

WORLD PUBLIC HEALTH NUTRITION ASSOCIATION

*World Public Health Nutrition Association comments
on the FAO-WHO 2014 International Conference on Nutrition
Framework for Action zero draft as guided by the draft Rome Declaration on Nutrition*

Contextual comments

Thank you for instituting this process of consultation with civil society organisations and social movements. Our specific comments are in the separate document below.

Work on ICN2 has a practical context. We recognise that this participatory process, not used for the 1992 International Conference on Nutrition, imposes an additional load on the UN agency secretariats. This response is in a spirit of sympathy and solidarity. We also recognise other strains that are stressing the UN system. Relevant UN agencies need much more unrestricted funding, absolutely and relatively, from member states, in order to fulfil their mandates, to serve member states and the public interest, and to protect and preserve sustainable agriculture, food and health systems.

ICN2 needs to be positioned as within a very broad context of knowledge, policy and action. We emphatically support the commitment of the UN Food and Agriculture Organization to family farming, which will and must remain fundamental, and the commitment of the World Health Organization, frequently emphasised by Director-General Margaret Chan, to universal primary health care.

What people eat and the effect of diets on personal health, and of dietary patterns on population health, are now well known to have environmental, economic, political, social and cultural as well as behavioural and biological determinants. These can be grasped only by use of systems methods. The linked financial, fuel and food crises are symptoms of world disorder that can be addressed only at the very highest level. Climate change has now been identified by the President of the World Bank as potentially profoundly disruptive of food systems and population health, so much so as to be a cause of wars. The deliberations and outcomes of ICN2 will make a real and lasting difference for the better if, and only if, they focus on the basic and underlying causes of disease, health and well-being in the whole sense of these terms.

We appreciate that our overstretched colleagues in the UN system who are working on ICN2, together with many member state representatives especially from the more vulnerable regions, know all this. We pledge to give the ICN2 process and its outcomes all the support we can.

WORLD PUBLIC HEALTH NUTRITION ASSOCIATION

*World Public Health Nutrition Association comments
on the FAO-WHO 2014 International Conference on Nutrition
Framework for Action zero draft as guided by the draft Rome Declaration on Nutrition*

General comments

The main ICN2 input and output documents should include explicit reference to and citation of other documents on which ICN2 has been built, or that are relevant to its work. This is of course normal in UN processes. Two recent examples are the May 2014 publication on *Family Farming, Food Security, Nutrition and Public Health in the Americas*, prepared by UN agency colleagues; and the June 2014 *Santa Cruz Declaration For a New World Order for Living Well* of the G77 group of member states (now 133, + China). Pdfs of these documents are attached.

Of the statements and recommendations made in comments seen so far, we wish to give broad support to four that have, as here, been submitted by named people on behalf of international organisations. These include that by Corinna Hawkes, on behalf of World Cancer Research Fund International and the NCD Alliance, on achieving an effective process. They also include those by Lida Llotska on behalf of the International Baby Food Action Network; by Claudio Schuftan on behalf of the People's Health Movement; Xaviera Cabada on behalf of El Poder del Consumidor; and Flavio Valente on behalf of FIAN International. We basically agree with their comments on the broad issues that are neglected in or missing from the *Framework For Action* draft. We also agree that the draft is still not in a state where it is sensible to propose drafting changes and adjustments. Its general approach requires new thinking, much of which has now been proposed.

- The structural determinants of states of population health, and the realisation that epidemic diseases are symptoms of sick societies.
- The need to enable impoverished populations to determine their own ways of being and living and to gain sustained agriculture and food security.
- The imperative need in all normal situations for extended exclusive breastfeeding followed by freshly prepared culturally appropriate food and meals
- The devastating impact of the penetration by transnational food and drink product corporations of middle and low income countries in the global South.

These and other statements made in these three documents are amply supported, not seriously contested, and need emphasis. On the issue of transnational corporations, we agree with the position reached in a relevant February 2013 *Lancet* paper in its *Non-Communicable Diseases* series, attached. To include such powerful industries, whose interests directly conflict with those of public health, in any form of policy planning (as distinct from implementation) is absurd.

In addition, we propose that all the main ICN2 input and output documents need to be introduced by a short set of governing and guiding principles which set out the conceptual and ethical framework of ICN2 and in effect of all other high-level meetings whose intention is to preserve and protect agriculture, food, nutrition and health systems. If this recommendation is accepted we will propose some principles, one of which certainly is that concerning the human right to adequate and nourishing food.

*World Public Health Nutrition Association comments
on the FAO-WHO 2014 International Conference on Nutrition
Framework for Action zero draft as guided by the draft Rome Declaration on Nutrition*

Specific comments

The specific comments that follow indicate general concern about the nature of the draft Framework For Action. The stage has not yet been reached when the sole or main focus should be on specifics. This said, here are some specific concerns, keyed to the text of the Framework draft.

