



ACF Comments to the ICN2 “Rome accord” draft 1 – Feb 2014

Version: Final, Monday, 24 March 2014

Action Against Hunger | ACF International (ACF)¹ is ‘profoundly’ concerned that this first draft of the “Rome Accord” is by and large a ‘manifesto’ from a food perspective, without specific propositions for multi-sectoral solutions in the areas of nutrition, health systems, water and sanitation, education, family planning, social protection, and governance that are so urgently needed in large-scale nutrition sensitive interventions and programmes. Acute malnutrition (wasting), the most deadly form of hunger, is mentioned only in passing - the zero draft fails to recognize that the prevalence rate of wasting has stagnated since 1990, as acknowledged in the WHO report January 2014, and does not make sufficient commitments on wasting to significantly reduce these rates and put the world on a path to ending child deaths from this condition, which can be done within in a generation with urgent action now.

During the first International Conference on Nutrition (ICN) in 1992, governments pledged to make all efforts to eliminate and reduce substantially, before the next millennium, starvation and famine; widespread chronic hunger; undernutrition, especially among children, women and the aged; micronutrient deficiencies, especially iron, iodine and vitamin A deficiencies; diet-related communicable and non-communicable diseases; impediments to optimal breast-feeding; and inadequate sanitation, poor hygiene and unsafe drinking-water. ACF believes the ICN2 deserves an equally encompassing and ambitious commitment.

The second International Conference on Nutrition (ICN2), unlike the first ICN, appears instead to avoid an accountable plan of action for nutrition, based on a broad consultation with all actors. ACF believes that the ICN2 needs to draft a plan of action, foster an in-depth discourse on factors beyond the food perspective and propose accountable commitments. Doing anything less places the ICN2 at risk of being perceived as becoming a lost opportunity.

ACF acknowledges the efforts by FAO and WHO to organise the ICN2 and appreciates the intent of the organisers to establish a more effective bridging of nutrition-sensitive issues to nutrition-specific interventions across sectors. ACF would like to see the food and nutrition security of infants and

¹ Action Against Hunger | ACF International is a leading civil society organisation engaged in over 40 high burden countries, able to bring experience and expertise in key areas relevant to the Second International Conference on Nutrition (ICN2). ACF has worked on the integration of nutrition, livelihood, food security water, sanitation, hygiene and health for over three decades, at all levels from grassroots to national policies and related global arenas, as practitioners, partners and respected analyst of the local, national and global response to nutrition.

young children more firmly recognized as an important priority of the ICN2 agenda: in particular a recognition of the health, social protection, water, sanitation and hygiene (WASH) and livelihoods approaches in support of children under 5 years old who have fallen ill with severe acute malnutrition or wasting. 70% of these children live in Asia, largely unaffected by major conflicts or sudden onset crisis but rather in contexts of chronic deprivation, which underlines that wasting cannot be labelled as just an emergency issue but one in need of urgent attention by ICN2 as a development crisis. The ICN2 must recognise that action on malnutrition requires equally prevention (food systems, education, public health, social action) and treatment for micro-nutrition deficiency and wasting. For the latter the ICN2 needs clear defined commitments and a plan of action that includes increased coverage and access to treatment for acute malnutrition for all.

The definition of malnutrition offered in this zero draft is a too general and too biased food system approach. This definition however needs to be extended to include the concepts such as utilisation and individual dietary diversity scores. There needs to be explicit conceptualization in support of social and inequality drivers of malnutrition. The ICN2 must find ways to stipulate improved diets and equitable utilization, based on local action in all sectors: health, livelihoods social protection, water and sanitation, care practises and rights to adequate food.

ACF is concerned about the current lack of sufficient transparency of the ICN2 process. With only eight months to go, inadequate dialogue is taking place between the ICN2 member states and civil society actors through appropriate channels. ACF is actively engaged with many civil society working groups and alliances, and reaffirms our commitment to engage further on the elaboration of the “Rome Accord” and related processes.

