

Comments on the draft Work Programme of the UN Decade of Action on Nutrition

Collection of contributions received

To ensure that the Work Programme presented the compelling vision necessary to enable strategic interaction and mutual support across existing initiatives and programmes, several rounds of consultation took place on the draft. These include the UNSCN-led online consultation (30 January to 26 February), the CFS Open Ended Working Group on Nutrition (10 February), the Informal Briefing with the Permanent Representatives of FAO and WHO both in Rome and Geneva (27 February) and the Consultation meeting with Member States in Geneva (22 March 2017).

This proceeding is a summary of the inputs received.

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Topic note used for the UNSCN-led FSN Forum discussion

On 1 April 2016, the United Nations (UN) General Assembly, through its Resolution 70/259, proclaimed 2016–2025 the [United Nations Decade of Action on Nutrition](#) (hereafter referred to as Nutrition Decade). Under the normative framework of the [Second International Conference on Nutrition](#) (ICN2) and the [2030 Agenda for Sustainable Development](#), the Nutrition Decade marks a new ambition and direction in global nutrition action to eradicate hunger and malnutrition in all its forms and reduce the burden of diet-related noncommunicable diseases (NCDs) in all age groups.

The Decade is a global effort driven by Members States of the United Nations and convened by the [Food and Agriculture Organization of the United Nations](#) (FAO) and the [World Health Organization](#) (WHO) in collaboration with the [World Food Programme](#) (WFP), the [International](#)

[Fund for Agriculture Development \(IFAD\)](#) and the [United Nations Children's Fund \(UNICEF\)](#), and including other UN bodies and other entities such as the [Committee on World Food Security \(CFS\)](#) and the [United Nations System Standing Committee on Nutrition \(UNSCN\)](#).

To ensure an inclusive, continuous and collaborative process, building upon and connecting the independent initiatives of governments and their many partners, several rounds of consultation have taken place, including through the [FSN Forum](#). These discussions were an attempt to better understand the critical activities that need to be included in the work programme of the UN Decade of Action on Nutrition. More specifically these discussions aimed at identifying the activities that would need to be accelerated in countries and how all partners can better work together to improve the ambition and specificity of commitments and their implementation. FAO and WHO have drawn upon feedback from many stakeholders to produce the first draft work programme of the UN Decade of Action on Nutrition. This work programme is a living document, building upon and connecting the independent initiatives of governments and their many partners and will be adapted according to needs and lessons learned. We now invite you to comment on the first draft that is presented here <https://www.unscn.org/uploads/web/news/First-draft-Work-programme-Nutrition-Decade.pdf>

Specifically, we invite you to share your views on how best to strengthen the Decade's first draft work programme. You may want to consider the following questions:

1. Does the work programme present a compelling vision for enabling strategic interaction and mutual support across existing initiatives, platforms, forums and programmes, given the stipulation of Res 70/259 that the Decade should be organized with existing institutions and available resources?
2. What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition?
3. Do you feel you can contribute to the success of the Nutrition Decade or align yourself with the proposed range of action areas?
4. How could this draft work programme be improved to promote collective action to achieve the transformational change called for by the 2030 Agenda for Sustainable Development and the ICN2 outcomes? What is missing?
5. Do you have specific comments on the section on accountability and shared learning?

Your comments will be added to those received at a forthcoming meeting of the CFS Open Ended Working Group on Nutrition at FAO HQ on 10 February 2017. The FAO and WHO will produce a final work programme of the UN Decade of Action on Nutrition to discuss with their Member States during the World Health Assembly (May 2017) and the FAO Conference (June 2017).

We thank you for your valuable contribution to this exchange.

UNSCN Secretariat, in collaboration with FAO and WHO

Contributions received from the UNSCN-led FSN Forum discussion

1. George Kent, Department of Political Science, University of Hawaii, United States of America

ASPIRATIONS versus GOALS

This is a comment on the first draft of the *Work Programme of the UN Decade of Action on Nutrition, 2016-2025*, accessed at <https://www.unscn.org/uploads/web/news/First-draft-Work-programme-Nutrition-Decade.pdf>

The draft confuses long-term aspirations and concrete goals. Aspirations are about moving toward something, while goals are about actually getting to some well-defined destination by a specific time.

Paragraph 2 says that at the second International Conference on Nutrition (ICN2), “the global community committed to eliminate malnutrition in all its forms . . .” That is a good aspiration, but as presented in this draft, the actual plan is to *reduce* malnutrition in all its forms, not *eliminate* it. Eliminating *all* forms of malnutrition is not a realistic goal.

Paragraph 1 points out that there are many forms of malnutrition: “undernutrition, vitamin and mineral deficiency, overweight or obesity and diet-related noncommunicable diseases (NCDs).” Grouping them all together could lead to very diffuse assignments of responsibility, limiting the potential for holding any agencies accountable with regard to goal achievement. In pooling these issues together, there is a risk that resources would be shifted to favor goals that are achieved more easily, reducing attention to ones that are more important.

The FAO and the Committee on World Food Security generally focus on food insecurity, roughly equivalent to undernutrition or hunger. Given its great importance, a serious commitment and plan could be formulated to *eliminate* this one form of malnutrition by a specific date, while calling on the global community to *reduce* the other forms of malnutrition.

Accepting this would mean retaining the sentence in Paragraph 3 that speaks about *ending* hunger by 2030, but modifying the following sentence so that it speaks about *reducing* other forms of malnutrition.

With this approach, it would be useful to establish separate lines of responsibility for the *ending* part of the overall agenda, and others for the *reducing* parts. Different UN agencies could be designated to take the lead for different parts. This would be a radical change in the Work Programme. It would lead to a far more serious approach to addressing the challenge of widespread and persistent hunger.

If the consensus is that ending hunger is not a realistic goal, that should be said and it should be explained. Speaking as if it is a realistic goal when key actors are convinced it is not would be unfair to all concerned.

George Kent
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Author, *Caring About Hunger*

<http://www.lulu.com/shop/george-kent/caring-about-hunger/paperback/product-22919316.html>

2. Yemisi Jaiyeola, TOFTEH World, Nigeria

PRESERVATION OF NUTRITIONAL CONTENTS OF FOOD IS VERY IMPORTANT.

It is very important, most especially in the rural area. The awareness of preserving food nutritional content in all aspects of food preservation, cooking and processing.

Ordinarily, after cooking, when the pot is left on the heat of the charcoal stove or hot plate that has been off, because of the volatility of some nutrients and vitamins, it will easily be destroyed. There is need to be careful when applying heat e.g roasting, grilling, toasting, baking, blanching etc. so as to retain all the nutritional content of the food products that is essential for the development of growth of the body.

Most rural area and even urban areas lack this knowledge and it is one of the major causes of malnutrition or nutritional deficiencies.

3. Sinead O'Mahony, GOAL, Ireland

Please find attached GOAL Global's responses to the consultation on the decade of nutrition work programme. Please let me know if you would like any additional clarifications on the attached.

Kind regards

Sinead

Attachment:

**Work Programme for the UN Decade of Action on Nutrition 2016-2025
 GOAL Global Response January 31st 2017**

Question	Response
Does the work programme present a compelling vision for enabling strategic interaction and mutual support across existing initiatives, platforms, forums and programmes, given the stipulation of Res 70/259 that the Decade should be organized with existing institutions and available resources?	There is sufficient overview of the coordination on food systems platforms. However health, sanitation and early child development all of which are essential for improving nutrition outcomes are not sufficiently included in this draft. The nexus between humanitarian and development is also absent and should be better covered.
What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition? & How could this draft work programme be improved to promote	The current focus of the document is too focused on improving food systems as the solution for improving nutrition outcomes globally. The document would be strengthened by improving its focus on other essential sectors for improving nutrition outcomes including early childhood development, WASH and health.

<p>collective action to achieve the transformational change called for by the 2030 Agenda for Sustainable Development and the ICN2 outcomes? What is missing?</p>	<p>In particular with regards to health there is no mention in this document of the 13 high impact nutrition interventions highlighted by the Lancet 2013 maternal and child nutrition series.</p> <p>Gender vulnerabilities to malnutrition are not highlighted in the document and it would be strengthened by including the impact of gender and gender norms on improving malnutrition.</p> <p>Action 4: trade and investment only focuses on the food system. However trade in other areas is essential for improved nutrition, including health commodities, WASH infrastructure etc. This section is too narrow and should be broadened beyond food commodity.</p> <p>Action 5: could be strengthened by specifying promotion of adoption of the WHO code and baby friendly hospitals initiative.</p> <p>Action 6: Focuses on commitment to funding rather than putting actual budgets in place. This would be improved by being more solid rather than ‘commitment’ as we have seen examples under the SUN where country nutrition action plans are put in place but not financed at a decentralised level. Also this could link to the World Bank lives saved tool (LiST) which is useful for countries in costing intervention to improve nutrition outcomes.</p>
<p>Do you feel you can contribute to the success of the Nutrition Decade or align yourself with the proposed range of action areas?</p>	<p>Yes, this aligns with GOAL’s areas of intervention in nutrition and we would be in a position to support actions as a result of this work programme in our areas of intervention.</p>
<p>Do you have specific comments on the section on accountability and shared learning?</p>	<p>No</p>

4. Diana Lee-Smith, Mazingira Institute, Kenya

NUTRITION WORK PROGRAM

Diana Lee-Smith, Mazingira Institute, Nairobi

Thanks for the opportunity to comment on this important document. Additions are suggested to the Action Areas as follows:

1. SUSTAINABLE RESILIENT FOOD SYSTEMS FOR HEALTHY DIETS

In para 19, the definition of the food system should encompass production, processing, storage, transport, marketing, retailing, consumption, waste management and soil regeneration, to form a continuous system loop

2. ALIGNED HEALTH SYSTEMS PROVIDING UNIVERSAL COVERAGE OF NUTRITION ACTIONS

This action area should include practical measures on improving dietary diversity which is shown to be linked to obesity from overconsumption of fewer food groups specifically starches and sugars and lack of access to affordable fresh fruit and vegetables as well as other food groups.

These measures overlap with Action Area 1 on food systems, as well as Action Areas 3, 4 and 5.

These measures are: access to fresh foods through own production in rural and urban areas, plus support to small scale farming and ensuring affordable distribution through food networks in urban and peri-urban areas as well as rural to urban linkages.

3. SOCIAL PROTECTION AND NUTRITION EDUCATION

This links directly also to the dietary diversity measures proposed.

4. TRADE AND INVESTMENT FOR IMPROVED NUTRITION

The human right to adequate food links to the rights of small farmers to produce for their own subsistence as well as to trade locally. This is also linked to dietary diversity. In fact the right to dietary diversity and measures to achieve it should be included in the right to food through a new general comment by the Special Rapporteur on the Right to Food.

5. SAFE AND SUPPORTIVE ENVIRONMENTS FOR NUTRITION AT ALL AGES

Add a note on linking the improvement of sanitation and water supply to waste management and linking that to the safe recycling of solid and liquid wastes to soil improvement for better food production and thus improved dietary diversity in food systems.

5. Dhanya Praveen, Environment Protection Training and Research Institute, Hyderabad, India

Thank for the opportunity. A few missing points are suggested.

Under Action Areas (Page.16)

There is adequate indication of the need to have integrated actions among the key players of nutrition. However the issue of close relationship of climate variability, change on food and nutritional security is completely ignored in the draft. Unprecedented changes in the weather will affect the access to food, food intakes behaviour etc. especially during heat waves and droughts. Tackling Nutritional insecurities during of Climate Change and related disasters.

- It's a very well known fact that Climate change could affect amount of food produced, variety and nutritional value of food and the Cost of food, However there is no mention of all these factors are not all mentioned in the the action plans .
- Not only food , the availability Water -the key source for maintaining the metabolism of the body – gets affected by Climate changes and Disasters
- Air pollution (GHG emission) has a direct bearing on the iron absorption rates in the body

- Tackling Nutritional insecurities during Climate Change Disasters: The disruption of transportation and communication facilities may impact emergency responses with respect to food security and nutritional securities (other natural disasters- Earthquakes .will take longer recovery period).
- Risks in the access to health services and finance -including the most marginalized and most vulnerable – during disaster period (Emergency, recovery / response period) is needed (Page.6)

Under The aim

- *“to end all forms of malnutrition and leaving no one behind; Whether this is completely achievable ?*
- It may be better to have achievable aims as it’s very difficult to *end the all forms of malnutrition.*

Action area 1: Sustainable, resilient food systems for healthy diets

The report should analyze the concern of nutritional security with a Cross-sectoral livelihood perspective. Not only the small and marginalized strata. The modern lifestyles are actually adding to the malnutrition among rich strata of the society and children and old aged are the mostly hit category.

Action networks

- There should be a National Action Plan on Nutritional security and state level action plan for better implementation. There need to be nodal centre working to coordinate the activities for better implementation. *[The establishment of an action network should be communicated to the joint FAO/WHO Secretariat in writing by the convening country. The joint Secretariat will also disseminate the action network information, news and tools]*

Technical Support for implementation

The Nutrition Decade will strive to improve synergies in the provision of technical assistance by governments and international organizations in the context of development aid, as well as by NGOs, philanthropic foundations and the UN system.

In the backdrop of National vulnerability to nutritional insecurity, Governments is implementing various programmes and schemes for education, nutrition and health care for the women .To evaluate the efficiency of the Social Welfare Department’s various schemes of Ministry of Health and family welfare in improving the health and social status in children and women through qualitative and quantitative assessments based on Key Performance Indicators (KPI) could also be done. An online portal dash board showing the performance and achieved targets and key milestones with respect to each nutritional components can be taken up.

Governance

The Nutrition Decade will not seek to establish new structures but will facilitate broad consultation

among stakeholders to seek alignment of priorities, policy instruments, and monitoring mechanisms.

To have a Micro level planning framework for monitoring and evaluation for the priority scheme/area/district and ensure success in each plan is necessary.

6. Surendra Kumar Mishra, Ansul-India Health & Management Services, India

Dear Colleagues,

Thank you very much for sending me the report of FSN Global Forum on Maximizing the Impact of the UN Decade of Action on Nutrition, and inviting feedback on the Report.

I have just a couple of suggestions to make:

1. There is no clear mention of achieving the set targets of Sustainable Development Goals (SDGs) by 2030 in this brief, although the 2nd goal of SDGs is “Nutrition” and all countries are working towards that goal. Will this UN Decade (2016-30) help in any way in achieving those country-specific targets on Nutrition? If so, kindly elucidate it further.
2. Coming to LMIC settings including countries of South Asia, there is a genuine problem of food processing/cooking that leads to cultural diversification of food habits, leading towards the loss of nutritive values of consumed food items. This must get prioritized in all interventions and should get focused in nutrition policies, programs and practices.

Looking forward to your earliest response to this regard,

With my best wishes,

>SKMishra

*Dr. Surendra Kumar Mishra, Director (Global Programs)
Ansul-India Health & Management Services (AIHMS)
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7. Bruno Kistner, Asian Roundtable on Food Innovation for Improved Nutrition, Singapore

Following points should be mentioned:

If food variety is too expensive for low income populations, governments can consider to mandate food fortification. An important aspect which is widely neglected is effectiveness. Human does not function on one or 2 nutrients alone. The inclusion of the B-Vitamins for proper messaging in the body and proper cell functioning is essential. Contrary to wide believes fortification with B-Vitamins is not costly. To provide all essential B-Vitamins to 100 million people cost less than 20 million US\$ per year.

