



 Proceedings

## **Invitation to comment on the revised draft of the political outcome document of the ICN2**

Collection of contributions received

**Discussion No. 103 from 14 to 28 May 2014**

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## Introduction to the topic

The Food and Agriculture Organization of the United Nations (FAO) and the World Health Organization (WHO), in cooperation with IFAD, IFPRI, UNESCO, UNICEF, World Bank, WTO, WFP and the High Level Task Force on the Global Food Security Crisis (HLTF), are jointly organizing the Second International Conference on Nutrition (ICN2), a high-level conference at FAO Headquarters, Rome, from 19 to 21 November 2014. More information is available at: [www.fao.org/ICN2](http://www.fao.org/ICN2).

Two documents are expected to come out of the ICN2 - a political outcome document and a framework of action for its implementation.

On the basis of the discussions at the meetings of the ICN2 Joint Working Group (JWG) and of the comments received on the zero draft political outcome document through the public online consultation, [a new shorter, more concise and more coherent Draft of the Rome Declaration on Nutrition](#) has been prepared by the Co-Chairs of the JWG with the assistance of the joint Secretariats of FAO and WHO and is available in the six UN languages.

We now invite you to provide your comments on the [new draft version of the document](#), focusing on the set of questions formulated below and also available in a [template form](#).

This new open consultation, which will start on May 14th 2014 and end on May 28th 2014, is an opportunity to receive inputs from different stakeholders. These contributions will be then compiled by the Joint ICN2 Secretariat and transmitted to the JWG formal meeting on June 13th 2014.

We kindly thank you in advance for providing your comments and for sharing your knowledge and experiences with us.

We look forward to receiving your contributions.

FAO/WHO Joint Secretariat

### Questions:

1. **General comments on the Draft of the Rome Declaration on Nutrition.**
2. **Specific comments on the paragraphs related to the multiple threats that malnutrition poses to sustainable development (paragraphs 4-10).**
3. **Specific comments on the vision for global action to end all forms of malnutrition (paragraphs 11-12).**
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.

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

## Contributions received

### 1. Ranjani Harish, Dr. Mohan's Diabetes Specialities Centre and Madras Diabetes Research Foundation, India

I have enclosed my comments as bubbles in the attached PDF document (link below). It is a neatly laid out draft and I hope it results into some meaningful action.

Congratulations to the team!

[http://www.fao.org/fsnforum/sites/default/files/resources/Draft\\_EN\\_Rome\\_Declaration\\_12May-rh.pdf](http://www.fao.org/fsnforum/sites/default/files/resources/Draft_EN_Rome_Declaration_12May-rh.pdf)

### 2. Kanchan Lama, WOCAN, Nepal

Dear FSN Forum,

Thank you for sharing the draft version on political outcome on Nutrition on 12 may 2014 which is comprehensive and contains a reflects a strong political commitment to ensure enhanced situation on every aspect of nutritional health. However I miss an explicit commitment on special investment on tracking indigenous food habits of people of developing countries which is vital for their survival during difficult climatic condition and food insecurity situation. Thus rural women's knowledge about locally available nature based source of food might be marginalized by giving much weight to externally supplied food. In countries with very poor infrastructure for transport, food supply remains unsecured and irregular which imply that those remote people cannot have equal access to food like others from geographically privileged. In such situation, recognition to locally available food source is important, however due to lack of required attention for investment in research and development in this aspect, there has been a huge gap between local knowledge and managing food security measures of public agencies. I pledge that the document needs to give importance to this issue as an essential aspect of sustainability of food security chain.

My comments are also included in the template attached (link below).

Thanks and regards

Kanchan Lama

Gender Equality and Social Inclusion Specialist (Freelancer)  
Member, BoD, WOCAN ([www.wocan.org](http://www.wocan.org))

[http://www.fao.org/fsnforum/sites/default/files/resources/Kanchan%20Lama\\_Form%20ICN2-2.docx](http://www.fao.org/fsnforum/sites/default/files/resources/Kanchan%20Lama_Form%20ICN2-2.docx)

### 3. Gianluca Ragusa, International independent consultant, Italy

Dear FSN Forum

please kindly find attached the form (filled in with my contribution),

Thank you for your kind cooperation.

Sincerely

Gianluca

<http://www.fao.org/fsnforum/sites/default/files/resources/Ragusa%20Form%20ICN2.docx>

### 4. Selina Juul, Stop Wasting Food movement, Denmark

There should be **more** focus on food losses and waste in Rome Declaration on Nutrition - and perhaps even making fighting food losses and waste among **the first 3** priorities.

### 5. Claudio Schuftan, PHM, Viet Nam

Attached my input to the online consultation.

<http://www.fao.org/fsnforum/sites/default/files/resources/Form%20ICN2%20ZERO%2B2%20SCHUFTAN.docx>

### 6. Peter Skripchuk, National University water management and natural resources use, Ukraine

*[Original contribution in Russian]*

Мои пропозиции к пункту

Дальнейшие действия

13.

Мы обязуемся:

а)

искоренить голод и все формы неполноценного питания, в частности с целью ликвидации таких явлений, как отставание в росте, истощение и избыточный вес среди детей в возрасте до 5 лет, а также анемия у женщин; искоренение недоедания и прекращения нарастания тенденций к ожирению;

Добавить

Усовершенствование систем орошения и осушения как инструментов получения продовольствия в зонах риска. Учитывать изменения климата и прогнозировать комплексные мелиорации с использованием процедур экологического аудита и сертификации территорий (земель сельскохозяйственного назначения).

(по этому направлению есть много публикаций и методика аудита)

Украина, г. Ровно, Национальный университет водного хозяйства и природопользования, доктор экономических наук, профессор, Скрипчук Петр Михайлович

-

2 и объявить десятилетие действий в области питания

[*English translation*]

My propositions are:

Steps to be taken

13.

We shall be obligated to:

a) end hunger and all forms of malnutrition, particularly in order to eliminate such issues as stunting, wasting and overweight among children under 5 years old, as well as anemia among women; ending undernutrition and stopping tendency towards obesity;

To add:

Improvement of irrigation and drainage systems as tools for producing food in areas at risk. To consider climate change and to project complex amelioration using procedures of environmental audit and certification of land (agricultural land).

(there are many publications and audit procedure on this subject)

Ukraine, Rivne, National University Of Water Management And Nature Resources Use, Doctor of Economics, Professor, Peter Skripchuk

-

2 and to announce Decade of Actions on Nutrition

## **7. Randa Saadeh, WHO, Switzerland**

Thank you for sharing this draft of the declaration with us.

The document reads well and the flow of the ideas is good.

Comments:

\* It is good to refer to ICN1 and the targets as well as existing commitments (as stated in the footnote). Hope this will include the recent Nutrition Action Plan and some of the existing strategies as the Global Strategy for IYCF.

\*Overall the document is strong on food and agriculture language and scope and not much on nutrition. It includes ideas related to food safety and non-communicable diseases (as obesity) but not much on malnutrition.

\*The document does not include any reference or mentioning of nutrition in emergencies and as we know this is an area extremely important in many parts of the world.

\*It will be good to include the current situation concerning IYCF (as breastfeeding/complementary feeding) on page 2, number 10....especially that we have new indicators now.

\*The document also lacks mentioning HIV and infectious diseases and the relationship with nutrition.

\*Under point 11 (b) many things are lumped together here that it became unclear on what we want to say.

\*Point 11 (a, b, c, d and e) and the “the vision for global action to end all form of malnutrition” does not actually have any point related to nutrition or malnutrition specifically.

\*The same comment goes to section (12) where (a to j) do not address specific points relate to nutrition or malnutrition.

Point (e) is the only point referring to nutrition but is broad and refer to obesity and intake of nutrients.

\*For section 13 and the “Commitment to action”, good to see good reference to nutrition in point (a) but not specific enough;

\*point (e) is the only place in the document where breastfeeding and complementary feeding are mentioned (this is why it will be good to set the stage before for that and give some data on where we stand); this was one of the targets within the Plan of Action in ICN1 I think and will be good to give more emphasis on this crucial area;

\*It will be helpful to define or give more explanation on what we mean by “people with special needs” .....does it include emergency for example??

\*It is surprising not to see the “Code” mentioned in the document.....although the Codex is. Can we include that?

\*And to be comprehensive (according to recent WHA resolutions), it will be good to mention BFHI within the action points.

\*Under point 14, the statement “...implementation of their national programmes and plans for nutrition” is not clear. Almost all countries have existing “Plan of action on Nutrition” and the idea here is to strengthen these and build on them and not reinvent the wheels and start from scratch again. It can be confusing to countries learning from experience of ICN1.

\*Does the document need to be endorsed by WHA first??

Hope you find the above helpful.

Best regards,

Randa Saadeh

## 8. Margret Vidar, FAO, Italy

Dear participants in the FSN forum,

To me the revised draft has many good qualities. It is succinct and actionable and highlights the importance of the entire food system to achieve good nutrition outcomes for all. It also contains references to the right to adequate food, which is indispensable for nutrition.

On the other hand, it would be beneficial to highlight gender issues more in the document. References to the impact of discrimination on women's nutrition generally, and the special nutritional needs of women could usefully be included, including the special needs they have during pregnancy and breastfeeding. Wording from the Convention on the Elimination of all forms of Discrimination Against Women could be used for this purpose.

Furthermore, the right to the highest attainable standard of health could be mentioned along with the right to adequate food, so as to impress upon all that nutrition is not solely a matter of access to adequate food and clean water, but also access to public health and medical interventions in extreme cases.

Finally, it would be useful to mention that achieving good nutrition for all depends on good governance and a human rights based approach.

Margret Vidar

## 9. Elchin Atabayev, Institute of Agr Economy, Azerbaijan

*[Original contribution in Russian]*

Предлагаю рассмотреть следующие предложения :

По пункту 14 .

Отказаться от практики монетарного определения минимального уровня

продуктового обеспечения . В условиях постоянно растущих цен и финансовых потрясений

создается ложная картина и иллюзия благополучия . Одновременно , финансовая планка

позволяет манипулировать значительным объемом "околобарьерной" части населения .

По пункту 13 .

в/ + включая отказ от распоряжения водными трансграничными ресурсами как рычагом

давления или детерминанта гуманитарного кризиса .

c/ + при однозначно признаваемой возрастающей методической и научной роли структур ФАО .

По пункту 12 .

d/ + логистики продуктов , подготовки профильных управленцев и научных исследователей .

По пункту 11.

e/ Учитывая постоянное удорожание академического образования и медицинских услуг ,

использовать возможности ИКТ для дистанционного информационного обеспечения всех

слоев населения по обсуждаемым вопросам.

a/ + вопросам сохранения генофонда .

С уважением Эльчин Р. Атабабаев , к.с/х н. , Инст. Экономики С/Х МСХ АР .  
Баку, Азербайджан.

*[English translation]*

I propose to consider the following suggestions:

In regard to the paragraph 14

To renounce the practice of monetary measuring of the minimum level of food security in terms of food provision. In the context of an ever-increasing prices and financial turmoil, misconception and illusion of well-being are created. At the same time financial bar allows to manipulate the sufficient quantity of “near-the-barrier” population.

In regard to the paragraph 13

b/ + including refusing to dispose of transboundary water resources as a lever of pressure or determinant of humanitarian crisis.

c/ + with clearly recognized increasing methodological and scientific role of FAO structures

In regard to the paragraph 12

d/ + food product logistics, management training of specialists and training of scientists

In regard to the paragraph 11

e/ taking into account permanent appreciation of academic education and health services,

to use all opportunities provided by ICT for the purpose of distant communication for all social groups in regard to the discussed issues

a/ + genetic conservation issues

Best regards, Elchin Atababayev, Master of Agriculture, Institute of Agricultural Economics of the Ministry of Agriculture of Azerbaijan. Baku, Azerbaijan

## **10. Hélène Delisle, Université de Montréal , Canada**

Please find my comments below :

General:

- I reiterate my preference for food security and nutrition. If nutrition security is retained, it would have to be more clearly defined
- The whole declaration is still very heavy on agriculture but not enough on health and health systems
- There is hardly any mention of local food systems are sustainable ones to be strengthened.

Multiple threats:

- Threats of malnutrition are a major challenge to sustainable development AND QUALITY OF LIFE. Nutrition improvement should also aim at improving individuals' families' and societies' quality of life
- Food, health and therefore nutrition inequalities should be highlighted as a major concern. Paragraph 6 could be clearer on this. Inequalities which culminate in the double burden of malnutrition affecting the poor and women have to be the focus of this paragraph
- Environmental and societal changes ASSOCIATED WITH URBANIZATION AS A MAJOR DRIVER OF SUCH CHANGES (paragraph 7): The changes referred to are typical of the nutrition transition propelled by urbanization, globalization and technological 'progress'
- The rule of profit is another obstacle to the Big Food contributing to health-promoting foods (paragraph 9)
- 10.b: A link should be made between obesity and the currently growing prevalence of diabetes, CVD and certain cancers
- 10.e: The sentence will have to be reformulated.

Vision:

- What is the difference between ‘reaffirm that’ and ‘recognize that’? All these statements are well known facts...
- Can’t water, sanitation and hygiene be linked, under health systems?
- Health measures are also essential for adequate physiological utilization of food energy and nutrients!
- There is not a word about nutrition as central to prevention and control of chronic diseases such as obesity, diabetes, high blood pressure, etc.

Commitment to action:

- Much like my comments to the previous version, this all sounds like vague, non-compelling, idealistic wishes. Why not make an attempt at giving examples of successful initiatives?

Thank you for giving us the opportunity to react.

Best wishes,

Hélène Delisle, Ph.D.

Professeur titulaire et directeur de TRANSNUT

Centre collaborateur OMS sur la transition nutritionnelle et le développement  
(WHO Collaborating Centre on Nutrition Changes and Development),

Département de nutrition, Faculté de Médecine

Pavillon Liliane-Stewart, Université de Montréal

Canada

## **11. Nahla Hwalla, American University of Beirut, Lebanon**

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

This global forum is interesting and promising, as it seriously aims to manage the crucial issue of food security and nutrition which represents a global threat. It is comprehensive enough to account for multiple factors and threats for malnutrition, different population and age groups that are affected by the crisis and a multidisciplinary envisioned action plan.

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

10 (c):

- Over two billion of people, particularly children, pregnant women and women with childbearing age, suffer from micronutrient deficiencies, such as vitamin A, iodine, iron, zinc, and **vitamin D**.
- **Suboptimal early feeding practices (low breastfeeding rates and early introduction of complementary feeding), particularly in developing countries, that fall below global recommendations.**

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

- 
- None.

**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;

None.

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;

None.

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;

None.

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;

None.

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;

None.

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

None.

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.

None.

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

- Promote sustainable agriculture and community development: encourage research and education on healthy diets (if adequate, traditional foods- depending on the country and the respective culture).
- Address food companies/industries and social media for nutritionally-sensitive production of foods and for implementation of responsible marketing and advertisement of foods.
- Promote initiatives for water conservation and the efficient use of water to minimize losses, as most of the MENA region is short of arable lands.

- Endorse Baby Friendly Hospitals and adequate complementary feeding in developing countries.
- Incorporate food security in research and education programs of universities that will bridge issues of food, agriculture, and nutrition.

## **12. Manuel Moya, International Pediatric Association. TAG on Nutrition, Spain**

Dear Sir, Dear Madam,

Here are the my comments on the revised Draft for the second International Conference on Nutrition

General comment: The four sections, Introduction; Multiple threats; a vision; Commitment, clearly encompass the present problems related to nutrition for any specific or general audience.

Specific comments for the development actions:

Point 6. Over/underweights coexists in many countries and even in the same household with a growing trend. When taking into account how difficult obesity prevention has resulted in countries of high income economy, then clear nutritional information to avoid extra energetic intake should be planned and given to low income economy countries.

Point 9. This point should maybe reworded to make it clearer.

Point 12.c. Food and agriculture. Taking into account that cereals, grains and flour are an important nutritional base and also assuming that genetically it is possible to increase essential amino acids in these (i.e. corn), an effort should be made to increase lysine content in sorghum flour.

Point 12 f. To limit processed foods is a primordial governmental aim in the lower income countries.

Point 13.b. Reshape cattle. Goat's milk is nutritionally acceptable and goats are more resilient than cows.

Should you require additional information, please let me know.

Yours faithfully

Manuel Moya  
Catedrático E Pediatría/E Professor and Head  
Chair of Technical Adviser Group on Nutrition. International Pediatric Association(IPA)

Chief Editor of IPA Newsletter  
International Pediatric Association Foundation, Board of Directors  
Vice President European Pediatric Association  
Academician of the Real Academia de Medicina  
Pediatric Dept. Universidad Miguel Hernández  
Campus de San Juan. Ctra Valencia s/n  
03550 S Juan. Alicante Spain

### **13. Bhubaneswor Dhakal, Nepal**

Dear Moderator and participants of the FSN forum

The points in the declarations are still too general and inadequate to attract attention of policy decision makers on critical conditions. Most of the points in the declaration represent mainstream groups. The declaration is silent on the nutritional issues of minority, crises condition and regions with special food production systems. The people in government policy decision making can be lost to interpret the points in the declaration and translate into actions. My specific points are as follows.

1. The third point of the preamble section, for example, has missed the term “Natural rights on food”. In current development context some ethnic groups have been deprived of using the natural rights on food. It is based on the fact that the human races are naturally different in food bases from evolution perspective. The requirement of nutritional elements are, thus, naturally (genetically) different between the races. Or the groups may genetically adapted to the food sources on which their evolution based. The food bases of the society particularly the tribal communities are encroached, destroyed and criminalised in uses by mainstream societies. The minority groups are disadvantaged position to influence in government policy and markets. Many of them are not aware of effect of their food habit changes in their future generation. The policy and markets are dominated by mainstream groups which have increased the tempting the group on the food of mainstream societies. The interventions might have caused deficiency of the essential nutrition and led to extinction of the groups. The nutritional elements of the people could be increased by increasing their awareness on and access to their natural food bases.

2. In the section of multiple threats of mal-nutrition, the document has stated the problem of climate change but the policy actions to mitigate the climate change have also increased threats to food security, the main pathway to nutrition, particularly for socially disadvantaged communities. The effects are more pervasive and serious than the global climate change at present context. For example, vulnerable people access to the food of common properties such as forests and alpine grazing areas which provided hedge against extreme misery conditions. Nowadays their accesses are restricted with expansion of national park/ protected area, community forestry and REDD forest policies. If you like to make the declaration fair the threats requires to be acknowledged.

3. The issues of food security and nutrition problems are more critical in institutionally weak countries where international organizations (e.g. the World Bank, ADB, IPCC and EPA) can make high influences in national policies decisions by using their material and symbolic powers. These agencies often overlook the issues of food security and nutrition of vulnerable societies in achieving their work progresses in other fields. For example, the World Bank has advised the Nepal government to apply its Carbon fund to managed community used forest resources for carbon storage under REDD policy. Many vulnerable people including tribal groups are based in the forest. The programme, by nature, restricts the vulnerable people’s access to local forest resources and affects food production and nutritional access. It also displaced local employment and increases the numbers of Nepalese women suffering from domestic violence and sexual

abuses. You can read the online EPIN document to evaluate the quality of the programme activities that the World Bank groups agreed to support (<https://www.forestcarbonpartnership.org/node/3877>). Therefore it is important to include a point about dialoguing with other international organizations to stop the policies and programmes that threatens food security and nutrition in vulnerable communities.

4. It also requires action oriented commitments representing needs of minority groups, crises conditions and regions with special food production system in all sections.

Reference

**Carbon Fund Ninth Meeting (CF9), April 9-11, 2014, Brussels, Belgium.**(the EPIN document is attached in the first programme scheduled on Thursday).<https://www.forestcarbonpartnership.org/node/3877>--

Thank you.  
Best Wishes.  
Bhubaneswor Dhakal

#### **14. Jean Philippe Pancrate, Perfect Union, France**

*[translation in English]*

Ladies and Gentlemen

It is with great pleasure that I read your comments and I benefit every day from the shared knowledge. I must also congratulate the excellent work of the FSN forum moderators in their role as controllers.

Concerning the draft of the Rome Declaration, I entirely agree with the text overall and especially on the following point: malnutrition is a major obstacle to sustainable development stemming from the reduction in productivity (Article 4). Indeed, this point is crucial, how can a country develop if its vital forces suffer from malnutrition? Furthermore, to reach full productivity, this aspect should be reinforced and measured with indicators in the final draft.

*[original in French]*

Mesdames et Messieurs,

c'est avec grand plaisir que je lis vos commentaires et je m'enrichis chaque jour du partage des connaissances. Je tiens aussi à féliciter l'excellent travail des modérateurs du FSN forum pour leur rôle d'aiguilleurs.

