

Short summary of the web consultation comments on the ICN2 draft Framework for Action

A draft of the Framework for Action to be adopted at the Second International Conference on Nutrition (ICN2) in November 2014 was issued for web consultation in July 2014. In total, 82 comments were received. This short summary document aims to synthesise the main messages to emerge from the responses to the consultation.

In terms of the process, many commentators were grateful for the opportunity to comment on the early draft, and some commended the openness of the process. There were, however, some grave expressions of concern about a perceived lack of opportunity for civil society participation in the development of the Framework.

Overall comments on the draft Framework for Action

Among the positive reactions to the draft Framework for Action, the comprehensive scope and wide-ranging aspirations and ambitions of the document were welcomed. The coverage of malnutrition in all its forms was particularly appreciated, although the fact that the different forms of malnutrition co-exist should be more explicit. There was support for the systems approach adopted and the recognition of the complex, multidimensional and cross-sectoral nature of the nutrition challenge.

For many respondents, however, the draft Framework is *too* broad in scope, resulting in statements that are overly general and vague. The text needs to be much more precise and a drastic reduction in length was suggested by, for example, deleting most of the background text to leave a much clearer focus on the priority actions.

A short set of governing principles at the start of the document was proposed. Inclusion of the key facts and figures, to set out the scale of the problem, was suggested. References to provide supporting evidence for statements throughout the text should be given.

The priority actions in the draft were widely criticized as being vague. The priority actions need to be clear, specific and expressed in active language. If possible, there should be some prioritization of the actions. The text should specify how goals are to be achieved, with what mechanisms, who is to take action and by when.

Another key message is the need for much greater clarity on how the Framework relates to the many global initiatives, arrangements, platforms and action plans that exist. The document needs to acknowledge these and to ensure coherence and consistency, ensuring there is no duplication of effort. Specifically in relation to the post-2015 development process, several commentators urged the Framework to recognize the need for nutrition to feature prominently in that process and to make the case for inclusion of a stand-alone goal for nutrition (with specific targets on stunting, wasting, breastfeeding etc.) in the post-2015 goals.

The detailed comments on the content of the Framework are synthesised in a longer summary document.¹ Some of the issues to provoke the greatest discussion and the points to emerge most strongly are summarised below:

Imbalance between food and other sectors – Although the multi-sectoral nature of the Framework was welcomed, there were repeated criticisms that there is too great an emphasis on food systems. Other sectors, particularly health, should be given greater prominence and the priority actions should be more balanced between sectors.

Private sector – There were divergent views on the role for the private sector in implementation. Some respondents urged greater recognition of the role of private sector and public-private partnerships, while several commentators counselled caution in the involvement of the private sector, and it was suggested that there should be ‘interaction’ or ‘negotiation’ with industry interests rather than partnership. The importance of ensuring that solid mechanisms for managing potential conflicts of interest are well established was stressed repeatedly.

¹ Available in English only.

Civil society – A strong message emerged that the Framework should be stronger on the involvement of civil society and should go beyond the current approach of consultation (e.g., see section 2.2) to one of fostering participation and collaboration with public interest civil society organizations and communities.

Human rights – There were repeated criticisms that the document lacks a human rights perspective and fails to embody a human rights approach, particularly with reference to the right to adequate food and nutrition.

Gender – Strengthening the text in relation to gender inequalities, gender discrimination and empowerment of women and girls was suggested. Important issues to cover include women’s access to land and other productive resources, women’s education, sexual and reproductive rights of women and girls (although one respondent cautioned that this language could be divisive). The needs of particularly vulnerable groups of women (including widows, women living with HIV/AIDS or disabilities, adolescent girls, etc.) should also be addressed. Inclusion of gender-sensitive targets and indicators was proposed, and the importance of disaggregating monitoring and evaluation data by age and sex underlined.

Establishment of cross-government mechanisms and multi-stakeholder platforms – There was general support for these proposals, despite some scepticism that repeatedly calling for such mechanisms has yielded little to date. High-level coordination is needed within government and adoption of explicit nutrition objectives and/or indicators across relevant government departments was proposed.

Fiscal incentives / disincentives – While some respondents welcomed the inclusion of fiscal incentives/disincentives as a policy option (p12), several comments urged caution and challenged the evidence to support this.

Financing – Financial investment is seen as critical and this section could be improved by setting out *how* more money can be mobilized for nutrition and a series of more precise and concrete priority actions.

Regulation – Several respondents challenged the suggestion that availability of and access to unhealthy foods should be effectively regulated (p24). Others, however, called for stronger language throughout the text on the need for legislation. This message emerged particularly strongly in relation to marketing of unhealthy foods and beverages and implementation of the International Code of Marketing of Breast-milk Substitutes (‘the Code’).

Foods, diets and nutrient profiling – Some respondents urged a focus on diets, rather than individual foods or nutrients. The meaning and definition of ‘unhealthy foods’ was challenged. A number of respondents challenged the inclusion of the reference to nutrient profiling as a tool (p21).