If industry is providing healthy food options at low prices positive taxation of governments should be considered in order to increase the accessibility and availability of healthy food options.

Governments can support the approval and distribution of healthy food options, especially food options that are targeting the first 1000 days, i.e. adolescent girls.

Small and medium sized enterprises provide 85 % of the global packaged food supply. The SME's must be included in policies that promote sugar, fat and salt reduction and fortification.

8. Mahtab S. Bamji, Dangoria Charitable Trust, India

Dear FSN Forum

Attached please find the PDFdocument with my comments, using note tool. Will be obliged if you can load it. Thanks.

Dr. Ms Mahtab S. Bamji,

INSA Emeritus Scientist, Dangoria Charitable Trust, Hyderabad

1. Does the work programme present a compelling vision for enabling strategic interaction and mutual support across existing initiatives, platforms, forums and programmes, given the stipulation of Res 70/259 that the Decade should be organized with existing institutions and available resources?

To some extent. See comments on the document and under 5.

2. What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition?

See comments on the document and under 5.

3. Do you feel you can contribute to the success of the Nutrition Decade or align yourself with the proposed range of action areas?

May be. Being 82 years old retired woman scientist who is now engaged in science and society related programmes with nutrition as focus in the villages of Medak district of the state of Telangana, I have some limitations.

4. How could this draft work programme be improved to promote collective action to achieve the transformational change called for by the 2030 Agenda for Sustainable Development and the ICN2 outcomes? What is missing?

Interdepartmental convergence between food, health, water, environment needs to be emphasised for all countries.

5. Do you have specific comments on the section on accountability and shared learning?

(i) There should be an executive summary clearly stating the fact that Nutrition security goes beyond food security - though food security is very important. For Nutrition security, there has to be Awareness and Access at Affordable cost to food security, safe drinking water, disease-free environment and health care outreach. This will take care of Absorption. There has to be convergence between these. As it is in India at least, the departments concerned with each of these work in silos.

(ii) The earlier sections prior to Action Areas are rather vague and verbose. See some comments on the manuscript.

(iii) The economic cost of malnutrition, particularly micronutrient deficiencies- the hidden hunger, to a nation needs to be emphasised. Nutrition should be a parameter for judging national development and not just economic parameters like GDP.

(iv) Nutrition should not be subsumed under health. Health often stops at immunisation, oral rehydration etc. Agenda should always be Health, Food and Nutrition. In India except once, when

Dr. Manmohan Singh called malnutrition “a curse”, nutrition never gets mentioned in budgets. This point should be emphasised clearly.

(v) Nutrition should be included as a subject in the professional courses like health and agriculture. As it is the knowledge of physicians and other health workers and agriculture scientists, extension workers is very poor. Latter will help to leverage nutrition into agriculture.

(vi) WTO should bring subsidies relevant to poor in developing countries, in green box. Rich farmers are getting huge subsidies in developed countries.

(vii) Nutrition monitoring and surveillance is mentioned in the table but not so clearly in the text. This is important.

(viii) Table 1 only lists items related to food security. No mention is made of ensuring safe drinking water, disease free environment and access to affordable health care. These are very important.

(ix) Indiscriminate use of antibiotics (including the last resort new ones) in animal husbandry and fishery is a great threat to development of resistance to antibiotics in humans and livestock. This point should be brought out clearly.

Attachment:

<http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/UN%20First-draft-Work-programme-Nutrition-Decade.pdf>

9. Carlos Granado Fernandez, Universidad Politécnica de las Fuerzas Armadas, Venezuela

Original contribution in Spanish

En mi país VENEZUELA hay muy poca participación en sus programas a pesar de que necesitamos más que otro país en la región de estos programas ya que tenemos muchos problemas de desnutrición en todas sus categorías como consecuencia de la falta de producción de alimentos.

Esta situación se ha empeorado drásticamente este año pese a los esfuerzos del gobierno de subsidiar algunos alimentos a los más necesitados sin ningún tipo de resultado por la corrupción del sistema de distribución que caracteriza a los empleados que laboran en estos programas.

Enfermedades como la diabetes son más frecuentes por la falta de azúcar en la dieta diaria.

Espero estas sencillas palabras le sean de alguna utilidad, en nombre de mis hermanos, y nos apoyen para mejorar la nutrición en nuestro país.

SIEMPRE A SUS ORDENES PARA CUALQUIER OTRA INFORMACIÓN QUE NECESITEN

Saludos Ing. Prof. Carlos Granado F

VENEZUELA

English translation

Even though my country, VENEZUELA, is the one that most needs these programmes in the region due to the many undernutrition problems caused by food production shortages, the overall involvement of the population is very limited.

This year this situation has deteriorated dramatically despite the government's efforts to subsidize several food products to those in greatest need. The corrupt distribution system, also affecting the employees working in these programmes, makes the attempt fruitless.

Diseases like diabetes are more frequent due to the lack of sugar in the daily diet.

I hope you find these simple remarks useful, on behalf of my brothers, and that you will help us to improve nutrition in our country.

I REMAIN AT YOUR DISPOSAL TO PROVIDE ANY INFORMATION YOU MAY REQUIRE.

Best regards,

Prof. Eng. Carlos Granado Fernández

VENEZUELA

10. Pradip Dey, ICAR-AICRP (STCR), Indian Institute of Soil Science, Bhopal, India

Risk allocation and way forward for successful multistakeholder partnership, engagement and delivery towards food security and nutrition in the face of climate change

In dealing with the challenge of food security and nutrition, countries must act on several fronts in a focused manner simultaneously. One of approach to address the issue is public private partnership (PPP) mode wherein wherein the contractual parties are the public and private partners and the purpose of the document is to govern and establish guidelines for the relationship between all parties. The objective from the public sector point of view is to make sure that the risks are allocated so that the private sector is incentivized to provide the service under the PPP contract but not require the private sector to take risks that they cannot control. The private sector attaches a premium on the risks, which affects the cost of their services. Consequently, the public authority must also consider which risks it will retain because it is able to control these risks more cost effectively. The National Action Plan for food security and nutrition hinges on the development and use of new technologies. The implementation of the Plan would be through appropriate institutional mechanisms suited for effective delivery of each individual Mission's objectives and include public private partnerships and civil society action. The focus will be on promoting understanding of climate change, adaptation and mitigation, energy efficiency and natural resource conservation. Lenders are required in many PPP arrangements, such as concession agreements, to finance the capital investments of a project.

Strategies need to be adopted for active citizen engagement

Capacity building - at both individual and institutional level, greater involvement of private sector through Public Private Partnership and better awareness is important. Top-down anti-corruption practices and national level approaches to improving accountability mechanisms have often failed in fragile and conflict-affected situations. In contrast, identifying and supporting local accountability mechanisms, strengthening partnerships, and supporting collaborative governance and capacity building has been shown to be more effective in these contexts. The accountability triangle involving Citizen, Policymakers and Public Private Partnership provides a way to understand successes and failures along the service delivery chain by analyzing the relationships between policymakers/politicians, service providers and citizens.

Suggested steps for effective implementation of food security and nutrition strategy

Preliminary risk assessment on food security and nutrition:

An initial risk assessment need to be conducted based on secondary data. The data will be collected from relevant government agencies and authorized organizations. Quick observations of vulnerable communities need to be done to assess the sensitivity and exposure towards food and nutritional insecurity. The risk assessment report need to be compiled and utilized for public awareness and multistakeholder consultations and shared through local and national media. This will help to increase the political will and public support for taking measures to reduce the risk.

Public awareness and community involvement:

This is basically a step for sensitizing public after analysis of risk assessment report with multistakeholders and communities. Their opinion on ways to reduce risk will be further compiled and analysed.

Local institutional mapping:

Existing local institutions that have potential roles in risk reduction will be mapped. This mapping accounts for both government and non-government agencies. The risk assessment report will be shared with identified institutions and their opinion on measures to be taken will be captured.

Policy review:

Review of existing policies on food security and nutrition will be done. The policies and strategies need to be clearly discussed at various levels. A policy brief need to be prepared based on the review and circulated through printing and electronic media.

Multistakeholder consultations:

Consultation meetings with multistakeholders (including political parties, government and non-government agencies, media, and academicians) need to be organized. The findings of step of above steps will be shared among all. Consensus on food security and nutrition need to be sought from all the multistakeholders for final implementable strategies.

11. Lal Manavado, University of Oslo affiliate, Norway

Beginning with “How could this draft work programme be improved to promote collective action to achieve the transformational change called for by the 2030 Agenda for Sustainable Development and the ICN2 outcomes?” and taking up the question, “What is missing?”, the draft seems to lack logical cohesions one would like in the sequence; what are our aims, and then how do we propose to achieve them. There is a mixing of these two, i.e., ends and means that might lead to confusion and inefficiency.

When I refer to organisations, I only mean the people who man them, and not in the sense of ‘legal entities’.

I shall quote from the First Draft to build a frame of reference that embodies the logical hierarchy of sequential actions that must be undertaken with sufficient skill to achieve at least some of the objectives the document describes. My point of departure is the super-ordinate goal of the ‘Decade’, viz., “to end all forms of malnutrition and leaving no one behind.” Envisioning “a world where all people at all times and at all stages of life have access to affordable, diversified, safe and healthy diets.”

I think we all agree that the above objective subsumes malnutrition in all its manifestations, including the excessive intake of some nutrients leading to obesity and the associated diseases caused by non-infectious agents. At this point, it would be wise for us to leave the medical aspects of malnutrition to health professionals, and concentrate more on how we may initiate and execute a coordinated joint action with them against ill-effects of malnutrition.

Of course, our super-ordinate aim subsumes a variety of goals which the First Draft describes in terms of percentage reductions. These specific instances and some others would have been better placed at the top as the general nutritional objective, followed by its more specific manifestations. I shall not labour this point, and will proceed to the next stage.

Obviously, we are here concerned with how may we best achieve our objective. Once we have clearly identified the goals our overall objective would justifiably subsume, we can move onto deciding the best available means of achieving them and their areas of impact. I think it is at this point the current draft displays its weakness, because it does not distinguish clearly between ends to be gained, and then go onto determine how and where to act.

This is tricky indeed. Personally, I think it would be wise to outline where to act first, because the authority needed and the type and extent of competence required to carry out a given action varies with how a goal instantiates itself at different socio-political levels. However, we can resolve this difficulty by displaying how each level of authority or interest grouping may contribute to achieving our objectives as follows:

Top level- global authorities: Eg. Un, FAO, WTO, etc.

Here may one list how these institutions may contribute in diverse ways within their range of action. For instance, WTO could refrain from imposing trade regulations that require countries to permit import, manufacture and sale of unhealthy food and beverages while promoting that of their opposite.

International interest groups: Some Ngos. Multinational food companies.

There is an inherent conflict of interests between these two groups. The dilemma is that compromises between them could only slow down the current increase in both forms of malnutrition, but not their long-term resolution. One may be averse to look the stark reality in face, but, it does not change the big picture.

For the sake of completeness, it must be noted that NGO's may not agree on either the kinds of goals or on the order of their importance with respect to what we are trying to achieve here. In short, what we most require at this level is a general agreement on the goal to be pursued, and then a set of policies in the relevant areas like agriculture, employment, trade, education, health, etc., which are in harmony with respect to our goal.

The regional level: EU, etc.

Action it is appropriate for the regional authorities to undertake will have a greater specificity with reference to our objectives, and will take into account the region-specific considerations. Obviously, the relevant regional policies should be harmonious with respect to the regional variation of our overall goal.

Reconciling the conflicting aims of NGO's and trade interests at regional level is not categorically different from those mentioned above.

National level:

Depending on the degree of political devolution, national, regional and local government authorities will be able to make contributions of increasing specificity with reference to the local food culture.

Provided that the NGO's or any other volunteer groups agree on goals and their priorities, they could make a very significant contribution here.

Once again, when we deal with commercial interests, we encounter the same difficulties at a more specific level. For instance, it may involve attempts to replace/deprecate the local food culture by 'high powered' promotion of food and drink of questionable nutritional value.

Next, we have the specific public institutions like the ministries, educational institutions, the relevant research units, agricultural extension services, etc., whose contribution depends on skilful implementation of sound policies in harmony with what we intend to achieve.

Now we come to the final and the crucial target groups, viz., actual producers of food, independent retailers, small catering establishments (cafes and restaurants) and most of all, the people who are the end-users, i.e., all of us.

The draft ought to make this gradation among who should undertake the actions necessary to achieve our objective, for generally speaking, a farmer may not be the best person to formulate national agricultural policy, nor yet a minister of agriculture competent to cultivate that farmer's fields. So, we need to assign each required action to those most competent to carry them out. It will be seen they follow the rule, higher the authority greater the generality of action which requires having a sound overall view of the problem, while at the operational terminus, one needs greater /agricultural technical competence.

The draft describes some of the 'how's', but not very clear about to whom they are assigned. Obviously, it would be helpful if it lists the 'how's' assigned to the international, regional and national (local) institutions respectively.

What I have in mind is something like the suggestion below:

International (global): FAO/International organisations shall ...

"Support all countries' efforts to address all forms and causes of malnutrition;"

"Stimulate the effective translation of the ICN2 commitments and the 2030 Agenda for SDG-2 into concrete, nationally-determined policies and programmes;"

"Promote harmony within and among the relevant policies at international, regional and national levels to combat all forms of malnutrition, including through improved monitoring and reporting of relevant policy impact at global, regional and national levels;" (I have re-ordered the logical priorities, and believe this 'how' on policy should lead the list)

I should add to this list---

To promote fair trade in victuals at international, regional and national levels;

To ensure highest priority given to the availability of financial and other appropriate resources required for food production;

I think it will be agreed that the above non-exhaustive list describes the assignment of 'how's' at the highest level of authority at the three levels we have discussed. Before proceeding to how our

objective may be attained at national level, it is necessary to consider the question of partnerships, which let me repeat is one of the 'how's'. We may use to achieve our aim.

Leaving out its link to our goal:

"... through Catalysing and facilitating alignment of on-going efforts of multiple actors from all sectors, including new and emerging actors, to foster a global movement to achieve the above objective."

First, we run into the problem of sovereignty and constitutional restraints. Other things being equal, international, regional and national policies are to be laid down by the 'elected' representatives of the people. Even if their disinterestedness could be guaranteed, to what extent non-governmental bodies may be allowed to influence this policy-making process is subject to legal and constitutional restraints.

Secondly, one has to determine at what level such partnerships could make a worthwhile contribution. Subject to the provisions outlined below, some partnerships may help us at intermediate level of operations and down. This corresponds to what happens after the general strategies have been carried out to implement the required policies. I have expanded on this point here: <http://www.fao.org/fsnforum/cfs-hlpe/node/1272>

Question: What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition?

As I have outlined above, the draft will benefit from describing a categorical hierarchy of goals, i.e. main aim followed by its increasingly specific manifestations.

Then, it ought to consider who should do what to achieve our aim. This 'who' consists of several levels of authority, technical competence, and sources of financial and material resources needed for the task. I have already commented on their assignment with reference to what action those who occupy each level of responsibility may justifiably undertake.

Question:

Does the work programme present a compelling vision for enabling strategic interaction and mutual support across existing initiatives, platforms, forums and programmes, given the stipulation of Res 70/259 that the Decade should be organized with existing institutions and available resources?

Should it embody the modifications suggested here, I think it would be considerably enhanced. However, I am not very sanguine about the proviso, "existing institutions and available resources," for many of the existing institutions will have to be altered, and the available resources considerably increased if we are to achieve our objective.