S'agissant du projet de la déclaration de Rome, je suis tout à fait d'accord sur le texte global et surtout sur le point suivant : la malnutrition est un obstacle majeur au développement durable par le biais de la baisse de productivité ( article 4 ). En effet, ce point est capital, comment un pays peut-il se développer si les forces vives souffrent de malnutrition ? Aussi, pour arriver à permettre une pleine productivité, cet axe devrait être renforcé et assorti d'indicateurs dans le projet final.

## 15. Alessandro Cagli, Belgium

I would like to comment on Point 7 of the Draft Rome Declaration on Nutrition, which should be addressing unbalanced diets, rather than individual foods. First of all because individual foods are not necessarily a problem in themselves, if consumed in the right amount and with the right frequency within the overall diet. And secondly because a focus on balanced diets, rather than on individual products, would be coherent with the UN Political Declaration on NCDs of 16 September 2011, as well as with Point 12 e) of this Draft Rome Declaration itself, which states that: "nutrition improvements require the provision of balanced and diversified diets".

Furthermore, since the issue of "excessive intakes of saturated fat, sugars and salt sodium" is already addressed in Point 12 e), it would be redundant to also include it in Point 7.

I would, therefore, suggest to reword Point 7 of the Draft Rome Declaration as follows:

"7. Recognize that environmental and societal changes often have an impact on dietary and physical activity patterns, leading to higher susceptibility to obesity and noncommunicable diseases through increasingly sedentary lifestyles and unbalanced diets."

Finally, I would also caution against the inclusion in Point 12 f) of the sentence saying "while limiting the consumption of processed foods that negatively affect nutrition and health", as this could imply the introduction of rules which would not be compatible with competition laws applied in many countries.

Thank you for your attention and consideration and best regards.

## 16. Ximena Moratorio, Ministry of Public Health, Uruguay

*[Original contribution in Spanish]*

1. Observaciones generales sobre el Proyecto de la Declaración de Roma sobre la nutrición. Considero que es más adecuado el empleo del término seguridad alimentaria y nutricional en lugar de seguridad alimentaria ya que es un concepto más amplio.

2. Observaciones específicas sobre los párrafos relacionados con las múltiples amenazas que la malnutrición supone para el desarrollo sostenible (párrafos 4-10).

Párrafo 5: cuando se refiere a las causas de la malnutrición, da la impresión que se limita demasiado al acceso, la pobreza y sus factores asociados, dejando por fuera otros componentes de la seguridad alimentaria y nutricional, por ejemplo el consumo y las preferencias alimentarias de las personas que no están determinadas únicamente por el acceso. Si pensamos en la malnutrición en su sentido amplio (como se expresa más arriba) esta afecta en forma más grave a la población económicamente más desfavorecida pero afecta a todos los sectores socioeconómicos, aún cuando el acceso esté cubierto.

Párrafo 6: considero que se debería mencionar que las desigualdades en la situación nutricional afectan especialmente a las mujeres y niños pequeños.

Párrafo 7: sugiero cambiar el término alimentos elaborados por productos ultra-procesados y mencionar al final de la frase que éstos son objeto de una intensa publicidad.

3. Observaciones particulares sobre la visión de la acción mundial para poner fin a todas las formas de malnutrición (párrafos 11-12).

Párrafo 12 punto e: el “ofrecer” dietas equilibradas y diversificadas resulta insuficiente ya que el problema no es únicamente de acceso a alimentos nutritivos, por este hecho no se evitará el consumo excesivo de grasas, azúcares y sal. Las preferencias alimentarias son influenciadas por otros factores como son el estilo de vida y la industria alimentaria que promueve el consumo de alimentos ricos en grasas azúcares y sal. Es necesario que los países tomen medidas activas para detener la influencia que ejerce la industria en las preferencias alimentarias de las personas a través de la publicidad y promoción de alimentos y que se proteja en particular a los niños de ello.

Párrafo 12 punto f: sugiero cambiar el término alimentos elaborados por productos ultra-procesados.

*[English translation]*

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

I believe the term “food and nutrition security” is more adequate than “food security” as it involves a broader concept.

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

Paragraph 5: When referring to the causes of malnutrition, it seems they are limited to the access to food, poverty and associated factors, leaving out other food security and nutrition components such as the population’s consumption and food preferences, not only determined by the access. If we think of malnutrition in its broadest sense (as stated above) not only it affects the economically disadvantaged population more severely, but it also impacts all socio-economic sectors, even when access is granted.

Paragraph 6: I think that it should be worth mentioning that nutritional status inequalities especially affect women and young children.

Paragraph 7: I suggest changing the term “processed food” by “ultra-processed products” and mentioning, at the end of the sentence, that these are intensively advertised.

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

Paragraph 12 point e: “offering” balanced and diversified diets is insufficient, because the problem is not limited to the access to nutritious food. Accordingly, the excessive consumption of fat, sugar and salt will not be avoided. Food preferences are influenced by other factors such as lifestyle and the food industry promoting food with high fat, sugar and salt content. Countries need to adopt

active measures to stop the industry influence on the population food preferences, through advertising and food promotion, especially protecting children.

Paragraph 12 point f: I suggest changing the term “prepared food” by “ultra-processed products”.

### **17. Muhammad Ariful Haque, Kamfist Universe Engineering, Bangladesh**

Many projects related to food productions had gone in vein due to Combination among projects & Lack of right focus. For example, many of our roads are constructed to the parallel of rivers and canals without plan. If we use the soil of rivers and canals for road constructions then it will safe cost of soil arrangement for roads and dredging cost for rivers and canals. Again embankment can safe our rivers and canals from land grabbers. But embankment roads are unsafe and later on needed to reshape. So, I think we need strict "Right program & Right Patronization" policy. For Environment friendly Regional Balanced development; UNESCAP can develop multiple bi-pass highways with involving funds from banks & other financial institutions. By this I think, UNESCAP can play an important role by minimizing food price by reducing transportation cost and food scarcity in remote areas.

There are huge cultivable lands in world are in a barren stage as well as huge people are unemployed. If we can develop ourselves with global personality & skill and able to turn these barren lands under production with proper local & international management, I think food and nutrition problem will be eliminated. I think IOM can also play a significant role for international agri-employees security & food production management.

If we cultivate suitable plants on Slope of Highway & Railway, Barren-lands, Indoor & Coastal (SHARBIC) areas, then rain water flow will be maximum used as a part of Securing Water for Food and roads & highway will be save from mudslide. We can use GIS and other IT service for enhance (SHARBIC) gardening. It will increase beautification to there as well as enhance total national tea production. Please note ‘Sharbic’ means Total.

Social farming/ care farming is an important source of food & nutrition. I think to enhance social farming/ care farming, there should be compulsory free of cost or very low cost bank account against each social farmer. This account should be used for maintaining all sorts of expenditure relevant to care farming. From local to international donation -everything might be operating through this account. In remote areas where branches of any bank are unavailable, there might be engaged agent of Bank. There also should be Green environmental Loan disbursement target for each branch of each bank. Agent of Banks also needed to be involved in here. Its transparency & regular monitoring could be possible using latest low cost IT products & services.

Veranda gardening, Rooftop gardening, indoor aquaculture etc should be considered as urban social farming for bank loan sanctioning. I think this will enhance economy specially women economy. Social farming should focus more on food & nutrition production rather than armature farming because water, time, money etc are involved in here. As for social farming, 100% pure is not necessary, water reuse policy could be applied there. Domestic Bio fertilizer, warm fertilizer etc could be used there. Using renewable energy for care farming should be influenced.

Agri-telemedicine could be a significant tool for nutrition / malnutrition relevant advice sharing for all specially for the people of remote areas. To operate Agri-telemedicine agriculturists and other specialists are needed to be trained up in local language. Online based diplomas in home economics, care farming, or any relevant short courses are necessary in this regard.

14th April- Pohela Boishakh (Beginning day of Bengali new year)- is a heritage of South & southeast Asian countries including Bangladesh (ref: [http://en.wikipedia.org/wiki/Pohela\\_Boishakh](http://en.wikipedia.org/wiki/Pohela_Boishakh)). This calendar was formed as a crop calendar. Now at the time of Global warming, water and food insecurity; we can globally observe this day that is 14th April as "Global Crop Calendars Day". By this we can estimate crop production delaying or any hazards form 1556 to till now. All the same, other regional calendars of the world could be influenced for enhancing crop production.

Thank you  
Muhammad Ariful Haque

### **18. Elchin Atababayev, Institute of Agr Economy, Azerbaijan**

*[Original comment in Russian]*

For the paragraph 5.

Порожденная выходящей за рамки поддержания конкуренции неадекватным распределением национальных богатств нищета в значительной степени обуславливает ..... (далее по тексту) .

For the paragraph 12.

d/ + признавая право каждого на доступ к продовольствию, в рамках надлежащего управления следует определить минимальную долю в % к ВВП государственных ассигнований на обеспечение продовольственной безопасности.

e / + Глобализация сопровождается огромными миграционными потоками. Адекватное продовольственное обеспечение миграционных потоков является составным компонентом безопасности того или иного сообщества.

*[English translation]*

For the paragraph 5.

Poverty generated by the transcending support of competition through inadequate distribution of wealth is greatly responsible for... (with no further amendments to the text)

For the paragraph 12

d/ + when recognizing the universal right to have access to food, as a part of good governance the minimum share of government subsidies on food security (in % of GDP) shall be determined.

e/ +

Globalization is accompanied by enormous migration flows. Adequate food provision for migration flows is an integral part of safety of any community.

### **19. Abubacker Siddick Syed Mohamed, M.S.Swaminathan Research Foundation, India**

Questions:

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

Nil

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

5. Recognises the root causes of malnutrition...

Promotion of NUTRITION EDUCATION, BEHAVIOUR CHANGE COMMUNICATION in schools, colleges, work places

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

Paragraph 12

Reducing Food losses..

To promote rural godowns for storing the excess harvests, local governments to fix procurement prices for farmers produce, crop insurance for farmers, promotion of rural post harvest processing centres ( In India if drought affected, only paddy/wheat farmers getting compensation grant while fruit, vegetable and other millet growers don't get)

Specific comments in the appropriate fields relating to the commitments (paragraph 13)

b. reshape food systems

promotion of nutritious legumes, millets, fruit seedlings (free distribution to small holders, especially women farmers and rural children) as intercrop, relay crop or mixed cropping  
d. encourage and facilitate contribution..

Exchange visits of field sites – successful models- to be arranged for women/ small holder farmers (family) inter country and inter state. Encouraging NGO participation through Government ( promoting Public Private Partnership)

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

Policy like promotion of home gardens (structured home gardens with greens, legumes, tubers, yellow vegetables, gourds, annuals and fruit trees) along with GREEN HOUSES or HOUSING SCHEMES FOR THE POOR.

PROMOTION OF VALUE ADDED FOOD (eg. Fortified Foods) through Public Distribution system.  
COMMUNICATION – Media to promote nutritious foods, sanitation and personal hygiene using Behavioural change communication tools, ICT, street plays and through famous film actors/ actresses

RIGHT TO FOOD- RIGHT TO NUTRITIOUS FOOD FOR CHILDREN schemes – supporting free food to school children with fruits and salads

Policies governing public funds need to converge before reaching the beneficiary ( For promoting nutrition for women and children, convergence of work plan of state department of Agriculture, Nutrition board, ICDS, Rural development, Education department is necessary)

## **20. Ariel D., YPA Development, Benin**

[translation in English]

Dear members, here are my suggestions:

1. General comments: I think that in the first 3 paragraphs the problem should straightaway be defined in terms of several types of malnutrition. This is because simply writing malnutrition in the singular will always summon up for those not well informed no more than malnutrition due to deficiency. Next, paragraph 3 mentions *the right of everyone to have access (...) consistent with adequate food and the fundamental right (...) to be free from hunger...* I propose that here it should finish... *"and with the natural right of minorities and native peoples to manage their own food supply.*
2. Specific comments (4-10): Nothing to add.
3. Specific comments (11-12): before any worldwide action, it is imperative to update national statistical databases for the key indicators concerned, as it happens in Economic Development Plans, to provide international organizations with the data and the pertinent categorization which would assist with global coordination. Without which we will go on going in circles.
4. Specific comments (13): Nothing to add.
5. Vision for implementation: the idea of pleading for the launch of ten actions for nutrition is very praiseworthy and could contribute, with good coordination in place, to get things going. Those would be the ideal ten projects to promote nutritional education programs for all. That will certainly not be enough but it is one program of actions among so many others to stimulate awareness from the ground up.

Thank you.

*[original in French]*

Chers membres, mes avis.

1. General comments : Je pense que dans les 03 premiers paragraphes, il faudrait d'emblée poser le problème sous l'angle DES malnutritions. Parce que la simple écriture DE LA malnutrition renverra toujours pour les non-informés aux seuls cas de malnutritions par carence. Ensuite, le paragraphe 3 fait mention du droit d'accès de chacun (...) conformément à une alimentation adéquate et au droit fondamental (...) d'être à l'abri de la faim... Je propose qu'il y soit complété ... " et au droit naturel des minorités et des peuples autochtones de disposer de leur propre alimentation.

2. Specifics comments (4-10) : RAS

3. Specifics comments (11-12) : Avant toute action mondiale, il est impératif de mettre à jour les bases de données des statistiques nationales sur les indicateurs clés concernés, en l'occurrence dans les PED, pour fournir aux organisations internationales des chiffres et des catégories pertinents pouvant faciliter la coordination mondiale. Sans quoi nous tournerons encore en rond.

4. Specifics comments (13) : RAS

5. Vision for implementation : L'idée du plaidoyer pour le lancement d'une décennie d'actions pour la nutrition est fort louable et pourrait contribuer, bonne coordination étant faite, à faire avancer les choses. Ce serait la décennie idéale pour promouvoir dans l'enseignement des programmes d'éducation nutritionnelle à tous. Cela ne suffit certes pas mais est un programme d'actions parmi tant d'autres pour éveiller la conscience depuis la base.

Merci,

Ariel Djomakon (YPA Development, Bénin)

## **21. Au sein des femme, Belgium**

*[Original comment in French]*

Commentaires sur le projet de Déclaration de Rome sur la Nutrition

Au sein des femmes – Belgique est une association sans but non lucratif qui accueille, accompagne toute personne concernée par le cancer et qui met en place des actions visant à promouvoir un mode de vie sain. L'association pense qu'une alimentation saine et équilibrée, qu'un mode de vie permettant l'épanouissement physique et psychique de la personne contribuent à maintenir son capital santé.

Au sein des femmes – Belgique tient à remercier l’initiative de la FAO d’ouvrir la possibilité à la société civile de participer à l’élaboration du projet de Déclaration de Rome sur la nutrition.

Au sein des femmes – Belgique est tout à fait favorable aux points d’engagement listés dans le projet et souhaite ajouter les commentaires suivants:

- chacun doit avoir accès à une alimentation suffisante, sûre et nutritive et devrait également avoir le droit d’avoir accès à une connaissance nutritionnelle minimum, à des aliments proprement étiquetés quant à leur valeurs nutritionnelles. Cette possibilité de choisir son alimentation en fonction des ses besoins nutritionnels, permettrait au consommateur de renforcer son autonomie quand à la prise en charge de sa santé. Ainsi, la liberté de choix éclairée du consommateur permettrait de faire évoluer les marchés vers des solutions de systèmes alimentaires plus durables. Cette information du consommateur passe par la mise en place de politique d’éducation et de transmission d’information le long de la chaîne alimentaire et d’étiquetage approprié des denrées alimentaires.

- L’approche de la fourche à la fourchette qui s’applique déjà dans les politiques internationales et nationales pour améliorer l’hygiène des denrées alimentaires, pourrait tout à fait être reprise dans un but de mieux maîtriser et d’améliorer la valeur nutritionnelle de ces denrées. Les pratiques de cultures agricoles, horticoles, les traitements de transformation de l’agro-industrie, les méthodes de cuisson appliquées par les consommateurs peuvent influencer (améliorer ou détériorer) les valeurs nutritionnelles, leurs effets devraient être plus connus et pris en compte afin de valider les pratiques écologiques durables favorables à l’enrichissement de la valeur nutritionnelle des denrées le long de la chaîne alimentaire. Il est primordial également que la mise en place de pratiques agricoles et industrielles durables permettent de proposer une alimentation abordable pour tous.

Mieux vaut prévenir que guérir. La formation des médecins généralistes à la nutrition et à la micronutrition semble être un élément essentiel dans les politiques de suivi des malades ou de suivi de personnes voulant préserver leur capital santé.

La prévision des bilans nutritionnels des populations devraient prendre en compte non seulement les besoins en calories et en protéines, mais également les besoins en autres nutriments essentiels, favorables à la santé. Des bilans plus poussés permettrait d’orienter les politiques agricoles vers des denrées plus diverses et nutritives.

Pour l’association de l’ASBL:

Karine Tanan  
Directrice communication

Bénédicte de Van Craynest  
Présidente

Jamil

*[English translation]*

Au sein des femmes – Belgique is a non-profit association that welcomes, and accompanies any person concerned by cancer and organizes actions aiming to promote a healthy way of life. The association thinks that a healthy and balanced diet, and a way of life that brings physical and mental fulfillment, help to maintain the health reserves of the individual.

Au sein des femmes – Belgique is grateful for the FAO initiative of making it possible for civil society to participate in the drafting of the Rome Declaration on Nutrition.

Au sein des femmes – Belgique is completely in favor of the undertakings listed in the project and wishes to add the following comments:

- Everyone must have access to sufficient, secure and nutritious food and should equally have the right to have access to a minimum of nutritional knowledge, and to food properly labeled with its nutritional values. This possibility of choosing their food based on their nutritional needs would enable consumers to assert their independence in the control of their health. Thus, the consumer's informed freedom of choice would encourage the development of markets towards more sustainable solutions for systems of feeding. This informing of the consumer comes about through the implementation of policies on education and transmission of information throughout the food chain and on the appropriate labeling of foodstuffs.

- The approach 'from farm to table' applied already in national and international policies to improve hygiene of foodstuffs, could be entirely reworked with the purpose of better controlling and improving the nutritional value of these foodstuffs. Agricultural and horticultural practices, the transformation processes of agro-industry, consumers' cooking methods, can influence (improve or reduce) nutritional values. Their effects should be better known and taken into account with the objective of validating sustainable ecological practices favorable to the enrichment of the nutritional value of food throughout the food-chain. It is equally essential that the implementation of sustainable agricultural and industrial practices should make affordable food available for all.

Prevention is better than cure. The training of general practice doctors in nutrition and micro nutrition seems to be an essential element in the policies of looking after the sick or those wishing to preserve their health.

Provisions for nutritional assessments of the population should take into account not only requirements in calories and proteins, but also requirements in other essential nutrients, of benefit to health. More in depth assessments would enable agricultural policies to be steered towards more diverse and nutritional foodstuffs.

For the association ASBL:

Karine Tanan

Directrice communication [Communications Director]

Bénédicte de Van Craynest

Présidente [President]

## **22. Jamil Junejo, Pakistan Fisherfolk forum, Pakistan**

It is indeed well written document. It contains almost all parts of the food and nutrition aspects . However, What there is missing is mention of issue of land concentration in few hands all around the world ( land reforms issues.) We believe that lack of land reforms is basic hurdle behind access to resources. Concentration of land in few hands deprives majority from access to land and subsequent blocked access to agriculture products ( food ). Therefore, this document should make commitment to promote land reforms all around the world.

Secondly, this document should also mention FAO responsible Governance of tenure of land, fisheries and forests in the Context of national food security. This declaration should endorse the guidelines.

Thirdly, This declaration seems to promotes role of IFIs which are not in favour. Doing business guidelines of the Bank produce sufficient evidence that Bank has nothing to do with common man's concerns.

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

Commitment b)

reshape food systems through promotion of new legislations, development and implementation of coherent 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;

### **23. Lal Manavado, Norway**

Greetings!

As nutrition is a fundamental need of everyone, food security in its general sense, i. e., access to an adequate supply of appropriate food, ought to be a goal of a post-2015 strategy. There is more than enough evidence to show that millions are severely under-nourished in the world.

I think the Rome Declaration would have reflected its appreciation of the 'know-how' mankind has gained through millenia of experience, if it had acknowledged the diversity of food culture in the world.

It would be a mistake to overlook the local culinary traditions, for these have been developed over centuries with reference to not only the human needs, but also to what may be securable with least difficulty within a given geographic and climatic locus.

Attempts to replace those with the food production and eating habits from elsewhere has often resulted in high production costs, inappropriate eating habits leading to obesity, etc., not to mention the drastic reduction in bio-diversity among crops and domestic fauna.