ACF sees the proposed “Rome Accord”, while discussing many aspects of nutrition issues, as too vague in many areas and needs to move to accountable commitments and the setting out of concrete plan of actions for nutrition. The ICN2 process, thus far, does not yet set up governments on a future path to ensure “better nutrition to all”. As such, ACF urges the organisers to push for an open discussion about the plan of action in addition to the consultation on the political outcome document. The framework of action must be a legacy of the ICN2 after November 2014 that rallies governments and international platforms to take accountable collective and individual actions to end malnutrition.

ACF hopes that by opening a discussion on the “Rome Accord” the organisers are signalling their firm commitment to a fully transparent road map leading to the ICN2 this November and actions beyond. We hope the organisers will open the ICN2 process to civil society in the declared spirit of reaching a “consensus around a global multi-sectoral nutrition framework including concrete steps to improve nutrition for all”.

Specific contributions to draft Rome Accord in order of paragraphs

1. Do you have any general comments on the draft political declaration and its vision (paragraphs 1-3 of the zero draft)?

The definition of *malnutrition* needs to be extended to include specifically **acute malnutrition or wasting**. Thus far the concept of utilisation and diversity at the individual level is underplayed and not further taken up in the latter part of the draft nor in the commitments. The definition of malnutrition offered in this draft is too general and too related to agriculture and food. There needs to be explicit conceptualization in support of non-product driven action aimed at improving diets and utilization, based on local action in all sectors: health, livelihoods social protection, water, sanitation and hygiene, care practises and rights to adequate food.

In paragraph 2, bullet 2: ACF would like to complete the statement on nutrition trends (stunting and wasting) by citing the Lancet (2013) which states that there is near to no progress since 1990 on the wasting burden globally. In 1990 there were 58 million, or 11% of children worldwide, affected by wasting at any one time. In 2011 this figure was persistently high at 52 million or 8%. 70% of these children live in Asia, largely unaffected by major conflicts or sudden onset crisis but rather in contexts of chronic deprivation, which underlines that wasting cannot be labelled as just an emergency issue but needs urgent attention by ICN2 as a development crisis.

There is a need for the Rome Accord to broaden out the analysis to **non-food based causes** protracting the nutrition crisis. The FAO Committee on Agriculture noted that increased food production, while often necessary, did not guarantee a decrease in the number of malnourished people (FAO, 1979). The text touches on social and health causes but more depth and breadth of analysis should be devoted to these issues. By referring predominantly to products and food production, the Accord runs the risk of following the misplaced assumption that increased production and value chain regulation will automatically lead to better nutrition of all. The ICN2 must address the multiple drivers of malnutrition. Intensified production without addressing the social and governance issues, might even cause possible harm to nutrition status (for instance, where smallholder investment shifts towards cash crops concentrated to fewer actors and thus reducing the dietary diversity of many, increasing the workload of women and/or increasing diseases related to the use of agro-chemicals). Thus the concept of the **Right to Adequate Diet / Food** (quality and quantity) would be desirable in any subsequent draft of the Rome Accord (in accordance with the ICN 1 held in 1992).

ACF calls for reference to the right to adequate nutrition as protected, among others, by article 25 § 1 Universal Declaration of Human Rights, article 11 International Covenant on Economic, Social and Cultural Rights, article 24 (c) Convention on the Rights of the Child and article 12 § 2 Convention on the Elimination of All Forms of Discrimination against Women. We support other contributors in the call for the **right to adequate food and nutrition for all** to be considered a cornerstone of the ICN2 and any action plan stemming from it.

The utilization pillar of food security should be further explored, since it inequalities with in utilisation are a major contributor to malnutrition especially from a gender perspective. The Rome

Accord cannot be limited to access, availability, and technology only. If the current food system is analysed as unable to provide adequate food to all and at all times it is not only due to access to and availability of food, it is also due to a problem of utilisation and equity in the repartition of this food. Moreover, if food production is constrained by resource and ecological sustainability, it is also because many large scale agricultural systems are not resilient, sustainable nor responsive to local needs. This should be clearly mentioned.