Question:

Do you feel you can contribute to the success of the Nutrition Decade or align yourself with the proposed range of action areas?

I'd be happy to offer my analytic and synthetic skills to improve the shape and consistency of the programme, or in any other way they may prove useful to object of the "Decade".

Question:

Do you have specific comments on the section on accountability and shared learning?

Material for shared learning could be an invaluable asset provided that it is relevant for an area under conditions existing there. These include the local food culture, unemployment rate, infrastructure, educational opportunities, etc.

As an example of untenable shared learning material, it is difficult to see what scientific justification could be presented in support of global numerical recommendations on nutrients, height, weight, bio-mass etc.

The reason for this is obvious; we need nutrients for various anabolic and catabolic processes, and their requirements vary with reference to age, sex, type of work, during pregnancy and nursing, illnesses, climatic conditions, etc. Hence, they cannot be standardised upon any scientific basis. Moreover, there is reason to believe that what constitutes our dietary needs have a certain racial component, which can be associated with the climatic conditions and the food available under them. Very high protein and fat content of the diet on which peoples of the Arctic Circle subsist and their physical features illustrate this. A similar bias towards protein-rich diet with considerable fat content is observable among nomadic peoples.

With best wishes!

Lal Manavado.

12. Lizzy Nneka Igbin, Nigerian women agro allied farmers association (Niwaafa), Nigeria

Dear Partners,

The document was well articulated and it contains the opinion of the masses.

My contributions are on how we can implement it to the later, Mobilization of stakeholders and inclusive participation will be the key to success.

As a farmer Organization, Implementation of this document will be beneficial to us especially in the production and utilization of our quality farm produce to produce Complementary feeding locally.

We the farmers association should be recognized and supported to produce home grown foods and fortification for our nursing mothers and under five year old born..

By so doing, we will grow our economy and enrich the health of our babies and citizenry.

13. Mylene Rodríguez Leyton, Metropolitan University, Barranquilla City, Colombia

English version

1. Does the program of work contain a compelling approach allowing for strategic interaction and mutual support among existing initiatives, platforms, forums and programs, taking into account the provisions of Resolution 70/259, under which the Decade should organize with existing institutions and available resources?

From the structure of the draft document of the decade's work program, I can observe and highlight the following strengths: it includes normative aspects and previous commitments, defines objectives and added value, has defined principles that guide actions, clearly defines areas

of action, contemplates Means for its implementation. Likewise, malnutrition and its associated problems stand out, which constitute challenges for the countries.

Similarly, the launching of these consultations, as an inclusive strategy, with open-ended participatory spaces that contribute from different perspectives to improve the horizon for global nutrition in the next decade.

Regarding strategic interaction and mutual support, while there are important advances in countries, defining mechanisms to monitor and verify progress periodically, in addition to accountability, there must be information systems and strategies that make it possible to give visibility to Achievements, guidelines should be given to strengthen or define operational mechanisms within countries to meet the goals and objectives of the decade at the regional and local levels.

2. What are your general comments to help improve the elements of the first draft of the program of work of the United Nations Decade of Action on Nutrition?

As expressed in the answer to the previous question, I consider that the draft document highlights essential elements that justify the formulation of actions that will allow in a decade to observe a change in the panorama of global malnutrition; I recommend including food culture as an element to be taken into account in the definition of national, regional and local strategies, since in countries like Colombia, strategies and mechanisms of implementation may vary from one region to another, our country as many Others are multicultural, have diversity of climates, ethnic diversity and variety of food.

Likewise, I think it is urgent to transcend food and nutritional security discussions from expert groups gathered at food summits, to the vision of food-nutritional security from the ecosystem view as an interdependent set of complex systems that They enter into the biological and social networks of life[1]. That is to say, other perspectives must be generated in which the thoughts and knowledge that arise from the same contexts as the sovereignty and the food wisdom, the well-being of the alimentary-nutritional life plots, should be generated.

Food and nutritional security with a systemic approach should be visible from other perspectives in which the thoughts and knowledge that arise from the same contexts as the sovereignty and the food wisdom be the well-being of the food-nutritional life plots [2].

3. Do you think you can contribute to the success of the Nutrition Decade or align with the various areas of action proposed?

Yes, of course. The objectives of the Nutrition Decade should be welcomed by all stakeholders in all areas of action, in the case of Colombia as regards the National, Regional, Departmental, Municipal and local levels.

Personally from my training and area of professional performance; I am a Nutritionist-dietitian and I work as a researcher at the Metropolitan University of Barranquilla, where we train health science professionals and among them nutritionists who are very interested in being active participants in solving the nutritional problems of the population of the Colombian Caribbean.

Nutrition content and sensitivity to nutritional problems should be included in the curricula of students from primary to undergraduate and postgraduate.

The academy can contribute from the training of professionals, contributing to the understanding and understanding of the nutritional and nutritional problems and developing capacity to sensitize themselves to the problems of the context and determined to put at their service the knowledge to propose and to develop sustainable solutions.

Research to propose innovative solutions at the service of communities is another of the strategies that should be made visible in this document.

Each of us professionals related to the problems of malnutrition and its causes and consequences can contribute from the environment where it lives and works to meet the challenges of the nutrition decade.

5. Do you have specific comments on the section on accountability and sharing?

Accountability reports within countries should be conducted in less than two-year terms and may be semi-annual and annual.

Generate spaces for dialogue and discussion within countries at national, regional, departmental and local levels that contribute to build on the needs of the population and be inclusive.

Identify and plan the monitoring and evaluation of achievements.

Define responsibilities in the countries.

Have qualified human resources.

Generate knowledge management strategies, in which the education sector and the academy play an important role from their role in training and research.

Strengthen observatories as information and knowledge management strategies.

Encourage the generation of knowledge networks.

Mylene Rodríguez Leyton
Teaching researcher
Metropolitan University
Barranquilla City

[1] Rodríguez, Mylene. Construcción de una episteme desde la perspectiva ambiental compleja para la gestión en seguridad alimentaria y nutricional. Tesis para optar el título de Magister en administración énfasis investigativo, Universidad Nacional de Colombia Sede Manizales. Manizales, Colombia. año 2010

[2] Ibid

Spanish version

Invitación a una discusión abierta sobre el primer borrador del programa de trabajo del Decenio de las Naciones Unidas de Acción sobre la Nutrición

1. ¿Presenta el programa de trabajo un enfoque convincente que permite la interacción estratégica y el apoyo mutuo entre las iniciativas, plataformas, foros y programas existentes, teniendo en cuenta lo dispuesto en la Resolución 70/259 en virtud de la cual el Decenio debería organizarse con las instituciones existentes y los recursos disponibles?

Desde la estructura del documento borrador del programa de trabajo del decenio puedo observar y destacar las siguientes fortalezas: incluye los aspectos normativos y compromisos previos, define objetivos y valor agregado, cuenta con principios definidos que guían las acciones, define claramente áreas de acción, contempla medios para su implementación. Así mismo destaca la malnutrición y sus problemáticas asociadas las cuales se constituyen en retos para los países.

De igual manera exalto la puesta en marcha de estas consultas, como una estrategia incluyente, con espacios participativos de opinión abierta que contribuyan desde diversas perspectivas a mejorar el horizonte para nutrición mundial en el próximo decenio.

Respecto a la interacción estratégica y el apoyo mutuo si bien es cierto existen en los países avances importantes, definir mecanismos para realizar monitoreo y verificar los avances periódicamente, además de las rendición de cuentas, deben existir sistemas de información y estrategias que permitan dar visibilidad a los logros, se deben dar pautas para que al interior de los países se fortalezcan o definan mecanismos operativos para dar cumplimiento a las metas y objetivos del decenio en los ámbitos regionales y locales.

2. ¿Cuáles son sus comentarios generales para ayudar a mejorar los elementos presentados del primer borrador del programa de trabajo del Decenio de las Naciones Unidas de Acción sobre la Nutrición?

Como lo expreso en la pregunta anterior considero que el documento borrador destaca elementos esenciales que justifican la formulación de acciones que permitan en una década observar un cambio en el panorama de la malnutrición mundial; recomiendo incluir la cultura alimentaria como un elemento a ser tenido en cuenta en la definición de estrategias nacionales, regionales y locales puesto que en países diversos como Colombia, las estrategias y los mecanismos de implementación pueden variar de una región a otra, nuestro país como muchos otros es multicultural, tiene diversidad de climas, diversidad étnica y variedad de alimentos.

De igual manera, pienso que es urgente trascender las discusiones de la seguridad alimentaria y nutricional de Grupos de expertos reunidos en las cumbres de alimentación, a la visión de la seguridad alimentaria-nutricional desde la mirada ecosistémica como un conjunto interdependiente de sistemas complejos que se entranan en las redes biológicas y sociales de la vida[1]. Es decir se deben generar otras perspectivas en las cuales se privilegien los pensamientos y conocimientos que surjan de los mismos contextos como la soberanía y la sabiduría alimentaria el estar-bien de las tramas de vida alimentaria-nutricional.

La Seguridad alimentaria y nutricional con enfoque sistémico debe ser visible a partir de otras perspectivas en las cuales se privilegien los pensamientos y conocimientos que surjan de los mismos contextos como la soberanía y la sabiduría alimentaria el estar-bien de las tramas de vida alimentaria-nutricional[2].

3. ¿Cree usted que puede contribuir al éxito del Decenio de la Nutrición o alinearse con los diversos ámbitos de actuación propuestos?

Si. por su puesto los Objetivos del Decenio de la Nutrición deben ser acogidos por todas las partes interesadas en todos los ámbitos de acción, para el caso de Colombia en lo que concierne al ámbito Nacional, Regional, Departamental, Municipal y local.

Personalmente desde mi formación y área de desempeño profesional; soy Nutricionista- dietista y trabajo como docente investigador en la Universidad Metropolitana de Barranquilla, donde

formamos profesionales de ciencias de la salud y dentro de ellos nutricionistas que están muy interesados en ser partícipes activos en la solución de los problemas nutricionales de la población del Caribe Colombiano.

Los contenidos de nutrición y la sensibilidad a las problemáticas nutricionales deben ser incluidos en los planes de estudio de los estudiantes desde la educación primaria hasta el pregrado y el postgrado.

La academia puede aportar desde la formación de profesionales, contribuyendo a la comprensión y entendimiento de los problemas alimentarios y nutricionales y desarrollando capacidad de sensibilizarse a los problemas del contexto y decididos a poner a su servicio los conocimientos para proponer y desarrollar soluciones sostenibles.

La investigación para proponer soluciones innovadoras al servicio de las comunidades es otras de las estrategias que debe hacerse visible en este documento.

Cada uno de nosotros los profesionales relacionados con las problemáticas de malnutrición y sus causas y consecuencias puede contribuir desde el entorno donde vive y trabaja a alcanzar los retos de la década de la nutrición.

4. ¿Cómo se podría mejorar este borrador de programa de trabajo para promover acciones conjuntas que logren el cambio transformador solicitado por la Agenda 2030 para el Desarrollo Sostenible y los resultados de la CIN2? ¿Qué echa en falta?

Incluir estrategias y mecanismos para hacer efectivo el trabajo en red desde las diversas partes interesadas en los distintos ámbitos de los países: nacional, regional, departamental, municipal y local.

Definir mecanismos lograr una gestión efectiva, por ejemplo generar espacios de discusión, construcción, planeación, ejecución, seguimiento y evaluación entre las distintas partes interesadas.

Para el seguimiento y evaluación definir indicadores que permitan medir los logros y establecer acciones correctivas en caso de ser necesario.

Exaltar el papel de la educación y los educadores en la contribución a la solución de las problemáticas alimentarias y nutricionales para lo cual deben incluirse en las disciplinas que sean pertinentes contenidos relacionados.

Ampliar el enfoque sistémico, además de los sistemas alimentarios sostenibles que son un elemento fundamental, podría proponerse un enfoque ecosistémico que implica su comprensión como procesos inherentes a la vida, estableciendo relaciones de interdependencia con todos los sistemas vivos y sistemas sociales. donde los pueblos y las comunidades expresan sus necesidades alimentarias y nutricionales y buscan maneras solidarias de solución.

Dar pautas para identificar los puntos de encuentro de las interrelaciones entre los sistemas que las integran, las cuales se dan en sentidos diversos e integran, apropian y articulan saberes desde una mirada transdisciplinaria[3], esto permitirá identificar en los planes de acción responsabilidades compartidas, dar claridad a los roles y contribuciones de cada uno.

5. ¿Tiene comentarios específicos sobre la sección dedicada a la rendición de cuentas y el aprendizaje compartido?

Los informes de rendición de cuentas al interior de los países deben realizarse en plazos inferiores a dos años pueden ser semestrales y anuales.

Generar espacios de diálogo y discusión al interior de los países en los ámbitos nacionales, regionales, departamentales y locales que contribuyan a construir sobre la base de las necesidades sentidas de la población y sea incluyente.

Identificar y planear el seguimiento y la evaluación de los logros.

Definir responsabilidades en los países.

Contar con recurso humano calificado.

Generar estrategias de gestión del conocimiento, en las cuales el sector educativo y la academia jueguen un rol importante desde su rol en la formación y en la investigación.

Fortalecer los observatorios como estrategias de gestión de información y conocimiento.

Fomentar la generación de redes de conocimiento.

Mylene Rodríguez Leyton
Teaching researcher
Metropolitan University
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[1] Rodríguez, Mylene. Construcción de una episteme desde la perspectiva ambiental compleja para la gestión en seguridad alimentaria y nutricional. Tesis para optar el título de Magister en administración énfasis investigativo, Universidad Nacional de Colombia Sede Manizales. Manizales, Colombia. año 2010

[2] Ibid.

[3] Ibid.

14. Dan Jones, WaterAid, United Kingdom

WaterAid's comments are attached and copied below.

WaterAid response to consultation on the draft work programme of the UN Decade of Action on Nutrition 2016-2025

WaterAid welcomes the transparency of the planning of the UN Decade of Action on Nutrition 2016-2025 (hereafter the Nutrition Decade) and the opportunity to comment on the draft work programme.

We warmly welcome the draft work programme's emphasis on the need to convene, coordinate, enhance cooperation and drive action across **multiple sectors and actors**. This will be critical to accelerating progress towards the goal of ending malnutrition by 2030. We particularly support and welcome the emphasis within Action area 5 ('safe and supportive environments for nutrition') on **integrating the recommendations of the ICN2 Framework for Action on water, sanitation and hygiene**.

Water, sanitation and hygiene (WASH) are fundamental to ending undernutrition. The WHO estimates that **50% of undernutrition** is associated with repeated diarrhoea, intestinal worm and other infections (environmental enteric dysfunction) directly resulting from inadequate

WASH.[1] WASH therefore needs to be integrated into national nutrition policies, strategies and plans, with joint multi-sector action, and increased domestic and international funding for WASH as a key ‘nutrition-sensitive’ intervention. **WaterAid calls for the Nutrition Decade to provide strong leadership in urging Governments to achieve much more effective integrated action on Nutrition and WASH.**

1. Does the work programme present a compelling vision for enabling strategic interaction and mutual support across existing initiatives, platforms, forums and programmes, given the stipulation of Res 70/259 that the Decade should be organized with existing institutions and available resources?

