

*World Public Health Nutrition Association comments
on the revised draft of the political outcome document of the ICN2.*

1. General comments on the Draft of the Rome Declaration on Nutrition.

We, the World Public Health Nutrition Association (WPHNA), welcome the opportunity to comment on the revised draft of the political outcome *Rome Declaration on Nutrition* of ICN2. We thank the convenors of ICN2 for their inclusive approach and therefore regard ourselves as partners in the process.

We also thank all those concerned within the UN system who are supporting the necessary moves to make nutrition central in relevant public health policies, throughout high-income as well as lower-income member states. The fact that ICN2 is taking place in the FAO *International Year of Family Farming*, we regard as auspicious. We also congratulate WHO on the relevant work done so far by its NUGAG initiative. Overall, we thank the UN Food and Agriculture Organization and the World Health Organization for the work being done to make this conference fully collaborative, with the engagement of other UN agencies, and with the other agents whose engagement is essential, including independent health and civil society organisations and social movements.

We urge FAO, WHO, and other members of the UN family, to come together with a will, to give ICN2 all possible and feasible support, so that its outcome and the international and national policies and programmes that follow, address all the main nutrition-related determinants of well-being, health, and disease.

The document as now drafted has some omissions which we suggest can be readily addressed, and as partners we will be pleased to support the drafters in the process of adjustment and revision. We see four omissions perhaps above all.

One is that it is framed in general terms including in places where greater specificity would be helpful. Documents designed to give global guidance need to guard against overlooking and neglecting the diversity which is a glory of human achievement and a wonder of the living and physical world. We should approach our work in a spirit of respect and even humility and be careful not to think or act as if we have all the answers.

Two is that it makes little reference to the political and economic as distinct from the social and environmental determinants of food systems and thus food supplies and dietary patterns. There is an extensive literature on this

fundamental aspect of food systems and many member states are now addressing salient issues.

Three is that it does not make much reference to broader aspects of nutrition. These include long established appropriate sustainable agriculture and food systems, native foods that are exceptionally nutritious in the context both of nutritional deficiencies and of overweight, obesity and diabetes, or to meals, cooking, food culture and tradition, commensality, and the impact of food as acquired, prepared and consumed on family, community and social life, as well as on relationships with the living and physical world. FAO has already done much good work here.

Four is that the whole document should, we suggest, be examined to ensure that in its totality, explicitly and implicitly, it does indeed support the human right to adequate nourishing food; and also it recognises, valorises and supports the wisdom and knowledge of all those ‘on the ground’ within countries, municipalities and rural and urban communities whose knowledge and wisdom upholds and develops long-established and traditional food systems that have evolved rationally in response to climate, terrain and resources. In this respect we believe that special recognition and value should be given to regions and countries whose food systems and dietary cultures are of continuous long duration. Of these the classic ‘Mediterranean diet’ or diets throughout the Mediterranean littoral is an example. Well-known other examples are within China, India and Thailand, Mexico and Peru. Others survive elsewhere in Asia, and the Americas, and in Africa, the Arab world, and the Pacific region.

2. Specific comments on the paragraphs related to the multiple threats that malnutrition poses to sustainable development (paragraphs 4-10).

We suggest that reference to malnutrition could be rebalanced to give equal weight to under-nutrition and over-nutrition.

On over-nutrition, leading to overweight and obesity, and related diseases and diabetes in particular, we suggest that the document should make explicit reference to the corporate actors whose activities are driving food systems towards greater supply of fatty, sugary or salty processed products. Evidence that the policies of international food manufacturers, caterers and associated actors in effect displace long-established sustainable food systems is we suggest not seriously disputed, and indeed is even acknowledged by these actors.

3. Specific comments on the vision for global action to end all forms of malnutrition (paragraphs 11-12).

Some of our concerns here are mentioned in point (3) in response to the request for general comments.

We also suggest that the document as now drafted gives rather too much emphasis to development that involves highly capitalised and intensive methods. For example, one passage refers to ‘investments and incentives for agricultural production, food processing and distribution’. Misunderstood, this could imply greater intensification, concentration of land and resource ownership and control, loss of land ownership and rights, unjust use and privatisation of common goods such as water, and continued and even accelerated loss of agricultural, horticultural and species and variants biodiversity.

We suggest that passages like these need to be rephrased in order to support investments and incentives that are controlled and driven nationally and locally, with affirmative action in favour of small and family farmers whose livelihoods continue to be threatened by inequitable and unjust events and circumstances beyond their control, whose produce amounts to most of the world’s food supplies.