Even though this may prove a moot point, I believe that it is time to outlaw commodity speculation, and it is time to encourage and support co-operative food production, wstorage and distribution, so that more benefits would accrue to the producers of food and to its consumers than to the middlemen as it does now.

Best wishes!

Lal Manavado

## 24. Katy Lee International Agri-Food Network, Italy

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

On behalf of the International Agri-Food Network, I wish to make some brief points in the area of nutrition and attach our position paper. The Network is a unique focal point for the food value chain from farmers to small and medium entrepreneurs, to large multinational companies, national associations and co-operatives. The IAFN seeks to represent members in 135 countries.

As we go forward together, the private sector is committed to offering tools and capabilities in robust partnerships with other stakeholders that seek to launch nutrition solutions for country driven programs and initiatives.

We want to build on the game changing achievements of the past 5 years through a network of these partnerships that identify, prioritize and implement initiatives and programs in areas that can make a real difference.

The private sector recognizes the values it can leverage through public- private partnerships among key drivers to help:

- Support programs and initiatives to achieve the Zero Hunger Challenge; fulfil the recommendations and guidance directions of the 2013 Lancet Series;
- Participate in the Scaling Up Nutrition (SUN) movement; strengthen the policy dialogue and advocate for relevant UN Committee on World Food Security (UN CFS) guidelines;
- Shape the sustainable agricultural productivity and nutrition targets in the Post-2015 Development Framework; and
- Fulfil the mission of the International Conference on Nutrition (ICN2) to build a new nutrition policy framework.

We believe the following two principles are absolutely essential to help fulfil the mission of building a new nutrition policy framework:

- Embed nutrition in multi-sector strategies within national and local government plans and initiatives, stressing the valued roles for nutrition with health, agriculture, education, environment, finance, gender, diversity, and other development factors.
- Recognize that the Zero Hunger Challenge depends on collaborations among stakeholder partners to implement mutually shared, purpose driven goals and aspirations

To our partners at FAO and WHO, we respectively offer that the 2014 ICN2 planning body would be well served to establish and maintain open, transparent interactive platforms and mechanisms

for the civil society and private sector mechanisms and other interested stakeholders to fully participate as the process and events move ahead over the coming months.

And to our friends and colleagues at FAO, WHO and the Civil Society Mechanism, we express our interest and desire to work together to help create the environment for building trust as we seek to demonstrate the effective value of leveraging our capabilities in these partnerships.

Thank you.

## **25. Adolfo Hurtado, Nicaragua**

[Original contribution in Spanish]

El prf 3 dice: "... tener acceso a alimentos suficientes, sanos y nutritivos ..."que esto sea todos los días (estable) no es relevante? En el punto 5 es visto como un elemento central

Ninguno de los argumentos entre el punto 4 y 10, se explica en sus magnitudes sin la Cultura Alimentaria de paño de fondo, así como la adecuación y la sostenibilidad en la observación general 12 del PIDESC.

El plan de acción propuesto no es posible si no va acompañado con una sólida estrategia de educación en cultura alimentaria que además de lo propuesto permita reforzar las estrategias adaptativas a las variaciones de disponibilidad y acceso de alimentos, como orienta el prf 9 de la OG12, en su segunda parte, como se observó en centro américa en las pasadas crisis de los precios de los alimentos. A esta línea deberían integrarse educación, salud, agricultura y seguridad social. Otros elementos igualmente relevantes que pueden alcanzarse con una estrategia de este tipo son: i) optimización de los recursos alimentarios disponibles; ii) fortalecimiento de las relaciones de la cultura alimentaria local y a biota alimentaria local; iii) incremento de biodiversidad alimentaria total global disponible por revinculación de la cultura alimentaria local con la biota alimentaria local

[*English translation*]

Paragraph 3 refers to having "access to sufficient, safe and nutritious food". Wouldn't it be relevant mentioning that this right should be ensured on a daily basis (stable)? In point 5 it is regarded as a key element.

None of the arguments featured in points 4 to 10, nor the adequacy and sustainability in general comment 12 of the International Covenant on Economic, Social and Cultural Rights (ICESCR) can be explained without the Food Culture background.

The proposed action plan is not possible unless it is complemented by a solid strategy in food culture education which, in addition to what has been proposed, allows reinforcing the adaptive strategies to changes in food availability and access, as pointed out in the second section of paragraph 9 of General Comment 12, and as noted in Central America in former food prices crises. Education, health, agriculture and social security should also be integrated. Other equally important results that can be achieved with this type of strategy are: i) optimizing the available

food resources; ii) strengthening the relations between local food culture and local food biota; iii) increasing the available global food biodiversity to re-link local food culture to local food biota.

## 26. Lida Lhotska, IBFAN, Switzerland

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

We appreciate that the opening paragraphs emphasize the right to adequate food. However, for the outcome document to help the still existing divide between food and nutrition, these opening paragraphs should ensure this gap begins to be closed in this Declaration by always referring to the right to adequate FOOD and NUTRITION.

With regard to the list of commitments which should be footnoted under Para 2, we wish to ensure that also the Global Strategy on Infant and Young Child Feeding (WHO 2003) with its protect, promote and support framework, and the International Code of Marketing of Breastmilk Substitutes and subsequent relevant WHA resolutions are listed.

**Rationale:** In this manner the contribution of women/mothers to the attainment of the right to adequate food and nutrition and the right to health will be at least implicitly recognized. It is important to not forget that women, by providing 6 months of exclusive breastfeeding to their child are THE perfect food system feeding a population of 0-6 months old with food which is tailored to the need of the consumer, healthy, in the right quantity and quality, available on demand and environment friendly (no packaging transport and required, no discarding of rubbish, packaging etc.). Breastfeeding continues to provide an important contribution to infant's and young child's food security well into the second year of the child's life and beyond. However, this 'food system' is also influenced by social, political, economic and environmental contexts and requires inputs in a form of policies that ensure respect, protection and promotion (facilitation). policies and programmes that support it. Today, less than 52 of 135 million children are being optimally breastfed despite the fact that breastfeeding is cited internationally as one of the most cost effective 'interventions' in mother and child health. Thus apart from the poor nutritional and health outcomes and thus major gap in attainment of the right to adequate food and nutrition, this also means an enormous waste in resources. When we use market prices to value the milk that women produce around the world each year, it highlights that women's capacity to breastfeed is an extremely valuable national asset. Worldwide, its value is around USD 1983 billion a year based on breastfeeding rates and demographics in the UNICEF state of the world's children report. Therefore it's important to act on several fronts, including this political declaration, to normalise breastfeeding, ensure mothers do not suffer discrimination and are supported in their country and community, including through their own right to adequate food and nutrition being met, as they are making this enormous contribution to the attainment of the child's right.

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

Proposed amendments highlighted in RED:

*Para 4:...*"and poses heavy burden on societies by restricting the attainment of human rights, fulfilment of human potential and causes reduction of productivity".

*Para 5:* “Recognize that the root causes of malnutrition are complex and multidimensional **and related to human rights violations.**”

*First bullet point:* ..., “and ingestion of harmful levels of chemical **and biological** contaminants due to unsafe food supplies, **and of toxic additives added in the manufacturing process** ;

*Para 7:...*” and salt/sodium, **and that may contain toxic chemical additives, such as endocrine disrupters, that can harm human health when consumed on a regular basis**”.

*Para 9: ...*”coercive economic measures **and lack of binding regulations that would make the TNCs of the sector liable for their violations of human rights law, including the right to adequate food and nutrition, and right to health**”.

*Para 10, add point f) to read:* **f) the human diet contains an increasing amount of toxic chemicals substances, such as pesticides, herbicides and endocrine disrupters, that may severely affect human health and lead to cancers, overweight, obesity and others non-communicable diseases.**

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

*Para 11 b): ...*” as well as securing **universal access to health, social protection,...**”

*Para 11 c): ....*” food processing, distribution **and ethical marketing;**”...

*Para 11 e)* improvements in diet and nutrition require strengthening the legislative and regulatory framework for food **marketing**, safety and quality control at national, regional and international levels, including enhanced engagement of the Codex Alimentarius Commission, increased participation of Member States and adherence to the Codex Standards, Guidelines **and UN recommendations**”.

*Para 12 a)...*” national nutrition initiatives and measures, **in particular their coherence within the human rights framework;**”

*Para 12b): ...*” adequate food **and nutrition** for all is an imperative and requires...”

*Para 12 c):...*” addressed holistically **and from the human rights perspective** by **regulatory measures and** public policies

- *Para 12 d): ....*”and appropriate **binding** market regulations in food; ...”
- *Para 12 e): ....*” and removing trans-fat **and endocrine disrupters**”;

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

- **General comment: Timeframe unclear....by when should these commitments be met?**
- Specific amendments proposed in the text in **RED**

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 **regulatory frameworks** and 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, **protecting**, 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.

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

- Please refer to the rationale in the General comment section regarding the inclusion and of the Global Strategy on Infant and Young Child Feeding with it protect, promote and support framework, and the International Code of Marketing of Breastmilk Substitutes and subsequent relevant WHA resolutions. Our vision is full implementation of the Strategy and of the International Code as both are human rights based and make invaluable contribution to the achievement of the right to adequate food and nutrition. At national level, NGO community is

mobilized around participatory tools developed on the basis of these global instruments and the ICN2 follow up in these areas will have full support from the public interest civil society groups internationally and nationally. Not implementing these policies represents not only a considerable shortcoming in fulfilment of already expressed commitments and HR obligations but it is also a poor economic judgement. It is important to avoid repeating the costly mistakes of the past.

## 27. Sight and Life, Switzerland

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

The document represents an important paradigm shift, one that recognizes the multidisciplinary and complex links between food and nutrition, through prioritizing the food system. Furthermore, this prioritization will allow countries to characterize the appropriate policy prescriptions for a sustainable and equitable food system. We therefore urge the drafting team to also give due consideration to:

### Specific comments relating to these commitments (paragraph 13):

*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; **AND***

*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;*

- I. **Demand for nutritious** products results from the consumers choice to purchase and consume foods. Policy formulations are needed to improve how food choices are woven into everyday eating decisions and behaviors. Policy instruments that give careful consideration to nutrition education, social marketing campaigns, and girls schooling/ women's education should be prioritized.
  - a. **Informed decision-making** commonly happens at the point of purchase . Restrictive labeling and packaging requirements will have unintended consequences, as consumers will not be able to distinguish healthy from unhealthy foods. It is important to strengthen policy and regulatory frameworks that protects the consumers right to know what is in the package and the impact it can have on their health and nutritional well- being. Member states must engage with CODEX guidelines and normative advice should be aligned.
- II. **The food system is socially constructed** from policy decisions and through applications of policy instruments.

- a. Participation in the food system is not equitable. **Policy instruments** that analyze gender, socioeconomic and health disparities should be prioritized **to eliminate equity gaps**.
- b. Global and national policy must consider how subsidies for staple foods (corn, wheat, and soy) facilitate cheap inputs for processed foods, which may deliver little nutrition.
- c. **Policies that increase the nutrient density** of the food supply should be encouraged
  - i. (e.g., food fortification). Dietary diversity strategies, while necessary for public health, will not be sufficient to meet the nutrient requirements for some sectors of the population (i.e., pregnant women and young children). Targeted fortification and supplementation, should be pursued in conjunction with improving dietary diversity.

*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;*

The UN system has been extremely successful at strategic guidance on policy frameworks and instruments. However, to achieve the WHA 2025 targets, further resources are needed to **operationalize policies. Implementation science is uniquely suited for this task** and we encourage further collaboration among UN agencies, politicians, academics and scientific societies to improve implementation of programs. Monitoring systems that assess the health impact of policy decisions should be prioritized.

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

**Food systems and climate change.** Food systems contribute to and accelerate environmental degradation through their carbon footprint. In addition to addressing food loss and food waste, policy instruments should also target water usage, non-degradable garbage, and carbon emissions.

- a) There is also a need to develop indicators that integrate nutrient density, safety, and affordability in relation to the environmental impact. It is possible that the diet with the least environmental impact may not be the most nutritious.
- b) Achieving desired dietary diversity, that includes nutrient dense animal source foods, will contribute to higher greenhouse gas emissions. Policies should be targeted to women and young children, whose growth and physiological status necessitate the consumption of animal source foods. Other strategies, such as fortification, to close nutrient gaps should be considered as appropriate.

**28. Laura S. Jin, FAO Forestry, Italy**

Dear FSN Forum members,

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

While the document captures multi-dimensional aspects of nutrition issues comprehensively, it would be beneficial to include and highlight other related factors to food and nutrition security, e.g. sustainable use of natural resources, in particular forests. In this regard, some specific comments are made below for your consideration.

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

1) For the existing paragraph 8, additional words in bold below are suggested to be added:

“Recognize that climate change and unsustainable use of natural resources are negatively impacting the quantity, quality and diversity of food grown and are therefore posing a major threat to food and nutrition security.”

2) Another paragraph is suggested to be inserted after the paragraph 8 before the paragraph 9 as follows:

“Recognize that unclear and/or unequitable land tenure rights are threats to the fundamental right of everyone to be free from hunger.”

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

1) As for the paragraph 11. c), additional words in bold below are suggested to be added:

“global and national policy coherence is needed among relevant sectors, including in trade and investment agreements, in investments and incentives for agricultural production, sustainable natural resource management, food processing and distribution;”

2) As for the paragraph 12. c), an additional word in bold below is suggested to be added:

“food and agriculture including crops, livestock, forestry, fisheries and aquaculture systems need to be addressed holistically by public policies, including the resources, investment, environment, people, institutions and processes with which food is produced, processed, stored, distributed, prepared and consumed;”

3) As for the paragraph 12. h), additional words in bold below are suggested to be added:

“food systems should be sustainable, and all components for food production, processing and distribution (including land, soil and other natural resources, seeds, fertilizers, water, energy, harvesting, storage and transport) should be managed sustainably, with due attention to environmental impacts;”

4) As for the paragraph 12. f), additional words in bold below are suggested to be added:

“food systems need to promote healthy dietary patterns by providing year-round access to safe and nutritious foods including fruits, and vegetables, pulses, wholegrains, non-wood forest products, edible insects and animal source foods such as fish, while limiting the consumption of processed foods that negatively affect nutrition and health;”

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

1) As for the paragraph 13, a new section is suggested to be added as follows:

x) Capture all untapped opportunities that natural resources, including non-wood forest products, edible insects, etc. , can provide for a better nutrition.

2) In paragraph 5, the 2nd bullet point recognises, “Poverty as a major contributor to malnutrition in both rural and urban areas.” As such the commitment to action in paragraph 13 should reflect actions that address poverty alleviation, especially targeting smallholder farmers, fisher folk and forest communities.

## **29. Kristine Dandanell Garn, UNICEF, Mozambique**

Thank you for providing an opportunity to comment on this important document.

The document does mention the need for multisectoral action to address malnutrition (both under and over nutrition) but from paragraph 12 down, including the section on commitments to action, the text only makes reference to food as the area of focus in preventing malnutrition. The document could be strengthened by including actions in health and other sectors such as water, sanitation and hygiene promotion. Also, the formulation of the first commitment to action (a) leaves out micronutrient deficiency (where food and food fortification, including biofortification, has a key role to play) and does not mention adolescents as a target group and there is no reference to the 1000 day window). There is very little mentioning on the role of the private sector and research institutions and UNICEF, WFP and REACH are not mentioned as key actors in supporting governments in developing, implementing and monitoring their national nutrition plans (point 14 under commitments to action). The SUN movement is also not mentioned.

In short, I believe the document could gain from better reflecting that food security is necessary but not sufficient for nutrition security.

Disclaimer: The comment above is an expression of my personnel views and should not be seen as an expression of the view of UNICEF.

## **30. 1,000 Days Partnership, United States of America**

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

Thank you to the organizers of ICN2 for the efforts to plan and prepare for the event in November 2014, and for the opportunity to comment on the Rome Declaration on Nutrition document. It is critical for ICN2 to focus on a singular objective, to gain commitment and outline actions needed to reshape the global food system to improve people’s nutrition, and agree on a guiding principle that agriculture and food policies must first do no harm.

We applaud the inclusion of malnutrition in all its forms and believe that it is of paramount importance to not only treat and prevent the occurrence of malnutrition but also build sustainable food systems to ensure long-term impact. Moreover, it will be key to approach malnutrition in a comprehensive manner by demonstrating the linkages of nutrition with

other relevant sectors of development including agriculture, health, water, sanitation, hygiene (WASH), gender equality, female empowerment, and governance.

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

- **Paragraph 5: Under bullet point one: “Year-around access to sufficient food, adequate both in quantity and quality, affordable and culturally acceptable, is a key determinant; compounded and often aggravated, in a vicious cycle, by non-potable water, poor sanitation and hygiene, food borne and parasitic infections, and ingestion of harmful levels of chemical contaminants due to unsafe food supplies;” we suggest adding the bolded “and hygiene” above, as it is critical for water, sanitation and hygiene to be addressed together.**

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

- a. Please include a point that specifically states that this will endorse and commit to actions to meet all of the 2012 World Health Assembly (WHA) nutrition targets.
  -
- b. Thank you for recognizing that women and children have specific needs, however, under point (a) when you state: “the elimination of malnutrition in all its forms is an imperative for ethical, political, social and economic reasons, paying particular attention to the special needs of children, women, elderly and disabled people,” please add the line: **“especially during the 1,000 day window of opportunity from a woman’s pregnancy to her child’s second birthday.”** The consequences of malnutrition during the critical 1,000 day “window of opportunity” from a woman’s pregnancy to her child’s second birthday are largely irreversible, and can cause long-lasting damage. Maternal nutrition and support are therefore crucial to break the intergenerational cycle of malnutrition and build the foundations of healthy individuals and societies.
- c. Under the “Recognize that” section:
  - i. We suggest adding a point that reads: **“Recognize that a framework for collective commitment, action and results is needed to reshape the global food system to improve people’s nutrition, particularly that of women and young children during the critical 1,000 day window from pregnancy to age 2.”**

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

- a. **It is critical to make the commitments to action list more specific and ambitious. We suggest the following commitments be added to the list:**
  - Accelerate progress to achieve the 2012 World Health Assembly nutrition targets at national levels.
  - Governments and donors commit to, and ensure implementation of a long-term, adequately resourced, equitably delivered national minimum package of direct nutrition interventions.

- All countries establish (or enshrine, if already established) a multi-sectoral coordination mechanism for nutrition to ensure that policy decisions are owned by all relevant ministries and have domestic budget lines for nutrition; as well as appoint a government nutrition focal point who is responsible for ensuring that the country's nutrition efforts effectively engage the whole of government and external stakeholders.
- All countries expand their target nutrition group to include women and children in the 1,000 day window from pregnancy to age 2.
- Nutrition is integrated into national social protection policies for young children, pregnant women, and breastfeeding and lactating mothers.

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

We recommend the following:

- Normative guidance from FAO/WHO on how agriculture programs, investments and policies can deliver greater nutrition impact and nutrition-centered approaches to agricultural production. Reframe the food debate around the consumer, including education around healthy consumption, affordability and preparation.
- Support and strengthen the Scaling Up Nutrition (SUN) movement.
- Develop long-term funding and technical assistance provision options for countries and communities to address malnutrition, looking to HIV/AIDS, education and other models.
- Build a nutrition data revolution, measuring and understanding what people eat and increasing the quality and quantity of nutrition outcome data and analysis. For example, a new partnership with Gallup could expand their voices of the hungry survey, including Save the Children's cost of the diet survey which evaluates the costs of a nutritious diet in a local context and the extent to which households can afford it. This could be included in official statistics collection, or MICS and DHS surveys, and be expanded via partnerships with telecommunications firms to collect data on production and consumption.
- Level the playing field: agriculture has been focused on producing certain crops (e.g. staples like cereals), which help to grow the economy, but this has led to a neglect of nutritious foods. Most agricultural policies are biased to staple foods; we need to let "healthier" foods become more competitive and accessible.
- Increase control by women of key resources such as land and microfinance—with the idea that women would more likely grow and distribute more nutritious food.
- Governments generally have agricultural policies not "food" policies (e.g. looking at nutrition enhancing efforts within food chains). There are no incentives for this; so we need to focus more on developing food policies, keeping in mind that the private sector is a big player in this arena.
- Education – change the understanding among consumers so that they are more nutrition conscious and create demand.
- Partnerships with multilateral institutions, NGOs and businesses on nutrition and breastfeeding behavior change communication.
- Develop examples of best practice of food and nutrition strategies at a country level which focus on increasing the value proposition for export markets, while focusing on improving access to nutritious food among poor and marginalized groups. This should focus on pre-empting and responding to the challenge of non-

communicable diseases, as well as looking at the challenges of increased populations, volatility, etc.