We welcome the emphasis in the workplan on coordinating with and building upon existing institutions and initiatives, rather than further fragmenting global governance and accountability mechanisms. The emphasis is rightly on **supporting the development and implementation of ambitious national nutrition action plans – reiterating the need for country ownership that is fundamental to the work of the Scaling Up Nutrition (SUN) Movement.**

While the work programme stresses the need for action by “multiple actors from all sectors”, and specifically references Every Woman, Every Child (EWEC) as one important existing initiative, **it should make clearer links to existing initiatives and platforms in other nutrition-relevant sectors.** For instance, the work programme could highlight the need to **build upon the early efforts to coordinate between SUN, the Sanitation and Water for All partnership (SWA) and the Global Partnership for Education (GPE).** The Nutrition Decade should provide additional impetus and convening opportunities to significantly shift global governance in this more coordinated, more harmonised direction which will be fundamental to driving ‘nutrition sensitive’ investment and action.

2. What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition?

‘Aims and Added Value’

(para 9) The stated aims should be strengthened by a greater emphasis on not just “addressing” malnutrition (implying a focus on treatment) but **preventing** it. We propose an additional clear aim to **“Support all countries’ efforts to prevent malnutrition through effective multi-sectoral action to address the underlying determinants”.**

Action areas

(para 18) The reference to conducting “a full and thorough mapping” of existing initiatives and movements is welcome. We propose that this should explicitly include initiatives **between nutrition-relevant sectors.** For instance, **SUN and the SWA have recently agreed a joint work plan for action** on WASH-Nutrition integration – this may provide a useful model and example of cross-sectoral action at the global governance level.

Action area 1

(para 21) **Water availability and water resource management** are critical aspects of sustainable food systems (e.g. for adequate and consistent supplies to crops and livestock as well as people) and should be referenced.

(para 23) Improving access to WASH is fundamental to **preventing Anti-Microbial Resistance (AMR)**.

Action area 2

(para 25) Achieving UHC requires that the fundamentals of good quality healthcare are in place. Yet the WHO estimate that **38% of healthcare facilities in low- and middle-income countries lack access to water**[2]. 19% do not have adequate sanitation and 35% do not have soap for handwashing. In Sub-Saharan Africa, 42% of healthcare facilities do not have access to water. Ensuring adequate WASH in healthcare is critical to delivering quality health care, including the treatment of malnutrition. The **Global Action Plan on WASH in Healthcare Facilities** co-led by WHO and UNICEF is therefore a key initiative to highlight and coordinate with that will be fundamental to improving nutrition.

Action area 5

(para 37) We strongly welcome the inclusion of an area on water, sanitation and hygiene. Poor WASH is linked to nutrition in multiple ways, beyond diarrhoeal disease. **The direct biological pathways through which poor WASH is linked to undernutrition includes diarrhoeal diseases, intestinal worms, and environmental enteric dysfunction**, a sub-clinical condition which affects the structure and function of the small intestine, resulting in the poor absorption of nutrients. The paragraph would be strengthened by including a more thorough overview of the key links between WASH and nutrition, and a greater emphasis on the role of hygiene behaviour change as a critical intervention to break the common routes of faecal-oral transmission.

Means of Implementation

(para 45) We strongly support the proposal for **“a publicly-accessible repository” of commitments** made by Member States in support of the Nutrition Decade, which will help to drive transparency and accountability. This is particularly crucial for commitments to ‘nutrition sensitive’ action, which are often less easy to track and carry greater risk of ‘double-counting’ of existing commitments in other sectors without sufficient thought and effort to enhance nutrition-sensitivity.

3. Do you feel you can contribute to the success of the Nutrition Decade or align yourself with the proposed range of action areas?

Yes, WaterAid stands ready to contribute towards the success of the Nutrition Decade. Our advocacy on the need for integration of WASH and Nutrition in policies and practice will be key. We have already established relationships and initiatives with the aim of enhancing coordination and integration, working closely with SUN, SWA, the Global Nutrition Report team, EWEC and WHO, among others.

We propose that **WASH-Nutrition integration could be a specific topic for the development of commitments and the establishment of action networks**, adding to those suggested in Table 1. We would argue that to have one topic on “Nutrition sensitive investments” as currently listed may be too broad a topic to allow the in-depth sharing of experience and knowledge necessary to enhance effective multi-sectoral action.

4. How could this draft work programme be improved to promote collective action to achieve the transformational change called for by the 2030 Agenda for Sustainable Development and the ICN2 outcomes? What is missing?

The work programme must drive a step-change in multi-sectoral coordination for effective Nutrition-sensitive investments and actions. The Global Nutrition Report in 2016 highlighted that scaling up nutrition-specific interventions to 90% coverage in 34 of the countries with the highest burden of child undernutrition, **will only reduce stunting by 20%**.^[3] Therefore effective nutrition-sensitive action will be absolutely vital to meeting the goals of the Nutrition Decade and SDG 2. This should be reflected in the work programme by:

(para 13) Making explicit within the ‘guiding principles’ **the need to ensure ambitious funding for ‘nutrition-sensitive’** as well as ‘nutrition-specific’ action, and the role of the Nutrition Decade in **convening high level stakeholders across nutrition-relevant sectors**.

(para 49) Ensuring that ‘Action Networks’ have the active participation of government representatives **from across nutrition-relevant ministries** such as Ministers or senior officials for WASH, Education, Agriculture, Health, Planning and Infrastructure.

(paras 55, 56) Emphasising that funding modalities and the mobilisation of new financial resources **must include ambitious commitments to nutrition-sensitive investments**. While the World Bank / R4D estimates of the cost of achieving global nutrition targets is an important benchmark, it should not be treated as definitive. Their conclusion that an annual additional \$2.2 billion of financing is required to deliver a ‘priority package’ of interventions clearly states **that this estimate is predicated on the assumption of “ambitious commitments in water and sanitation”**^[4], among other nutrition-relevant sectors. Further urgent work is needed to **improve the costing and tracking of nutrition-sensitive investments** by governments and donors, including improving resource tracking of ODA via OECD DAC measurement.

5. Do you have specific comments on the section on accountability and learning?

We welcome the proposals for transparency and accountability. A focus on **shared learning is particularly critical for integration and effective nutrition-sensitive action**, where the evidence and cost-effectiveness of interventions is still being researched. It is vital that governments and donors do **not** only invest in and report on the more limited set of nutrition-specific interventions – since this will not result in meeting the goal to end malnutrition by 2030. Rather, **the Nutrition Decade must act to galvanise rapid experimentation, evaluation and learning to strengthen the global nutrition community’s understanding of what works in effective multi-sectoral action**.

[1] WHO (2008) Safer water, better health: Costs, benefits and sustainability of interventions to protect and promote health. Available online at: http://whqlibdoc.who.int/publications/2008/9789241596435_eng.pdf

[2] WHO (2015), Water, sanitation and hygiene in health care facilities: Status in low- and middle-income countries and way forward http://www.who.int/water_sanitation_health/publications/wash-health-care-facilities/en/

[3] Global Nutrition Report (2016) Actions and accountability to advance nutrition and sustainable development <http://www.ifpri.org/cdmref/p15738coll2/id/130354/filename/130565.pdf>

[4] http://donors4nutrition.r4d.org/assets/pdf/R4D_Priority_Package.pdf

15. Sandy Thomas, Global Panel on Agriculture and Food Systems for Nutrition, United Kingdom

The [Global Panel on Agriculture and Food Systems for Nutrition](#) welcomes this Work Programme for the UN Decade for Action on Nutrition. This unique opportunity will allow the global food systems community to come together to combat the ever-growing problem of poor diet quality and malnutrition in all its forms. Every country in the world has a moral and economic imperative to establish well-nourished societies.

Much of the Work Programme is common with the Global Panel's on-going work. Specific comments, as well as areas where the Global Panel can provide knowledge and evidence to help deliver this Work Programme, are presented below. It is hoped these comments prove helpful and should not detract from what is a well-considered and constructive document.

The Global Panel Secretariat stand ready to work with partners across the food system to deliver this timely and important initiative.

General comments

The Panel strongly endorses the need to promote coherence of national, regional and international policies across multiple sectors, including through improved monitoring and reporting of relevant policy impact at national, regional and global levels. This has been highlighted in the Panel's policy and technical briefs, as well as the Foresight Report *Food systems and diets: Facing the challenges of the 21st century*. These documents, as well as other forthcoming evidence-based briefs will help support many of the proposed action networks (Table 1 of the Work Programme). The Panel will also continue to engage influential policy makers in low and middle-income countries, through high-level round table meetings, advocacy, and tools to help decision makers implement the policy changes required to make this Decade of Action a success.

It is largely accepted that the world faces a triple burden of underweight, overweight and micronutrient deficiencies. This is particularly important in low and middle-income countries where issues of obesity and the associated non-communicable disease are becoming increasingly problematic. As the Panel's Foresight report shows, by 2030 Sub Saharan Africa's obesity rate is expected to reach 17.5%, which is double that of 2005. In Ethiopia, the number of adults with diabetes could double by 2030 from 1.4 million to 2.7 million. The current Work Programme gives little reference to overweight and obesity. For example, the word "obesity" only occurs three times and in section 9 (Aims and Added Value) it only occurs in a footnote. Likewise, there is little mention of childhood obesity. It is felt that actions to prevent the rising tide of overweight and obese adults and children, through low quality diets, particularly in low and middle-income countries, should be more apparent in the Work Programme.

Whilst the concept of food systems is referred to in Action area 1, the concept of the food system, in bringing together food, agriculture, nutrition and health with other areas of policy, for example infrastructure, trade, social development and welfare could be better emphasised and defined. The food system is an overarching framework through which higher quality diets will be achieved.

Action area 1: Sustainable, resilient food systems for healthy diets:

This section appears to focus on agriculture and food safety, with not enough emphasis on the food system as a whole. Perhaps this section could be structured to set out the various parts of the food

system that need to be considered, highlighting the need for integrated approaches which work throughout food systems.

Para 19: It may help to define the terms “social, economic and environmental sustainability”. For example, does environmental sustainability include water, carbon, soil health, or biodiversity?

Action area 2: Health systems:

This section, although very important, is quite general. Is it possible to provide specific priorities relating to malnutrition in all its forms?

Action area 3: Social protection and nutrition education:

It may be advantageous to highlight the need for all countries to develop better food-based dietary guidelines (para 32) and, more specifically, how these should be used to inform policy.

Action area 4: Trade and investment:

It may be worth adding that food production is also used for important non-food purposes, for example generating exports and overseas currency, biofuels, packaging materials, and alcohol.

Action area 5: Safe and supportive environments for nutrition at all ages:

With urbanisation mentioned as a proposed action network (Table 1 of the Work Programme), it may be worth highlighting the specific nutrition challenges of urban environments in this section.

Likewise, it may be worth giving reference to the concept of a ‘food environment’ in this section (following the work of Herforth, Ahmed, Swinburn, Hawkes, et al.)

Action area 6: Governance and accountability

Giving priority to collecting better data on what people are actually eating would strengthen this section. The lack of good data is currently a serious limitation for effective evidence-based policymaking.

With reference to King Letsie III of Lesotho and other high profile advocates, for example the [African Leaders for Nutrition initiative](#), highlighting the need for real high-level global leadership and commitment may be worth mentioning in this section.

The section on “Accountability and Shared Learning” could emphasise the need to analyse *why* specific actions work well or less well in specific circumstances, and to share those lessons with a view to modifying priorities and actions.

Prof Sandy Thomas

Director, Global Panel on Agriculture and Food Systems for Nutrition

16. Abdul Rahim, RAAHATH Chinese Acupuncture & Herbal Clinic and Research Centre, India

The online public consultation on the UN Decade of Action on Nutrition’s Work Programme

Thank you very much for the opportunity given to me. It is pleased to understand about the efforts taken by the world community to eradicate the malnutrition and hunger. It is also known that the FAO had accepted the fact of having enough food for all in the **International Conference on Nutrition held in 1992.**

The world community is already having nine priority themes in **the Plan of Action for Nutrition** announced in the International **Conference on Nutrition, held in 1992**.

I submit below my poor contribution in this online consultation by considering the following 5 questions:

Q1. Does the work programme present a compelling vision for enabling strategic interaction and mutual support across existing initiatives, platforms, forums and programmes, given the stipulation of Res 70/259 that the Decade should be organized with existing institutions and available resources?

The work programme can be executed to achieve the aim of the world community even before the stipulated time, if our steps are measured intact.

Q2. What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition?

The world community has to expect the real health of mankind, not mere through good foods, by simply ignoring good deeds. Both the good foods and the good deeds are playing a vital role with the human health.

Everyone is having two themes:

1. Human body
2. Soul

The Creator created man [Adam] from sounding clay like clay of pottery. The soul [the Spirit] is one of the things, the knowledge of which is only with The Creator. Even after the great research no one can specifically find out about the soul that of what it is! Still the mankind is able only to realize the soul; like air and electricity.

How to promote the human body:

The human body is hardware. The body is used to grow with the help of the natural foods from the earth. If our foods are adulterated with synthetic chemicals & synthetic enzymes knowingly or unknowingly, the routine function of our valuable body will get interrupted.

Then our body will used to give some signal as warning to the owner of the body to stop the consumptions of such synthetic chemicals & synthetic enzymes. If we stopped forthwith, our body will restore itself, achieving and, wherever necessary, reestablishing the natural equilibrium of bodily processes, a state referred to as homeostasis.

It is these inborn mechanisms which usually cure us while we are ill, not physicians, nor even prescription medication. Everyone should know that the body of every mankind is the best doctor. Whereas we are not minding the signal of our body and keep on in taking such synthetic chemicals & synthetic enzymes, our health will change from "ease state" to "disease state". If we continue the same habit, the health of the body will become worse.

So, everyone can justify that more or less 7500 millions best doctors are living in this world at present.

Everyone should try to consume proper and timely food:

1. First food early in the morning: little solid food with water which is beneficial than 1000 medicines.

2. Breakfast in between 7 am & 9 am. In full as the fuel for vehicle.
3. Natural de-worming twice in a month.

Eat 2 ripe bananas an hour before lunch on empty stomach which is the special food to the worms. At that time, worms residing in the stomach will be expecting their normal food we used to intake regularly. Immediately the worms will intake that special food in full and get a kick. Then we should intake our lunch at the scheduled time.

After our lunch the digestive organs will work.

The worms will not be able to intake that food, because they already consumed the special food in full and got kick. So, while the digesting process they will not be able to take effort to survive to remain in the stomach itself.

They will be eliminated along with the process through small intestine, large intestine and rectum. While the evacuation of stool, the worms will also be eliminated naturally. We can take this natural treatment 2 or 3 continuous days in a month. This is an ancient and natural system of medicine.

4. Lunch –moderate both for tongue and stomach.
5. Refreshment- in a saucer, either natural food or cooked food.
6. Supper- It will be super, if it is a measure to compensate the lunch.
7. Always eat one type of food, either cooked food or nature food such as fruits and raw vegetables to avoid fermentation.
7. Don't eat too hot and too cold.
8. Eat to live & don't live to eat.
9. Shouldn't eat unclean & harmful foods.
10. Eat good nutritious & healthy foods.
11. Eat only when real hungry.
12. When eat do not over eat, but stop eat before hunger is fully satisfied.

How to promote the human soul:

The human soul is software. The soul is used to grow only with the help of good deeds.

