CFS work on nutrition

- Regarding policy convergence

We welcome the focus on policy guidance.

We are missing former included language that is in our view important to phrase the issue about food system and nutrition (draft 11 February; p.4 f.):

“These will imply giving special attention, in the design and targeting of policies that shape both supply- and demand-oriented food systems interventions for good nutrition, to:

- (i) promoting gender equality and women’s empowerment throughout sustainable food systems;
- (ii) safeguarding and increasing women’s access to, and control over, incomes and natural resources and agricultural inputs;
- (iii) reducing women’s time constraints, which is critical for women to perform nutrition-related activities including breastfeeding⁹; and
- (iv) promoting effective interventions that are sensitive to gender, including nutrition education.”

Moreover para 17 refers only to the Recommended actions for sustainable food systems promoting healthy diets. In our view the Recommended actions for nutrition education and information of the FFA are equally important to cover the demand and supply side of food systems.

- Regarding lessons and good practices sharing

Para 21: We are not convinced that sharing lessons learned in plenary will led to a fruitful exchange. We would suggest to split into thematic groups according to the interest of the MS and to have a more interactive format such as workshops.

- Regarding reviewing progress

In our view UNSCN should be the platform to discuss the overall follow up of ICN2, including reporting on the implementation. Will UNSCN therefore play an active role regarding reporting?

FAO/WHO shared a concept note on reporting. There they suggest discussing the concept note with MS. Will this take place on April 29th?

What will be reported by the CFS Chair to governing bodies? The final CFS report in October? Please add content of report of the chair in the draft.

When will the reporting activities end? 2025? 2030? Please add possible end year in the draft.

Netherlands (see attachment)

Norway

I have been requested by the Norwegian Ministry of Foreign Affairs to provide direct input into this paper. Other Norwegian colleagues may also provide direct responses. First, may I say we very much support the CFS in its broader mandate and regard it as a critical platform for action. In this regard we very much support the increasingly explicit attention given to nutrition and efforts by the CFS to enhance the role of the CFS in shedding light on positive impactful actions to enhance the nutritional outcomes of agriculture and food systems. We strongly believe the predominantly medicalized intervention approach to redressing under-nutrition has not been able to redress the global under-nutrition problem and is even more deficient as a response to the transitioning nutrition problem and enhanced levels of micro-nutrient deficiencies and over-nutrition.

· In this regard the paper somewhat disappoints as it does not establish a clear vision of the need to build up an iterative process (and capacity/finances) to determine opportunities and threats and enhance contextualized action plans to enhance rural economies, enhance equity, diversify food chains and enhance rural and urban nutritional health over time. Going beyond addressing malnutrition in all its forms as a problem of individual choices and capacities to understand structural determinants of malnutrition and how to respond to these is a critical need in the globalizing environment – and the CFS we believe might have ambitions to play a significant role in establishing this capacity. The paper states need for longer term action – but emphasizes immediate concrete actions and does not define a future beyond these. Recommendation: we would recommend explicit recognition of the need to define determinants of nutritional ill health in local contexts and how to counter them – and the institutional capacities to take on this function (capacities, institutional housing, financing etc).

· Secondly the diagram page 4 is somewhat confusing. There is too much overlap in “Policy convergence” and “Lessons and good practice”. The bullet points out of the boxes are not comprehensive and seem rather scattered and do not enhance the illustrative power of the model. Finally the focus is on public policy development and implementation – and does not fully incorporate the private sector as possibly the most important segment. We would have a much more enhanced box or bubble for coordination and dissemination in the center of the diagram. We would distinguish between policy convergence and lessons much more sharply – possibly defining a cycle of “identify core policy actions” – “implement” – “monitor impact” – “revise/reform” –

“identify new actions”: with two cycles for public sector action and for private sector and have interactions between public and private with possibilities for CSO/parliament/media accountability and inputs. . Recommendation: enhance the diagram with more emphasis on coordination and dissemination; private sector/markets; iterative implementation, monitoring and review; and less ad hoc use of bullet points.

· Lastly while it is clear that nutritional problems can only be redressed through multi-sectoral action; we must also be clear that nutrition cannot be a stand-alone objective. It is unlikely that we can redress nutrition without dynamic and sustainable rural economies that generate a degree of self-sufficiency, offer service access and education, and a high degree of opportunity for all. Furthermore we cannot stave off the transitional nutrition threats without urban food systems that offer fresh, quality and nutritious food at relatively low and affordable prices. In recognizing the multi-sectoral nature of the nutrition problem – we need to understand that solo objectives for nutrition reduction across sectors are likely to have limited uptake and impact. We need to establish “co-benefits” and “convergence”, (while pointing out major health threats from some decisions or paths (red flags)) regarding sustainable farming systems, food systems, climate/environmental preservation, economic development and urban:rural divides. This in part responds to the degree to confusion in the early phase following adoption of the SDGs. There are many reporting mechanisms by many institutions to many bodies – much of them overlapping. The CFS will need to stand over these mechanisms and act to shape the different reporting mechanisms to reduce overlap and increase quality and comprehensiveness of reporting (especially regarding multiple objective/outcome areas). Recommendation. The paper should try and establish a longer term vision on monitoring and data – how it will receive and feedback to different reporting mechanisms to expand information and utility over time.

