**Open discussion on the ICN2 Framework for Action zero draft to implement the Rome Declaration on Nutrition-Comments of Livio Luzi**

The Draft document contains many balanced recommendations on which I agree on, but it also includes some recommendations which are not fully correct and, therefore, in my opinion should be modified.

* **Comments on chapter 1-2**

The following references made in chapters 1 and 2 can be supported with some considerations:

The overall comment on Chapters 1 and 2 is that, although the Declaration has focused on Nutrition, too little emphasis is more in general on life-style and particularly on the relevance of physical activity in contrasting the development of obesity. More in detail, I would suggest not to use specifically the terms of “healthy and unhealthy” foods (a concept that is rather limitative). Instead, I would more appropriately use the terminology of “healthy or unhealthy life-style”. This would be a more comprehensive approach to face and combat obesity pandemic diffusion. From this general consideration stems as examples the following specific potential corrections:

* + “*nutritionally appropriate diets*” (par. 1.1), without specificying the adjective “unhealthy”;
	+ “*knowledge and evidence-based* strategies, policies and programmes” (par. 2.1)
	+ “*involve regular consultations among all implementing partners, including consumer groups, other civil society organizations,* ***basic and clinical investigators in nutrition****, producers, processors, distributors and retailers of food*” (par. 2.2)
	+ “*professional nutritionists, research scientists, educators,* ***personal trainers***” (par. 2.2)
* **Comments on chapter 3 (3.1 Food systems, 3.2 Social Protection; 3.3 Health; 3.4 International trade and investment)**

A point that require support (and expansion) is the fact: “*interventions in isolation may have limited impacts within such a complex system, interventions that consider food systems as a whole are more likely to succeed*” (par. 3.1). Accentuating the relevance of this point will allow the inclusion of more general aspect of life-style as well e.g. physical activity).

Please find some negative feelings on the following points made in chapter 3:

* **Paragraph on Food systems (3.1, paragraph 10)**: the reference to WHO recommendations on diets contained in this paragraph, appears partially incorrect because it refers to draft recommendations not yet approved by Member States, such as the one included in the 5th bullet point (“***WHO recommends that intake of free sugars is less than 10% of total energy intake or, preferably, less than 5%”).*** *T*hese Guidelines are still in a **draft version**, recently put to public consultation and still under revision. I personally believe, and I already had the chance to comment on this, that ***giving clear-cut percentage is not supported by scientific data at present***. Free-sugar, acutely, is well known to have also positive effects on energy metabolism and neurophysiological parameter. For this main reason, namely the lack of supporting scientific data, or in specific case paradoxically the opposite effect, the statement should be smoothened or deleted.
* **Paragraph “Nutrition education for behavior change” (3.3.4, page 21, 7th paragraph): “*Nutrient profiling has been used as a tool to qualify the nutritional value of individual foods and help consumers make healthy choices, as well as governments design schemes to control food marketing and label food products”****.* As science has shown, there is no such a thing as a “good” or a “bad” food in itself: it all depends on how the different foods are combined within the daily and weekly eating traditions and habits. Moreover and more importantly in my opinion is pivotal the relationship between the nutritional daily intake and the level of physical activity. Remember that marathon runners caloric intake rages between 3500 and 5500 daily calories most of them derived from fats! **This sentence should, therefore, also be removed** **or significantly modified.**
* **Paragraph 4.4. “International Trade and Investment”, (pag.24, third paragraph-** it follows par. 3.3.6 and before par. 4)**: “*The availability of and access to unhealthy foods should be effectively regulated and discouraged. International standards in regulations for nutrition content to promote compliance with nutrition requirements should be established, implemented and enforced.”*** Regulating the nutrition content of food products with pre-set standards applicable to International Trade would not only be most likely against applicable competition rules, but also is in contrast with more basic psicologic approach to any “addiction” conditions (obesity can be considered a food addiction condition). In fact, prohibitionist period teaches us that is ineffective to prohibit alcohol, smoking, drugs etcetera, to avoid diffusion. In fact, this would only results in illegal diffusion and selling of the prohibited product. Instead, a positive reinforcement on global aspects of life-style interventions will more easily reach the target and limit unhealthy life-style habits. **This sentence should, therefore, also be removed** **or significantly modified.**

**Comments on Implementation**: Add considerations and data on the correlation between nutrition and other aspect of life-style (mainly the level, quality and quantity of physical activity in relation to quality and quantity of daily calories).

Sincerely,

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