"The reward of deeds depends upon the intentions". As all the men are the children of only one father Adam [AS], all are equal. Everyone is second to none. No one is entitled to prefer over other, by claiming colour, country, continent, language and region, but based on the deeds one does. Everyone must try to listen and understand the universal reality. Everyone must try to depend on the reality to construct brotherhood among the nation and away from the materiality to avoid enmity among the nation. Though the human body will be destroyed one day or other, the human soul will never be destroyed.

Even the minutest good deed with good intention becomes the greatest act due to its dedication and even the biggest good act can become worse due to bad intention. All men should be united and integrated with love, affection and broad mindedness to spread the humanitarian equality among the world community.

Everyone must wish for the welfare of the Ruler because of whom the development of citizen and its survival is possible. It is always good for entire mankind as well as our self and our family welfare.

If the world community will try to consider both the human body and human soul as the two wings of the bird, the entire world can fly joyfully for ever till the day of resurrection.

The life project of the Creator is:

“We have certainly created man in the best stature:

And made the sleep [a means for] rest: And made the night as clothing:

And made the day for livelihood”

So, everyone should have adequate sleep in every night. Lesser than required sleep will lead the man to get confusion in day today duties. Similarly everyone should utilise the day time for livelihood.

A challenge to entire world: If the above life project is followed properly the necessity of the medical treatment will definitely reduce considerably with no doubt.

Q3. Do you feel you can contribute to the success of the Nutrition Decade or align yourself with the proposed range of action areas?

Though hunger and malnutrition are inevitable in the world normally, the world community is capable to overcome them by taking three types if efforts;

1. Appropriate efforts
2. Required efforts,
3. Possible efforts.

The Creator creates 18000 varieties of creations in this vast universe.12000 varieties are living in water portion & 6000 varieties are living in earth portion. The Creator selects the mankind as the best among those creations & declares the mankind as His representatives, because of our sixth sense which is not non-sense.

The animals without sixth sense such as goat, sheep, cow, rabbit, deer & horse etc., are used to consume green grass, vegetables, fruits and leaves. They are not facing the problems such as malnutrition etc., why? They are able to choose their correct food. They have no facilities to cook their food by adding salt, spices and oils. They are capable to live healthy manner by consuming only natural food.

Malnutrition can often be very difficult to recognise, particularly in patients who are overweight or obese to start with. Malnutrition can happen very gradually, which can make it very difficult to spot in the early stages. Some of the symptoms and signs to watch out for include:

- Loss of appetite
- Weight loss – clothes, rings, jewels, dentures may become loose
- Tiredness, loss of energy
- Reduced ability to perform normal tasks

- Reduced physical performance – for example, not being able to walk as far or as fast as usual
- Altered mood – malnutrition can be associated with lethargy and depression
- Poor concentration
- Poor growth in children

Whenever a patient find one or more than one symptoms and signs, he/she may practice the following food schedule:

1. Initially he/she should drink 300/400 ml. of normal water early in the morning on empty stomach daily.
2. After 30 minutes he/she should eat by chewing 200 grams of tender carrot/ ripe carrot and few soaked almond seeds.
3. After an hour he/she should drink 300/400 ml. of green vegetable juice mixed with 10/15 ml. of bee honey on empty stomach continuously till get cured as breakfast. Use available green juicy vegetables and juicy green leaves such curry leaves, coriander leaves, mint leaves and few greens.
4. In between breakfast and lunch eat 100/150 grams of sprouted seeds such as Green gram seeds, Bengal gram seeds, soya bean seeds, sesame seeds and whole wheat grains.
5. Then have the regular lunch with cooked rice, whole wheat chapatti/ roti , cooked vegetables, semi cooked vegetables, white meat & red meat etc., [no uncooked raw vegetables & fruits]
6. In between lunch and supper eat 100/150 grams of cooked pulses seeds such as Green gram seeds, Bengal gram seeds, soya bean seeds
7. Then have the regular supper.
8. Add available fruits & dry fruits as salad separately not with cooked food.
9. Always avoid ice water, ice cream, tinned foods, biscuits, bakery products, white sugar, fine white flour, fried junk foods.
10. Reduce oils, salt and spices as much as possible.

Q4. How could this draft work programme be improved to promote collective action to achieve the transformational change called for by the 2030 Agenda for Sustainable Development and the ICN2 outcomes? What is missing?

I humbly submit my few suggestions in my draft “the online public consultation on the UN Decade of Action Nutrition’s Work Programme” about the both cultivations;

1. To cultivate the intention to enable the people to have proper food &
2. To generate the awareness to enable the people to cultivate the possible food crops and medicinal plants with available source.

The constitution of mankind is made up of seven constituents:

1. Elements, 2.Temperaments, 3.Humours, 4.Fundamental organs, 5.Spirits, 6.Faculties &
- 7.Functions.

There are three states of the body that are possible:

1. Health,
2. Disease &
3. A condition, which is neither health nor disease, that is, convalescence and old age.

Everyone must learn & have hygiene. What is meant by hygiene? Hygiene is the art of self healing, or health maintenance and disease prevention. The art of hygiene is solely affordable, if it is cultivated. Proper hygiene practices build good health; faulty or improper hygiene breeds suffering and disease.

The art of hygiene has two sides.

First, you have to give your body all the good, wholesome things it needs: a healthy, nutritious food, adequate exercise and activity, sufficient regenerative sleep and rest, and a healthy constructive lifestyle.

The other side involves eliminating all the undesirable impurities, residues and superfluties from the body by cleansing to keep the body clean, both inwardly and outwardly.

Disease flourishes where filth and impurities accumulate. Most traditional healing systems are built upon the art of proper hygiene. At its core, the traditional systems of medicine are essentially a very elaborate and sophisticated system of hygiene.

Sometimes it's more important to know that, " what kind of person has a disease than what kind of disease a person has."

Q5. Do you have specific comments on the section on accountability and shared learning?

A. To cultivate the intention to enable the people to have proper food:

Health education through primary school , secondary school and college in creating real awareness among the people & pupil to have access to nutritionally adequate and safe foods besides adequate rest since childhood to enable the pupil to maintain adequate health.

How to cultivate intention:

Normally the energy in our body is used to exhausts while every movement such as working, playing, walking, running, seeing, singing, standing, talking etc., Even without movement such as in mere sitting without doing any kind of work and sleeping the energy in our body is also used to exhausts because of our blood circulatory system, respiratory system, digestive system and excretory system.

But our body is getting energy only through the in taking of food. To compromise and compensate everyone must in take adequate food. Through the pre-school and the primary school, the teachers must teach about the importance of in taking of proper food to everyone.

The school authorities should take care about the teaching process.

The government authorities should take proper efforts to reach the same knowledge to one all including parents, through amicable ways.

Hospital authorities may also take care of all the patients while sick. Then after recovery, they should take much care in creating real awareness among the patients to have access to nutritionally adequate and safe foods besides adequate rest.

World Health Organization says:

4 things cause the well being > Physical state, Financial state, Mental state & Spiritual state:

4 things cause the ill being > Biological state, Environmental state, Chemical state [handling & in taking] & Psychological state.

What is disease?

ORDER x DISORDER

COMFORT x UNCOMFORT

BALANCE x IMBALANCE

NORMAL x ABNORMAL/ SUBNORMAL

EASE x DISEASE

The Creator certainly created the mankind in the best stature. The body of every mankind is the best doctor. The adequate rest is the best medicine. Our body is an amazing creation. It provides us with all the components it needs not just to maintain itself, but additionally to give rise to new life.

Each and every normal and balanced body possess an innate capability to control and restore itself, achieving and, wherever necessary, reestablishing the natural equilibrium of bodily processes, a state referred to as homeostasis. It is these inborn mechanisms which usually cure us while we are ill, not physicians, nor even prescription medication.

Our bodies are entirely able to regenerating themselves therefore we should be ultra cautious whenever using terms like “incurable”. Physicians who identify an illness as incurable are actually proclaiming that they have reached the limit of their experience and knowledge as medical experts.

If anything happens in the human body, that is a turn to the abnormal or to the subnormal state, three types of people [1.himself /she, 2.well wishers 3.physicians] should take efforts to set it to right, that is return again to normal state.

Generally a wrong concept is prevailing among the nation: “Medication alone will do the purpose”. Never! Three things are compulsorily required to get “ease state” from the “disease state”:

- I. Adequate rest to the affected organs.
- II. Required consumption of easily digestible nutrient food.
- III. Acceptable and affordable medication.

Nowadays, in the noble medical field, we can hear the word “Terminal” often, which is a term that simply spreads fear. It suppresses and lessens our body’s innate defense mechanism and also proves the ungratefulness of the grateful mankind. The mankind is absolutely capable to terminate the terminology such as “Terminal” which simply spreads unwanted fear among the nation.

Excess nutrition is required while exhaust energy:

The government, especially the medical authorities should take much care in creating real awareness among the people to have access to nutritionally adequate and safe foods besides adequate rest in the following states;

- a. Recovery after sick.
- b. In accidents.
- c. During the periodical menses & in irregularities of every female.
- d. During the conceived period of every female
- e. During child birth of every female.
- f. During the tenure of breast-feeding.
- g. During the adolescent of everyone -person between childhood and manhood [14 to 25 in the case of a male and 12 to 21 in the case of a female].
- h. During the geriatric period of every male & female.

Note:

These will be very easy to adopt whenever required, if the real awareness was created among the people [pupil] in the school period itself.

B. To generate the awareness to enable the people to cultivate the possible food crops and medicinal plants with available source.

Types of cultivation:

1. Pot cultivation:
2. Tub cultivation:
3. Hanging cultivation:
4. Housing garden- cultivati:
5. Concrete cultivation:
6. Waste land cultivation:
7. Uncultivable land cultivation:
8. Agro forestry:
9. Compost pit on backyard to supply organic manure to the house hold crops:
10. Ground cultivation of fodder crops in a village as cattle feed as common field to have food to the cattle in homes:
11. Border trees as a fencing for every small field to get natural green manure:
12. Provide adequate land for gardening in every school to teach about the cultivation of possible vegetables, greens and medicinal plants to the students.

To promote the utilization of land:

1. Land allocation to be made by the government to their citizen on free of cost with bindings;
2. Land allocation to be made by the government to their citizen on nominal cost with bindings;
3. Land allocation to be made by the government to their citizen on lease basis to cultivate and to pay a share in benefit to the government;
4. Land allocation to be made by the government to their citizen on cost according to the market value, by facilitating to enable them to pay in easy installments to cultivate by their own.

5. Unutilized land from the land lords may be purchased by the government. Then the same may be allocated to their citizen on cost according to the market value, by facilitating to enable them to pay in easy installments to cultivate by their own

Every government should concentrate on the cultivation of irrigated crops and rain fed crops. On poor water source area, the government may promote the cultivation by implementing the drip irrigation system and the sprinkler irrigation system.

Moreover, every government should concentrate on the farming's such as fish farming, poultry farming, cattle farming, buffalo farming, goat farming, camel farming and sheep farming to enable the people to have access to nutritionally adequate and safe foods.

WATER SOURCES

1. Rain water savings:

Government should arrange to collect the rain water from everywhere and infuse into the earth without any wastage. Collect the rain water through small canals and store into small pools wherever and whenever possible.

2. Percolation tanks

Government should construct small and large percolation tanks by collecting the waste water wherever and whenever possible.

3. Wells and bore wells

Every home should have a small or large well depends upon the potentiality of water wealth.

4. Ponds and lakes

Government should arrange to collect the rain water from everywhere from heavy water flow area while raining and collect into the ponds and lakes without any wastage.

5. Rivers and Dams

Government should construct small and large dams across the rivers wherever possible to have enough water.

Priceless suggestion:

Everyone can see variation in all..., such as, in nationality, in age, in educational qualification, in wealth status, in health status, in mother tongue, in profession, in colour, in personality and so on.

But no variation in what? If we spent few seconds, we can realize the valuable fact! Only in **time!** 24 hours in every day to everybody! Everyone can able to buy several clocks! But no one can able to buy even a single second!

Don't waste the time! No need to spend the time!! Please try to utilize & encash the time!!!

If anything lost from us, there are many possibilities to collect back them with required efforts. But, if the time, even a single moment is lost ... how can? Who can? When can? Where can?

I hope that these efforts will be useful to the entire mankind!

Thank you very much.

With respectful regards

DR.I.ABDUL RAHIM

17. Paula Dominguez-Salas, International Livestock Research Institute, United Kingdom

Please find below ILRI's response to the consultation on the Decade of Nutrition work programme.

Best wishes,

Paula

Work Programme of the UN Decade of Action on Nutrition, 2016-2025

International Livestock Research Institute Response

Does the work programme present a compelling vision for enabling strategic interaction and mutual support across existing initiatives, platforms, forums and programmes, given the stipulation of Res 70/259 that the Decade should be organized with existing institutions and available resources?

The proposed Work programme fulfills well the onerous task of putting together most relevant issues to nutrition for the next 10 years. Given the need to work with existing institutions and available resources the most challenging task would seem the coordination; this is briefly mentioned but might require more specific thought/content. Similar for the leadership needed to make it happen.

Research needs to have an important role here, all the more important because much nutrition research has over-relied on cross-sectional or cohort data which has proven misleading in the past. Evidence is presented as an appreciated input for practice and advocacy but not so much emphasis is given to the reverse i.e how practice/policy can contribute to build the body of evidence. Only for NCD, 'targeted programme and policy evaluations are encouraged'; however the need for robust monitoring and evaluation should be promoted in a widespread manner, given the important evidence gaps existing at present.

What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition?

How could this draft work programme be improved to promote collective action to achieve the transformational change called for by the 2030 Agenda for Sustainable Development and the ICN2 outcomes? What is missing?

The document focuses in 'all countries' and 'all people', and maybe does not spell out enough the challenges of the contradictory needs and contexts. Given the urge for sustainable diets and the environmental footprint of crop and livestock production, a delicate balance is needed between eating too much and too little, particularly when it comes to animal-source foods (ASFs), for which there are populations (namely poor women and children with diets little diverse) who would benefit substantially from extra ASFs, while more high-income populations should reduce its consumption. Similarly, special attention needs to be given to food losses and wastage, not only at consumer level, as included in the document under a point on education, but also throughout the food systems. Fixing inefficiencies along the value chains to reduce wastage is an essential part. Then, the importance of food environments, which provide too much access to unhealthy foods (not only to children, but to all age groups), and unhealthy lifestyles has not been considered in the document, despite the key role in nutrition.

The trade-offs of formal and informal food systems also need careful consideration, particularly as informal (wet) markets supply most of poor households purchased food. This links with urbanisation, which will be a major challenge in developing countries to adequate food supply, due to the pressure for rapid growth of value chains. We welcome the inclusion of food safety as a specific point, given the existing gaps in knowledge and the emerging evidence on the very high burden of food borne disease (FBD) and its major impacts on human health, nutrition, market access, and livelihoods. In 2015, the first global assessment of the burden of FBD was published by the World Health Organisation. The method used was very conservative. Still, the burden was similar to that caused by malaria, HIV/AIDs or tuberculosis, making FBD a major public health issue. Developing countries bear most of the burden of FBD, but these are often poorly measured, and therefore their impact underestimated. Effort is needed to improve FBD surveillance and reporting, starting with risk-targeting the most high risk products (ASF and fresh produce). Water and sanitation are touched upon in the document but not profusely covered; in particular, the role of environmental contamination from animals in rural areas needs attention.

It is also worth noting that food systems are not only a source of nutrients for consumers, but also form the livelihood of some of the most vulnerable households, who are agents in the food systems. For these households, the food systems may represent a pathway out of poverty and ultimately to improved nutrition. Value chain analysis can be useful to identify opportinites and barriers to act upon and build fairer food systems.