When referring to legislative and regulatory framework the document as now drafted focuses on food safety and quality control. These are essential. It is now we believe agreed beyond serious dispute that what is also needed are effective statutory regulation of supply of and demand for unhealthy products, and of their advertising and marketing, most of all but not only to children up to the age of 18.

4. Specific comments in the appropriate fields relating to these commitments (paragraph 13):

Commitment a): eradicate hunger and all forms of malnutrition, particularly to eliminate stunting, wasting and overweight in children under 5 and anemia in women; eliminating undernourishment and reversing rising trends in obesity;

Commitment b): reshape food systems through coherent implementation of public policies and investment plans throughout food value chains to serve the health and nutrition needs of the growing world population by providing access to safe, nutritious and healthy foods in a sustainable and resilient way;

Commitment c): take leadership to shape and manage food systems and improve nutrition by strengthening institutional capacity, ensuring adequate resourcing and coordinating effectively across sectors;

Commitment d): encourage and facilitate contributions by all stakeholders in society and promote collaboration within and across countries, including North-South, South-South and triangular cooperation;

Commitment e): enhance people's nutrition, including people with special needs, through policies and initiatives for healthy diets throughout the life course, starting from the early stages of life, before and during pregnancy, promoting and supporting adequate breast feeding and appropriate complementary feeding, healthy eating by families, and at school during childhood;

Commitment f): adopt and implement a Framework for Action that should be used to monitor progress in achieving targets and fulfilling commitments;

Commitment g): integrate the objectives of the Framework for Action into the post-2015 development agenda including a possible global goal on food security and nutrition.

Specific suggestion for Commitments

We here suggest some drafting adjustments. We are at your disposal to work on such adjustments and other revisions as may be needed.

Commitment b): reshape food systems through coherent implementation of public policies and investment plans ~~throughout food value chains~~ to serve the health and nutrition needs of the growing world population by providing access to safe, nutritious and healthy foods in a sustainable, **equitable** and resilient way;

Commitment c): take leadership to shape and manage food systems and improve nutrition by strengthening institutional capacity, ensuring adequate resourcing, **preserving and/or recovering agro-biodiversity and culinary traditions, preventing manufacturers and suppliers of unhealthy products from undermining local food systems and supplies,** and coordinating effectively across sectors;

Commitment e): enhance people's nutrition, including people with special needs, through policies, initiatives, **and economic and legislative measures that can provide protective, fostering and supportive environments for** healthy diets throughout the life course, starting from the early stages of life, before and during pregnancy, promoting and supporting adequate breast feeding and appropriate complementary feeding, **managing price policies in order to favour the access of families to healthy eating** ~~by families~~, and at school **developing knowledge of food and nutrition and family life, and skills to acquire, prepare and cook food, and statutory regulation and restriction of advertising and marketing of unhealthy food products** during childhood up to the age of 18 and throughout life.

- 5. We would also appreciate your vision on policies, programmes and investment that might help translate such commitments into action.**

We see ICN2 as one vital part of the move towards sustainable development that formally begins in 2015, following the 2012 Rio conference. Members and associates of WPHNA are already engaged in initiatives such as those now being undertaken in Mexico and throughout the Americas, and as advisors to FAO, WHO and other relevant UN agencies. We will continue this work.

We place great value in the thinking that has led to the decision to mount ICN2. Malnutrition in all its forms is mostly basically caused by structural failures in food systems and supplies. This has always been so. Conversely, population good health and well-being is vitally enhanced by food systems and supplies that are adequate and equitable. This also has always been so.

We believe that all those most concerned with ICN2 will do well to continue to see this 'big picture', which explains why the current interconnected food, finance and fuel crises, manifested among other phenomena by gross economic and social inequity, climate change, fluctuations in availability of food, and continuing food insecurity, all of which are triggering riots and uprisings, are relevant to our considerations.

We admire the work done by colleagues within the UN System, and now also within associated agencies notably the World Bank, to drive towards equitable, sustainable food systems and supplies, and thus adequate and nourishing food and nutrition for a growing world population. These responsibilities are very serious and must be seen as one crucial part of the drive to recover, protect and enhance sustainable systems of world, national municipal and local governance within increasingly participatory democracies. This is the best chance for humanity at this critical time in history. Our policies and actions now will be judged in future. We are at your disposal to support you in your work from now leading to ICN2, at the conference, and thereafter.