World Public Health Nutrition Association comments

on the ICN2 Zero draft ‘Rome Accord’

As requested we, the World Public Health Nutrition Association (WPHNA), have made some general and specific comments on this zero draft. We welcome the opportunity to comment on this draft, and appreciate the efforts in putting this document together. However, it is a disappointing document. Its statements, claims and implications continually seem to contradict currently agreed positions of relevant UN agencies.

Inasmuch as we can understand the document, its approach and suppositions represent a great step backwards from the position of the 1992 ICN1, and could if put into practice cause further deterioration in the quality of food systems and supplies and thus of human health. We also feel uneasy about working on a document that is often unclear, confused or fragmentary. We would like to suggest that it is a ‘pre-Zero draft’ that needs substantial revision. We will be happy to make more detailed comments on a new draft. We hope the comments presented here are helpful for the preparation of a new, more substantial version.

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

Some examples of lack of clarity and of confusion follow. In item 1 'malnutrition' is defined to include overconsumption, whereas in item 2 the term is used to refer only to undernutrition. Item 2, first bullet point, states that 'at least 842 million' children were undernourished in 2011-2013. We assume this means in each of these three years, and suggest that the draft needs some basic checking and editing. Also here and throughout the document it is unclear whether obesity is counted as a chronic non-communicable disease: either way, the general point here is that key concepts and the language of the document need revision. The same applies, for instance, for the concept of food systems that is presented later on in the document.

The human right to adequate food is absent of the document, which is clearly not written with a human-rights lens. There is no recognition of the roles and responsibilities of the different stakeholders that the document proposes to engage in the promotion of food as a right of all people. FAO’s efforts in promoting food as a human right have been of extreme importance, yet this is not reflected in the document in its current form. When addressing targets the focus is restricted to undernutrition, despite the fact that an outcome document of the ICN2 needs to cover all forms of malnutrition. Although malnutrition is referred to as a complex problem, a simplistic position is often taken. Thus, key determinants of malnutrition of all types are overlooked or ignored. These include penetration of transnational corporations into global South food systems; interference by foreign governments and corporations in public policies designed to protect rational and sustainable food systems and supplies; and the impoverishment of agricultural and biological diversity. Many other examples can be given, including of themes that are now seen as central by relevant UN agencies.

Some statements or claims, while unclear, seem to us to be simply incorrect. For instance, it is implied that increases in supply and consumption of fruits and vegetables, and increased diet diversity, are attributable to agricultural innovations. This is not true. The impact of agribusiness and of corporate food commodity and product development has made food systems more monotonous and more homogenous. This is well known to the relevant UN agencies.

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

The document implies a grandiose concept of some universal food system, to be adopted or imposed on regions and countries throughout the world. Such concept reflects what transnational food and drink product corporations want and are planning for. This is not in the interests of public health or public goods.

There is no recognition or reference in the document to the fact that the prime drivers of what are and now the uncontrolled pandemics of obesity and diabetes are the ultra-processed food and drink products manufactured and advertised by transnational corporations. It is a prime duty of relevant UN agencies to resist this trend in favour of genuine diversity and food systems that are appropriate in different cultures, climates and terrains. This is surely what the UN Food and Agriculture Organization 2014 year of family farming is all about.

Being sensitive to and focused on strengthening local circumstances is essential in order to avoid transplanting global actions into local socio-political contexts that are far distant from some plan for a ‘global solution’. Countries where traditional and long-established food systems and dietary patterns based on meals, need encouragement to preserve protect their diversity. In such countries certainly, any policy to reformulate intrinsically unhealthy ultra-processed products would only increase their market share.

The document refers to renewal or resurrection of commitments and processes. This section is vague. What ‘renewals’ and ‘recalls’ mean is never made clear. There is also practically no reference in the document to the fundamental need to promote equitable food systems.

We agree that 'food system' is the appropriate concept. But the use of the term in the singular, as if there is or should be only one global 'food system', is tendentious and mistaken. Also the term 'our food systems' (here in the plural) in the points at the end of the document is strange.

Further and respectfully, references to 'the private sector' and to 'industry' seem not to recognise that the main issue here is the activities of transnational corporations whose policies and products are a main part of the problem. WHO Director-General Dr Margaret Chan has already made this very clear, for example in her address to the 8th Global Conference on Health Promotion in 2013.

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)?***

This section is completely vague. The suggested actions are unclear. We do not understand what is meant by ‘technical elaboration’ – most issues that determine food systems and dietary patterns and the health of nations are political. Nothing is said about how the actions could be achieved. No guide is suggested.

Also, the document has nothing to say about strengthening and amplifying the participation of civil society organizations and social movements, and regulating conflicts of interest in order to prevent policies from being undermined by corporate interests.

These are some of the reasons why we recommend that the ‘Zero draft’ on which these are comments is set aside, and that a new Zero draft is issued. The problem now is partly one of clarity and coherence but is more than that. A new draft should have an appropriate conceptual framework that takes proper account of the social, cultural, economic, political and environmental determinants of food systems and thus dietary patterns.

A new draft should state and amplify current policies of the relevant UN agencies setting clear guides on how to enact them. It should include a clear recognition that transnational corporate penetration and takeover of food systems and supplies especially in the global South is not in the public interest and will lead to further deterioration of public health, notably in the form of very rapidly rising rates of obesity and diabetes, and of public goods including in the form of loss of biodiversity. It should abandon all language that implies that a solution lies in a global food system imposed from on high.