The current proposal is maybe weak in highlighting the mainstreaming role of women in improving nutrition. Women are not only a key nutritionally vulnerable group, but they also are a driver of change in the communities through empowerment and decision-making, that directly impact on nutrition and food saftey.

Do you feel you can contribute to the success of the Nutrition Decade or align yourself with the proposed range of action areas?

Yes, this aligns with ILRI's areas of work, particularly the area of sustainable, resilient food systems for healthy diets, and we would be in a position to support action networks and contribute to building new evidence on nutrition-sensitive agricultural interventions, particularly in the area of livestock value chains and ASFs.

Do you have specific comments on the section on accountability and shared learning?

No

**18. Hamid Ahmad, Pakistan Society of Food Scientists & Food Technologists (PSFST),
Lahore Chapter, Afghanistan**

Dear Sir,

I would like to add that serious, high and deep focus for all international institutions & food/nutrition related think-tanks, in the matter needs to be a comparison between the amount of total global food production as compared to requirements of total global population (mouths to eat). To me there is more than sufficient food available (but not reachable) for each mouth in the world. This fact is not entering the minds of most of the people in the world.

Keeping this point in view at all levels, all stages, in all strategies, in all plans, so much so in every way of thought process would be very helpful. Rather a slogan should be effectively and promptly be promoted & propagated internationally saying that,

“ It is not global food production rather food deliverance to every human on earth is the cause of hunger, malnutrition, all other food/nutrition related problems of the world.”

I sincerely believe that it will payback / add heavily & effectively toward any / all efforts made for better food / nutrition in the world.

Yours Sincerely,

Hamid Ahmad

Ex-Chairman,

Pakistan Society of Food Scientists & Technologists (PSFST),

Lahore Chapter,

Islamabad, Pakistan

19. NGO Working Group on Food and Hunger, United States of America

WG Food and Hunger Analysis of Work Programme of the UN Decade of Action on Nutrition, 2016-2025

Thank you for the opportunity to participate in the discussion and provide feedback on the first draft work programme of the United Nations Decade of Action on Nutrition.

We would like to address the first prompt, and offer a few suggestions that we deem will help strengthen the report.

Overall, the report needs a stronger focus on climate change, gender, and cultural components of nutrition. We cannot adequately discuss nutrition without addressing climate change. As climate change possess the capacity to affect the quantity of food produced, the variety of crops cultivated, the cost of production, and the nutritional value of food, it is a substantial threat and challenge to sustainable agriculture and resilient food systems that must be included in the dialogue regarding strategies to eliminate hunger and malnutrition.

In addition, the draft document fails to acknowledge the gender-specific vulnerabilities to malnutrition. Women in rural areas make up the majority of smallholder farmers worldwide, thus providing the global population with the majority of the food we live on. However, female farmers are the worst affected by hunger and extreme poverty, often eating less and eating last in households. Women’s contributions to agriculture work are too often unpaid, unseen, and undervalued, leading to the undermining of the role of women and girls in shaping rural food systems. Women and girls are subject to systemic gender-based discrimination which often disallows them to obtain land rights, receive credit or small loans, access agricultural education, engage in markets, obtain productive assets, work full-time, or even receive payment for their work. For these reasons, recognizing the impact of gender on nutrition should play an essential role formulating policy to alleviate malnutrition.

Furthermore, although global policy coordination constitutes an integral component in the fight to eradicate hunger and malnutrition, it should not take precedence over food sovereignty, which seeks to ensure nutritional needs are met in a culturally appropriate manner.

Finally, the focus on the SDGs in this draft is very weak. Although it highlights the SDGs as an important framework in advocacy efforts, the draft should elaborate upon the relation between the SDGs and the UN Decade of Action on Nutrition. We suggest a particular focus on SDGs 2, 5, 6, and 13.

Section-Specific Analyses:

Aims and Added Value:

The UN NGO Working Group on Food and Hunger agrees that policy coherence across multiple sectors, including reporting and monitoring, is key to combatting all forms of malnutrition. We recommend that this aim could best be achieved through the CFS as this particular body is the most knowledge-based and democratic of the various UN agencies included in the monitoring process. It receives input from a wide variety of stakeholders, including civil society and small producers. If the Nutrition Decade work programme intends to be democratic and inclusive of stakeholders, CFS should be given the lead in monitoring and policy formation, and the UN General Assembly should increase coordination with the CFS to enable this policy coherence.

Guiding Principles:

We agree that an inclusive stakeholder process that builds upon existing tools and efforts is an effective way to promote alignment. The most efficient way to address all forms of malnutrition is to include key actors, and it is imperative to include civil society in this process. However, this section is lacking an emphasis on some of those most vulnerable to malnutrition. For example, there is no mention of refugee and migrant nutrition. In addition, there should be an emphasis on engaging, learning from, and empowering Indigenous peoples who hold knowledge from time immemorial of environmental stewardship knowledge and have been regarded by FAO as central to efforts of climate change resilience.

Action Areas:

(1) Sustainable, resilient food systems for healthy diets

There is a crucial error in this section as there is no mention of climate change. How can we discuss sustainable and resilient food systems without addressing the most threatening challenge to agriculture?

The NGO Working Group on Food and Hunger agrees with the proposed effort to “strengthen local food production and processing, especially by smallholder and family farms,” but it should be noted that the most sustainable and resilient action is that which comes from the grassroots. The best local level, sustainable action is acknowledging and initiating efforts towards food sovereignty.

- (3) Social protection and nutrition education
- (4) Trade and investment for improved nutrition

The best form of social protection is to protect small holder farmers. These individuals face land tenure issues which put their livelihoods and the environment at risk. Small holders farmers, Indigenous peoples, and especially women (who represent the majority of rural farmers) often lack land tenure and are vulnerable in the face of large corporations. Therefore, to protect smallholder farmers and encourage local, sustainable food production, multinational corporations should have much stricter regulations. The discussion of 'conflicts of interest' should first and always surround how multinational corporations infringe on human rights, and make the livelihoods of smallholder farmers, Indigenous peoples, and women especially vulnerable.

The discussion of more investment should be considered carefully. Investment should support small holder and agro-ecological farmers. Too often investment is at their expense and enacted through land-grabbing and agro-industrial development. Positive investments should improve standards of living for individuals living in rural settings and speed the transition to environmentally sustainable food production.

- (5) Safe and supportive environments for nutrition at all ages

Water is a finite resource. Its relationship to agriculture and nutrition should be acknowledged in this section. More than 70% of all freshwater is used for agriculture right now. Policy should re-examine the water-food nexus keeping in mind the relationship with nutrition, climate resilience, and corporate resource grabbing. It is imperative to commence the utilization of water in a human-rights based, environmentally sustainable manner. Global policy efforts should also focus on decreasing the use of aquifer groundwater supplies and ending abusive industrial and mining uses of water. In response to climate change and widespread drought, re-forestation and conservation land-use efforts must be implemented to promote more reliable rainfall and improve moisture retention in soil. These efforts will ensure a healthy water supply is available to all and not just multinational corporations.

20. Raghavendra Guru Srinivasan, Independent, India

Foundations of tax policy: Current health related food tax is a product of both medical science (Allopathy/western medicine) and economics. With obesity and other non-communicable diseases being one of the biggest market failure, there is an urgent need to look at healthy people like yoga (Indian medicine) practitioners for lessons in management of food consumption and for taxation.

The Governments around the world have proposed to tax various food products to stop obesity, diabetes and other non-communicable diseases (NCDs), and they include soda tax, candy tax, sugar tax, high salt and high sugar tax, junk food tax, pastry tax, etc. Even after taxing food products there is still discussion on food supplied in large quantities, and on promotions to children in the form of gifts and toys. There is a need for comprehensive global framework for health related food taxation and it is addressed by the attached work.

Attachment:

http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/Efficient-Tax-Framework%20cam_0.pdf

21. Christine Campeau, facilitator of the discussion, UNSCN

Thank you to everyone who has contributed so far. This is a great start to the discussion.

There was overwhelming support for the opportunity provided by the UN Decade of Action on Nutrition to enhance coordination and cooperation amongst all actors, and drive integrated action across multiple sectors. With this, however, several asked for the lines of responsibility to be better defined, and for more explicit information about who is expected to do what.

Some contributors suggested structural changes to make the work programme more coherent and efficient, including the need to better distinguish between aspirations and concrete goals (i.e. “our ends and means”) to avoid confusion. This dynamic was also challenged with questions about what is achievable, such as our ability to end hunger and all forms of malnutrition. Others pointed to essential sectors that are missing, such as water, hygiene and sanitation, the nexus between humanitarian and development, and the challenges posed by climate change on food variability and nutrition security.

A strong case was made for a transparent, inclusive, open-ended participatory processes throughout the Decade to ensure that all actors feel a sense of ownership, togetherness and to ensure that the voices and commitments of all actors are heard. Online consultations were given as an example, as was a publically accessible repository of commitments to strengthen accountability. An online dashboard would allow for targets and performance to be tracked. It would also help to ensure that double counting of nutrition sensitive actions are avoided.

Today in Rome, the Committee on World Food Security’s Open Ended Working Group on Nutrition is meeting at FAO HQ to discuss its contribution to the Decade. We welcome you to consider an answer to that in the contributions to follow, and on broader observations on the Decade.

Thank you again for the thoughtful input and the commitments made to the Decade through this forum.

I look forward to continuing the conversation.

Christine

22. Mark Lawrence, Deakin University, Australia

Dear FSN Moderator

Thank you for the opportunity to comment on on the first draft work programme of the UN Decade of Action on Nutrition. I write to comment specifically on the second posed question, ‘What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition?’

I fully endorse the programme’s Action area 1: Sustainable, resilient food systems for healthy diets and its recognition in points #19 and #20 of the need for sustainable food systems that promote healthy and safe diets. However, it is a concern that the programme also includes in certain places a focus on a reductionist approach to nutrition science, i.e. a focus on nutrient-based interventions, in potential conflict with the systems and dietary patterns approach emphasised in

Action area 1. For example, Table 1: Potential topics for the development of commitments and the establishment of action networks, lists 'Food reformulation' as one of its first mentioned topics. In this context, food reformulation, an intervention in which the nutrient profile of food products is manipulated, is being proposed as a solution to nutrition problems that are predominantly a consequence of dietary excesses and imbalances and which in turn are predominantly determined by social and ecological circumstances. Such an intervention is a simplistic response to complex food and nutrition problems.

Also, food reformulation has risks because it has the potential to undermine the promotion of food systems and food-based dietary guidelines. Not only does it risk diverting attention away from dietary pattern, and food systems approaches, but also it risks framing potential solutions to the benefit of ultraprocessed (junk) foods and to the detriment of nutritious whole foods. For instance, in Australia we have a flawed front-of-pack labelling system (the 'Health Star Rating' system) that inappropriately rewards the reformulation of ultra-processed foods with so-called health stars. Here the problem is that the manufacturers of ultraprocessed foods such as high-sugar snack foods can reformulate their products by moderately reducing the product's sugar content to attract a relatively high star rating despite the product remaining an ultraprocessed food.

Perversely, whole foods such as fresh fruits and vegetables which the Programme highlights as core components of a healthy diet, are less able to be reformulated and as a consequence, less able to compete against ultraprocessed foods in the implementation of many food reformulation interventions. In certain circumstances food reformulation may have a limited role, e.g. supporting the reduction on the salt content of bread, but it is a relatively low priority intervention and requires careful management to avoid being exploited for non-nutrition agendas.

Professor Mark Lawrence
Deakin University
Australia

23. Jane Sherman, FAO, Italy

Dear FSN Forum,

Below are my comments on the workplan, together with tracking comments on the text itself (which are much the same).

Best regards,

Jane Sherman

Most of the following comments fall under Question 2 of the suggested areas for comment: *What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition?*

General points

- In several action areas (e.g. paras 22, 23, 30) the problems are laid out but no program of action is indicated.

- Throughout, the document should emphasize the critical importance of M&E in guiding the choice of interventions and ensuring their success, and the essential criteria of (a) cost-effectiveness, and (b) sustainability of impact, especially in interventions which depend on establishing practices and attitudes.
- In this light, a really useful document would be a guide for governments, NGOs and aid organizations on how to choose between, or mix, interventions to get the best long-term results at the lowest cost. It could link to an accumulating database of
 - models of working interventions (preferably institutionalized),
 - tools and instruments, policy outlines, regulatory measures, etc.,
 - evidence for effectiveness and cost-effectiveness
 - protocols for program design
 - existing training materials

Points on specific paragraphs

Para 13. Full support for inclusiveness and for making use of existing skills and expertise in the population, but can we also ask that nutrition education pay due attention to

- people's/consumers' existing understanding, practices, attitudes and motivations, resources, capacities and influences
- building consumer capacity, maintenance and resilience with regard to diet and food practices and the professional capacity to promote them
- the choice, mix and balance of strategies adopted, on the criteria of cost, durability/long-term impact, evidence of success, context, history and country capacity

Para 16.2 Does "essential nutrition actions" refer to the ENAs (i.e. for infant and young child feeding), or does it mean essential nutrition actions in general, for all the population?

Paras 16 and 28. In line with the framework of action developed by ICN2, nutrition education cannot be simply included with social protection in point 3. Nutrition education (which includes behavior change interventions) is integrated across the sectors in nutrition-sensitive interventions, and has shown impact at scale in several of them, in particular in home gardening and maternal and infant feeding as well as social protection. It has also shown impact in income generation schemes and is recommended at all levels of school education by the ICN2. It should therefore be seen as an intervention cutting across all sectors. There is also a great need for capacity in the field of nutrition education (quite distinct from expertise in nutrition), for understanding at all social and political levels, and for expression in national policy and programming. It is suggested therefore that nutrition education should stand a 7th action area headed "Food and nutrition education and professional training at all levels and in all sectors".

Para 18. Add "including civil society organizations and consumer movements" after "other potential actors", to balance the top-down emphasis.

Para 19. "A food system approach – from production to processing, storage, transportation, marketing, retailing and consumption – is thus important to promote healthy, sustainable diets and improve nutrition as isolated interventions have a limited impact." If "consumption" includes

“acquisition”, well and good. If not, “acquisition” needs to appear, otherwise the consumer has no role except to eat and the food system is presented as entirely supply-side.

Paras 20 and 21 need more attention to consumer demand: there are suggested tracking changes in the text. The paragraphs should also insist on the importance of implementing food-based dietary guidelines and evaluating impact as well as developing them.

Para 22. The description of food safety problems should be extended with suggestions on what to do about them, especially in the light of the high cost of refrigeration/regulation/inspection in low-income countries.

Paras 24-16 on health services. The emphasis here is mainly technical. The strength of health systems is not only determined by what they treat, or the evidence base for the treatments, but by the quality of the service in terms of (e.g.) training, numbers, presence, accessibility (is this the same as access?), consumer service (including respectful handling, follow-up and education) and accountability to communities. There is a body of action and expertise in these areas, and also on low-cost strategies for improving health services, which could be acknowledged here.

Para 27 Suggest expanding the role of the health services in nutrition education with a new para, e.g. “Health ministries are usually responsible for national campaigns to promote better nutrition and food practices, for advising the education and food security sectors on food and nutrition. They therefore need expertise in direct nutrition education, in training frontline workers in nutrition education, and in integrating nutrition and nutrition education into interventions in other sectors.

