Questions:

1. Do you have any general comments on the draft Framework for Action?
Abbott Nutrition is grateful for the opportunity to comment on the draft Framework for Action. The Framework recognizes that malnutrition is a complex and multifactorial global challenge that requires involvement of multistakeholders to provide solutions. We welcome the recognition that there is a need to achieve political and policy coherence and coordination across all sectors, including in agriculture and food systems, health, social protection, education, employment, trade, environment, information, consumer affairs, planning and other sectors. Coherent and co-ordinated policy making is an important factor in resolving global malnutrition – in both developing and developed economies – recognizing local and national specificities.

Do you have any comments on chapter 1-2?

2.1 Enabling Environment: We agree with the need for the development of knowledge and evidence-based strategies, policies and programmes and would recommend the involvement and consultation of the private sector to access additional knowledge and evidence to inform policies and programmes, at both national and international level.

2.2 Better governance for nutrition: We agree with the need to establish multi-stakeholder platforms as highlighted in 2.2. This will result in better governance and facilitate the implementation of policies and national strategies. The Private sector has science based programs designed for the needs of countries they operate in and that address local and national specific nutrition related issues and food consumption patterns.

Abbott Nutrition specifically support the need to establish: A cross-government, inter-sectoral governance mechanism, including the engagement of local and intermediate level governments; and multi-stakeholder platforms, including engagement with local communities, with adequate mechanisms to safeguard against potential conflicts of interest.

2.3 Financing for improved nutrition outcomes: We support the need to identify innovative financing tools and welcome the identification of public-private partnerships as a mechanism for financing for improved nutrition outcomes.

Do you have any comments on chapter 3 (3.1 Food systems, 3.2 Social Protection; 3.3 Health; 3.4 International trade and investment)?

feedM.E. is a publically available resource which recognizes the global problem of malnutrition and provides extensive resources that can inform local, national and international policy-makers. feedM.E. is a global awareness, education, and action initiative designed to:

- Heighten awareness of the high prevalence of malnutrition and the importance of nutrition
- Educate hospital staff and patients about nutrition’s important role in recovery from illness and injury
- Galvanize action to improve nutrition status
feedM.E. works with healthcare systems and communities to help bring about global change on a local level.

3.1 Food systems: We agree with the priority actions identified in this section but are would request the consideration for the need for appropriate specialised nutritional interventions as needed in food crises situations. Codex Alimentarius Commission recently recognized a request from UNICEF and WFP for the development of a standard for ready to use supplementary foods in the treatment of malnourishment of children. We believe this should also be considered in this Framework.

3.2 Social Protection: We agree that special attention needs to be given to the ‘first 1000 days’ when vulnerability to nutritional deficiencies is greatest. Well-targeted interventions can have significant results. The private sector can contribute to the evidence-based to support policy actions in this area.

3.3 Health:

3.3.1 Delivery of effective nutrition interventions: We recognize the challenge for local and national governments in developing policies regarding wasting, stunting and to address anaemia in women of reproductive age. We support the priority actions identified regarding these issues and would encourage consultation with the private sector in the development of policies in this area.

3.3.3 Breastfeeding: We acknowledge and support the important role of breastfeeding in infant nutrition. We also fully support the introduction of nutritionally appropriate and safe complementary foods after six months of age. We recognize the challenge of meeting the developing infant’s nutritional needs, particularly those outlined within this section, and encourage continued consultation with industry in addressing these challenges.

3.3.4 Nutrition education for behaviour change: We also suggest that the all healthcare professionals dealing with patients suffering from disease associated malnutrition are educated in the value of nutrition. Malnutrition assessment tools should be standardised globally. Also, nutrient profiling tools should be standardised and finalized.

3.4 International trade and investment: We agree that trade policies and agreements should ‘do no harm’ to nutrition and that trade and investment policies should be coherent with and not undermine national nutrition strategies. Trade policy should also support nutrition policy and not restrict the ability to implement effective nutrition policies.

Do you have any comments on chapter 4-5?

4.1.1 National level: Same comments as for Section 2.2 above. We would agree that there is a need for Governments, industry and academic institutions to sustain (rather than increase) their contributions in research to improve the scientific and technological knowledge base against which food, nutrition and health problems can be analysed and solved. Significant resources have
already been invested globally providing substantial scientific knowledge. There is now a need to bring together all of this knowledge, validate it for its application and use it as an evidence base for policy interventions. Future investments should be co-ordinated to ensure impact from the investments made. To ensure future investments provide the required outcomes, all stakeholders should be engaged from the early stages in the development of the research program. In addition, we agree that public and private efforts should also be directed to training the appropriate personnel needed in all relevant sectors.

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

In the absence of the final version of the Declaration it is difficult to assess whether the Framework reflects the Declaration.

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

The Framework provides guidance, however there are some aspects that require reconsideration / refinement – see comments above. Also, realization of the commitments depends on the actions outlines for 2015 in Section 5.

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?

None at this time however, we would reiterate the need to fully engage the private sector as a partner in developing solutions to resolve the global issue of malnutrition. The private sector has a substantial scientific knowledge – local and international – that can help inform the development of policies and programs.