### **31. Jo Lofthouse, Children's Investment Fund Foundation, United Kingdom**

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

- This draft is a welcome improvement on the zero version, with much greater recognition of the multi-sectoral nature and impact of undernutrition. Many thanks to colleagues who worked on it.

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

**Para 2.** It will be important to mention WHA 2025 nutrition targets here. I recognise the sensitivities you outline regarding FAO's mandate; a clear reference to these would point the system in the same direction.

We welcome paragraph 4's emphasis on nutrition's widespread impact on society, including the impact on human potential.

We welcome para 5, bullet 2: recognition of poverty as a major factor in undernutrition.

We welcome para 8: recognition of impact of climate change.

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

#### **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;

- We recommend a commitment to multisectoral coordination here, in the spirit of para 11b. Suggest adding a reference to this in point 13d.

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;

- WHA targets should also be referenced under para 13f, to avoid duplication of existing targets

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.

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

Domestic budgets must be increased and made more nutrition sensitive in order to tackle the challenge of undernutrition.

Governments and other actors can leverage existing platforms to deliver nutrition outcomes, for example community health workers and agricultural extension workers. This is critical to securing better nutrition for all.

We'd like to see a much greater focus on livestock and fish promotion for increased animal source protein. This is a neglected area of debate in the undernutrition debate.

All actors must place greater emphasis on pregnant and lactating women, in order to target the crucial first 1000 days from conception to the age of 2.

### **32. Helen Medina, US Council for International Business, United States of America**

On behalf of the US Council for International Business, I would like to thank the organizers of ICN2 for the opportunity to contribute to this online consultation on the revised draft of the Rome Declaration on Nutrition. While we greatly support the submission made by IAFN, we would like to offer some additional comments.

Although an online consultation will solicit some input, we would like to suggest that the FAO and the WHO create a more targeted approach to engaging with stakeholders, including the private sector. We recommend a formal consultation with stakeholders, including the private sector, to have a more robust and complete discussion on these important issues related to nutrition.

In general, we believe the outcome document should reflect that the private sector can contribute in the area of nutrition through its innovative products, its science and technology know-how, as well as good production and management practices, which can be increasingly harnessed through effective partnerships with research institutions, farmers, policy-makers, and civil society.

In addition, we believe that advancing health and nutrition requires a multi-stakeholder approach that reflects the complexities of the issues. For this reason, we believe that ICN2 should include participation from civil society as well as the private sector. There is no quick or simple solution to addressing nutritional challenges. While we believe that the private sector has a role in producing healthy and nutritious food, it is equally important to address issues that impact the community's ability to thrive, such as poverty, hunger, gender inequality, water access and sustainable agriculture. We believe that developing the economy, including promoting women's role in the economy, is important. The private sector can play a critical role in further strengthening markets, spurring economic growth and improving livelihoods including nutrition.

We look forward working with the FAO, the WHO and the Civil Society Mechanism to help create the environment for building trust as we seek to demonstrate the effective value of leveraging our capabilities in these partnerships to address the nutritional challenges ahead.

Thank you.

### **33. Strawberry Francia, National Nutrition Council, Philippines**

1. General comments on the Draft of the Rome Declaration on Nutrition.
  - The political document does not explicitly support what has been discussed in the Lancet Series on Maternal and Child Nutrition. It has very little discussion on breastfeeding, and most especially complementary feeding and concerns related to the first 1000 days of life. Thus, effort to address malnutrition during these life stages is limited in this document. This should be strengthened in the document.

- • There is also a need to integrate related concerns from the post-2015 development agenda and the Scaling Up Nutrition Movement.
- • The targets set forth in this document must also be in line with the global targets committed for 2025 which states the following:
  - ~ 40% reduction in the number of children under-five who are stunted
  - ~ 50% reduction of anemia in women of reproductive age
  - ~ 30% reduction in low birth weight infants
  - ~ No increase in childhood overweight
  - ~ increase the rate of exclusive breastfeeding in the first six months up to at least 50%
  - ~ reduce and maintain childhood wasting to less than 5%
- • We also suggest for the FAO and WHO to develop a mechanism for alert notifications to member countries who joined the ICN2 forum last November 2013 in Rome for recent updates that may be available in the website. We very much welcome the idea of subscription to the ICN2 forum to keep track of the discussion and the latest documents being released.

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

- Paragraph #4 should specify or state that undernutrition “at an early age” is the greatest determining factor on the negative “irreversible effect” on productivity and achievement of human potential in adulthood.
- In paragraph #10, it is important to take note that the rate of decline in underweight, stunting and wasting is slow.
- Paragraph 10.e can correlate the impact of undernutrition at an early age on overweight and obesity during adulthood

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

- There is a need to specify in paragraph #11.a young children and pregnant and lactating women.
- Paragraph 11.e. should also include strengthening of the milk code as breastfeeding has a great role in curbing undernutrition at an early age.

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;

- Include the elimination of underweight in children under 5 in paragraph #13.a.

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

- We suggest the intensification of exclusive breastfeeding during the first six months of life and the promotion of infant and young child feeding which particularly discusses the proper complementary feeding from 6 months onwards together with continued breastfeeding.

Please refer to the SUN Movement and WHA nutrition related resolutions for policies and programs.

Thank you.

#### **34. Golam Sorowor, Bangladesh**

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

Its really a excellent outcome and we appreciate this Declaration on Nutrition.

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

5. Recognize that the root causes

Not only poverty lack of information and awarness regarding balanced diet also on of the major contributor to malnutrition in both rural and urban areas (In bangladesh large number of women and children suffer from malnutrition including undernutrition, micronutrient deficiencies, overweight and obesity, as well as noncommunicable diseases. But all the victim are not poor.)

#### **35. Tim Lang, City University London, United Kingdom**

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

- The Declaration should make strong reference to food and nutrition's role in environmental degradation and protection. Food has a major impact on the environment. WHO and FAO ought to include that dimension in the Rome Declaration. It should and could reaffirm past UN commitments that health and environment are intimately connected through food and diet.

There is a strong tradition in the UN of cross-referencing to wider UN commitments. Rio+20 for example acknowledged the environment.

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

Include in paragraph 5 specific reference to how poverty undermines the environment on which food systems for the poor depend.

Include in paragraph 6 specific reference to the co-occurrence of over-, mal- and under-nutrition within low income communities and countries. The 21<sup>st</sup> century nutrition world is more complex than mal-nutrition, desperate and important though that is.

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

Include under paragraph 12 a new sub-section h) about the need to help consumers worldwide by the provision of guidance at population level which promotes diets which are sustainable in that they meet health, environmental and cultural goals.

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

I suggest the inclusion of the following specific commitment either as a new commitment 4 h) or within one of the other sub-sections:

[We commit to:] support steps to produce dietary guidelines which meet both nutrition and environmental/sustainability criteria.

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.

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

Given that food is one of the most significant drivers of NCDs, and that food is one of the most significant drivers of threats to environmental sustainability (through climate change, water use, biodiversity loss and land use squeeze), the Rome Declaration should make strong connections between food security, health, environment, and livelihoods. The 1992 ICN made encouraged member states to set up systems of governance to support this progressive role in the form of food policy councils / nutrition councils (there are many names for this institutional form). The 21<sup>st</sup> Century challenge is about how humanity does or does not manage those connections. ICN2 must encourage programmes by all Member States which link the actions of state bodies, companies and civil society to live, grow and eat within environmental limits in manners which promote ecological public health. We need in particular research programmes which explore what land use needs to be to meet sustainable diets and which ask: what sort of agriculture and horticulture are needed to provide sustainable diets.

## 36. FIAN International

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

We regret that the vast majority of our comments on the ICN2 zero draft, submitted during the first e-consultation, have not been incorporated into the revised declaration. While we appreciate the reference to the right to food in the opening paragraph, the overall declaration still fails to be grounded in human rights. No mention is made of nutrition as core element of the human right to adequate food and nutrition and corresponding State obligations to respect, protect and fulfill this right. The elimination of malnutrition is considered to be imperative for “ethical, political, social and economic reasons”, but not because it is a human rights obligation of States. As in the previous draft, there is no acknowledgement or analysis of the systematic violations of human rights, including violations of women’s rights, child rights, and people’s access to natural resources, in which malnutrition is rooted. The detrimental impact of malnutrition on the enjoyment of other human rights is equally not considered. Women’s rights and the essential role of women in food production and nutrition (including through breastfeeding) are also overlooked.

We recommend, in addition to the specific changes outlined below, that reference is made throughout the document to the “right to adequate food and nutrition” to emphasize the links between food and nutrition and the fact that nutrition is a core element of the right to adequate food.

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

*Multiple threats of malnutrition are a major challenge to sustainable development [and the universal enjoyment of human rights](#)*

4. Acknowledge that malnutrition, including undernutrition, micronutrient deficiencies, overweight and obesity, as well as noncommunicable diseases caused by unbalanced diet, [restricts the full realization of human rights](#); has high socioeconomic and other costs for individuals and families, communities and states; threatens their health and wellbeing by impacting negatively on human physical and cognitive development; compromises the immune system; increases susceptibility to communicable and noncommunicable diseases; and poses heavy burden on societies by restricting the attainment of human potential and reducing productivity.

5. Recognize that the root causes of malnutrition are complex and multidimensional [and grounded in systematic violations of the right to adequate food and nutrition](#):

- [Lack of](#) year-around access to sufficient food, adequate both in quantity and quality, affordable and culturally acceptable, [and respective access to natural resources \(including](#)

[land, water and seeds](#)), [decent employment and living wages, and social protection](#), ~~are~~ a key determinants; compounded and often aggravated, in a vicious cycle, by non-potable water, poor sanitation, food borne and parasitic infections, and ingestion of harmful levels of chemical contaminants due to unsafe food supplies;

- Poverty [and rising levels of inequality](#) ~~is~~ ~~are~~ major contributors to malnutrition in both rural and urban areas.

6. Acknowledge that different forms of malnutrition co-exist within most countries; while dietary risk affects all socio-economic groups, large inequalities exist in nutritional status, exposure to risk and adequacy of dietary energy and nutrient intake, between and within countries.

7. Recognize that [trade, foreign direct investment, subsidies, and tax policies, in addition to](#) environmental and societal changes often have an impact on dietary and physical activity patterns, leading to higher susceptibility to obesity and noncommunicable diseases through increasingly sedentary lifestyles and greater [availability and](#) consumption of [unhealthy, highly](#) processed food, that is high in fat, especially saturated and trans-fats, sugars, and salt/sodium.

8. Recognize that climate change is negatively impacting the quantity, quality and diversity of food grown and is therefore posing a major threat to food and nutrition security. [Recognize that the dominant agro-industrial model of food production is a major contributor to climate change and eco-destruction, and that a move towards human rights-compliant and sustainable production models, based on agro-ecological peasant farming, is urgently needed.](#)

9. Acknowledge that current food systems, [based on agro-industrial modes of production](#), are being increasingly challenged to provide safe and nutritious food for all to enable healthy diets, due inter alia to constraints posed by resource and ecological sustainability, large food losses and waste, [unequal/unbalanced](#) distribution and trade distorting economic measures, including unilateral coercive economic measures.

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

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#### ***A vision for global action to end all forms of malnutrition***

11. Reaffirm that:

a) the elimination of malnutrition in all its forms is [a human rights obligation of States as well as](#) an imperative for ethical, political, social and economic reasons, paying particular attention to the special needs of children, women, elderly and disabled people;

- b) a coordinated action of different actors, at international, regional, national and community levels [which aims at advancing the realization of the right to adequate food and nutrition](#) should be supported, through cross-cutting policies, programmes and initiatives in the food system, as well as health, social protection, education, research, energy, trade, rural development, water, sanitation, hygiene, consumer protection, transport, urban planning, and the environment;
- c) global and national policy coherence [in line with the right to adequate food and nutrition, related human rights and food sovereignty](#) is needed among relevant sectors, including in trade and investment agreements, in investments and incentives for agricultural production, food processing and distribution;
- d) the risks linked to higher and more volatile prices for agricultural commodities [, caused inter alia by liberalization of agricultural markets, monopolistic market structures, food speculation, export subsidies and bio-fuel policies](#) and their consequences for global food security and nutrition, need to be managed;
- e) improvements in diet and nutrition require strengthening the legislative and regulatory framework for [the production and marketing of food](#), food safety and quality control at national, regional and international levels, including enhanced engagement of the Codex Alimentarius Commission, increased participation of Member States and adherence to the Codex [and other UN Standards and Guidelines](#).

## 12. Recognize that:

- a) [States have an obligation to create an enabling international environment for the realization of the right to adequate food and nutrition, including through aligning their trade, investment, development, agricultural, energy, and other policies with the right to adequate food and nutrition.](#)
- [International cooperation and official development assistance for nutrition should be aligned with human rights, with a focus on tackling the underlying causes of malnutrition, and](#), as appropriate, support and complement national nutrition initiatives and measures;
- b) achieving the right to adequate food for all requires sustainable, equitable, accessible and resilient food systems;
- c) food and agriculture (including crops, livestock, fisheries and aquaculture) systems need to be addressed holistically by public policies, including the resources, investment, environment, people, institutions and processes with which food is produced, processed, stored, distributed, prepared and consumed;
- d) while private investments and markets will continue to ~~drive both~~ [influence](#) the supply of and access to nutritious food, responsible public investments [and tax policies, as well as necessary and appropriate](#) market regulations in food, agriculture and other sectors are crucial to overcoming malnutrition;
- e) nutrition improvement requires the ~~access to provision of~~ [balanced and diversified diets](#), meeting nutrient requirements of all age groups and all groups with special needs, avoiding excessive intakes of saturated fat, sugars and salt/sodium, and removing trans-fat;
- f) food systems need to promote healthy dietary patterns by providing year-round access to [fresh/locally-sourced](#), safe and nutritious foods including fruits, and vegetables, pulses, whole grains and animal source foods such as fish, while limiting the consumption of processed foods that negatively affect nutrition and health;
- g) food systems need to address and prevent infectious and zoonotic diseases and to tackle antimicrobial resistance;
- h) food systems should be sustainable [and based on agro-ecological production methods](#), and all components for food production, processing and distribution (including land, soil, seeds,

fertilizers, water, energy, harvesting, storage and transport) should be [made accessible to small-scale food producers, in particular women and other marginalized groups, and](#) managed sustainably, with due attention to environmental impacts;

i) efforts should be made to reduce post-harvest losses and food waste throughout the food chain including consumption, as these can significantly contribute to reducing sustainability and nutrition security;

j) the United Nations system and the international financial institutions must work more effectively together in a coherent manner to [create an enabling environment for the realization of the right to adequate food and nutrition and](#) enhance international cooperation to support national efforts to accelerate progress in addressing malnutrition.

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

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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 [overweight and](#) 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 [in line with the right to adequate food and nutrition and food sovereignty](#);

Commitment c): take leadership to shape and manage food systems and improve nutrition by strengthening [the regulatory framework and](#) 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.

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

- ❖ Nutritional well-being for all, to us, must be seen at the same time as one of the central objectives of human rights-based development and one of the basic pre-requisites for the realization of all other human rights and human dignity.
- ❖ Nutrition goals must be reflected, therefore, in all policies and programs related to the social determinants of nutritional well-being such as those related to access to productive resources (land, water, and seeds); environment-friendly food production, in line with agro-ecological principles; accessibility to affordable diverse, safe, and healthy diets; adequate living income; healthy environment; basic health care; water and sanitation; and social security and care.
- ❖ This requires adequate governance of nutrition at all levels, and multisectoral coordination to guarantee nutrition is adequately taken into account throughout the life cycle as well.
- ❖ Policies, programmes and investment in the field of nutrition must be people-centred. Small-holder farmers, including fisherfolk and livestock farmers, and other small-scale food producers as well as groups most affected by malnutrition must be at the centre of international and national efforts aimed at reshaping food systems - as beneficiaries as well as designers and implementers of such systems.
- ❖ In line with the on-going discussions on investments, we recognize the magnitude of the investments done by small scale producers themselves and propose public support to small-scale, diversified farming, in line with agro-ecological principles, food production geared towards local and regional markets, and to the provision of affordable, healthy, safe, and culturally adequate diets. No public investments or subsidies should be provided to agro-industrial initiatives.
- ❖ It is fundamental to institute public regulation of private corporate sector activities in food production and other food systems-related processes, as well as other fields that negatively impact on the enjoyment of the right to adequate food and nutrition, such as land grabbing, abusive use of agrochemicals, monopolizing of agricultural inputs, patents on life, publicity of food to children, marketing of breast milk substitutes, and marketing of ultra-processed and junk food.

### **37. Muhammad Sarwat Mirza, HANDS (Health And Nutrition Development Society), Pakistan**

HANDS is working in Pakistan since last 34 years covering most of the development sectors including Health, Nutrition, Livelihood, education etc. Mostly the Private sector in developing countries related to food business have hampered and disrupted the food distribution and accessibility to poor, e.g. Dairy industry. The commercial market partners must be regulated globally or at National level by individual governments. There is no ethical guidelines are proposed to ensure the rights of poor people. The high population growth and recurrent pregnancies increased the burden on already stressed food insecurity in many developing and under-developed countries. Its recognition is extremely significant as it has many implications on women malnutrition and long continued malnutrition in the children leading to whole life impact. This vicious circle is one of the barriers in achieving sustainable development.

The countries' Food security, Nutritional policies must be integrated with Economic development and Population policies. Economic and Population policies of the government may be added in paragraph 11-12. The framework of Action should be flexible with regional dimensions such as developed countries and developing or poor countries.

HANDS is one of the largest health and development organizations in Pakistan. We have experienced that the community mobilization and involvement is the key to success in implementing all government policies and turning them into actions. We would support the ICN2 Declaration and would be committed to the Framework for Action.

### **38. Consumers International, United Kingdom**

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

We welcome the current Draft of the Rome Declaration on Nutrition. We have a few suggestions for how it could be improved. These are intended to:

- make it clear that production methods need to be acceptable to consumers and take account of social and cultural aspects
- stress the importance of consumer choice over production methods
- give greater emphasis to food marketing not undermining efforts to protect and promote healthy diets
- require cross-cutting food policies
- include a way of monitoring progress

Furthermore, we call on the WHO to initiate work on a Framework Convention to promote and protect healthy diets.

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

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

12 (d) – include after ‘other sectors’: that take account of consumer acceptability.

12 (g) – add reference to chemical contamination

12 new (h) – add a paragraph: ‘food systems, associated government policies and market actors should recognise the importance of ensuring the cultural and social acceptability of food production methods and consumers’ right to make informed choices about what they eat’

**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;**

13 (a) – at the end of the sentence add ‘and other diet-related NCDs’

**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;**

13 (b) – add ‘that is acceptable to consumers’

13 new para after (b) – to ensure that marketing communications and information that is provided to consumers is consistent with this aim and tackle marketing communications that undermine efforts to promote safe, nutritious and healthy foods particularly to children.

**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;**

13 (c) – after capacity add ‘adopting coherent cross-governmental food policies’

**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.**

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

We suggest the following edits:

Paragraph 14 (about FAO and WHO co-operation and support), add: ‘and develop a mechanism to monitor progress on meeting these commitments every 2 years to their governing bodies.’

New ‘15’ – We call on WHO to initiate work on a Framework Convention to promote and protect healthy diets.

### **39. International Dairy Federation, Belgium**

The International Dairy Federation (IDF) is grateful for the opportunity to be able to comment again on the revised draft political outcome document of the ICN2. Since 1903, IDF is the pre-eminent source of scientific and technical expertise for all stakeholders of the dairy chain. IDF commits to help nourish the world with safe and sustainable dairy.

The IDF supports the need to promote healthy diets and to focus on balanced and diversified diets. Emphasis should be put on the value of a ‘whole food’ and ‘dietary approach’, rather than ‘isolated nutrients’ approach.