Paras 30 and 32 “Knowledge” and “education” appear to be treated as distinct. Does education not include knowledge? If “education” here does not mean “learning” by whatever means, perhaps its meaning can be defined. Alternatively, in some cases “education and knowledge” could be replaced by e.g. “learning about food and how to improve diet”.

Para 30. The program for nutrition education, again in line with the recommendations of ICN2, needs to be expanded, for example by adding the following words:

“It (NE) also maximizes the impact of nutrition-sensitive interventions in food security, health, social protection, which may all need some element of FNE/SBC. Achieving such results requires specialist capacities in the relevant services, beyond technical knowledge of nutrition, health or agriculture, which should be recognized in training curricula for educators, agriculture and health professionals. FNE/SBC requires an enabling physical and institutional environments, and hence calls for action at several levels of society, including policy and programming. It is also enabled by a supportive social environment and a general climate of interest in food and health, hence the importance of an extensive action-oriented school curriculum, well-publicised government actions (e.g. labeling, subsidies, taxes), and ongoing media attention. In all cases where FNE/SBC is an important arm of a program, allowance should be made for some form of impact evaluation.”

Para 37 should be followed with some recommendations on (a) the information and communication environment, e.g. the control of deceptive information/advertising, food advertising to children, free access to information on good diet and the role of the media and (b) the food environment – guidance for institutions, workplaces etc on how to create nutrition-friendly environments

38. Is a multi-sectoral umbrella committee essential? Have we any evidence of success with such committees or of the demands they pose (e.g. costs, time, transport), the necessary level and quality of communications, and the time-span (e.g. for collaborative training, curriculum change)? Outside projects can do this, but in the end the praxis has to be institutionalized. The answer would seem to be to do things bit by bit, but I have not seen this recommended anywhere. When giving counsel of perfection, there should be some attention to the challenges.

Jane Sherman 11.02.17

Attachment:

http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/Tracking%20comments%20on%20the%20text_JSherman.docx

24. Alexandrina Sirbu, Romania

Open discussion on the first draft work programme of the UN Decade:

Goals such as the ending hunger or malnutrition in all their forms seem to be not really compelling. Also should be different approach between hunger, malnutrition and food security in terms of nutrition and food availability.

Nutrition Decade addresses to important topics but tools for SMART achievements on the engagement and support all thereof are generally. For instance, at paragraphs 17 and 18 is pointed out that an approach will ensure that solutions are equitable and people-centred and in the same time the priorities and specific actions will depend on the interest expressed by potential actors. What happens if stakeholders have not resources or interests to do it?

Overall I positive appreciate the areas of the actions, which are comprehensive and succeed many of problems related sustainable food system, health and nutrition, social protection and education to be carried out for changing/improving food consumption models.

Regards,

Alexandrina Sirbu

Professor, PhD -

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240210 Ramnicu Valcea, Valcea County – Romania

25. Manuel Moya, International Pediatric Association, Spain

One main issue of Nutrition Decade is to end hunger and all forms of malnutrition, undernutrition and obesity will be mainly considered due to the fact that micronutrient malnutrition deserves specific actions nor always feasible. Undernutrition and obesity are quite different or even antagonist situations but their origin is the same: inappropriate nutrition which enables us to deal with both in a general and individual preventive frame. In high-income countries (HIC) overweight and obesity are the predominant form, in low-and middle-income countries (LMIC) traditionally undernutrition in all its forms has been the foremost one, but presently this coexists with a steady trend in obesity, ie the 'double burden'. Because of the long term consequences of malnutrition

adequate nutrition should be a target in the first 1000 days of life that could be extended to all children under five.

As said by the FAO Director-General (UN General Assembly, 20th September 2016, New York) the preventive action 'start at country level'. This is a crucial point and many of the individual four preventive points that should be carried out by the primary health care provider acting directly on malnourished people are hardly impaired without this national support.

There have been significant advances related to malnutrition in the last decades (UN Agencies) as is the pediatric undernutrition recoil (1990 30.2%; 2015 19.3%) (1), although this not occurring with obesity. It is worth considering that if there are good preventive programs why has obesity been increasing until now and will continue up to 2030 or even 2060 (2): Probably the reasons are: Too many plans/ guidelines not all with the desirable quality and wide covering, the flow from global directions to individual level is slow moving even in HIC with integrative approaches, the difficulty of applying evidence criteria for assessing preventive effectivity. Therefore the continuous evaluation of the applied procedures is far from generalized. Labeling (Flabel in EU), fast food advertising, taxes for sugary drinks, school-lunch programs for malnutrition, epigenome-wide association study (EWAS) and so many others, still have an unknown impact on obesity reduction. In HIC the specific budget for prevention is considerably lower than that of acute care. In LMIC nothing is done apart from punctual and small actions, consequently in a few decades obesity there will be an added problem to the treatment lag of these regions. The country-driven plans are probably the top priority.

1. Unicef, WHO, World Bank Group. Levels and trends in child malnutrition. Key findings of the 2015 edition. Unicef/jmedashboard 2015.
2. Sabin MA, Kao KT, Juonala M, Baur LA, Wake M. Viewpoint article: Childhood Obesity-looking back over 50 years to begin to look forward. Journal of Pediatrics and Child Health S1 (2015) 82-86. Doi: 10.1111/ipc.12819.

26. Claudio Schuftan, PHM, Viet Nam

This Decade document is unfortunately quite disappointing. It has no teeth. It repeats all the old (predictable) remedies and cliches. It is jargony. It too often states the obvious.

By paragraphs:

4, 38, 54. multistakeholder platforms are taken as a given. Will not more people oppose this? The conflicts of interest (CoI) issue has not been solved...

9. "Leaving no one behind"... You know the quote that says that this is not an accident. The para also speaks of a "global accountability framework": where is such to be found?

12, 13, 15, 38, 41, 44, 54, 67, 69, 73. "Stakeholder" is used over and over. In many of these places, using rights holders and duty bearers is what is called for.

12. The SUN initiative is mentioned casually...without quoting what some of its detractors object.

13. 31. Speak of CSOs or NGOs as the same. It should say (private interest CSOs (PICSOs). It mentions "an enabling environment" for HR and the RTF. Only enabling? Isn't it to be the cornerstone?
13. The para only says "management of Col". Will we demand stronger language on Col?
14. Speaks of "an enabling environment" for HR and the RTF. Will we demand stronger language?
16. Cross-cutting area #4 calls for "trade and investment for improved nutrition". How? Does past experience teach us something?
17. Asks for "fostering policy dialogue...to ensure that solutions are equitable and people-centered". This is not what the HR framework calls for! Claim holders demand!
19. Paragraph sooo weak..
20. Calls for "strengthening local food production especially by small holders". This is not what we stand for. Language already a consensus puts central emphasis on small holders.
29. Mentions "nutrient dense foods". Which? RUTF?
30. This para on nutrition education is sooo weak and naif. Could have been written in the 1970s.
31. "Lead by example" ????
34. Are only "coherence and flexibility" needed??
35. "Achieve global food and nutrition through trade", i.e. "appropriate trade agreements"? What is that?
38. "Multistakeholder governance mechanisms should avoid Col". We certainly need stronger wording here.
41. "Member states are encouraged to translate the commitments of ICN2". Just encourage?? (Then in para 42 there is a call for them to actually commit.... A contradiction). The mention of SMART here is a gimmick, just for show.
43. The call is "to raise the level of ambition". Only? Need stronger language?
45. Speaks of a "commitments repository in FAO and WHO"? Would this work and be binding?
- 47, 48. The call here is for "champions" and "action networks"; seems to me wishful thinking. I may be wrong.
54. "SUN will provide opportunities"? How many years has SUN been on? What to show for?

59. “The Decade will strengthen the capacities at community level as appropriate? Meaning what? Far from what we are asking for re empowering clim holders and duty bearers...

63. Calls for “Evidence-informed advocacy”. What gimmick is that? Does scientific evidence convince politicians?

64. What “visual identity” is referred here to?

69. We read “FAO/WHO will consult with the private sector” ...for governance issues? This sentence is in the governance section!! Needs to be deleted. No private sector in governance.

Table 1. Proposes a “reformulation” of foods group. We all know what Monteiro and Cannon say about this giving BIG Food a way to whitewash their image and the public still staying hooked on ultrprocessed foods.

The table also proposes a nutrition sensitive issues group. We all know this was invented as a (bad) substitute for what are the social determinants of nutrition.

27. GAFSP Coordination Unit, World Bank Group, United States of America

Dear UNSCN,

Thank you for the opportunity to comment on the first draft Work Programme of the UN Decade of Action on Nutrition. The Coordination Unit of the Global Agriculture and Food Security Program (GAFSP) is pleased to provide responses to the following questions posed in the FSN Forum:

What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition? It may be helpful to have a simplified/“big-picture” Theory of Change (ToC) of the Nutrition Decade demonstrating links and sequencing among various elements listed under Principles and Action Areas. Moreover, a ToC approach could help conceptualize appropriate indicators to measure progress.

Do you feel you can contribute to the success of the Nutrition Decade or align yourself with the proposed range of action areas? Yes. GAFSP invests in agriculture to reduce poverty and improve food and nutrition security in low-income countries through investments in both the public and private sectors.

More than half of the Public Sector Window projects in the current portfolio include nutrition-related activities, totaling \$140 million (about 14 percent of funding from the Public Sector Window financing). About two-thirds of the nutrition-related spend by GAFSP is on nutrition-sensitive agricultural activities, while about a third is for direct nutrition-specific activities, such as the distribution of micronutrient supplements (such as folic acid and iron to pregnant women, women of reproductive age, and adolescent girls, or sprinkles for children), behavioral change campaigns, and improving home conditions (kitchen and latrines).

The Private Sector Window also addresses the issue of chronic malnutrition and its negative impact on human capital development. In 2015 the Private Sector Window made an investment in Africa Improved Foods Limited (AIFL) to establish a nutritious food processing plant in Rwanda that will feed 700,000 malnourished children in that country each year. The AIFL project is simple but promises significant development impact. Using maize and soy sourced and grown locally by

Rwandan farmers, the processing plant will develop fortified blended foods for young children and their mothers, supporting the prevention and treatment of malnutrition in this vulnerable population. The project is part of a broader public-private partnership between the Clinton Health Access Initiative, the World Food Programme, the IFC, the government of Rwanda, GAFSP, and private sector actors. This project enables GAFSP to help malnourished children by giving them access to fortified nutrients that will allow them to reach their full potential. It also means that farmers in Rwanda can gain access to higher-quality inputs and better farm management practices.

Moreover, going forward, GAFSP will measure progress towards food security by using the SDG2 Indicator for hunger, the Food Insecurity Experience Scale (FIES), as well as the Food Consumption Score (FCS) to track progress on improving dietary diversity of households; or, for individuals, the Minimum Dietary Diversity of women/young children (MDD-W/C) where these are explicit objectives in GAFSP projects. GAFSP, thanks to its strong M&E system aligned to the SDGs, is leading efforts to implement the use of FIES in projects.

Lastly, GAFSP as a multistakeholder platform of an inclusive approach has a balanced representation of donors and recipients, strong participation of partner institutions and civil society throughout the project cycle, and growing private sector involvement across the program. Three of the Decade conveners, specifically FAO, IFAD and WFP, are also participating in GAFSP.

How could this draft work programme be improved to promote collective action to achieve the transformational change called for by the 2030 Agenda for Sustainable Development and the ICN2 outcomes? What is missing? The roles of the private sector and the public at large could be highlighted further as being part of the collective action required.

Do you have specific comments on the section on accountability and shared learning? There are other overall accountability frameworks and networks that could be acknowledged. The Decade Action Plan could explore explicit synergy with for instance the formal Agenda 2030 monitoring and accountability system that lies within the High-Level Political Forum and ECOSOC, or the SDG2 Accountability Framework led by the GODAN Secretariat.

Comments provided on behalf of the GAFSP Coordination Unit, acknowledging kind assistance of Nadim Khouri.

Kind regards,

Aira Htenas

Agric. Economist
World Bank Group

28. Veronica Lattuada, CIAI – Italian Association for Aid to Children, Italy

CIAI– Italian Association for Aid to Children – we really appreciate the invitation of UNSCN to share our views about the draft. We would like to bring your attention to the specific measures that have been taken in consideration in the “Action area 3: Social protection and nutrition education” and along the full draft, regarding children of all ages. Form our experience of almost 50 years working with children, we consider that Governments, non-governmental organizations (NGOs), the private sector and nutrition advocates should also promote more participative actions, where children are not only a passive receptor of school feeding programs and nutritional education, but participate

actively during the programming, implementation and valuation of the actions and services addressed to them. Children' of all ages should have an active role that can be activated through children clubs, schools committees for food, nutrition, and WASH services, and their participation in the local and national level consultation platforms, to increase the effectiveness and sustainability of the measures to address malnutrition challenges.

29. Maria Pizzini, Scaling Up Nutrition Movement, Switzerland

Feedback on the First Draft Work Programme of the UN Decade of Action on Nutrition, 2016-2025 from the Scaling Up Nutrition (SUN) Movement Coordinator & Secretariat

We applaud the work of colleagues at WHO and FAO to bring together the latest draft of the Work Programme of the UN Decade of Action. We would like to share some general comments on the overall direction of the documents. We then include in annex some more specific comments related to various elements.

After years of neglect, nutrition has received unprecedented attention over the past several years. This has resulted in some hugely promising commitments including but not limited to: the six global nutrition goals adopted by the WHA in 2012 and the nutrition and the NCD framework adopted at the 66th session of the WHA in 2013; the Global Compact of the Nutrition for Growth meeting in 2013; the second International Conference on Nutrition (ICN2) in 2014, the adoption of the 2030 Agenda of sustainable development and in particular SDG 2 in 2015 as well as the World Bank-hosted Human Capital Summit in 2016 where ministers from nine countries pledged to improve nutrition, health and education programs for young children to dramatically reduce childhood stunting. In the SUN Movement, the leadership of the 59 countries and the Indian States of Maharashtra, Uttar Pradesh and Jharkhand as well as the large number of in-country stakeholders supporting the SUN Movement's efforts to fight all forms of malnutrition are particularly promising,

A myriad of processes, projects and working groups have been launched to support these commitments - government ministries, development partners, businesses and academia have begun to reorient their focus and realign their approaches to ensure that nutrition is at the heart of their work.

Now is the time to secure the leadership and shine a light on the pathways to coherent ACTIONS leading to results and impact, which is at the heart of this Decade.

We see the Decade of Action as the opportunity to consolidate the gains made in recent years and ensure that the final collective results are greater than the sum of smaller, disconnected or isolated efforts. Most importantly, we see it as a platform on which country-ownership and leadership can be displayed, celebrated, better understood and further replicated. It is also the opportunity to explain how UN agencies involved will work together to bring coherence, encourage and guide collaboration, support capacity, build trust and make smart use of what is going on, using the naming and faming method to encourage the smart and opportunistic combination of supports from various initiatives for better impact.

These elements are not easy to find in the document as it currently reads and we have some suggestions to help improve this.