PSM

I am pleased to inform you that the Private Sector Mechanism is fully satisfied with the current document and does not have further comments.

Russia (see attachment)

Thank You for preparing and distributing the revised proposal for the CFS engagement in advancing nutrition.

Please find attached herewith our comments to that document in tracking changes mode.

SCN

Again I feel the proposal has been improved considerably. Thanks a lot for your dedication.

Please find my comments below:

Par 4: Please mention the Decade of Action for nutrition has been declared formally. I suggest to make use of the exact wording in the resolution: endorsing the ICN outcome document and calling on FAO and WHO to lead”and using coordination mechanisms such as UNSCN and multi-stakeholder platforms such as CFS , in line with its mandate , and in consultation with other international and regional organizations and platform”

You may also want to refer to par 4 of the resolution (on page 3) that emphasises the open nature of the Decade, involving all actors

Par 7, In the introductory sentence about the vision: please do add Right to Food as one of the underlying principles of CFSs’work

Vision: Instead of adequate food: use healthy, balanced and diversified diets . Argumentation: Rome declaration on nutrition, outcome document of the ICN2 refers to diets , not so much to food . In

addition: diet links food systems with nutrition improvement . Moreover this formulation is also more consistent with par 10 where you also use healthy balanced and diversified diets>
Add to the vision: “for an active and healthy life” (linking nutrition with health systems)
I believe changing the words like this, ensures the necessary links between food systems, health systems and nutrition

Par 9: After Rome Based Agencies, please do add “and WHO” . Argumentation: WHO is now part of the AG because CFS has adopted nutrition in its agenda, so we need to acknowledge their knowledge and expertise, specifically where CFS needs to ensure coherency with improvements in the health systems

Par 11 Used to be stronger and much clearer in the earlier version of this document (I refer to the former par 4)

I think the message of this par is that there stronger underlying drivers that shape our food systems. In addition there is a range of stakeholders (I would use the word stakeholder here instead of the more neutral “actor” to show that some tensions are caused by the several stakes/interests of the stakeholders) . Some have more, or have less influence to shape the food system. PS has large influence especially in more industrialised food systems.

The last sentence is not correct: food systems do not have objectives (see also the definition: a food system consists of several elements) , the stakeholders in the food systems have objectives that are sometimes conflicting.

Therefore I suggest to replace actors with stakeholders. And in the last sentence: replace food systems with stakeholders (or actors if you wish)

This would be a compromise if we can't go back to the original (stronger) paragraph

Par 18: 2nd sentence: please say “improved” or “better” nutrition at household and individual level. Full stop

Followed by new sentence: Gender equality and the realisation of women's rights is essential to achieve nutrition goals. Argumentation: It is not just about position of women in food systems, it is throughout society

Par 24: Reporting by WHO and FAO about ICN2 follow up could be combined with or similar to reporting about progress of the Decade

UK

Thanks for sharing the latest proposal on CFS engagement in advancing nutrition. We look forward to the next OEWG meeting. In the meantime, the UK would like to share with you the following comments:

- It would be useful to understand how CFS will equip itself to deliver on the various components outlined in the draft documents.
- As already mentioned by us during previous OEWG meetings, we feel that this proposal should set out how CFS will fit in the sometimes complicated Nutrition related agenda. Particularly, we would like to see mentioned how CFS will get involved with other global initiatives such as the SUN movement, the Global Panel on Agriculture and Food Systems for Nutrition and others. It is helpful to clarify this from the start to avoid creating further confusion in a quite fragmented scenario, as confirmed by the very useful “Overview of some important actors in nutrition” that you shared with us before the last OEWG meeting.

USA

Here is a proposed revised to para 11 from the United States. We're pleased to see a strong mention of the private sector, but this doesn't seem to capture the fundamental role of the private sector in

the food system. The language is dated, with a focus only on “large industrial food systems” when in fact, everything along the value chain (production, processing, distribution, etc) can be private sector, whether large or small companies, local or multinational, organic or “tech”-driven agriculture.

Original:

11. Food systems are driven by political, environmental, cultural and socio-economic factors such as poverty, inequality, livelihoods, climate change and natural resource management and shaped by the objectives of a wide variety of actors, with the private sector playing a major role in particular in large industrial food systems. Improved health and nutrition is only one of the objectives of food systems, with tensions between sometimes conflicting objectives such as nutrition, sustainability and profitability objectives.