What customers acquire and consumers eat and drink is not influenced just by availability and access, as indicated and implied. One of other determinants that are decisive, are the product formulation and marketing policies and practices most of all of gigantic transnational and other huge food and drink manufacturing and catering corporations. The Framework needs to emphasise this and other determinants explicitly (page 1, paragraph 3)

The draft fails to specify the basic and underlying causes of malnutrition. It identifies the problems and then quickly moves on to propose solutions. But unless social, economic, political and other determinants are understood, it is all too likely that policies will be irrational and actions and programmes ineffective or unsustainable. (page 1, paragraph 3-4)

The scientific basis of the Framework should be governed by human rights principles, to which there is no reference. (page 2, paragraph 1)

The Framework refers to ‘the global food system’. This is a basic error. The term implies among other mistakes, standardisation, concentration of power, sources, supplies, inequity, cultural monotony, and reduction of cultivars. What is needed is the identification, protection and strengthening multiple, traditional, democratic, equitable, sustainable and health promoting food systems. (page 2, paragraph 1)

While referring to its alignment with World Health Assembly agreements, the Framework fails to indicate the need to recognise and uphold family farming, as emphasised by the UN Food and Agriculture Organisation as responsible for most of the food produced supplied worldwide. (page 3)

Member states are indeed primarily responsible for implementing UN agreements, such as those planned for ICN2. But the term and concept of ‘partnering’ with other sectors is not appropriate. This in particular implies a community of interests with corporations whose business depends on unhealthy products. Instead, the term and concept of ‘negotiation’ is appropriate. (page 3, paragraph 3)

It is essential to state indicate that solid mechanisms to avoid conflicts of interest are put in place. A fifth key element is needed, on the need for enhanced, strong and sustained monitoring and sanctioning mechanisms. (page 3, last paragraph)

The fourth element of 'Better governance for nutrition' should also state the need to assess corporate commercial practices, policies and products promoting or associated with unsustainable or unhealthy ways of production or consumption. (page 3, last paragraph)

Business jargon and its implications should be avoided. For instance, the 'stakeholder' concept should be eliminated. Instead, social participation forums and councils should be specified to be used to engage social movements and those most affected by nutrition problems. (page 5, bullet points)

Fiscal measures to reduce the demand for products contributing to unhealthy eating, such as taxes on sugared drinks, should be identified as a source of revenue earmarked for public health initiatives, such as guaranteeing the right to safe drinking water. (page 6, bullet points)

The Food Systems section is inadequate. It indicates that achieving foods adequate in quantity and in quality is the aim. However, who and how these foods have been produced are essential for the environmental, cultural and social adequacy and sustainability. It is possible to supply food adequate in quantity and quality from a biomedical perspective that nevertheless causes calamitous loss of biodiversity, cultural and socioeconomic impoverishment, and vast increases in inequities. (page 7)

The text on traditional and industrial food systems is incoherent. On the one hand it states problems with industrial systems. Yet at the same time, the Framework recommendations favour or assume 'modern' industrial systems. The value of traditional systems, universal until very recently in history, which are still the norm in many parts of the world, needs to be clearly stated. For instance, the use of pesticides in modern systems impoverishes the soil. In this vein, the document elides reference to low-input traditional technologies to improve food production. (page 7, paragraphs 3 and 4)

'Increasing productivity and economic growth can improve nutrition outcomes'. But it can also cause and worsen nutrition problems. The document also includes inappropriate and misleading statements implying that automation of agriculture and food production gives more time to women to take care of children and prepare food. Massive mechanization does indeed reduce rural employment, but thereby increases immiseration in rural communities and urban slums. (page 8, first paragraph)

The use of nutritional supplements should be identified on most situations as a temporary expedient only. (page 8, 4th paragraph)

'At each step in the chain...' – This paragraph is mainly about artificial measures. It should include suggestions of the value of traditional technologies in farming, cooking, eating. (page 9, paragraph 4)

Page 10: Priority actions

Under ‘Promoting dietary quality and diversity,,,’ there should be included the sub-item:

- regulating the demand for unhealthy products and associated unhealthy eating practices by fiscal and other formal means that restrict propaganda for unhealthy products and that make healthy foods relatively more accessible and affordable.

Page 10: Priority actions

On the action: ‘Identifying and promoting good practices for improving nutrition enhancing food and agriculture based approaches on a large scale.’ This should give foremost emphasis to small scale farming.

Page 10: Priority actions

An additional item is needed that recommends radical scaling-down of the use of agrochemicals of all types, including antimicrobial drugs, and corresponding scaling-up of diversification.

Page 12 and several other passages in the following pages

Priority actions to improve the food environment. Mainly from this item on, the term ‘nutrient-rich food’ is continually used. It is confusing and misleading and should be avoided. For nutrition specialists the term refers to micro and trace nutrients. But it can be and is also interpreted as energy-rich foods, fat-rich foods, and so on. Also, the term and the way it is used implies that food products however unhealthy that are fortified with nutrients are therefore healthy.

Under ‘Healthy Diets’, the term ‘nutrient-rich foods’ should be replaced by ‘unprocessed or minimally or moderately processed foods’. (page 12)

Under the text on social protection it needs to be made clear that the impact of in-kind food transfers has been considerably higher than cash transfers where food is not available on the market, particularly in emergency contexts, as cash transfers can have an inflationary effect, resulting in further local food price increases. Food distributed through these scheme needs to be nutritionally adequate, and preferably produced by and purchased from the most socioeconomic vulnerable communities that grow food. (page 14, white bullet point 3)

On actions to addressing micronutrient deficiencies, it is a mistake to give priority to artificial addition of nutrients to food. The priority needs to be diversification of diet and preservation of agro-biodiversity. (pages 16-18)

On the priority actions on water, sanitation and hygiene. This needs to identify water as a public good and a human right. (page 22)