**Invitation to an open discussion**

**on the political outcome document of the ICN**

**Comment Form**

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

**“Rome Accord”**

**Zero Draft**

**Comments from the World Sugar Research Organisation**

**Introduction**

WSRO welcomes the opportunity to contribute to the International Conference on Nutrition 2014 and the discussions on objectives and approaches to improving nutrition and food security throughout the world. We would therefore offer the following perspectives on the Political Outcome Document zero draft entitled “Rome Accord”.

**Background**

The excellent report “The State of Food and Agriculture” (FAO, 2013)1 addresses many of the key issues that need to be considered when developing policy to tackle the various forms of **under-nutrition** observed in so many countries. It rightly emphasizes the unacceptable damage caused to humanity and to economic development by the continued existence of widespread malnutrition; the necessity for a multisectoral approach to improving the situation; the absolute need for further improvements in the scale of agricultural production and in agricultural productivity; the opportunities and risks of both traditional and modern food supply chains; and the need for better governance of the food system. It also rightly notes that people, not governments, ultimately decide what they eat, making choices from among the foods that are available, acceptable and affordable to them.

While the Report focusses on the role of food systems and food supply as a means of addressing under-nutrition in its various forms, it also considers the question of **over-nutrition** and notes that the improvements achieved to date in food security and affordability have been accompanied by increases in the prevalence of obesity. However, it seems to suggest that the emergent problem of widespread over-nutrition and obesity can be tackled by the same supply-side approaches that may be appropriate for under-nutrition.

We would argue strongly that the three basic types of nutrition-related problems seen in different countries (i.e. under- and over-nutrition of food energy, and micronutrient deficiency) should be carefully analysed and disaggregated. Only then would then be possible to seek appropriate actions to improve the situation in each problem in each country, on a case by case basis. A “one size fits all” approach is unlikely to be effective.

The confusion that can arise by assuming that a single approach will solve all nutrition-related problems is not confined to the issue of obesity versus under-nutrition. It is also seen when the different forms of under-nutrition are considered. This is important as the solution to under-nutrition with respect to micronutrients may not be identical to that for under-nutrition of food energy.

No one food can provide an adequate intake of all essential macronutrients, together with all essential micronutrients, and also serve as a staple source of food energy. A distinction thus needs to be made between the types of food that are needed to address the different form of under-nutrition. Whether over-nutrition is best tackled by supply side management remains not only controversial but untested.

The diverse demands of the food supply system in different localities has implications for the types of agriculture that need to be encouraged to address the two distinct types of under-nutrition. Where under-nutrition with respect to micronutrients coexists with under-nutrition with respect to food energy there is a need to find means to increase the affordability and availability of suitable staple foods as well as those foods that may provide those micronutrients that may not be present in the main energy-providing (i.e. “staple”) foods. This may lead to competition for available land. The balance between these two requirements will need to be carefully weighed at the local, national and international level, depending on the interconnectedness of the relevant supply chains. The role of public initiatives and private investment will also need to be carefully considered. It is most likely that a mixed approach will be the most effective.

Increased supply of macro- and micro-nutrient rich foods has been shown to lead to improvements in under-nutrition across the world. The successes that have followed the Green Revolution, and the adoption of the Millennium Development Goals, while incomplete, are nevertheless testimony to the effectiveness of this strategy9.

At the same time, the welcome decreases in the prevalence of stunting, wasting and micronutrient deficiency diseases have been accompanied by rapid increases in the prevalence of obesity. This is not merely an example of unintended consequences. It highlights a basic conundrum: how to improve food security for the poorest without encouraging those with greater disposable income to over-consume10.

The fashionable solution proposed is that over-consumption would be avoided if the diet contained a larger proportion of foods with lower energy density but with a higher content of some, but by no means all, micronutrients (such as fruits and vegetables). It is also assumed that encouraging production of fruit and vegetables would reduce all forms of under-nutrition. Neither assumption is well supported with evidence.