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

### *Trans-fats – the type needs specifying throughout the document*

- Whenever the term *trans* fats is used, it should be specified that this relates to industrially produced *trans* fat, **NOT** the trans fatty acids that are naturally present in ruminant fat.
- This is because the detrimental effects of industrial TFA on heart health are well accepted. For example:
- A 2009 WHO Scientific update on TFA concluded that:

*'The current growing body of evidence from controlled trials and observational studies indicates that TFA consumption from **partially hydrogenated oils** adversely affects multiple cardiovascular risk factors and contributes significantly to increased risk of CHD events.*

*TFA produced by **partial hydrogenation** of fats and oils should be considered industrial food additives having no demonstrable health benefits and clear risks to human health.'*<sup>i</sup>

- The 2010 FAO/WHO Expert Consultation on Fats and Fatty Acids in Human Nutrition contain similar conclusions on industrial TFA:

*'There is convincing evidence that TFA from commercial **partially hydrogenated vegetable oils** (PHVO) increase CHD risk factors and CHD events – more so than had been thought in the past.*

*There is also probable evidence of an increased risk of fatal CHD and sudden cardiac death in addition to an increased risk of metabolic syndrome components and diabetes.'*<sup>ii</sup>

- However, the conclusions of the 2009 WHO Scientific update on TFA about ruminant TFA were very different to those relating to industrial TFA:

*Although **ruminant** TFAs cannot be removed entirely from the diet their intake is **low** in most populations and to date there is **no conclusive evidence** supporting an association with CHD risks **in the amounts usually consumed.***<sup>iii</sup>

- The 2010 FAO/WHO Expert Consultation on Fats and Fatty Acids in Human Nutrition concluded:

*Among adults, the estimated average daily **ruminant TFA intake in most societies is low.***<sup>vi</sup>

- A systematic review and meta-analysis of cohort studies concluded that 'industrial TFA may be positively related to CHD, whereas ruminant TFA is not, but the limited number of available studies prohibits any firm conclusions concerning whether the source of TFA is

important. The null association of ruminant TFA with CHD risk may be due to lower intake levels.<sup>iv</sup>

- In a 2013 review of randomised controlled trials, Brouwer and colleagues found that gram for gram, ruminant TFA, CLA and industrial TFA had largely the same effect on blood lipoproteins, but commented that the question whether ruminant TFA cause cardiovascular disease is irrelevant, because their intake is too low.<sup>v</sup>
- As the wording is at present, one of the nutrition improvements outlined in paragraph 12 f (removing trans-fat) is in practice recommending the removal of all dairy products and ruminant meat (e.g. beef, lamb, goat). As we do not believe that this is intended, we recommend that the wording is changed to '*removing industrially produced trans-fat*'.

**In light of the evidence outlined above, we recommend that all mentions of *trans-fats* should be changed to '*industrial trans-fats*' throughout the document.**

*Sugars* – the type needs specifying throughout the document

We recommend that all mentions of sugar are changed to 'added sugars'. This is because the WHO draft guidelines on free sugars and the evidence behind this, indicate that it is *free* sugars added to foods by the manufacturer, cook or consumer and sugars naturally present in honey, syrups, fruit juices and fruit concentrates, NOT intrinsic sugars (those incorporated within the structure of intact fruit and vegetables) or sugars from milk (lactose and galactose) that need to be restricted.

Slight wording change to paragraph 7 to improve clarity

The last sentence of paragraph 7 gives the indication that it is processed foods that are high in fat, sugars **and** salt/sodium that are associated with greater susceptibility to obesity and non-communicative diseases. In fact, these foods can be high in fat **and/or** sugars **and/or** salt/sodium.

In summary, we recommend that this wording is changed to:

.....and greater consumption of processed foods that **are** high in fat, especially saturated **and/or** **industrially produced** trans-fats, **and/or added** sugars and **or** salt/sodium.

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

If an example is given of nutritious animal source foods then milk and dairy foods should be added

The IDF supports the need to promote healthy diets and to focus on balanced and diversified diets as it has been shown that access to better and more diversified diets is key for combating problems of micronutrient malnutrition or "hidden hunger"<sup>vi</sup>. And FAO states that "the only sustainable means of addressing malnutrition is through the consumption of a high-quality, diverse diet that provides adequate but not excessive energy."<sup>vii</sup>

Research on the consumption of animal-based foods by children has convincingly demonstrated improved growth, micronutrient status, cognitive performance and a level of physical activity<sup>viii</sup>. Milk and other dairy foods provide macronutrients, essential micronutrients (vitamins and minerals), fatty acids and growth factors that are needed for energy and for growth and development of children. Under-nutrition and micronutrient deficiencies, which could begin to be alleviated with greater consumption of milk and other dairy products and animal based foods, are still highly prevalent in children less than 5 years old.

The FAO book on Milk and Dairy products in human nutrition poses that *“Milk and dairy products play a key role in healthy human nutrition and development throughout life, but especially in childhood”*<sup>ix</sup>. That milk and dairy products can help alleviate malnutrition and stunted growth is stated throughout the book:

- “Growing consumption of dairy and other livestock products is bringing important nutritional benefits to large segments of the population of developing countries.”
- “As a concentrated source of macro- and micronutrients, milk and dairy products can play a particularly important role in human nutrition in developing countries where the diets of poor people frequently lack diversity and consumption of animal-source foods may be limited.”
- “Milk plays a key role in treating under-nutrition both in industrialized countries, where almost all products used for enteral feeding of malnourished hospitalized children and adults are milk-based and in developing countries.”
- “In children with poor nutritional status, the addition of milk to the diet is likely to supply nutrients that are important for growth and are deficient in the diet.”

Also, Table 4.8 of this publication highlights many benefits in relation to chronic diseases:

- “There is moderate evidence showing an association between milk and dairy product consumption and lower incidence of T2DM in adults.”
- “Milk and calcium probably protect against colorectal cancer”
- “There may be a protective effect of milk and dairy on weight due to components such as protein. However, if such an effect exists the magnitude is likely to be small.”
- The majority of review studies conducting meta-analyses of prospective studies conclude that low-fat milk and total dairy product consumption is generally not associated with CVD risk and may actually contribute to a reduction of CVD.”
- ‘Although dairy foods contribute to SFA content of the diet, other components in milk such as calcium and PUFAs may reduce risk factors for CHD.’

**Considering the important role milk and dairy products can play in healthy human nutrition, we feel that if examples are given of nutritious animal source foods then it would be relevant to mention milk and dairy products with the animal source foods:**

- food systems need to promote healthy dietary patterns by providing year round access to safe and nutritious foods including fruits, and vegetables, pulses, wholegrains and animal source foods such as fish and milk and dairy products, while limiting the consumption of processed foods that negatively affect nutrition and health;

#### Make the wording of 12e consistent with that of 7

Paragraph 7 highlights that it is '*greater consumption of processed foods that is high in fat, especially saturated and trans-fats, sugars, and salt/sodium*' that lead to higher susceptibility to obesity and non-communicable diseases.

Therefore, the nutrition improvement advised in paragraph 12 f should be **consistent** with this point and clarify that it excessive intakes of processed foods that are high in fat, especially and industrially produced trans-fats, and/or added sugars, and/or salt/sodium that should be avoided.

We recommend that the wording for 12e is changed to:

'.....avoiding excessive intakes of processed foods that are high in fat, and/or added sugars, and/or sodium, and removal of industrially produced trans-fat from the food supply.'

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

IDF would also like to suggest that as important as it is for FAO and WHO to maintain the cooperation they offer to support governments, a closer cooperation with appropriate members of the private sector in the development and implementation of programmes and plans for nutrition should also be considered. For example, international dairy organisations such as IDF and national dairy food organisations have specialist expertise in the valuable role that milk and dairy products play in health, and therefore can play a role in the development of nutrition policy, such as evidence based dietary guidelines. Their staff have expertise in dairy nutrition and are up to date with the latest scientific literature on dairy foods and health that can be of tremendous value in assisting policy makers in arriving at evidence based policies and guidelines. Also, many national dairy organisations fund research to fill gaps in knowledge relating to the impact of dairy consumption on health.

#### Comment on 13e

We would recommend that the elderly are added to the list in 13e. There is an aging population in many western countries and the higher rates of malnutrition, sarcopenia and frailty mean that they are a special group in terms of nutrition policies.

<sup>i</sup> Uauy R et al., (2009) Review. WHO Scientific update on trans fatty acids: summary and conclusions. EJCN 63, S68-75.

<sup>ii</sup> FAO (2010) Food and Nutrition Paper 91. Fats and fatty acids in human nutrition. Report of an expert consultation. (<http://foris.fao.org/preview/25553-ece4cb94ac52f9a25af77ca5cfba7a8c.pdf>, accessed 12 March 2014)

- iii Chowdhury R et al. (2014) Association of Dietary, Circulating, and Supplement Fatty Acids With Coronary Risk. *Ann Intern Med* 160; 398-406
- iv Bendtsen NT et al., (2011) Consumption of industrial and ruminant trans fatty acids and risk of coronary heart disease: a systematic review and meta-analysis of cohort studies. *Eur J Clin Nutr* 65;773-83.
- v Brouwer IA et al. (2013) *Trans* fatty acids and cardiovascular health: research completed? *Eur J Clin Nutr* advance online publication, 27 March 2013; doi: 10.1038/ejcn.2013.43.
- vi FAO.2013. Milk and Dairy Products in Human Nutrition. <http://www.fao.org/docrep/018/i3396e/i3396e.pdf> (Accessed on 6 May 2014)
- vii FAO 2013. The state of food and agriculture. Food systems for better nutrition. <http://www.fao.org/docrep/018/i3300e/i3300e00.htm> (Accessed on 6 May 2014)
- viii Dror DK, Allen LH. The importance of milk and other animal-source foods for children in low-income countries. *Food & Nutrition Bulletin*. 2011; 32:227-43.
- ix FAO.2013. Milk and Dairy Products in Human Nutrition. <http://www.fao.org/docrep/018/i3396e/i3396e.pdf> (Accessed on 6 May 2014)

## 40. International Diabetes Federation, Belgium

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

Paragraph 3: IDF strongly recommends that it is rephrased to reflect the right of everyone to have access to “**sufficient, safe and affordable nutritious food**”. Affordability of nutritious food is also a key determinant to all forms of malnutrition, both in low- and middle-income countries (LMICs) and in high-income countries (HIC).

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

Paragraph 4: IDF requests that it includes **overconsumption**, defined as population-wide increased consumption of energy intake, **as a form of malnutrition**. This paragraph also needs to specify that, apart from increasing susceptibility to communicable and noncommunicable diseases (NCDs), **malnutrition can also be a direct risk factor for NCDs**: in the case of diabetes, obesity, overweight and overconsumption are among its main risk factors.

Paragraph 5 should clearly state that **poverty is a major contributor of malnutrition in rural and urban areas of both LMICs and HIC**, as it interferes with food availability and affordability.

Paragraph 7: 90% of the adults with diabetes are affected by type 2 diabetes, which has obesity and sedentary lifestyles as its main risk factors. For that reason, we request that this paragraph states that **environment and societal changes lead to a higher susceptibility to obesity, diabetes and other NCDs**.

Paragraph 10 should also note that **maternal overweight and obesity at the time of pregnancy, which is a risk factor for childhood obesity and gestational diabetes, have increased steadily since 1980**. Also, in section e) of this paragraph, IDF would like to highlight that **dietary risk factors may account for more than 10% of the global burden of disease**, given into account that 8.3% of the adult population is estimated to have diabetes in 2013 - 90% of them having type 2 diabetes, which has obesity as one of its main risk factors.

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

Paragraph 11: IDF requests that section a) of this paragraph specifically mentions the **special needs of pregnant women**, as the rising trend of maternal overweight and obesity is leading to a transgenerational transmission of obesity, which is one of factors fuelling the diabetes epidemic in LMICs.

Section c) of the same paragraph should mention that **policy coherence is specially required in regards to the investments and incentives for the production of crops used in high-processed food**, especially sugar.

Paragraph 12: in section c) **food marketing needs to be listed along with production, processing, storing, distribution, preparation and consumption**, as marketing has an obvious impact on nutrition through consumer choices and preferences.

Section e) of this paragraph should also include **avoiding excessive intake of calories**. Section f) should read "**access to safe, affordable and nutritious foods**", for the reasons explained in paragraph 3.

### **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;

IDF recommends that this commitment includes **reversing the rising trends in obesity and diabetes**, as did the original document, as well as **eradicate the overconsumption of poorly nutritious foods**.

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;

**Assuring affordable nutritious and healthy foods should be part of this commitment**, for the reasons previously mentioned for paragraph 3 and 12.

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.

IDF greatly supports the inclusion of a goal on food security and nutrition in the post-2015 development agenda and, therefore, welcomes this commitment.

## 41. World Obesity Federation, United Kingdom

**These comments are made on behalf of the World Obesity Federation and endorsed by the UK Health Forum.**

Thank you for this opportunity to comment on the revised draft of the political outcome document of the ICN2. Overall, we commend the content and welcome the inclusion of both under and over nutrition within the broader topic of malnutrition.

However, we are concerned that the declaration lacks any commitment to time bound reporting or monitoring as well as to the absence of any implementation plans. We call on the Joint Working Group to specify the timeframe for the Framework for Action (we propose 2015-2025) and the Decade of Action on Nutrition. For the purpose of monitoring and accountability, we recommend that the ICN political outcomes document is ratified / adopted by the UN General Assembly in 2015 and that progress towards implementation of the political outcomes document on nutrition is reviewed by the UN General Assembly once every five years (ie in 2020 and 2025).

These points should be addressed if the declaration is to lead to concrete action being taken, with appropriate accountability.

Specific comments on each of the paragraphs can be found in the attached document.

Best wishes

Hannah Brinsden  
*Policy & Advocacy Researcher*  
*World Obesity Federation*

**See specific comments on the form:**

<http://www.fao.org/fsnforum/sites/default/files/resources/ICN2%20Comments%20-%20FINAL.pdf>

## 42. Concern Worldwide, Helen Keller International and the SUN Civil Society Network

### **Second Draft of the Rome Declaration on Nutrition**

Concern Worldwide, Helen Keller International and the SUN Civil Society Network welcome the opportunity to feedback on the latest iteration of the Rome Declaration. Progress has been made which is welcome, but many significant issues remain to be addressed. We offer the below as organisations committed to realising the best outcome and potential from ICN2 and hope that it proves helpful in finalising the Rome Declaration.

#### ***General comments***

- In addition to restricting the attainment of human potential and impacts on physical and cognitive development, as the Cost of Hunger Study in Africa<sup>1</sup> highlighted, undernutrition can cost a country as much as 16.5 percent of its GDP. **Outlining the economic consequences of undernutrition is important and further emphasises the urgency and imperative to act.** This omission has still not been rectified in the latest iteration of the Rome Declaration.

- Reference to the World Health Assembly targets is still lacking. **Member States' continued commitment and support of the WHA targets should be explicitly articulated**, as well as recognising the need for commitments that go beyond the WHA 2025 targets.
- **Gender and the issue of equality are not addressed and this omission should be rectified.** Ensuring an end to all forms of gender discrimination, recognising this as one of the greatest causes of undernutrition. Action to end hunger must transform societal norms that result in girls eating last and least, that keeps girls out of school, limits women's income, voice and productivity, and that lead to child marriage. Improving women's status and role, their access to education as well as their access to and control over resources is key (i.e. land, income, agricultural inputs and agricultural services).
- The second draft of the Rome Declaration continues to have a bias toward a food system approach. Many social and environmental factors such as gender, environmental health, optimal caring and feeding practices are key determinants. **Other drivers and determinants of malnutrition need to be acknowledged and addressed. There is significant space and need for further promoting a balance between food systems approaches, nutrition sensitive interventions and nutrition specific interventions.**
- It would be useful to explicitly **mention the three underlying causes of malnutrition (Food, Care and Health)** in the text to show the importance of all three being satisfied if nutritional status is to be improved.
- There is no mention of the vast **transformation that urbanization will have on food systems and nutrition outcomes.**
- We would suggest that mention is made that as food systems change and families, including the poor, utilize commercially produced complementary foods for children, **explicit normative guidance will be required to help countries operationalize and enforce necessary steps to ensure the appropriate marketing of these products for children 6-24 months while at the same time protecting and promoting optimal breastfeeding.** This is an issue that the WHA is addressing during its 67th Session, thus of utmost importance. See Lancet Series 2013 Paper 4 by Gillespie et. al.
- The Outcome declaration should also push for **having coding for nutrition-sensitive efforts** as a first step towards thinking of normative guidance for nutrition sensitive efforts and to contribute to comparable data across countries.

### *Specific references*

- In relation to the second bullet under paragraph 5, poverty is indeed a major contributor to malnutrition, but also vice versa - **malnutrition is also a contributor to poverty.**
- Point 7 suggest adding – 'Recognise the environmental, societal changes, **and economic and gender disparities** have an impact on dietary and physical patterns, ...'
- While 12 d) recognises that public investments and appropriate market regulations in food, agriculture and other sectors are crucial to overcoming malnutrition, **the Code on Marketing of Breastmilk Substitutes is conspicuously missing and should be explicitly referenced.**
- Under paragraph 12:
  - o A point should be made on the importance of/encourage the integration of a multi-stakeholder approach to ensure food and nutrition security.

o Support the alignment behind national needs from all stakeholders and clear processes for making this happen.

- Highlight the importance of diversification and the central role of small holder farmers as the main producers of food.

- Under a 'vision for global action to end all forms of malnutrition', the need to support coordinated action of different actors is mentioned as well as the need for global and national policy coherence. **The need and importance of coherence and consistency between the various global frameworks and initiatives on nutrition and food security should also be stressed**, such as the Nutrition for Growth, WHA framework against the 6 targets, and SUN.

### ***Commitment section***

- We would encourage additional clarity/specificity on the commitments referenced, there is **still work needed to make them SMARTER**, in relation to what is and will be 'measurable' specifically, which also encompasses the timeliness.

- The commitment to action could be strengthened by adding '**ensuring universal access to safe drinking water, sanitation, and hygiene for households, schools, and health facilities. WASH is critical to addressing malnutrition, preventing infections and diseases such as diarrhoea**'.

- In commitment section, we further suggest adding a point on:

o Generating **more evidence on nutrition-sensitive programming and policies** to inform scale up and integration in policies, strategies, plans of government (multi- sectoral) and various line ministries.

- We support the idea of pushing for **a Decade of Action, but this should not be UN only. It needs to be owned by multiple stakeholders.**

- A commitment should be made to plan for accountability in a way that is aligned with the broader nutrition architecture (e.g. GNR, WHA, N4G)- to ensure efficient monitoring which begins as soon as possible after commitments
- In relation to the above point - a commitment and reference to learn from current experience should be mentioned.

### **43. Miroslaw Jarosz, National Food and Nutrition Institute, Poland**

We at the Nutrition, Physical Activity and Obesity Programme of the WHO/Regional Office for Europe received the attached contribution from Prof. Mirosław Jarosz, National Food and Nutrition Institute, Warsaw, Poland.

Paola Bennati

**Link to form:**

[http://www.fao.org/fsnforum/sites/default/files/resources/icn2\\_2nd\\_onlineconsultation\\_May2014National%20Food%20and%20Nutrition%20Institute.docx](http://www.fao.org/fsnforum/sites/default/files/resources/icn2_2nd_onlineconsultation_May2014National%20Food%20and%20Nutrition%20Institute.docx)

#### **44. Miriam Yiannakis, Wold Vision International, Greece**

Thank you for the opportunity to provide feedback. Attached is the template with our comments.

##### **Link to form:**

[http://www.fao.org/fsnforum/sites/default/files/resources/ICN2%202nd%20Consultation%20World%20Vision%20International\\_0.docx](http://www.fao.org/fsnforum/sites/default/files/resources/ICN2%202nd%20Consultation%20World%20Vision%20International_0.docx)

#### **45. International Meat Secretariat, France**

As a partner in the Multi-Stakeholder Global Agenda for Sustainable Livestock, the International Meat Secretariat (IMS) is pleased to participate in the discussion on the Draft of the Rome Declaration on Nutrition. The IMS represents beef, sheep and pork meat producers around the world and its Committees, including the Human Nutrition and Health Committee and the Sustainability Committee contribute to the development of best practices around the sustainable production and consumption of our products as part of a healthy diet. Our members represent countries that together account for more than 75% of global red meat production and include key global producers of red meat, including Australia and Brazil and as such, play a critical role in contributing to global food and nutrition security.

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

We welcome the inclusive approach adopted in the Declaration, in particular, recognition of the need to include all stakeholders, including the private sector, to ensure food and nutrition security is achieved. The agricultural industries operate from paddock to plate and consequently, have the potential to make a meaningful contribution to food and nutrition security by helping to identify opportunities and innovations and facilitating their implementation as part of a multi-stakeholder partnership.

##### **See specific comments on the form:**

<http://www.fao.org/fsnforum/sites/default/files/resources/IMS%20comments%20ICN2%20political%20outcome%20document%20May%202014.docx>

#### **46. Corinna Hawkes, World Cancer Research Fund International, UK**

We commend the Joint Working Group for streamlining and improving the body of the text. We make some suggested wording changes to the text below, clearly identifiable through “track changes”. We also make some specific comments in comments “boxes”. These suggestions:

- Improve the clarity of the text
- Link the document more fully to existing internationally agreed global initiatives and actions relevant to nutrition
- Add in one further commitment (on advancing the development of data systems and metrics) and an additional “call” (for more official development assistance)
- Call on the Joint Working Group to specify the timeframe for the Framework for Action (we propose 2015-2025) and the Decade of Action on Nutrition
- Recommend that, for the purpose of monitoring and accountability, the ICN political outcomes document is ratified / adopted by the UN General Assembly in 2015 and that

progress towards implementation of the political outcomes document on nutrition is reviewed by the UN General Assembly once every five years (ie in 2020 and 2025).