WHO dietary recommendations – Some respondents specifically welcomed inclusion of the WHO dietary recommendations (p8). Others, however, challenged inclusion of the recommended intake of free sugars, arguing that its inclusion is premature because this proposal was recently issued for consultation. The recommendation on animal source foods was also queried, since there are populations where animal sources are unacceptable for religious, cultural or philosophical reasons. Finally, some comments challenged the evidence base for the saturated fatty acids recommendation and it was suggested that the text should specify *industrial* trans fats.

Health - The health section was criticised as being disproportionately short and having too little focus on tackling overnutrition and diet-related noncommunicable diseases (NCDs). It was suggested that the section on wasting should be broken down to identify separate priority actions for severe acute malnutrition and moderate acute malnutrition. Greater emphasis on strengthening health systems and the role of primary health care was urged. Suggestions to strengthen the section on breastfeeding, itself broadly welcomed, include the revitalization of the Baby-Friendly Hospital Initiative and more specific, concrete actions on parental leave legislation and full implementation and enforcement of the Code at country level. There were a number of suggestions for references to the protection, promotion and support of breastfeeding in other parts of the text.

Nutrition education – A lack of focus and the absence of priority actions in this section were noted by several respondents. Caution is needed to ensure that this section does not minimize the impact of external factors. Inclusion of a clear footnote defining nutrition education in its broadest sense would improve clarity.

Food safety and antimicrobial resistance – The lack of priority actions on food safety was noted, and some respondents found the section on antimicrobial resistance (AMR) disproportionately long. The relevance of

including the AMR sub-section was questioned, while some responses challenged the language on terminating the non-therapeutic use and restricting/limiting use of critically important antimicrobials (p23).

International trade and investment – Several respondents welcomed the inclusion of the ‘do no harm’ principle (p24). Others suggested that the section should recognise potential benefits of trade as well as highlighting potential risks. There were calls to strengthen this section and to include precise, concrete priority actions.

The responses contain a long list of suggestions for additional issues or concepts to be included in the document. This list includes: equity; food sovereignty; physical activity; explanation of the basic and underlying causes of malnutrition; protection of biodiversity; support for small-scale producers; forest foods and agroforestry; nutrition education for health workers; education about infant feeding; appropriate, specialized nutrition interventions in food crisis situations; standardization of malnutrition assessment tools; strengthening resilience and nutrition; capacity building and the lack of necessary trained/skilled professionals in governments and civil society; priority actions for a more robust and comprehensive research agenda; important vulnerable groups including indigenous communities, ethnic minorities, refugees and displaced populations; protection and promotion of local food systems; land rights, ‘land grabbing’ and the expansion of the agro-industrial model of production; targets for food reformulation; priority actions on nutrition labelling, specifically front-of-pack information, out-of-home labelling and regulation of claims; sustainable use and management of natural resources; the impact of structural adjustment programmes; the importance of measuring baseline data; acknowledgement of the World Health Assembly (WHA) resolution on prevention of birth defects; and the need to disincentivize production of crops used in highly processed foods.²

Comments on the proposals to take forward the Framework for Action

The Decade of Action on Nutrition was welcomed, but more detail is sought on how this will be implemented. Substantial revision of chapters 4 and 5 was suggested, to create a text transformed into a series of priority actions, preceded by a reference to the Decade of Action for Nutrition.

There was a suggestion that the Framework’s timeframe should be aligned with the 2030 timeframe of the post-2015 process, as well as aligning with the 2025 timeframe for the WHA global nutrition targets.

The section on accountability mechanisms, in particular, was criticized for being too broad and lacking in specific details. This section should include details of reporting mechanisms and processes, along with suggested timelines.

Clarification on the role of the proposed Intergovernmental Panel on Nutrition (p28) was sought by several respondents. Although some respondents welcomed the proposal for the Panel, others questioned the value or sense of establishing such a body. Some respondents welcomed the proposal for a Global Trust Fund (p24). Other respondents, however, questioned the need for such a structure and posited that such a fund risks diverting attention from the need to mobilize domestic resources. Proposals for new global structures, it was suggested, are premature before the Rome Declaration and Framework for Action have been finalised.

Other comments sought clarity on the relationship with other existing, or forthcoming, frameworks and goals or targets, and urged coherence and alignment. A central role was proposed for the Committee on World Food Security (CFS) and related human rights bodies, and the Global Nutrition Report was also highlighted.

The question on how well the Framework reflects the commitments in the Rome Declaration was, in general, seen as difficult to answer given that the finalized version of the Rome Declaration is not yet available but some highlighted the need to ensure that the FFA is closely linked to the Rome Declaration

Several respondents commented that the Framework does give sufficient guidance to realize the commitments made, while recognizing that some of the commitments may be difficult to achieve, others reflected that the document does not give sufficient guidance. The comments suggest that a shorter document, with a much briefer narrative and a concise list of concrete actions, would be more helpful. There were calls for future versions to

² This list is not exhaustive; see the longer summary for a more comprehensive list of suggestions.

include more guidance and more clarity on targets and timelines for implementation and realization of commitments.