**Comments on ICN2 Framework for Action**

**By Global Harvest Initiative, Washington DC**

Thank you for this opportunity to comment on the zero draft of the ICN2 Framework for Action.

The emphasis in this document on public-private partnership is encouraging. We welcome the Framework’s recognition of the important role of science and information-based technologies in providing sufficient nutritious and affordable food and reducing food waste and loss.

As participants in the Private Sector Mechanism’s working group on nutrition, we support the comments submitted by IAFN. In addition, we would like to note the following concerns and suggestions.

1. Page 5, Paragraph 1
   1. The phrase “subordination of interests which conflicts with government policies, agreed implementation strategies, or human rights” is vague and unnecessary. The paragraph’s emphasis on “aligned efforts”, “synergy of action”, and “trust and mutual accountability" adequately capture what is intended here.
   2. SUGGESTION: Rewrite the last sentence of the paragraph to read: “Engagement of multiple partners requires transparency, trust, and mutual accountability.”
2. Page 7, section 3.1 Food Systems
   1. Paragraphs 3-4: The references to “traditional” and “modern” supply chains in these paragraphs are ambiguous and open to value-laden interpretations. What makes a supply chain “traditional” or “modern”? Is the inputs used? The scale? The socio-economic circumstances of the actors involved? The juxtaposition of “traditional” to “modern” food systems creates a false dichotomy that does not accurately represent the complexity of how, when, and where people procure the food they consume.
      1. SUGGESTION: Replace “traditional” and “modern” with “short” and “long”. Focusing on the length of value chains recognizes two essential complexities of the food system: (1) many food value chains have both “traditional” and “modern” elements and (2) people at all economic levels, in high-income countries and low-income countries, consume food produced from a variety of value chains
         1. EXAMPLE: In 2009, Land O’Lakes International Development, USAID, and CIC Agri Business, a Sri Lankan dairy company, launched a three-year [dairy enhancement in Eastern Province (DEEP) program](http://www.globalharvestinitiative.org/index.php/2014/03/productive-dairy-value-chain-improves-lives-of-women-in-sri-lanka/) designed to introduce improved animal nutrition, care and disease management technologies and link smallholder women farmers to commercial markets.  Today, relying solely on milk production from the participants in the DEEP Program, CIC Agri Business is selling 50,000 cups of yogurt a day, as well as 15,000 small packets of milk for children. Thanks to “modern” inputs of technology and financing, women working at a “traditional” scale are contributing to a longer value chain that produced dairy products consumed across Sri Lanka. (Source, GHI’s [2013 Global Agricultural Productivity Report](http://www.globalharvestinitiative.org/index.php/gap-report-gap-index/2013-gap-report/2013-gap-report-digital/), 28-29.)
   2. Replace *supply chain* with *value chain* in paragraphs 3 & 4*.* This distinction seems subtle, but in the context of this document, it is significant. Economically, socially, and nutritionally sustainable food systems need to do more than “supply” nutritious food to consumers – they must create “value” for the actors along the entire chain: from the scientists, engineers, and entrepreneurs who are creating more productive and sustainable technologies, to farmers and producers, aggregators and processors, risk management providers, retailers, and consumers.
   3. Add “consumption” to the last sentence of paragraph #4. “However, they have also increased the availability **and consumption** of highly process foods…”