We remain disappointed that the commitments are insufficiently specific for the purposes of monitoring and accountability. But we recognise the importance of a Framework for Action, which we call on the JWG to draft and complete ready for adoption at the November meeting along with the Political Outcomes document. We recommend the Framework builds on the commitments made in the Outcomes Document, and is concise, focused and actionable.

**See specific comments on the form:**

<http://www.fao.org/fsnforum/sites/default/files/resources/WCRFI%20NCDA%20ICN%202%20comments%20Zero%2B1%20FINAL.docx>

#### **47. World Farmers' Organisation (WFO-OMA) Italy**

WFO Comments to the "Draft of the Rome Declaration on Nutrition"

The World Farmers' Organisation, WFO, strongly supports the Second International Conference on Nutrition and the importance of a "Rome Declaration on Nutrition". As a general comment, WFO wants to highlight the importance of explicitly referring to farmers, the main food producers and those responsible for high-quality food production, as key stakeholders to achieve better nutrition standards.

Nutrition is certainly a major challenge to development, and all stakeholders, including farmers, civil society, private sector, and Governments have to join forces and make an extra effort to raise awareness on the importance of nutrition all over the world. Involving farmers in this process is the key for success. Farmers do not simply produce food, but they are the ones who know what to produce, how to produce and when to produce. Farmers have the knowledge and expertise to produce high-quality food which is the basic element to achieve better nutrition goals.

Please find attached the detailed comments to the "Draft of the Rome Declaration on Nutrition".

<http://www.fao.org/fsnforum/sites/default/files/resources/WFO%20Comments%20ICN2.pdf>

#### **48. Muhammad Sarwat Mirza, HANDS (Health And Nutrition Development Society), Pakistan**

**See form:**

<http://www.fao.org/fsnforum/sites/default/files/resources/%5Bag2nut%5D%20ICN2%20-%20Comments%20HANDS-Pakistan.docx>

#### **49. World Public Health Nutrition Association, UK**

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 (tracked changes can be find in the pdf attached).

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.

**See form:**

[http://www.fao.org/fsnforum/sites/default/files/resources/WPHNA\\_statement\\_draft\\_ICN2\\_2nd\\_round\\_final.pdf](http://www.fao.org/fsnforum/sites/default/files/resources/WPHNA_statement_draft_ICN2_2nd_round_final.pdf)

## **50. Action Against Hunger**

Dear ICN2 Organizers and Friends,

I like to comment on behalf of Action Against Hunger on the Draft of the Zero plus one Draft Rome Declaration on Nutrition.

ACF International recognizes that the 'Draft of the Rome Declaration on Nutrition' has made advances in broadening the scope of the ICN2. In particular, we acknowledge the inclusion of a wider definition of food systems, the commitment to under-five malnutrition and the commitment to linking the ICN2 to the Post-2015 Development Agenda.

However, there is significant space and need for further promoting a balance between food systems approaches, nutrition sensitive interventions, and nutrition specific interventions. The Rome Declaration of ICN2 should include commitments on the strengthening of health systems, in order to ensure the full integration of direct nutritional interventions within basic health care. The ICN2 will be in danger of failing its aims if it does not acknowledge the importance of health, care practices, and education. The final declaration should more generally reaffirm agreed and ratified human rights language, including explicit reference of the right to adequate food and health.

Despite various reasonable and pragmatic proposals from Civil Society Organisation coalitions on ways forward, there remains a lack of adequate interaction between the Secretariat, Member States and CSOs. The ICN2 process must be made more inclusive, accountable and transparent. We acknowledge the electronic consultation on the various stages of the outcome document, at the same time we do not believe these intermittent points to be sufficient in the run up to the November high-level conference and would like to see a more interactive discussion as this will improve the quality of the event and its outcomes. ACF, together with over a dozen CSOs, hosted a successful roundtable event during the WHA on 22 May in Geneva, bringing together informally the Secretariat, Member States and CSOs to help create clarity, shared understanding and promote constructive dialogue. We welcomed the open and productive interaction during the event with the Joint Working Group (JWG) and the Secretariat and hope all stakeholders seize the opportunity presented by the demonstrated commitment and fully adopt the principle discussion. We suggest that the JWG and the Secretariat consider similar public meetings in Rome and Geneva

later in July following the expected publication of the first draft of the Framework for Action, to inform and collect input in a timely and transparent way.

We also urge the ICN2 Secretariat and the JWG to work with the WHO and FAO and propose an inclusive discussion before, during and beyond the November Meeting on opportunities to further mobilise multi-stakeholder interaction.

Lastly, we restate the need to include accountable commitments and the setting up of a Framework for Action. This framework must be a legacy of the ICN2 after November 2014 that rallies governments and international platforms to take accountable collective and individual actions to end malnutrition. It must also be a place that enables progress on the country level.

With only six months to go, ACF believes the ICN2 should reaffirm its commitments of coherence and consistency between the various global frameworks on nutrition and food security by adopting the widely agreed and achievable WHO nutrition targets as part of the Rome Declaration and a foundation for the subsequent discussion on the Framework for Action. The ICN2 must build bridges with global initiatives on food and nutrition security such as the SUN Movement, Nutrition for Growth initiative, REACH and the CFS to ensure to maximise its impact. The declaration should call for more coherence among the sectors, including in regard to land rights, health supply, gender, social protection and education.

Enclosed ACF submission of detailed recommendations to improve the Draft Rome Declaration paragraph by paragraph.

ACF considers the ICN2 to be a unique opportunity and we remain fully committed to bringing about change for better nutrition and to share our expertise with the organisers. We would especially like to offer the ICN2 the knowledge, expertise and perspectives that our day to day contact with the most affected people and communities – those that ultimately are at the centre of a successful ICN for whom ‘better nutrition for all’ is not a slogan but a desperate need.

Thanks  
Samuel Hauenstein Swan  
Senior Reserch and Policy Advisor  
ACF International

## **51. Abbott Nutrition, Ireland**

Please find attached Abbott Nutrition’s submission on foot of the public consultation on the Draft Rome Declaration on Nutrition. We welcome this opportunity to comment on the draft and look forward to contributing to the discussions over the coming months and to hearing the outcome of the meeting in June.

With kind regards,

Pamela Byrne

**Link to form:**

[http://www.fao.org/fsnforum/sites/default/files/resources/Form%20ICN2Final%20Abbott%20Nutrition\\_0.pdf](http://www.fao.org/fsnforum/sites/default/files/resources/Form%20ICN2Final%20Abbott%20Nutrition_0.pdf)

## 52. **Xavieria Cabada, AEl Poder del Consumidor, Mexico**

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

- The importance of sovereignty and sustainability regarding agricultural practices is needed to be more emphasised as well as the emergency need for the protection of biodiversity.
- As part of the right of everyone to have access to sufficient, safe, **healthy**, and nutritious foods, there needs to be the reaffirming of the importance of traditional diets from the world.
- There needs to be more emphasis on human rights approach and the urgent need for the protection of breastfeeding as the first way to guarantee the right to adequate food among population.
- As part of the root causes of malnutrition, the intake of ultraprocessed foods high on sugar, fat, saturated fat, trans-fats, and salt/sodium has become one element that is directly linked to malnutrition as a cause, it would be proper to integrate it as such.
- Regarding trade practices, there needs to be recognized the need for **fair trade** practices.
- Importance of participation of civil society organizations for the public interest needs to be integrated in the document.
- Among agricultural practices there needs to be the **exclusion of genetically modified organisms**, especially in those countries where they represent a severe threat to their sovereignty.
- In commitment to action, conflict of interest needs to be approached.

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

- Paragraph 4, instead of unbalanced diets- **unhealthy diets**.
- Paragraph 5, as part of the root causes, point one would need to integrate in line 3, where ... “vicious cycle, by **lack of breastfeeding**, non-potable water, poor sanitation, food borne and parasitic infection, and ingestion of **ultraprocessed foods high on sugar, fat, especially saturated and trans-fats, and salt/sodium**.”
- Paragraph 7. “Recognize that environmental, societal changes, **and marketing practices of unhealthy foods, especially those directed to children** often have an impact on dietary and physical activity patterns....”

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

- Paragraph 11, subsection a)... “paying particular attention to the special needs of children, women, elderly and disabled people; **emphasizing the human rights approach**.”
- Paragraph 11, subsection b)... “a coordinated action of different actors, **where civil society is a key actor**, at international.... as well as health, **breastfeeding**,....”
- Paragraph 11, subsection c)... “including in **fair** trade and investment agreements...”
- Paragraph 12, subsection a)... “support and complement nutritional **effective** initiatives and measures”
- Paragraph 12, subsection c)... at the end of the subsection, after consumed add the following; “assuring local agricultural practices, promoting sustainable practices, and the exclusion of genetically modified organisms, especially in those countries where they represent a severe threat to their sovereignty.”
- Paragraph 12, subsection d)... “appropriate market **and price** regulations in food” ...
- Paragraph 12, subsection f)... “while limiting the consumption of processed foods that negatively affect nutrition and health, **including breastmilk substitutes for infants**”
- Paragraph 12, subsection h)... “food systems should be **self-sustainable**...”

#### **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

Add **“and diabetes and other chronic diseases”**

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;

Add after public policies **“free from conflict of interest”**

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;

Add **“with the full support to small and medium local producers”**

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;

Add **“adequate collaboration”**

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.

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

Policies and investment must be implemented entirely for the public interest, without conflict of interest.

It is crucial agricultural systems to be exempt from genetically modified organisms, especially in those countries where their presence implies a severe threat to the sovereignty of the country. Countries need FAO support.

Small and medium local producers need full support from governments and international entities like FAO and WHO.

Documentation that may be of support: WHO Recommendations on the marketing of foods and non-alcoholic beverages to children and the marketing of feeding products for infants and young children,

International Code of Marketing of Breastmilk Substitutes and subsequent relevant WHA resolutions,

Convention on the Rights of the Child from the Committee on the Rights of the Child, General Comment No. 16 (2013) on State obligations regarding the impact of the business sector on children’s rights.

## 53. Andrea Sonntag, Welthungerhilfe , Germany

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

Welthungerhilfe welcomes the opportunity to comment on the second draft of the ICN2 Declaration on Nutrition.

We acknowledge that the second draft of the Rome Declaration is more concise and better structured and makes reference to some of the aspects we have indicated as missing in the first draft.

We appreciate the reference made to the Right to Food in the introductory paragraph of the document. However, we recommend that the document as a whole should make stronger reference to the existing human rights framework as part of binding international law and the deriving obligation of states to respect, protect and fulfil the Human Right to adequate Food.

Reference to gender based discrimination and the violation of women's rights as key drivers of malnutrition and the crucial role of women in food and nutrition security is still lacking.

More attention should also be paid to the role of education as another key aspect to end malnutrition in all its forms.

The document makes only little reference to rural areas and does not mention at all the role of small scale food producers although they represent the majority of the nutrition insecure population and play a significant role as the main producers of food.

Finally, a commitment to clear targets and timeframes to end malnutrition in all its forms and for accountability mechanisms to monitor this process is still missing.

We would like to reiterate that the participation of civil society should go further than an invitation to participate in the e-consultation on the political outcome document. We deem of vital importance that the civil society constituencies, the people who are directly affected by malnutrition and global nutrition policies, are given the opportunity of meaningful participation in the preparation of the ICN2 conference, the conference itself and the follow-up process.

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

Para 5.

With regard to the "root causes of malnutrition" the analysis should also mention the lack of access and control over resources, gender based discrimination and poor education as causes.

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

Para 11 a)

It should be mentioned, that the elimination of malnutrition in all its forms is not only an imperative for ethical, political, social and economic reasons, but a binding obligation of national governments as set out in the legal frameworks on the Human Right to Food and the Human Right to Health.

Para 11 b)

The empowerment of women is crucial to end malnutrition and should be included here.

Para 11 c)

The list of relevant sectors to ensure political coherence should include climate policies, too. Delaying international agreements and preventing stronger commitments to stop climate change leads to increasing nutrition insecurity and therefore implies a violation of the Right to Food.

Para 11 e)

We recommend referring more explicitly to the strengthening of the legislative and regulatory framework in terms of preventing the marketing of unhealthy non nutritious food (HFSS foods) as well as implementing the WHO recommendation on the marketing of breast-milk substitutes.

Para 12 h)

With regard to sustainability reference should be made not only to its ecological but also to its social dimension addressing the need to ensure social equity within food systems.

#### **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;

*Public policies and investment should particularly provide support for small-scale food producers allowing them for a sustainable production, processing and marketing of diversified nutritious food.*

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;

*The Framework for Action should include clear targets, timeframes as well as commitments on financial resources and define accountability mechanisms allowing for meaningful participation of civil society actors, particularly of the segments of the populations most affected by malnutrition.*

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.

#### **54. Divine Nganje Njie, FAO, Italy**

Thank you very much for the opportunity to comment on the revised draft of the ICN2 political outcome document. We would like to comment on the issue of food loss and waste. Food loss and waste is acknowledged in the document as one of the challenges that reduce the ability of food systems to provide safe and nutritious food, while post-harvest loss and waste is one of the intervention areas identified under the vision for global action. Yet, the section on commitment to action makes no mention of food loss and waste, which would have made a logical progression from the identified threats and the vision. This risks reducing attention and interest to address this crucial factor impacting on food and nutrition security, especially in the developing countries.

The attached template contains comments to sections of the document.

[http://www.fao.org/fsnforum/sites/default/files/resources/Form%20ICN2\\_0.docx](http://www.fao.org/fsnforum/sites/default/files/resources/Form%20ICN2_0.docx)

Thank you

Divine Njie and Camelia Bucatariu  
Agro-food Industries Group, FAO

#### **54. Manuel Castrillo, Proyecto Camino Verde, Costa Rica**

*[Original contribution in Spanish]*

En verdad las expectativas son muchas y los compromisos serán elusivos en muchos casos. Aparte de los nobles y enaltecidos deseos, el asunto radica mucho en cuestiones éticas y económicas, sigo insistiendo que la OMC, debería jugar un papel importante en el arbitrio para metodologías que contemplen este paradigma y su atención entre las naciones y los bloques ricos y pobres, Asimismo el desperdicio y la inequidad, son factores que distancian tan solo la posibilidad de alimentarse, aunque no sea de la manera más saludable. La asignación de recursos para casos de hambrunas y conflictos debería contar con mecanismos más expeditos. asegurados por la ONU con un poder real de intervención; la retórica no llena estómagos y muchos menos en casos de exilios masivos o pestes, o inmigraciones por conflictos sean estos los que fueren.

Las condiciones de salubridad también incluyen cambios profundos en prácticas culturales de alimentación, son necesarias campañas " constantes " para informar y formar a las personas, los estados despifarran recursos por no tener un buen contenido.

El aspecto nutricional depende de condiciones para que los agricultores puedan producir alimentos más sanos, con menos químicos, así como, incentivar mejores prácticas, que sean rentables, pues la producción orgánica, no ha llegado a ser barata y accesible comparativamente con la producción industrial.

El reto es inmenso, el liderazgo de las agencias implica poder establecer balances entre los actores tan diversos, esa es la fe, mucha suerte !

*[English translation]*

Indeed, there are many expectations and commitments will be elusive in many cases. Besides the noble and praiseworthy desires, the matter depends on ethical and economic issues to a large extent. I keep insisting that WTO should play an important role in the decision on methodologies that address this paradigm, paying attention to rich and poor nations. Moreover, waste and inequality are factors that only constraint feeding, despite not in the healthiest way. More expeditious mechanisms secured by the UN with the power to move beyond the rhetoric to real action are required to allocate resources in famines and conflicts. Rhetoric does not fill bellies, even less in massive exiles, pests or immigration flows due to any type of conflicts.

Sanitation also involves major changes in cultural feeding practices. "Continuous" campaigns informing and educating the population are necessary. States waste resources when these campaigns lack proper contents.

The nutritional aspect depends on the conditions enabling farmers to produce healthier food, with fewer chemicals, as well as the promotion of best practices that are profitable, as organic production has not been cheap or accessible when compared to industrial production.

The challenge is immense. The agencies' leadership involves establishing balances between the many different stakeholders. This is the hope, good luck!

## **56. GISA (Groupe interministériel sur la Sécurité Alimentaire) , France**

GISA is strongly committed to an inclusive participation of all stakeholders in the preparation of ICN2 as well as during the conference. Thus, we would like to thank the secretariat for organizing this second electronic consultation on the draft V0+2 of the political statement.

We recognize that there has been positive progress made in this new version of the “Draft of the Rome Declaration on Nutrition”. However other drivers of nutrition as health, care and education should be strengthened in the declaration in order to ensure that malnutrition is addressed in a more holistic and multisectoral manner.

GISA's general comments on the draft V0+2 of the Rome Declaration on nutrition are the following:

- The text should reaffirm more broadly respect for human rights in all fields when it comes to tackling food and nutrition insecurity.
- Food people's preferences should also be added right from the introductory section, as this principle is part of the food security definition (world food summit, 1996).
- Access to quality health services, care practices, hygiene and prevention should be better included in the text, both in the section on “multiple threats of malnutrition”, and in the section on “vision for global action”. A commitment should be added to encourage country health system strengthening strategies (such as national IHP compacts) while ensuring the full integration of nutrition within basic health care to ensure the sustainable delivery of direct interventions.
- The nutrition goal of agriculture should be recognized and the importance of nutrition sensitive approaches through the diversification of crops/livestock within production system should be underlined.
- Smallholders and family farming are the primary victims of hunger (75% of those suffering from hunger are smallholders) while they are the main producers of food. They play an important role in reducing malnutrition and contributing to a balanced diet, and need to be supported by public policies to this effect. It should be added in the section on “vision for global action”.
- Women play a central role in nutrition. Specific efforts to protect and empower women should be added in the section on “vision for global action”.
- In order to promote healthy dietary patterns in food systems, nutrition and taste education is a key issue in order to develop varied food habits as well as take pleasure in eating.
- Consistency between the various global frameworks on nutrition and food security should be ensured. This should be specified in the Declaration.
- In its role as the most inclusive international and intergovernmental platform for all stakeholders to work together to ensure food security and nutrition globally, the Committee on World Food Security (CFS) should be mentioned in the section “a vision for global action”.

- Finally, GISA stands in favor of the adoption of an inclusive framework for action which should serve to monitor progress towards fulfilling the commitments agreed in the Rome Declaration on nutrition, in order to ensure accountability.

**Link to form:**

<http://www.fao.org/fsnforum/sites/default/files/resources/GISA-France-Draft%20V0%2B2-sent.docx>

**57. ABIA (Brazilian Association of Food Industries), Brazil**

Dear FAO/WHO,

The ABIA (Brazilian Association of Food Industries) welcome the opportunity to comment on the Draft of the Rome Declaration on Nutrition. Attached is the template with our comments.

Kindest regards.

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

**Proposal:** In response to the request for specific comments, we would suggest rewording paragraph 7 of the Draft Rome Declaration as follows:

*"7. Recognize that environmental and societal changes often have an impact on dietary and physical activity patterns, leading to higher susceptibility to obesity and noncommunicable diseases through increasingly sedentary lifestyles and greater consumption of fat, especially saturated and trans-fats, sugars, and salt/sodium."*

**Explanation:** We understand that not every processed food has high levels of fat, especially saturated and trans-fats, sugars, and salt/sodium. Furthermore, the consumption of nutrients that are considered critical comes from the diet as a whole and food preparations and some types of fresh foods can have high levels of these nutrients.

**Link to form:**

<http://www.fao.org/fsnforum/sites/default/files/resources/Form%20ICN2%20-%20ABIA.docx>

**58. ACTION, United States of America**

Hello,

Attached please find comments from ACTION on the Rome Declaration draft up for consultation through 28 May 2014.

Many thanks for your consideration!

Kate Goertzen  
Senior Associate - Nutrition, Child Health  
ACTION Secretariat

**Link to form:**

<http://www.fao.org/fsnforum/sites/default/files/resources/ACTION%20comments%20on%20Rome%20Declaration.pdf>

### **59. Global Harvest Initiative, United States of America**

Thank you to FAO for giving us an opportunity to provide our thoughts on the ICN2 draft document.