Over-consumption has not been shown to be reliably avoided simply by changing what is eaten. This is not surprising, since over-nutrition of food energy is essentially an issue of eating too much. At the same time, fruit and vegetables may not be a complete solution to under-nutrition, particularly where the under-nutrition is primarily a deficiency of food energy (leading to wasting and stunting from this cause) rather than micronutrient deficiency: many fruits and vegetables are low in energy.

A further issue to be considered with respect to obesity is the observation that the prevalence of obesity within population segments is directly related to disposable income in developing countries but inversely correlated in industrialised countries2. Thus the reasons for individuals’ over-consumption may differ between different countries, again pointing to the need for careful analysis of nutrition-related issues on a case by case basis.

**General Comments on the zero Draft “Rome Accord”**

1. The draft does not adequately address the multi-faceted dimension of malnutrition and the need for a balanced and flexible approach to addressing each situation on a case by case basis. It tends to imply a “one size fits all” approach.

2. The draft makes a number of negative references to certain aspects of food composition, particularly salt, fat and sugar. These are ill-considered in a document of this type and reflect the “one size fits all” approach questioned above. Those who are overweight or obese may need to consider their intake of all forms of food energy, whether fats, sugars, proteins, or starches. Those who are under-nourished with respect to food energy may have a very different perspective. It is unclear whether a decrease in availability, or affordability, of foods containing fat or sugar would materially influence obesity prevalence. It is equally possible to over-consume any macronutrient. It is also unclear whether fiscal measures to discourage consumption of any food will have unintended consequences for population groups such as the very poor and those with eating disorders.

3. The draft includes negative comments on food processing. It should be recognised (as the report “State of Food and Agriculture” in fact does) that food processing, especially preservation, has had a major role in improving overall agricultural productivity. This has led to greater food security, especially for urban populations; increased income for farmers; and radically improved food safety1. The value of food processing *per se* should not be conflated with opinions on the composition of some processed food products. The micronutrient composition of many factory-processed foods is often similar to the equivalent food traditionally preserved and distributed11,12.

4. Further attention should be given to the different but complementary contributions that can be made by the various actors in the food system. In particular, the role of the private sector and the value of public-private partnerships should be better recognised and fostered.

5. The draft refers to food addiction (paragraph 14). This is a speculative hypothesis that poorly fits the available evidence. It is inappropriate to include this reference in the draft7,13.

**Specific Comments on paragraphs 1-3 of the Zero Draft**

Paragraph 1. Malnutrition has a negative impact on many communicable diseases as well as non-communicable diseases.

Paragraph 2. Bullet 6. It is misleading to use the term “non-communicable diseases related to diet” as it implies that diet is the sole or main cause of all these disparate diseases. A more accurate term would be “non-communicable disease that may be partly influenced by diet”

Paragraph 3. It is established that “food availability, affordability and accessibility remain key determinants of under-nutrition”. However their role in over-nutrition remains uncertain.

The consumption of sugars per head of population has not increased globally3 and the assertion that sugars have any appreciable influence on the “global epidemic of NCDs” is not based on reliable or consistent evidence4.

The “constraints posed to food production” can be partly ameliorated by reductions in post-harvest losses. This is where food processing has played such an important part in the past and could contribute further in future.

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

**Specific Comments on paragraphs 14-20 of the Zero Draft**

Paragraph 4. The wording “obesity (is responsible) for over three million deaths every year” should not be placed in the same sentence with child deaths, as it is misleading. In addition, these deaths are in adults and they are *associated* with obesity only in some (but not all) mathematical models. The number of deaths that are *cause*d by obesity is still under debate5. The important role of physical inactivity, both as a cause of obesity and as an independent cause of morbidity and mortality, has not been fully elucidated6.

Paragraph 10. Food systems should produce more foods as well as more nutritious food. Good nutrition requires macronutrients, both for food energy and for certain essential nutrients, as well as micronutrients. Paragraph 9 summarizes the issues very well. Paragraph 10, on the other hand, is too tied to a mixture of ideas of variable merit. These include some currently fashionable but poorly established prejudices. These include a lack of understanding of the necessity to improve access to a secure supply of food energy as well as a secure supply of micronutrients. Current estimates suggest that 842 million people across the world are currently chronically short of food energy (Paragraph 1 bullet 1). There is a need for increased access to staple foods (i.e. those that are primary energy providers) as well as to foods that may contain other micronutrients. It would be highly unwise to steer agriculture in directions that lack evidence of effectiveness beyond reasonable doubt.