Further on to the above point the implication of climate volatility on malnutrition should be acknowledged in some more details in paragraph 3. Climate volatility is likely to have a greater impact on rates of severe stunting, which are estimated to increase by 23% (in central sub-Saharan Africa) to 62% (in South Asia) (Lloyd, Kovats, & Chalabi, 2011). By 2050, compared to a scenario without climate change, child malnutrition could increase by 20% (International Food Policy Research Institute - IFPRI, 2009).

There is no section on the significance that smallholders can have for improvements to nutrition. It would seem to be relevant to include some information on this in this document - more specifically the role in growing complementary food for children of 6 to 24 months. The ICN2 could highlight the available evidence that smallholder agricultural development leads to more effective food utilisation and dietary diversity.

Smallholder agricultural interventions can be made more sensitive to nutrition in two key ways; by reducing female disadvantages in farming, for example poor access to inputs, seasonal credit and technical assistance, thereby increasing women's returns from their farming, and through this giving them more opportunity to spend on the nutrition, health and care of their children — and themselves. The other is either to promote home gardens and small livestock keeping in order to encourage more diverse diets at the household level and especially under the control of the women, or advance breeding of local adopted crops to increase their nutritional value and added minerals and vitamins, otherwise a combination of these two.

ACF would like to see in this section of the Accord a more balanced approach that reaches beyond the Food System approach and opens a genuine discussion of the multiple threats of malnutrition (health, socio-economic, rights and there alike).

2. Do you have any comments on the background and analysis provided in the political declaration (paragraphs 4-20 of the zero draft)?

Paragraph 5: The ICN2 must propose and be monitored in how far it is addressing the *specific nutrition needs over the life cycle* more specifically the '**the window of opportunity of the first 1000 days**' to prevent impaired child growth, create healthy conditions for women during pregnancy and that put the growing child at a lower risk of suffering from chronic diseases in adulthood. In addition, global action needs to be reinforced by the ICN2 that targets maternal health and can help to prevent low birth weights and stalling progress in later child development, create healthier environments, lower workloads and production focus to raise availability and utilization of adequate

diets. The text so far does not mention adolescents, recognised by the Lancet (2013) as a key target group for nutrition interventions, further attention is needed to this age group.

There are a range of proven direct and indirect nutrition interventions that could be included in the final Accord for this 'the window of opportunity'. These include the promotion of breast feeding and optimal complementary feeding (guaranteed by a right to adequate food agenda), the increase of micronutrient interventions and strategies to improve family and community nutrition and reduction of disease burden (e.g. promotion of hand washing and strategies to reduce the burden of malaria in pregnancy). (For further information, see ACF International Manual, Maximising the Nutritional Impact of Food Security and Livelihoods Interventions, 2011).

ACF believes the ICN2 would make a very significant contribution for a better nutrition for all if it contributes policy options that have the potential to bridge various sectors rather than repeating the disjointed sector approach that has led to a fractured and inefficient response in the past. For instance strengthening the health system to provide treatment for acute malnutrition where it is needed most by the worst affected populations or strengthening the education system - for sustainable human resources for nutrition across the relevant sectors; sensitising the general population on good nutrition at an early age – primary school focus as secondary school attendance is patchy.

The ICN2 must encourage ministerial working groups that engage at the local, national and international level to make commitments for sufficient financing for tackling malnutrition allowing sustainable nutrition specific and nutrition sensitive actions to grow and develop. These working groups must be adapted to local needs and include the Ministry of Finance among others.