Global Harvest Initiative (GHI) is a private sector policy voice for improving productivity and reducing waste and loss throughout the agricultural value chain. GHI's member companies believe that the private sector, governments and civil society must work together to identify and implement sustainable pathways to sufficient, nutritious and affordable food for an expected global population of 9.6 billion by 2050.

GHI welcomes the opportunity to comment on the current draft of the ICN2 declaration. We would offer the following comments and suggestions.

1. The document recognizes that “poverty is a major contributor to malnutrition in both rural and urban areas”, yet the “Commitment to Action” does not call for policies and investments targeted at improving economic growth and incomes. The need for investing in social protection programs is mentioned, and this is a critical component of poverty alleviation. However, long-term reductions in malnutrition cannot be achieved without improving incomes, particularly for those populations most vulnerable to malnutrition, i.e. women and the rural poor.
2. In the declaration, the critical role that science-based technologies and innovations can play in reducing malnutrition is absent. Science-based innovations across the value chain can improve the nutrient value of foods, ensure food safety, reduce food waste and loss, or increase the production of nutritious foods, such as the so-called orphan crops. This declaration is an extraordinary opportunity to recognize and encourage the adoption of science-based technologies that can improve the lives and livelihoods of people struggling with malnutrition. The document needs to prioritize increased investments in AG R&D that also improve nutritional content of staple crops and for how to conserve nutrition in the value chain.
3. While this document is intended as a call to action for policymakers, we recommend that it also recognizes that food value chains are first-and-foremost consumer driven. Consumer choice and preferences must be respected and factored into any vision for reducing malnutrition and obesity. From a policymaking standpoint, robust nutrition education programs must be a priority if the gains of a more nutritious food system are to be fully realized.

4. Finally, the references to multi-stakeholder collaboration in this document are weak and do not adequately reflect the significant level of cooperation and partnership between governments, the private sector, and civil society that will be required to end malnutrition and hunger. Language to this effect should be included in the “Vision for Global Action” as well as “Commitment to Action”.

Many thanks,  
Margaret M. Zeigler, Ph.D.  
Executive Director  
Global Harvest Initiative  
801 17th Street, NW  
Suite 200  
Washington, DC 20006

## **60. Geoff Tansey, Independent, writer and consultant; Trustee, Food Ethics Council, United Kingdom**

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

Better than the first draft but it still avoids a single clear target date for achieving the aims laid out. 13f does refer to an action plan that by implication will have such dates and targets, however, I think one is needed in this document – see below.

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

Para 10e does not read clearly to me. 10 finishes ‘and that’:

e begins with ‘while etc etc’, either delete the ‘while’ and just list the points made in the rest of e or if keeping the ‘while’ then there needs to be something more added at the end of e

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

Suggest 11c should read

global and national policy coherence is needed among relevant sectors, including in trade and investment agreements to ensure they do not undermine governments’ ability to act in the public interest in promoting food and nutrition security, and in investments, incentives and constraints for agricultural production, food processing and distribution;

**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;

Add a date by which this is to be achieved so you can be held to account in monitoring progress and developing the framework for action mentioned in f. Suggest this date be **no later than 2025**.

**61. Amber Cashwell and Dano Gunderson, The Global Network for Neglected Tropical Diseases, United States**

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

We recommend adding the underlined portion to paragraph 10c:

“over two billion people suffer from micronutrient deficiencies such as of vitamin A, iodine, iron and zinc; these deficiencies are often caused by easily-preventable and treatable diseases such as helminth infections and schistosomiasis, particularly in pregnant women and children.”

References:

World Health Organization. Micronutrient deficiencies: Iron-deficiency anemia, Retrieved May 16, 2014: <http://www.who.int/nutrition/topics/ida/en/>

Hotez PJ (2009) Empowering Women and Improving Female Reproductive Health through Control of Neglected Tropical Diseases. PLoS Negl Trop Dis 3(11): e559.

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

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

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;

**Update commitment (c) with underlined:**

“take leadership to shape and manage food systems and improve nutrition by strengthening institutional capacity, ensuring adequate resourcing, addressing key health determinants such as parasitic diseases and coordinating effectively across sectors;”

## 62. Gender team, Social Protection Division, FAO, Italy

Comments on the revised draft of the political outcome document (12 May 2014) of the Second International Conference on Nutrition (ICN2)

Gender team, Social Protection Division

It is proposed that an emphasis on gender equality aspects be given to the political outcome document “Draft of the Rome Declaration on Nutrition”, recognizing that closing the gender gap in agriculture will produce significant nutritional gains for the society. Therefore, it is suggested that:

Multiple threats of malnutrition are a major challenge to sustainable development

Add the following bullet point in paragraph 5 on the root causes of malnutrition:

- Gender inequality in access to resources, opportunities, services and decision-making is a major cause and consequence of malnutrition.

Add the following point in paragraph 10 on uneven progress in reducing malnutrition, after c):

- Micronutrient deficiencies disproportionately impact women and children. Half of those suffering from iron deficiency are pregnant women and children under five in developing countries.

A vision for global action to end all forms of malnutrition

Add the following point in paragraph 11, after d):

- achieving gender equality remains crucial to reducing food and nutrition security; given women’s key role in nutrition, particularly at household level, positive measures for women must continue, but a more holistic approach to gender is needed to foster equitable, food and nutrition secure societies.

Add the following point in paragraph 12, after e):

- women’s role in nutrition through agricultural production, food provision and child care needs to be recognized and increased access to food and productive resources for women should be promoted throughout the food system;

Commitment to action

Rephrase paragraphs 13. a) and e) as follows:

a) eradicate hunger and all forms of malnutrition for all categories of people, particularly...

e) enhance people's nutrition, including people with special needs, and eliminate gender and age inequalities in nutritional status, through policies and initiatives for healthy diets throughout the life course.....

### **63. Franck Boni Konan, Université Alassane Ouattara, Côte d'Ivoire**

*[translation in English]*

Thank you to all the FSN team.

I am happy to be able to contribute to the drafting of this declaration which will guide the policies of world food security for the future.

This declaration is well drafted and emphasizes all aspects of the world nutrition problem; however, I have noticed a small misunderstanding in paragraph 4.

In this paragraph, the sentence is a little too long and has a tendency to diverge from its initial meaning. Some improvements would make it more readable. Accordingly, I have prepared a contribution, which you will find below:

#### CONTRIBUTION TO THE ROME DECLARATION

4- We acknowledge that malnutrition, including under nutrition, micronutrients deficiencies, excess weight and obesity, as well as noncommunicable diseases caused by an unbalanced diet, are very costly particularly in socioeconomic terms, for individuals and families, communities and States. These threats to their health and their wellbeing together with the negative repercussions on human physical and cognitive development; compromise their immune system and increases their exposure to both communicable and incommunicable diseases and imposes a heavy burden on peoples by limiting the realization of human potential and by reducing productivity.

Thank you all.

*[original in French]*

MERCI à toute l'équipe du FSN,

je me rejouis de pouvoir contribuer à la rédaction de cette déclaration qui va guider les politiques de sécurité alimentaire du monde pour les années à venir.

Cette déclaration est bien écrite et insiste sur tous les aspects de la problématique de nutrition dans le monde, cependant j'ai constaté une petite incompréhension au niveau de l'alinéa 4.

A ce niveau, la phrase est un peu trop longue et a tendance à corrompre son sens premier. Quelques améliorations permettront une plus bonne lisibilité. Ainsi, j'ai fait une contribution que vous trouverez ci-joint:

#### CONTRIBUTION POUR LA DECLARATION DE ROME

4- reconnaissons que la malnutrition, et notamment la dénutrition, les carences en micronutriments, l'excès pondéral et l'obésité, ainsi que les maladies non transmissibles provoquées par une alimentation déséquilibrée ont un coût élevé, notamment socioéconomique, pour les individus et les familles, les communautés et les États. Ces menaces sur leur santé et leur bien-être avec des répercussions négatives sur le développement physique et cognitif; compromettent leur système immunitaire et les exposent davantage aux maladies transmissibles et non transmissibles et constituent un lourd fardeau pour les sociétés en limitant la réalisation du potentiel humain et en faisant baisser la productivité;

MERCI à tous.

#### **64. Peter Carter, Climate Emergency Institute, Canada**

##### **Response to Political Outcome Document of ICN2**

N.B. I include below a key paragraph from the IPCC AR5 (2014) on food and one from the USDA assessment (2013).

It is good to see that the draft recognizes that global climate change is a major threat to nutrition and food security (item 8), but global climate change is not included anywhere else in the draft. It can only be assumed for planning that from now on, global climate change is going to reduce food production, which will become the defining factor for food security and nutrition by mid century.

From now on increasing extreme weather events driven by global climate change will be the leading factor in an ongoing deepening food security crisis.

Most importantly projected volatility of US food production over the next few decades means volatile and increasing world food prices.

I ask that the draft include a statement that emissions must immediately plateau and decline by 2020 in accordance with the RCP2.6 of the IPCC AR5 (the only scenario that limits warming to 2°C), in order to minimize food production loss affecting the world and all regions. RCP2.6 stabilizes at just below 2°C, at which temperature increase severe crop yield losses are projected. The US 2014 federal Climate Change Assessment projects that from mid century, US food production will decline. Crop declines are projected for most regions above 1.0°C and all regions by 2°C. The world's best food producing regions in the northern hemisphere are now projected to be vulnerable to already committed global change. Please include that the IPCC AR5 assessment projections make climate change mitigation with adaptation essential to minimize damaging, disastrous to catastrophic food production impacts over the short, medium and long terms.

Impacts over the next three decades cannot be prevented as we are locked into this period by climate system inertia, and so the worst ever and increasing food security disasters must be prepared for. Without effective mitigation (emissions reductions) starting by 2020 we will be committing ourselves to future world food calamity of progressive declines affecting all regions which will threaten the sustainability of civilization .

While starting adaptation now is essential, it is unlikely to help in any sustained way without ongoing effective mitigation.

I include a key paragraph from the IPCC AR5 on food and one from the USDA assessment. Please note that the IPCC does not decide what is dangerous climate change or dangerous levels of atmospheric greenhouse gases and does not make recommendations. This is left up to other organizations to do.

***IPCC WG2 TS P. 223. 3. Food production systems and food security***

***Without adaptation, local temperature increases of 1oC or more above preindustrial levels are projected to negatively impact yields for the major crops (wheat, rice, and maize) in tropical and temperate regions, although individual locations may benefit. With or without adaptation, climate change will reduce median yields by 0 to 2% per decade for the rest of the century, as compared to a baseline without climate change. These projected impacts will occur in the context of rising crop demand, projected to increase by about 14% per decade until 2050. Risks are greatest for tropical countries, given projected impacts that exceed adaptive capacity and higher poverty rates compared with temperate regions. Climate change will progressively increase inter-annual variability of crop yields in many regions.***

***p. 2 Key messages Climate Change and US Agriculture Assessment USDA September 2013 Projections for crops and livestock production systems reveal that climate change effects over the next 25 years will be mixed. Beyond mid century however changes in climate are expected to have overall detrimental effects on most crops and livestock.***

Please note that the above is derived from climate crop model projections that do not capture many large adverse impacts, including increased weeds and pests, extreme weather events, and increased tropospheric ozone. They do not capture combinations of adverse impacts. Possible benefits of CO2 fertilization for temperate regions are projected to be modest and short lived, after which yields decline progressively with increased temperatures. CO2 benefit for nutrition is offset by reduction of crop nutrients. Potential yield benefit will be offset if not cancelled out by rising ground level ozone.

Respectfully submitted,

Peter Carter

**65. Pradip Dey, Indian Society of Soil Salinity and Water Quality, India**

Dear FSN Forum team,

Good day!

Kindly find my comments in the attached file as per your template.

With warm regards,

Sincerely yours,

Pradip Dey

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

I found the initiative a very good and timely for addressing the nutritional aspects under diverse socioeconomic and cultural background of the earth. Overall, I agree with the broad essence of the draft. Some specific points on few aspects only (which in my opinion need some more specifics), have been provided below:

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

I agree with the broad essence of the draft- no comments.

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

I agree with the broad essence of the draft- no comments.

**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;

- Malnutrition vis-a-vis human right in relation to state obligations needs to be emphasised.

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;

- Micro-planning for nutritional security of smallholder farmers vis-a-vis food security of the developing nations needs to be more emphasised.

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;

- I agree with the broad essence of the draft- no comments.

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;

- Benchmarks of performance and accountability of resources are necessary for confidence building of donors and subsequently help in addressing the nutritional aspects.

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;

- There is an urgent need to strengthen the vital link between child feeding and food security of woman.

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

- I agree with the broad essence of the draft- no comments.

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.

- I agree with the broad essence of the draft- no comments.

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

- Earmarking certain portion of CSR funds specifically for addressing the nutritional aspects may be made mandatory by State legislation.
- Monitoring indicators and measuring tools for resource use is a must.

## **66. Bill Clay, The Florida State University, USA**

### **General comments on the Draft of the Rome Declaration on Nutrition.**

While addressing some of the more salient issues relevant to protecting and promoting nutrition around the world, in general, the Draft Declaration falls well short of providing the powerful statement of political intent – the riveting call to action – that should guide nations in their efforts, acting singularly and in concert, to end hunger and all forms of malnutrition. The Declaration is underwhelming, at best; but at worst, by ignoring or misdirecting attention away from many of the real problems, threats, constraints and opportunities it could actually be detrimental to making real progress in reducing hunger and malnutrition throughout the world. For example, the omission or minimalizing of references to issues such as famine and food emergencies, gender equity and problems of social discrimination, civil disturbances, governance, education, the domains of “food, health and care” especially immunizations, child care and complementary feeding, among others, coupled with a somewhat narrow and often distorted view of food systems,

all serve to detract attention from the basic and underlying problems of malnutrition. The Declaration as now written also removes nutrition from the mainstream of development efforts. Why is it not set within the framework of the Millennium Development Goals and, especially, within the follow-up plans. Where is the alignment with Secretary Ban Ki Moon's Zero Hunger Challenge? Nutrition is relevant, fundamental actually, to each of the MDGs, and going forward nutrition must be seen as being central to whatever emerges. If the ICN2 does not place it there, it will again be marginalized.

As it now stands, the Declaration lacks substance and focus and thus its purpose is unclear. Where it does call for specific action, such actions are limited and often fail to address the fundamental issues needed. Many times the Declaration falls into muddled jargon and, even worse, makes inappropriate and often simplistic recommendations based on misguided notions of both diet-health relationships and of how food systems operate. And finally, it lacks passion – and any hint of poetry. I fail to see how it could serve as a forthright statement of commitment by our political leaders to improve nutrition, or as an inspiring catalyst for the generating the political will necessary to improve food and nutrition security. It most certainly will not serve to accelerate the widespread, multisectoral action necessary to do so.

The following comments further illustrate some of the above-mentioned short-comings.

a) Regarding the Declaration's purpose and lack of focus: Para. 1 states that the purpose of the ICN2 is to "...address the multiple threats of malnutrition to sustainable development." Think about that. All this is about threats to sustainable development? Where is the focus on people? Where is the concern with people's suffering, with the growth, health and well-being of children, with the lost human potential? Instead we are told that the focus, the major concern of the ICN2, is on the threats posed by malnutrition to sustainable development, which may be a useful organizing principle, but in practice is somewhat nebulous and very difficult to apply in any real sense. Moreover, what about the impact of development – and natural disasters and civil disturbances – on nutrition? Focusing on sustainable development (as important as it is), instead of on people and their nutritional health and well-being, moves the ICN2 way off course, and into the realm of jargon, buzz words and fashionable concepts.

The bold-faced section heading after para 3 needs to go. It misses the point of what the Declaration should be about, and even at that it still does not relate to the following paragraphs.

b) Regarding the weak commitments and lack of passion: see para 2. Is reaffirming 22 year-old commitments that all too often were not seriously followed-up on the best we can do? Should not there be some soul searching as to why the commitments failed to materialize? The original ICN Declaration stated that "Hunger and malnutrition are unacceptable in a world that has both the

knowledge and resources to put an end to this human catastrophe.” Shouldn’t we be asking why we continue to accept what is unacceptable? Reaffirming the previous commitments without anyone being held accountable for their actions - and inaction – is a meaningless gesture. However, even with the shortcomings, there has been considerable progress on many of goals of the original ICN. These too should be highlighted and analysed.

The same lack of passion, stemming from a lack of conviction and clarity, is also evident in the final section of the Declaration. The new commitments need considerable work. Where is the determination to refocus development efforts so that the poor and socially marginalized can realize their right to food in a dignified and sustainable manner? Where is the demonstration of the political will necessary to prevent famines and to deal effectively with food emergencies before they lead to widespread displacement and death. Where is the demonstration of the political will necessary to stop and better yet, prevent the suffering and often slow devastation of individuals – of all ages - caused by malnutrition? Where is evidence of the commitment to build the capacities, both in governments and local communities, necessary to design, implement and participate in initiatives and interventions aimed at helping people secure their food and improve their nutritional status? I could go on....

c) Regarding muddled jargon and simplistic wording: Para 3. refers to “sufficient, safe and nutritious food” but fails to define what is actually meant by that. Most notably, this becomes a problem in regard to nutritious food, which is a particularly relative concept that has little real meaning. Is the most nutritious food the one that has the most number of nutrients or the one that has the most of a given nutrient? Is spinach or meat more nutritious? Is sugar nutritious? Honey? If energy deficiency is a problem and adding sugar increases the energy density of a food, does that make the food more nutritious?

Certainly some foods contain more nutrients than do other foods, but what we need to be concerned about is how well total diets meet the nutritional and other food needs of people. We need to be concerned with nutritious diets, not with seemingly nutritious foods. Individual food items contain widely divergent amounts of different nutrients, and what is important – all that is important – is how they all fit together to meet a given individual’s needs. Is a potato a nutritious food? Is a fried potato nutritious? Are highly polyunsaturated vegetable oils nutritious? Should any high-fat, high sugar food be considered nutritious? What about breastmilk and Plumpy-Nut?

The point is that notions of whether or not a given food is nutritious are very inexact and highly pliable, with the possible exceptions of contaminated foods or those containing anti-nutrient properties such as the goitrogenic types of cassava. In fact, the concept actually refers to food

quality not to the relative contributions a specific food may make to nutrient intake. In practical terms Codex defines a nutritious food as one that contains whatever nutrients one would expect to find in it. For example, an overly-heated canned fruit that has lost an excessive amount of vitamin C might be considered non-nutritious, while a properly processed can of the same fruit would be considered as being nutritious. Similarly, a chocolate bar made with high amounts of sugar and full-fat milk would be considered nutritious since it contains the nutrients expected in a chocolate bar. Again, the document needs to refer to nutritious diets, not foods.

d) paras. 7. And 12 f) refer pejoratively to processed foods, which is particularly unfortunate in a document that aims to stimulate and guide efforts to improve dietary intakes. These may or may not be oblique, negative references to the food industry, but they certainly are based on other equally pejorative, misguided and generally discredited concepts concerning diet and health relationships, involving dietary fat, saturated fat, salt and sugar. In any event such sweeping, unsubstantiated statements have no place in a document intended to highlight global problems and guide global solutions.

The swipe at processed foods, overall, is truly unfortunate, and it appears to be based on a serious misunderstanding as to why and how foods are processed. While there will certainly be changes in nutrient composition arising from the processing of food, I do not believe there is any argument that the benefits far outweigh any negative impacts. In general, processing preserves food and the nutrients it contains. It slows spoilage, and prevents or reduces contamination. Processing makes seasonal foods available for a much longer period of time. Processing can enhance the nutritional and organoleptic qualities of food, and in the case of fortification can add significant qualities of nutrients. Processing facilitates food storage and preparation, and it expands and diversifies the food supply. It makes more foods more widely available at lower costs. Processing adds value to foods and provides wide-ranging opportunities for stimulating economic activity all along the food chain. This is all good, and I could go on, but will stop here with a simple plea that you not allow the Declaration to condemn food processing in general, or suggest that consumption of processed foods, *per se*, including those containing saturated fats, salt or sugar lead to obesity and noncommunicable diseases. There is no compelling scientific evidence to support such claims.

The ICN2 represents the best chance that national governments, intergovernmental organizations, and all aspects of civil society will have, at least in the foreseeable future, to come together to renew their commitments and reinvigorate their efforts, acting singly or in concert with one another, to reduce the scourge of hunger and malnutrition found throughout the world. If the Plan of Action and the Declaration do not get it right, the opportunity to do so will have squandered.