Paragraph 11. The reduction of food wastage because of storage losses is one of the primary benefits of food processing. This should be acknowledged.

Paragraph 13. This paragraph is misleading by selection. Excessive consumption of any nutrient is to be discouraged. The selection of sugars for particular mention is not a fair reflection of the evidence4.

Paragraph 14. All misleading nutritional messages, whether originating from overtly commercial sources, or from other sources, should be discouraged. The reference to one particular type of misleading message is unhelpful. The reference to “addictions” is speculative7,13.

Local food cultures are important but they may not be the solution to all the world’s food problems1 and should not be presented as such.

Paragraph 18 This section should also include mention of the importance of encouraging private sector investment in agriculture, as well as public-private partnerships.

Paragraph 19 The use of the term “reshape” is likely to mislead. What is needed in some countries is improvement and progressive evolution, not re-engineering. In most developed countries the food system has not been proved to be the root of the problems seen.

Paragraph 20. WSRO strongly supports the need for better food and nutrition surveillance systems to support the framing of appropriate policy in this area and to monitor its effectiveness. The need is not just for wider application of food and nutrition surveillance, especially in developing countries, but also for improvements in the accuracy of the information obtained from surveys.

1. **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)?**

Please provide your comments in the appropriate fields relating to these commitments:

**Specific Comments on paragraphs 21- 23 of the Zero Draft**

Paragraph 21 The introduction again uses the word “reshape”. This is unhelpful and does not convey the meaning of “progressive evolutionary improvement” that is likely to be more broadly accepted.

Commitment I: aligning our food systems (systems for food production, storage and distribution)to people’s health needs;

Commitment I : This should specify that realignment should be considered where necessary. At least 15 countries are considered to have no malnutrition problems of public health significance1.

Commitment II: making our food systems equitable, enabling all to access nutritious foods.

Commitment II Agree

Commitment III: making our food systems provide safe and nutritious food in a sustainable and resilient way;

Commitment III Agree

Commitment IV: ensuring that nutritious food is accessible, affordable and acceptable through the coherent implementation of public policies throughout food value chains.

Commitment IV: This should also mention policies implemented by actors other than governments.

Commitment V: establishing governments’ leadership for shaping food systems.

Commitment V Agree

Commitment VI: encouraging contributions from all actors in society;

Commitment VI Agree

Commitment VII: implementing a framework through which our progress with achieving the targets and implementing these commitments can be monitored, and through which we will be held accountable

Commitment VII. We look forward to an open and detailed discussion on a framework for action.

22. Commit to launch a Decade of Action on Nutrition guided by a Framework for Action and to report biennially on its implementation to FAO, WHO and ECOSOC.

Paragraph 22. Again, it will be important to discuss the framework for action with all stakeholders. Recent experience would suggest that a few practicable targets would be more likely to succeed than an over-ambitious wish list8.

23. Commit to integrate the objectives and directions of the Ten Year Framework for Action into the post-2015 global development efforts.

Paragraph 23. We look forward to a detailed discussion of the framework.

**References**

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4. See: European Food Safety Authority (2010) Scientific opinion on dietary reference values for carbohydrates and dietary fibre. EFSA Panel on Dietetic Products, Nutrition and Allergies. EFSA Journal 2010; 8(3):1462

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7. Ziauddeen H, Farooqi IS, Fletcher PC (2012) Obesity and the brain: how convincing is the addiction model? Nature Reviews Neuroscience 13: 279-285

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9. Tilman D, Kassman KG, Matson PA et al. (2002) Agriculture sustainability and intensive production practices. Nature 418:671-677.

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13. <http://www.neurofast.eu/consensus/> accessed 17 March 2014