



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)?

In our view, the draft political declaration presents a good opportunity for accelerated and concerted action on multiple threats of malnutrition. However, its vision could benefit from inclusion of a notion of urgency, persistency of the problem, as well as – beyond stating its unacceptability and injustice – the fact that **the matter is of avoidable and preventable nature by reasonable and known means, many of which remain within the remit of systemic approach to good governance and redistribution of power and resources at local, national and supranational level.**

We agree that the causes of malnutrition are complex and multidimensional, indeed, as the draft political declaration state; however, the ‘causes of the causes’ of such a state, have not been adequately and clearly brought to a limelight – the past and current food and agriculture systems failed to address hunger and malnutrition due to unfavourable economic and political choices and have neglected to systematically and sustainably put health and nutrition for all at the heart of their decision makers. **In this regard, ‘access to food’, ‘right to food’ and ‘adequacy’ should come upfront when listing key determinants of malnutrition and inequalities at population level.** Moreover, the vision would benefit from a stronger alliance of the – so it seems – predominant food and farming sector with health and social systems at large, objectives of the fight against poverty and social exclusion as well as advancement of gender equality and a strong human rights protection in all approaches towards food and nutrition.



Furthermore, to go beyond 'just' focusing on the whole food and agriculture system that is to say the traceable food supply chain and actions across sectors to ensure coherence with health and equity, **due consideration should be given to the entire enabling food environment so that a healthy and nutritious choice is an easy one.**

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

We very much value a specific **focus put on increasing the rate of exclusive breastfeeding in the first six months as well as support towards adequate supply of (fresh) fruit and vegetables**, having seen a slow but persistent decline in political commitment towards these objectives and misguided agricultural subsidies that favour intensive production of products not considered to contribute to healthy and sustainable diets (such as the recent reform of the EU Common Agricultural Policy or the US Farm Bill).

In addition to recognising that *'nutritional protection is provided to people who are food (EPHA add. and nutrition) insecure, unable to purchase the (EPHA add. adequate amount and/or type of) nutritious foods they need, have special needs, or are nutritionally vulnerable for other reasons'*, it should be made clear that **by no means people should find themselves in a situation of food and nutrition poverty in the first place.** Of course, any emergency food aid is welcome when it is needed and necessary in unfortunate conditions but its temporary character should not be seen as a long term solution; neither should it replace structural and much needed good policies on a government side to address, mitigate and prevent such insecurities or inequalities.

When considering ways how to reshape and fix our broken and unsustainable food system to improve people's nutrition and ultimately health and well-being, **the entire food supply chain has to be scrutinised, including food environments in which people make food and nutrition-related decisions, how the foods are advertised and marketed, especially to the most vulnerable consumers** such as the child population, young parents, people on low income or minorities, among others. For better health and nutrition, the length of the food supply chain has to be considered – with the short(er), local, regional food production-consumption links found supporting healthier food options, reducing food waste, price volatility and ever-increasing power and market concentration in the agri-food sector.

This would bring us to another macro-economic level of influence in food and agriculture system - international 'free' trade agreements aimed to remove trade barriers, such as tariffs but also regulatory or harmonization framework of existing and future regulations aimed to guide production of foods considered safe, healthy, nutritious or environmentally-friendly; how the food could be grown, produced, processed, distributed, advertised and so on. The already happening increase in food commodification, globalization and disappearing diversity in our diets (usually towards cheaper and more convenient but unhealthy, western-type, highly-processed and intensively farmed) may be only further aggravated by such trade negotiations as

the **current Transatlantic Trade and Investment Partnership (TTIP) between the US and the EU**. In parallel with discussing policies on investment and subsidies to be aligned with nutrition goals, taxation policies could be used to support such an objective – favourable or no VAT for products clearly contributing to a healthy diet, increased taxes on foods considered unhealthy and which consumption should be discouraged – especially among the most vulnerable population groups who tend to consume relatively more of such products (aka ‘heavy users’ according to the food and drink industry) as compared to the general population and therefore taking a significantly heavier toll of the poor diet-related burden of disease.

In addition to all the above suggested issues, the vision for a food system that cares for people’s nutrition, health and equity should take into account the **issues of antibiotics’ over- and misuse in the livestock production system** and these adding to this emerging public health threat, **overproduction and overconsumption of animal proteins** as compared with insufficient supply and consumption of fruit and vegetables, whole grain and legumes. It should also be emphasised to consider various **health, social and environmental ‘externalities’ of the current food and agricultural production and consumption systems**, that is to say both short- and long-term consequences of the current system that favours unsustainable cheap highly-processed and intensively-farmed calories and trades away regulatory power to a handful of agri-food multinationals accountable neither to governments, international institutions nor citizens but to their shareholders.

Having said that, we welcome the following statement *‘(EPHA add. before interests of industry) Governments are obliged to protect consumers, especially children (EPHA add. and other highly vulnerable consumers), from misleading commercial messages (EPHA add. and financially appealing/attractive activities) promoting energy-dense but nutrition-poor foods, which can induce addictions and heighten the risk of disease’*. Indeed, **according to a ‘good governance-for-health’ approach, all relevant ministries and departments, together with whole-of-society actors should coordinate towards a shared goal of agriculture-food-health system.**

- 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)?**

In line with some issues outlined in the above text, first and foremost, we feel the commitments for action proposed in the draft political declaration are not as ambitious and far-reaching as what such an urgent and grave problem as global malnutrition and failing food and agriculture system would require to be done. We will elaborate on these below.

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



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

- rephrase: **putting equity, public health and nutrition at heart of food and agriculture system** (from farm-to-fork, along an entire food supply chain from production to consumption)

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

- **clearly mention a 'right to food' approach**

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

- **instate a reference to harmful externalities such as climate change, environmental degradation and pollution, health and social care costs in terms of premature deaths and healthy life years lost to disability due to malnutrition-related NCDs**

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

- a **food and nutrition adequacy** factor could also play a role here, given the issue often challenged with regards to breastfeeding, infant feeding, and general balanced diets. Public policies need to be not only implemented in a coherent way, but **a coherence factor needs to be mainstreamed throughout the entire public policy process from development to evaluation stage**

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

- as reinforced in the text earlier, **governments' leadership, commitment and political willingness, responsibility and accountability for shaping the food system needs to be established, maintained and reinforced from within a broader and long-term oriented framework of good governance for public goods**. It is absolutely crucial that governments realise it is their right and obligation to regulate if needed, in order to protect health and well-



being of their people and the future generations before vested interests of industry. Self-regulation by and for the food and drink industry has not proven to serve public health objectives so far. **This commitment should also spell out a need for (exploring) health-promoting, consumption-shaping taxation and subsidy policies**

Commitment VI: encouraging contributions from all actors in society;

- this commitment comes up as a somewhat vague and unclear. What specific types of contributions and which actors in society are meant? Does this include private operators and if so in what role?

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.

- would there be anything more concrete included in the monitoring and accountability framework such as for example sanctions and their nature? Would the accountability mechanisms be based on voluntary or mandatory obligations? Who would be acting as the (independent) monitoring body?

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.

- align with the below mentioned post-2015 global development agenda

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

- no comment

Contribution prepared on

20 March 2014 in Brussels, Belgium