Proposed Revision:

11. Food systems are driven by political, environmental, cultural and socio-economic factors such as poverty, inequality, livelihoods, climate change and natural resource management and shaped by the objectives of a wide variety of actors, with the private sector influencing food choices, enhancing food safety, and playing a major role in technological advances in production, processes, and distribution, particularly in large food systems.

WFP

Attached please find WFP Comments on the Revised Proposal for CFS Engagement in Advancing Nutrition. Please note that these comments were supported by the EU and German delegations during the OEWG meeting in February.

- WFP firmly believes that CFS’ lessons learned and good practice sharing on nutrition should be linked with the SUN Movement and that this should be stated in the work plan – it requests that CFS stakeholders kindly express their views on this topic at the next OEWG meeting. When CFS began exploring its opportunities for expanding its role in nutrition more in depth last year, leveraging complementarities and avoiding redundancies with other existing platforms was recognized as a priority. SUN countries have accumulated many experiences since it began in 2009, which are relevant to country-led, multi-stakeholder approaches to nutrition. Their successes and ongoing challenges alike could provide valuable lessons to CFS, as would SUN benefit greatly from CFS’ experiences. Therefore, articulating a clear link to SUN in CFS’s Functional Area 2, “Lessons learned and good practice sharing”, is an obvious opportunity to generate synergies between the two platforms, especially since SUN also seeks to promote such exchanges.
- Even when its early focus will remain on food systems and value chains, CFS must recognize that nutrition demands food systems to interface with health systems, education, social protection and beyond. Improving food systems’ ability to “talk to” and coordinate with these other sectors will involve collaboration beyond Rome-based Agencies and CFS stakeholders. SUN’s approach has been multi-sectoral since it began and many countries have made significant progress in setting up coordination platforms to bring these different actors together, as well as agree on multi-sectoral policy measures and results frameworks. Lessons learned related to these processes could help CFS identify entry points for food systems and value chains to better support the broad package of services needed for good nutrition.
- WFP advocates for lessons learned and good practices to be grouped around specific themes. It is recognized that neither SUN nor any other platform will have all the answers. However, by focusing exchanges under Functional Area 2 around specific themes, CFS may be able to more systematically map what works and what doesn’t, and what is known and

not known. SUN countries have particularly rich experiences in themes of improving multi-sectoral governance for nutrition and prevention of stunting - these are important to capture along with the approaches that other countries have taken. In other themes that are new to many—including SUN—such as the double burden of malnutrition, CFS could provide a critical role in facilitating an inclusive learning process among stakeholders and platforms.

WHO

First of all, we are very delighted that the UN Decade of Action on Nutrition from 2016 to 2025 has been proclaimed by the UN General Assembly in New York on 01 April 2016. By agreeing to the resolution, governments endorsed the Rome Declaration on Nutrition and Framework for Action adopted by the Second International Conference on Nutrition (ICN2) in November 2014. This is a great opportunity for all of us, across sectors and stakeholders, to scale up our joint work in nutrition to implement the ICN2 outcomes and the Sustainable Development Goals (SDGs).

The UN resolution calls upon FAO and WHO to lead the implementation of the Decade of Action on Nutrition, in collaboration with the World Food Programme (WFP), the International Fund for Agricultural Development (IFAD) and the United Nations Children’s Fund (UNICEF), and involving coordination mechanisms such as the United Nations System Standing Committee on Nutrition (SCN) and multi-stakeholder platforms such as the Committee on World Food Security (CFS). For more information on the UN resolution see: Resolution adopted by the UN General Assembly on the UN Decade of Action on Nutrition (2016-2025)

WHO and FAO are working closely on a process for developing a road map that will facilitate the implementation of the Decade. WHO and FAO will engage a wide array of stakeholders in this process. This Decade will consist of 10 years of sustained implementation of policies and programmes as recommended by the ICN2 Framework for Action.

On potential implications on CFS work in nutrition, we propose that the DOA is seen as the connecting element between the three proposed functions for CFS advancing nutrition. We welcome that the revised proposal ‘CFS engagement in advancing nutrition’ takes the UN Decade of Action on Nutrition already into consideration.

We would like to recall some of the key elements from the ICN2 outcomes:

- Nutrition is a global agenda and concerns all countries.
- It includes malnutrition in all forms, from hunger and undernutrition to overnutrition and diet related diseases.
- Food system change is fundamental in addressing these nutrition challenges.
- Food system change has to go together with strengthened health systems to achieve improved nutrition.

The three proposed functions for the CFS, and their activities, address these key elements and are in line with CFS mandate and comparative advantage.