Paragraph 6: The draft accord does not make specific links to likeminded platforms such as the SUN Movement and REACH

Paragraph 11: Seasonality, it seems important to include some discussion in the Accord on the effects of seasonal wasting, hunger and food access and availability, which is the reality for many children in low income countries and considers all pillars of food and nutrition security. It is well known that the poorest households – even those relying predominantly on small scale agriculture for their livelihoods – are reliant on the market to purchase food once their harvest runs out. It would be encouraging to read more in this draft on interventions and policies that aim to reduce the hunger gap by ways of food and seed storage, or how to reduce dependency on markets, especially during the hunger gap with interventions such as Inventory Guaranteed Credit Schemes (Warrantage), building storage solutions, guarantee affordable and adequate food processing on village level, social safety net transfers and the like to increase food and nutrition security during seasonal deprivation.

The gains made during the prosperous times of year are often negated by forced sales of assets and other coping mechanisms families are forced to undertake to survive during the hunger season. Seasonal changes in the local market can push vulnerable households closer to a threshold beyond which they cannot afford to cover their basic (qualitative and quantitative) dietary needs, eroding their resilience and preventing investment in their livelihoods. The care giver should increasingly be educated on the dietary needs of growing children so that they can make the best choice for planting, selling, saving and purchasing food commodities throughout the annual cycle.

The ICN2 should point to ways and needs of how to strengthen these self-generated safety nets linking rural smallholder with urban relatives and food markets to progress nutrition security.

Paragraph 19: Given national and international NGOs play a very important role in the fight against malnutrition, the ICN2 process and this Accord should mention NGOs as a part of the civil society and their important role in the process of reaching a consensus around a global multi-sectoral nutrition framework.

3. Do you have any comments on the commitments proposed in the political declaration? In this connection, do you have any suggestions to contribute to a more technical elaboration to guide action and implementation on these commitments (paragraphs 21-23 of the zero draft)?

Paragraph 21,

Five out of seven commitments in this section are related to the food system. This is unacceptable for an outcome document of an International Conference on Nutrition. The commitments must relate to an agreed and accountable Action Plan on ending malnutrition in all its forms.

The ICN2 member states must declare to work individually and collectively towards this goal with a strong emphasis on wide consultation across all stakeholders.

NEW Commitment (an additional commitment proposed) agree on accountable country action plans on the multiple threats of malnutrition through a coordinated multi-sector approach which addresses all casual pathways by 2016 (including action to make health systems, water and sanitation, education, family planning, social protection, and governance more nutrition sensitive.) Agree on regional and global coordination, monitoring and support.

Commitment I: must emphasize the analysis presented in paragraph 3 and 8 where the Accord plays at the complexity of causes and lack of accountability that drive the nutrition crisis, by proposing an alignment of the global and national nutrition action plans within a rights approach and re-affirm the progressive realisation of existing commitments that enshrine the Right to Adequate Food such as the Declaration of Human Rights, Convention on the Rights of the Child and Convention on the Elimination of All Forms of Discrimination against Women .

Commitment II: the Accord ought to go further and state that the undersigned will commit to the progressive realisation making all relevant sectors (see commitment 0) more nutrition sensitive, equitable and create healthier environments, enabling all to access and utilise nutritious foods all year round.

Commitment III: making all relevant sectors provide safe, healthy and nutritious food in a sustainable and resilient way, particularly in light of climate volatility;

Commitment IV: ensuring that nutritious food, health and education is accessible, affordable, utilised and acceptable with dignity through the coherent implementation of public policies aimed at the eradication of malnutrition in all forms.

NEW Commitment: recognises that action on malnutrition requires both prevention (food systems, education, public health, social action) and treatment for micro-nutrition deficiency and wasting. For

that latter the ICN2 needs clear defined commitments and a plan of action that includes increasing coverage and access to treatment for acute malnutrition for all.

Commitment V: establishing governments' leadership and financing for eliminating multiple threats of malnutrition and align where appropriate with regional and global governance structure to work towards an eradication of malnutrition globally.

Commitment VI: encouraging contributions from all actors in society including populations most affected by malnutrition, and civil society;

ACF welcomes the link with the post-2015 agenda, however we would like to have a more specific statement of intent for the ten-year plan of action to be integrated into the global development efforts for post-2015. They must also be part of efforts to achieve the targets set already by the World Health Assembly in reducing malnutrition.

END