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

See comments above on the misguided emphasis on sustainable development as the primary object of concern of the ICN2. Please emphasize people and their ability or inability to acquire and utilize the amount and variety of food they need to be well nourished, healthy and active. Overall, I find that this section fails to make a compelling case for placing nutrition appropriately in the context of social and economic development ( that is, as it being both an outcome of social and economic development and an input into the process). As such, it does not lead to the realization that broad-based, multisectoral action is needed to address nutritional problems.

**Para. 4:** "Acknowledge" is a pretty feeble response to widespread hunger and malnutrition. Why are we not outraged, frustrated, dismayed, etc. that they continue? In general the paragraph lacks passion; the almost clinical listing of woes fails to convey the reality of suffering and loss associated with hunger and malnutrition. The reference to "overweight" is inappropriate and irrelevant, given there is no evidence that it presents any health risk and may be seen as beneficial. The phrase "...noncommunicable diseases caused by unbalanced diet" should be stricken, or you are left with the logic that noncommunicable disease increases susceptibility to noncommunicable disease.

**Para. 5:** given the complex and multidimensional nature of the causes of malnutrition, why not build on the widely recognised framework of malnutrition that addresses the immediate, underlying and basic causes of malnutrition? This would facilitate efforts to direct action appropriately and to emphasise the interconnected nature of the causes.

First bullet: It should read: "The lack of year- round access..." Also, I do not believe there is any evidence of widespread public health problems arising from chemically contaminated food supplies. Isolated instances of adulteration have occurred, but the real threat to health comes from microbial contamination. If anything needs to be highlighted apart from referencing the need for safe food, that should get the attention, not chemical hazards.

Second bullet: The inverse is also true: malnutrition is a major contributor to low productivity and poverty and this, too, should be highlighted. In fact that is a major thrust of this entire section and making the point more explicitly would help give an economic reason, as well as a moral imperative, for addressing nutritional problems. I also suggest emphasising some of the

non-income related factors – gender bias, social and/or political discrimination, etc.- that also affect food and nutrition security.

**Para. 6:** a very confusing, poorly constructed paragraph that needs to be rewritten. What does the term “dietary risk” mean? Unequal nutritional status is a strange concept; change “inequalities” to “differences.”

**Para. 7:** very one-sided and misleading. In fact, many of the dietary changes associated with social and economic development have led to greatly improved nutritional status. Moreover, many of those improvements have come about through the greater consumption of processed foods. It is highly inaccurate and totally inappropriate to disparage processed foods and to suggest that the “greater consumption of processed food...” has generally been nutritionally detrimental. Such a perspective illustrates a profound ignorance of what food processing is, why it is important, the nutritional and health benefits associated with food processing, and, just as significantly, the social and economic benefits arising from it. If people are living in urban and peri-urban areas, processed foods are essential. So too, are they in rural areas, be they commercially or home processed. In addition, the emphasis on foods high in fat, saturated fats, sugar and salt is misplaced. Recent (and some not so recent) evidence clearly shows how misguided such global pronouncements are, and these should be eliminated from this document. Saturated fat, salt and sugar are not the dietary demons many would have us believe.

**Para 8:** Climate change is not/will not have a negative impact on food production everywhere. Some regions will prosper greatly from having a warmer, wetter climate.

**Para 9:** this presents a strange and distorted image of food systems. Also, what is the evidence that “...current food systems and being increasingly challenged to provide safe and nutritious food for all...”? That isn’t true. We have more people in the world today with greater access to a nutritionally adequate amount and variety of safe foods than at any time in history. This is not to minimize the importance of strengthening and improving local food systems, including better integrating them with other food and social and economic systems, but it should emphasize that efforts to improve diets and nutritional status need to involve much more than what is referred to, somewhat cavalierly, as a food system.

Part of the problem with this paragraph is there is no common understanding as to what constitutes a food system, how various food systems may interact, the environments in which food systems operate, how other social and economic systems (especially those most closely associated with consumers) intersect with a given food system, and arguably, what may be most

important, how food systems can become more nutrition sensitive. Instead, we are given an incomplete listing of selected issues that may or may not be particularly relevant to conditions in a real food system, and which do not provide a guide to any particular policy action. A more thorough, cogent discussion of food systems and their importance to nutrition would be more beneficial. Within that discussion, it would be important to stress that food systems do not exist in isolation, but are features of various environments (including physical, soci-economic, political, health, etc), and that they produce more than just food products. Food systems produce livelihoods and a variety of outputs and by-products that can be both very positive (fuel, fibre, etc) and negative (pollution).

This paragraph also seems to miss the point that food systems are a balance of many factors related to both the supply of and demand for food, and that, ultimately, food systems are driven by consumer choices. If consumers will not consume certain items, they will not be produced. Over time, farmers and food processors will simply not produce what they cannot eat, barter or sell. Governments can intervene in food systems in various ways, including providing support for either/both producers and consumers, but unless those interventions lead to improvements (hopefully, sustainable) in the conditions and welfare of the producers, they will fail. The challenge then is how to make food systems more profitable for producers – and more beneficial to consumers. Another challenge is how to integrate more people efficiently, effectively and equitably into existing food systems.

Three basic points emerge here: 1) except where environmental, political, social and economic constraints limit producer's abilities to produce and trade the commodities and food items consumers want and can pay for, food systems have no difficulty in providing adequate amounts of nutritionally adequate and safe foods; 2) where insufficient supply or demand are large enough problems to lead to malnutrition, lasting solutions should begin with trying to identify and address the specific constraints involved; and 3) poor diets and malnutrition are not all the result of inadequate food systems.

**Para 10:** a glaring omission are the deaths and poor health related to food emergencies and famine. This is particularly egregious since putting an end to famine deaths was one of the most hopeful goals of the original ICN. Why is there not mention of linkages with the Millennium Development Goals? I think there is considerable benefit in placing nutrition within the framework of the MDGs and especially the post-2015 framework that is emerging.

Bullet d) remove overweight – the cut-offs determining overweight status are arbitrary and there is no consistent risk associated with someone being above 25 BMI. When playing his best basketball, Micheal Jordan would have been considered over-weight.

Bullet e) what is a “dietary risk factor?” Perhaps a reference to “poor diets...”

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

- This is where the Declaration’s (and one assumes the ICN2’s ) lack of attention to people and their aspirations for food, health and care is again, disturbingly, very noticeable. The “vision” being laid out here is a vision for governmental action, specifically: better coordination, coherent policies, managing food prices, and improved regulatory frameworks. All these are good and necessary, but is that really the “vision” of the ICN2 and this Declaration? Where is the vision of healthy active people, growing children, productive adults, vibrant communities, thriving markets, and abundant and safe food supplies? Where is the vision of social and economic equity, fair trade, environmental and intergenerational sustainability, and consumer choice and protection? Where is the vision of a world free from hunger? The vision is very limited, and I again, stress, there no passion and no poetry. My fear is that it will lead to no action.

- **The section title and Para 11 a)** – The aspiration is laudable, but the impracticality of “eliminating all forms of malnutrition” makes it hard to take the vision seriously. Hold out the wish, but focus on what is possible. Stressing the multiple “imperatives” is good.

**11b)** How would you propose to “coordinate” the actors and “support “ their actions through the “cross-cutting policies, programmes and initiatives” in the areas noted (which is simply a list of someone’s favourite sectors, issues or current topics). This does not seem like a viable vision. Again, this is not to denigrate the need for multisectoral and multi-level action, but this sort of wording does nothing to make a serious case for fostering such action.

**11c)** This is another trite, virtually meaningless paragraph. Better targeted, more comprehensive, efficient and cost-effective policies and programmes that help to improve nutrition are always needed, and very welcome. However, to call for “global and national policy coherence...” without even specifying to what purpose, is an example of policy jargon that reveals nothing and leads nowhere. What policies, in what relevant sectors need to cohere? Is this call, in fact, but the latest ploy by the health sector in its quest to direct what the food and agriculture

sectors produce, process and market? One hopes not. If, however, it is a call for governments to develop greater common understanding and appreciation across sectors, and in particular situations, as to how various national and sectoral policies and programmes can impact nutrition, and to then encourage those sectors to find ways to cooperate in achieving common nutrition-related objectives, then it is welcome. And if that is what is being called for, say so.

**11d)** This seems like another well-meant, but poorly thought-out statement. Who, exactly, should manage the risks linked to high food prices, and how? If these are risks faced by consumers, what about managing the risks to producers of low food prices? Should the benefits of high food prices, of which there can be many for producers, also be managed? I suggest that the “vision” here should not be so much one of managing the risks linked to higher food prices, but rather one of ensuring that the poor can maintain adequate levels of food consumption, even in the midst of high and volatile food prices.

**11e)** I suggest envisioning a world where good quality and safe food is the norm; where good agricultural, manufacturing and marketing practices are followed; and consumers can protect themselves against contaminants. Achieving such a vision would include a strengthened Codex Alimentarius Commission, but it is much more than that. As written, this point is very overly specific and very limited in scope.

## **Para 12 -**

Most of what is in this section needs to be “recognized,” but often not in the way it is, or given the prominence it is given. The basic question here is: are these 10 points the most significant ones that should be “recognized” for setting the stage for the following commitments? I am not sure they are.

**12a)** – This is generally ok - if taken in the narrow sense of international nutrition assistance supporting local nutrition initiatives. However, it might not be ok, if we would like other types of international non-nutrition-specific assistance (i.e. health and/or agriculture related assistance) to be nutrition sensitive or have a specific nutritional impact even in the absence of a comparable local initiative. Perhaps it would be better to recognize here that nutrition is the outcome of many factors and is associated with various sectors, all of whom should strive to incorporate nutrition objectives and considerations into their policies, programmes and activities whenever possible.

**12b)** – Fine, but it also requires many other things, including: jobs; education; clean environments; social equity and protection; economic opportunities; political stability; fair trade; good governance; and more. Why the limited focus on certain aspects of food systems?

**12c)** – This sounds like another a jargon-laden catch phrase, the meaning of which is very unclear. What does it mean to address food and agriculture systems “holistically by public policies...?” This is especially troubling since it appears these public policies are to address the resources and investment, among other things, going into food systems, but without indicating what any of it means – other than it will be holistic. What is particularly alarming about this is the apparent lack of understanding that it is private resources and investment (especially that of local farmers and producers) and consumer spending that drive food systems. Governments have important roles to play in food systems, but to wish/hope/ expect governments to address, holistically, all aspects of food and agriculture systems in which food is produced, processed, stored, distribute, prepared and consumed is not a recipe for greater food security or better nutrition.

**12d)** – this makes sense!

**12e)** – nutritional well-being depends on the consumption of adequate diets sufficient to meet one’s nutritional requirements, not the provision of them.

Also, the notion that saturated fat, salt and sugar in the food supply is to blame for increasing levels of noncommunicable disease is outdated and generally discredited, except to those whose reputations and professional status requires them to hang on. There is certainly no scientific consensus around the need to single out saturated fat, sugars and salt/sodium as items to be avoided to promote good nutrition and health. In fact, excessive intake of anything is to be avoided, including so called “heart-healthy” fats. This is particularly important in regard to most of the polyunsaturated fatty acids (i.e. those referred to a omega-6 fatty acids) which have clearly been shown to raise the risk of cardiovascular disease.

**12f)** – This is the most egregious example of the lack of understanding about food systems and their relation to nutrition in the entire document. It is true that if we all are to be well nourished, then our food systems will have to supply us with the amount and variety of good quality and safe foods that we need and want, when and where we want it and at a price we can afford. However, this includes such “nutritious” foods as meat, milk products and eggs, which were dismissed by the “animal-source” reference in the paragraph. It also includes processed foods which were deemed to negatively affect nutrition and health! The sheer stupidity of such a statement is mind-boggling. Large losses of food are recognized as a serious threat to food security and nutrition around the world, and yet this Declaration wants its signers to try to limit “... the consumption of processed

foods.” Can anyone imagine a world without canned foods, bottled foods, dried foods, frozen foods, ready to eat foods, bread, pickled foods, processed cereals, fermented foods, vegetable oils, fortified foods, wines and beers, extracts, flavourings, cured meats, cheeses, yoghurts, condiments, spices, pepper sauces, whiskey, and the list goes on and on.

Pointedly, the paragraph in question does not suggest limiting the intake of non-processed foods. Is that because there is no risk to nutrition and health from unlimited unprocessed foods? Hardly, but the intention is to disparage processed foods, not to look honestly at diet and health relationships. It is my suggestion that instead of trying to limit food processing, the Declaration should seek to expand and improve food processing to both reduce waste and improve the nutrition and organoleptic qualities of foods.

Another major misunderstanding about food systems that keeps surfacing is that food is only one of the outcomes of food systems, and surprisingly, the actual food itself may not be the most important factor that contributes to good nutrition. Food systems also produce livelihoods. They are sources of income and wealth all along the various food or value chains. The food and nutrition security of countless billions of people around the world depends on them maintaining their job in some aspect of the food system, be it as a farmer, labourer, extension agent, fertilizer salesman, food processor, equipment saleslady, secretary, agronomist, food technician, etc., etc., etc.... This is one of the reasons that misguided nutrition and health policies can be so detrimental. Think of the destruction that could be caused by a totally unnecessary health policy that aimed to reduce consumption of chocolate bars due to a fear of fat and sugar. Cocoa farmers – small and large – in for example, Ghana and Ivory Coast could suffer, as would their laborers and the cocoa buyers, processors, shippers, exporters and importers. It doesn't stop there: think of the sugar producers and their laborers and factory workers, the shippers and traders, and distributors. If milk chocolate is a particular target, then dairies and the rest of the milk industry could be affected. Any almonds or peanuts in the chocolate? Count those farmers and their workers in, too, along with all those working in the factories, distribution and marketing of the chocolate. Suffice it to say that turning food systems over to the health sector is a bad idea, especially if improved food and nutrition security is the goal.

**12g)** while the overuse of antibiotics in animal production systems is a problem, the broader issue of tackling emerging anti-microbial resistance in human populations is more of a health sector responsibility. Inter-sectoral cooperation is needed, but stopping the overprescribing of antibiotics by the medical profession is of paramount importance. Also, food systems cannot prevent infections. More sloppy thinking and writing.

**12h)** Another feel-good call for an ill-defined outcome. Again, a laudable, aspirational concept, but one lacking a way to apply it in practice.

**12i)** – ok.

**12j)** – if only they would!

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

Taken together, these commitments do not point to a bold set of initiatives and actions emerging from the ICN2. They are uneven in terms of goals, processes and aspirations and need considerable thought and massaging. Also, SMART objectives are meant to be specific, measurable, achievable, realistic and time-bound. Given those criteria, this group could use some shaping up. If, in fact, they are not intended to be commitments for which governments are to held accountable, (i.e. they are “aspirationable”) then this needs to be made clear.

These commitments do not seem to warrant the time and effort of an ICN2. They lack strength, purpose, passion, conviction, and (a favorite word of the day) coherence.

**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;

A strange mix of hoped for outcomes, with no chance of being realized. Can stunting be eliminated since stunted children tend to stay stunted. Better to prevent it. Why <5s?

Why anaemia in women? Why not other micronutrient deficiencies, too?

Eliminate the reference to overweight children as it is meaningless.

**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;

See earlier comments on food systems. Expecting the “coherent implementation of public policies and investment plans” to reshape value chains and food systems into anything that could contribute to sustained improvements in nutrition and health is far-fetched, at best.

If better, more vibrant food systems, value chains, and income earning opportunities are what governments want to see, then say so. Then have them make a serious effort to work in partnership with the private sector, committing to create the supportive education, infrastructure and legislative and regulatory frameworks needed, and then turn them loose.

**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;

Combine with B above.

**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;

Nothing of particular significance to improving nutrition.

**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;

What is left to say??! This is bland and lifeless: Enhance people’s nutrition through policy and initiatives for healthy diets???

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

This means that targets and timelines need to be set

**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.

Finally, a link to the world outside of nutrition...

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

Mainstream nutrition! Nutrition-specific objectives could/should be part of many/most national and sectoral development policies, plans and programmes. Take nutrition out of the realm of nutrients and individual foods and place it meaningfully into the development process. Focus on food and nutrition security in meaningful ways – for example, focus on such things as: poverty, including the amounts and control of income; gender bias; social discrimination; people’s participation; managing environmental risks; food emergencies; promoting the expansion and diversification of food supplies; promoting better health care and practices; promoting better maternal and child care; meaningful nutrition education and consumer awareness; and protecting the quality and safety of foods all along the food chain. Perhaps one of the most important steps to promote is working to develop locally agreed upon assessments and analyses of nutritional problems and their causes among various high-risk social and economic groups. Such analyse could then inform and guide the development and implementation of appropriate interventions aimed at strengthening the capacity of local populations to participate more fully in the development process and to secure own right to food.

Do not let the 2<sup>nd</sup> International Conference on Nutrition sink into a Conference on Nutrients!

**67. Mostafa Faruq Al Banna, Ministry of Food, Lalita Bhattacharjee and Abdul Mannan, FAO, Bangladesh**

Dear FSN Forum and ICN2 Secretariat,

We have reviewed the draft of the Political outcome of the ICN2 both within the nutrition team at FAO and our government counterpart here in Bangladesh. Please find some inputs, suggestions for your consideration.

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

Well done, articulate and comprehensive. While there is an appropriate bias towards food systems, there is need for a clear articulation in strengthening/integrating nutrition outcomes into agriculture programming. Agricultural intervention programmes need to include explicit objectives of improving nutritional status with a focus on addressing child under nutrition, notably child stunting through building strengthened linkages between complementary feeding requirements/practices and agricultural production. The most sustainable, cost effective way to improve complementary feeding of children in poor rural households is by ensuring that nutritionally appropriate foods are available and utilized at household and community levels.

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

Under paragraph #5, include an additional bullet after: “Poverty... .. urban areas”

Inadequate knowledge and lack of awareness on nutrition is a factor that affects food choices, combinations, appropriate preparation and consumption and overall nutrition behaviour change.

Under paragraph # 10, bullet c, include calcium and vitamin D deficiencies

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

Under paragraph # 11:

Bullet b, 2<sup>nd</sup> line, include the word ‘plans of action’ after cross cutting policies

Bullet b, include an additional bullet : Influence legislation on prevention/ control of child or adolescent marriages so as positively influence nutrition of women and healthy child bearing

Bullet c, 3<sup>rd</sup> line, include ‘ nutrition’ after agriculture production

Bullet d, 2<sup>nd</sup> line, include the word ‘addressed’ instead of ‘managed’.

Bullet e, 2<sup>nd</sup> line, it, revise to ‘frameworks’; ‘food safety, quality and control’

Under paragraph # 12:

Bullet a, 2<sup>nd</sup> line, it is proposed to replace ‘complement’ by ‘and ‘add value’ to national... initiatives.

Bullet f, 3<sup>rd</sup> line, include ‘meat of small animals such as goat, poultry including egg and milk

**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;

Bullet b, 1<sup>st</sup> line, consider to replace ‘reshape’ with ‘orient’

Bullet c, 1<sup>st</sup> line, consider to replace ‘take’ with ‘strengthen’

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.

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

There is need to consider including the following points:

- ❖ Advocate for or support processes for country led planning and fund mobilization for food and nutrition security policies, programmes and interventions.
- ❖ There is need for scaling up of nutrition sensitive agriculture, better technologies and sustainable livelihood opportunities, reducing work load of women and promote knowledge and behaviour on nutrition, especially with regard to infant and young child feeding.
- ❖ Strengthen leadership and capacities for nutrition across sectors in planning, implementing, monitoring and evaluation

## **68. Save the Children**

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

Save the Children would like to thank the organisers of ICN2 for another opportunity to comment on the zero draft. The second version is a vast improvement on the last version and we would like to thank you for the work you have done to get it to this stage.

In general, the commitments could be made more specific and time-bound in order to ensure that they can be implemented and measured. There is also a need to ensure that the accountability framework for ICN2 is transparent, multi-stakeholder and harmonised across other frameworks.

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

It would be good for paragraph 4 to acknowledge that malnutrition also poses a heavy burden on society through the economic costs of ill-health and the medical treatment required to deal with the impacts of malnutrition.

Paragraph 9 could acknowledge that the food system is also being challenged by population growth.

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

Paragraph 12 could acknowledge that additional resources (financial and other) are required to tackle malnutrition.

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

We would welcome a commitment along the following lines:

- Generate more evidence on nutrition-sensitive programmes and policies to inform scale up and integration in policies, strategies plans of government (multi-sectoral) and various line ministries.

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;

This commitment needs to be time-bound and more specific. We suggest that the commitment uses the WHA nutrition targets as an intermediate milestone and is then extended.

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;

We would also add adolescents as a group that deserve particular attention.

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

The framework should be transparent, multistakeholder and harmonised with other relevant frameworks, such as the frameworks for the WHA Nutrition targets, Nutrition for Growth and Rio 2016.

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.