1. Function Policy convergence work

At ICN2 world leaders acknowledged that underlying the current nutrition problems is a broken food system that is not delivering on healthy diets. The ICN2 outcomes call for a sustainable food system that supports healthy diet. The major role and strength of CFS is on policy convergence work that is informed by evidence, such as HLPE reports.

CFS goes the right way in commencing with addressing the ICN2 FFA recommendations for sustainable food systems promoting healthy diets. These recommendations have to be

operationalized and turned into concrete policies and actions. Further elements from the FFA recommendations the CFS should work on in the medium and longer-term should include trade, investments, social protection and food safety.

2. Function Lessons and good practice sharing

The Decade of Action on Nutrition will build on the leadership expressed by some countries who have developed innovative multisectoral approaches to tackle malnutrition in all its forms and aims at bringing to a global scale such effective approaches.

It can effectively establish broad coalitions of countries who are committed to implement certain parts of the Framework for Action recommendations such as on actions for sustainable food systems promoting healthy diets throughout the life cycle. Networks could be established to enable Member States to learn from one another's experience and cooperate on joint action where appropriate. These coalitions should be member state driven and be open to all countries, independent of their income level, food system type and malnutrition problem. Different stakeholder groups could be engaged in this process, including, CSM and PSM, and different models of partnering with private sector, with civil society and social sector could be looked at.

With this regard, we support that CFS, as part of its contribution to the road map for the DOA, develops a concept on how to make the sharing of lessons and good practices a productive learning activity for countries and partners in CFS.

3. Function Reviewing progress

Another key aspect of the added value of the Decade of Action on Nutrition for Member States is that working together under this umbrella will rationalize the monitoring and accountability arrangements. A single monitoring and accountability framework will ensure regular reporting towards relevant global goals and targets, reduce the reporting burden for Member States and facilitate the reporting on the 2030 Development Agenda.

For CFS functions on nutrition, the proposed platform for reviewing progress will allow relevant multistakeholder discussions and will contribute to the establishment of future priorities for policy convergence work on advancing nutrition.

Furthermore, we are in full support to the proposed two way communication between the CFS, the World Health Assembly and the FAO Conference. We suggest that these should start in 2017.

Specific comments on the draft proposal

With regard to vision statement, we understand the wish for a longer-term more holistic vision for CFS work on nutrition. We like to stress that here we are talking about CFS's vision for nutrition, and not for CFS's vision per se or for food security. The nutrition vision should be part of and contribute to the overall CFS vision.

We support most of the elements of the proposed vision statement, and like to add more specifics on the used term 'adequate food'. According to Codex Alimentarius, food is defined as "any substance, whether processed, semi-processed, or raw, which is intended for human consumption, and includes drink, chewing gum and any substance which has been used in the manufacture, preparation or treatment of "food" but does not include cosmetics or tobacco or substances used only as drugs." (Codex Alimentarius Commission, Procedural Manual, 11th edition).

With regard to prevent all forms of malnutrition, and this within CFS mandate and comparative advantages, we propose that nutrition should not be defined only from the food perspective. Agreed language from the ICN2 outcome documents should be used and renegotiating of already agreed language should be avoided. The term 'healthy diet' is part of the agreed language at the ICN2 and used widely in the outcome documents, including in the final Commitments (Ref to ICN2

Rome Declaration). We propose the following additions to the proposed vision statement (highlighted in yellow):

A world free from malnutrition in all its forms, where all people at all stages of life and at all times have access to adequate food and consume health diet footnote

The footnote should read:

ICN2 Framework for Action, page 2: WHO fact sheet on healthy diets, September 2014 (<http://www.who.int/mediacentre/factsheets/fs394/en/>).

ICN2 Information Note on the Framework for Action. Joint FAO-WHO ICN2 Secretariat. 4 November 2014. <http://www.unscn.org/files/ICN2-2014/a-m-116e.pdf>.

Para 9: last sentence. We offer that the CFS can also draw on WHO technical expertise in areas related to its work in Nutrition. Therefore, suggest to add 'and WHO' in the last sentence after Rome-based agencies.

Para 14: the impacts referred to should be positive impacts. We suggest to add the word 'positive'.

Para 20: we notice that the text is missing introductory words on the proposed activity in the following table 'Discuss the road map of the UN Decade of Action on Nutrition from 2016 to 2025 and agree on CFS contribution'. This activity would also lead to a proposed CFS road map (as part of the overall road map) and be presented for adoption at CFS 44 Plenary Oct 2017.

Suggested language on this to add to para 20:CFS activities on nutrition during the intersessional period of 2016/17 include a discussion of the road map of the UN Decade of Action on Nutrition from 2016 to 2025, and on CFS's contribution to it.