1. This document could open by clearly demonstrating the urgency of securing lasting leadership for nutrition. This could be done by concisely summarising the powerful evidence of the impact that good nutrition has on people's well-being as well as the business case of investing in nutrition. (This could be easily backed up by the various studies and reports that has been pulled together in recent years.)
2. In order to ignite support behind a coordinated Decade of Action for nutrition, it would be helpful to:
 - a. Remind the reader how harmful inaction can be. In this sense, it would be useful to acknowledge how decades of underinvestment in nutrition further jeopardized the lives and potential of millions. While at the same time highlighting that improved nutrition can contribute to GDP growth
 - b. Celebrate what has already been achieved: Acknowledge the huge gains made in recent years. Illustrating this momentum with clear examples will help to set up this work plan up in a positive and inspiring way that compels the reader to participate in the Decade of Action.
 - c. Draw on what exists to sketch out a clear roadmap – highlighting existing processes and initiatives that bring results and impact at country level and can be shared at regional events and global fora.
3. The 'aims and added value' needs to feature much earlier
 - a. Country-ownership and leadership on ALL forms of malnutrition
 - b. Human rights based approach – with women and girls at the center
 - c. Focus on evidence and results
4. The 2030 Agenda and the SDGs have ignited a new approach that should define the spirit of the decade. In particular, there are elements of the 2030 Agenda that are particularly relevant:
 - a. Universality – the 2030 Agenda belongs to everyone; there is no country that is without the challenge of malnutrition and every country should be able to find a role of some size and shape in this Decade of Action. The Decade is not only meant for developing countries but also crucial for countries that face a growing challenge of over-nutrition, obesity and related NCD's. They can be partners in sharing expertise in preventing and fighting this.
 - b. Transformative- people-centered, putting human rights and social justice at its core
 - c. Partnerships – at the heart of the SUN Movement's approach is the belief that every actor has a role to play – from governments, business, civil society, development partners and academia. While the UN Member States are the primary audience for this work programme, it would be a missed opportunity if all of the existing partnerships were not encouraged to take part in this Decade of Action for nutrition.

The Partnerships Playbook, which was developed in partnership with Every Woman, Every Child, the Global Partnership for Education, Sanitation and Water for All, the Zero Hunger Challenge and the SUN Movement, was recently endorsed at the Second High-Level Meeting (HLM2) of the Global Partnership for Effective Development Cooperation as an official Global Partnership Initiative. This could provide some inspiration for further developing this section of the work programme of the Decade of Action.

5. The Rome Declaration and Framework for Action should be clearly referenced and concisely summarized but reopening or reinterpreting the substance in this document in the detail as currently expressed in six ‘areas’ doesn’t seem to advance collaborative action. As suggested above, it may be more helpful to highlight the initiatives, mechanisms or opportunities that have been established or are underway in each of these areas and then spend more time articulating the entry points for UN Member States to engage and align with these and how WHO and FAO in collaboration with WFP, IFAD and UNICEF will support Member States to do this.

a. Several examples include: highlight the objectives and process underway within the High Level Panel of Experts of the Committee on World Food Security to draft a paper on Nutrition and Food Systems;

b. Be clear on the role that WHO, FAO and others can and will play in raising awareness and connecting Member States with these opportunities to contribute and build upon.

6. Nutrition champions – There is much work underway that can be capitalized upon: The African Leaders for Nutrition; the SUN Movement Lead Group, the ambassador programmes of the UN agencies – particularly the celebrity chefs who have an enormous following across the globe.

7. Accountability and lesson sharing – There are several bodies to which UN Members States are already committed to reporting their progress and sharing lessons. The challenge for this work programme is to show how these link together and suggest inclusive ways for Member States to engage in coherence with 2030 Agenda and the SDGs without imposing more arduous burdens

a. The Voluntary National Review process of the High Level Political Forum for Sustainable Development

b. Reporting to the WHA on the six global nutrition goals and the NCD framework

c. Annual plenaries of the Committee on World Food Security (and in particular the work planned by its Open Ended Working Group on Nutrition)

8. It would be very useful to include a calendar that maps out key dates and milestones for the Decade.

More specific comments:

Point 2: Include a reference (footnote) to the Rome Declaration and the Framework for Action. It would be good to use ICN2 Framework for Action throughout the document.

Point 5: Is the Framework of the Decade of Action on Nutrition (2016-2025) different from the Framework for Action (point 2 and 4)?

Point 9:

· How is the “operational” framework different from the voluntary Framework for Action (point 2 and 4) and from the Framework of the Decade of Action on Nutrition (point 5)?

· The third bullet point assumes that global commitments translate into national policies and programmes. This is not aligned with the country-led and country-driven bottom up process that is then described in other parts of the document.

· On the NCD targets: please confirm that salt/sodium intake and obesity are the only two diet-related NCD targets considered by the Decade of Action and that diabetes and raised blood pressure will not be considered by the Decade of Action.

Point 11: Describes very well the added value of the Decade of Action. You may wish to review Point 9 in light of what is expressed under Point 11. It seems that some of the concepts are repeated or even reversed between Point 9 and Point 11.

Guiding principles: As mentioned above, WHO and FAO may wish to consider aligning with the 10 principles endorsed by the other partnerships including Every Woman, Every Child, the Global Partnership for Education, Sanitation and Water for All, the Zero Hunger Challenge, the SUN Movement as part of the Partnership Playbook.

Action Areas:

As expressed above, this section is unclear. Are the points a reminder on the types of actions that are already included in the ICN2 Framework for Action?

It might be more useful to simply clarify how the countries and partners can access and use the ICN2 Framework for Action document. It would even help to have an Annex with the summary list of the 60 actions included in the ICN2 Framework for Action for easy access and reference.

Nutrition education: Why is it linked only to social protection if this is clearly a cross-cutting theme?

Means of implementation:

It would make sense for this section to be the main focus of the Work Programme. It should provide much more clarity on how the Decade of Action will work with what is already existing.

Point 44: How will the UN Agencies solicit the engagement and support of other stakeholders? Is a call for commitments from “other stakeholders” the only option? How will this be carried out, recorded and monitored?

Point 45: It is difficult to understand what the high-commitments on ICN recommendations are.

Point 46: Nutrition Decade Secretariat is mentioned for the first and only time. It would be great to have more details on objectives and modalities of functioning. If a Nutrition Decade Secretariat is to be set up, it will be crucial to avoid duplication and mandate confusion with the existing UN coordination initiatives.

Action Networks

The first point should explain how the Decade of Action will effectively partner with the existing alliances, networks and initiatives to ensure increased focus and action.

The Action Networks could be a mechanism to ensure that the partnerships are accelerating and aligning efforts around certain topics.

Funding, TA and Advocacy: all three sections are very vague. We suggest the topic of funding is more precise. The topics of technical assistance and advocacy could be well covered when highlighting the related existing initiatives in the ‘means of implementation’ section.

Potential Topics in Table 1: How do these topics link with the ICN2 Framework for Action? Should the ICN2 Framework for Action not be the reference point for the establishment of the Action Networks?

30. Anne Marie Thow, University of Sydney, Australia

Comment on Work Programme of the UN Decade of Action on Nutrition, 2016-2025

Dr Anne Marie Thow, Dr Phillip Baker, Dr Sinead Boylan, Dr Kieron Rooney, Ms Alexandra Jones and Dr Belinda Reeve on behalf of the University of Sydney Food Governance Node

We greatly appreciate the UN support for the Decade of Action on Nutrition, and we welcome the opportunity to comment on the draft of the Work Programme of the UN Decade of Action on Nutrition, 2016-2025. We applaud the WHO and FAO for the comprehensive first draft presented here.

Over-arching comments

- From a nutrition perspective, the document would be strengthened by a clearer and more consistent conceptualization of what 'healthy diets' and 'healthy food' constitute, and the development of criteria on which definitions of healthy and unhealthy food might be based, to aid implementation of recommendations. In particular, considering level of processing, dietary diversity, and nutrients associated with poor health outcomes (such as fat, salt and sugar)
- The document would be strengthened by reference to synergies with declarations on aid effectiveness (Accra Agenda, Paris Declaration) and policy coherence for sustainable development (OECD)
- Despite the constraint in the Framework for Action that the work programme must be carried out within existing institutional arrangements and capacities, there is no information on existing remits of UN agencies or funding/administrative capacities. This is needed to ensure coherence and coordination among UN agencies involved – and also to ensure that member states are engaging most effectively with the UN.
- There is only one mention of conflicts of interest. This would be strengthened with more concrete recommendations and guidance regarding operationalisation (i.e. how do countries achieve this).
- The failure of many multi-sectoral nutrition coordinating bodies has resulted not from their technical competencies but from their failure to advocate for sustained attention, political commitment and resources at the country-level (i.e. from their organizational and strategic capacities). Again, this emphasises the need for country-level capacity building that focuses on more than just the technical aspects of nutrition policy and programming.

Guiding Principles

- This would be stronger with more clarity regarding what is meant by an enabling environment (See Lancet series on child and maternal nutrition for a definition).
- In paragraph 15, reference to the 'latest' scientific evidence is inappropriate – latest is not necessarily the best, most appropriate or most robust. High quality might be a more appropriate adjective.

Action area 1:

- The meaning of the term 'sustainability' here is not clear, and the concept of sustainability is not reflected in the actions listed. More explicit content as to how sustainability will be achieved

through food and nutrition interventions is needed (e.g. incorporation of sustainability objectives into food and nutrition guidelines).

- The food system approach identified in paragraph 19 is hugely important – and should also explicitly mention trade in addition to transportation.
- Paragraph 20 needs to include explicit recognition for the need for review of such policies and guidelines, in light of evidence for best-practice
- In addition to improved production of healthy food, this section should also note the need for incentives to decrease production, availability, accessibility and affordability of energy-dense nutrient poor foods, and highly processed and packaged foods.
- Food security ensures that nutritious food which is available, accessible and utilized by all. Utilization should be mentioned here.
- The reason for singling out aflatoxins over other environmental hazards is unclear. Paragraph 22 would be stronger if it ended at line 6, ending with “directly and indirectly”. By keeping it generic, then a country could pick this action area and this specific focus on biological hazards to address and be free to focus on their country specific hazard.
- The mention of Water, Sanitation and Hygiene here is very important – and could be further emphasized through prioritizing provision of safe water supply

Action area 2:

- This section should include more specific reference to the recommendations on stunting, wasting, breastfeeding and overweight/obesity identified in the Framework for Action.

Action area 3:

- In line with the objective to address the dual burden of malnutrition, point 29 should also address the dual burden of malnutrition at household level, through explicit recognition of the need to design social protection measures with complementary policies that seek to minimize the transition of households to increased consumption of nutrient-dense foods, especially in low-income households with women, infants and children.
- Point 31 should align with the policy options for diets identified in the recommendations of the Global Action Plan for the Prevention and Control of NCDs, and include specific mention of fiscal policies, regulations on marketing of energy-dense nutrient poor foods, nutrient and health claims, and agricultural/industrial policy incentives that reflect health considerations.

Action area 4:

- A critical concern that needs to be explicitly addressed in this section is that trade and investment policy should not constrain innovation in nutrition policy making – countries need to have policy space to be able to implement new approaches to protecting nutrition and food security and preventing NCDs. This should be explicitly recognized as a policy objective by trade and investment agreements, such that it can inform interpretation of agreements.
- It would be helpful to clarify the usefulness of frameworks, guidelines and strategies of agencies other than Codex (e.g. WHO, FAO, UNICEF) as reference points for interpreting WTO and other trade and investment agreements. (e.g. FCTC has been used as reference in trade disputes regarding tobacco)

- This section should include a specific note on protection of breastfeeding, particularly in light of recent large-scale and rapid growth in global breast-milk substitute markets

Action area 5:

- This section needs to explicitly incorporate NCD prevention – particularly with respect to access to affordable healthy food in 1) urban environments, 2) schools, 3) hospitals and nursing homes.
- In line with this, this section should note the importance of reducing the availability, accessibility and affordability of energy-dense nutrient-poor food.
- Paragraph 36 ends in a strange way by singling out hospitals and the workplace. More open ended text would be more appropriate, such as "in all environments a mother and child may find themselves in need of feeding"

Action area 6:

- This section would be much stronger with more detail with respect to governance. In particular, specific inclusion of capacity building for governance at all levels, particularly in light of decentralization of power and authority underway in many countries (i.e. overcoming coordination challenges that come with increased role of state and local level actors in nutrition governance)
- It would be helpful to reiterate previous recommendations (e.g. SUN) that the coordinating body should be situated in a supra-sectoral agency (e.g. national planning, office of PM), to facilitate multisectoral coordination; and if located within line agencies (e.g. ministry of health, agriculture, gender etc) these must be imbued with sufficient authority and capacities for coordinating actions (e.g. through resource control and performance-based budgeting mechanisms)

Implementation

- “Commitments for Action” – Para 42, point 2, seems confusing: need a more specific connection between the issue-specific recommendations in ICN2 framework (stunting, wasting etc) and the cross-cutting themes in the Decade of Action
- “Nutrition champions” concept could be strengthened by considering additional strategies to build capacity for nutrition leadership at global, national and subnational level, within government and civil society. For example, drawing on the African Nutrition Leadership Program, European Nutrition Leadership Program, and SUN leadership component. Strategies include: building capacity, mobilizing resources and strategic capacities. Otherwise, this ignores the diversity of leadership types needed for successful nutrition governance including advocates to generate/sustain attention and mobilize civil society networks, policy entrepreneurs who can navigate technical, bureaucratic and political environments, and high-level political leadership (e.g. heads-of-state and ministers).
- The inclusion of the private sector in “Action Networks” is concerning, and there is no transparency in where the ideas for action networks have come from (“potential partners”?). We suggest inclusion of an additional statement regarding avoidance of conflict of interests here.
- In addition, the proposed structure of the “Action networks” appears to limit participants to single topics rather than holistic integration of nutrition challenges. This potentially generates a high administrative burden (i.e. managing and attending network meetings and outputs) while

also narrowing complex multi-sectoral nutrition problems down into vertical issue-specific responses.

- The section on “Technical support for implementation” seems to imply that the challenge is a technical one in isolation from political and institutional environments in which nutrition actors operate. Strong evidence shows that technocratic approaches to nutrition are likely to fail in the absence of politically savvy leadership within countries.
- o Nutrition action is not just about technical capacity but also engagement with policy and practice
- o Imbuing nutrition policy networks within countries with necessary organizational and strategic capacities they require to navigate political systems and policy making processes.
- o This section would be stronger with a clearer statement of what is meant by Technical assistance and what it’s designed to achieved

Governance

- This section is very vague on how actions will be coordinated across the various agencies.
- The institutional framework for nutrition action at the global level is not clear and needs to be articulated, including clearly delineated roles and responsibilities for UN actors.
- This section would be stronger with consideration of how this engagement will also engage with other existing multisectoral fora that relate to nutrition (e.g. Zero Hunger, NCD Prevention and Control), that engage UN and other agencies related to nutrition.

31. Nakalembo Simwaka, Civil Society Scaling Up Nutrition, Zambia

1. Does the work programme present a compelling vision for enabling strategic interaction and mutual support across existing initiatives, platforms, forums and programmes, given the stipulation of Res 70/259 that the Decade should be organized with existing institutions and available resources? Open and inclusive dialogues, biennial reports, open access databases and regular tracking are all good measure to ensure a well-structured action on nutrition coupled with advocacy and technical support all covered in this first draft.

2. What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition? Overall the first draft is comprehensive. The Nutrition Decade secretariat would benefit from working closely with civil society in order to keep governments accountable. In each country a strong CSO focal point would be beneficial in garnering support. The advocacy component is key to ensuring success of the vision of the UN Decade of Action on Nutrition.

3. Do you feel you can contribute to the success of the Nutrition Decade or align yourself with the proposed range of action areas? As the only nutrition advocacy hub in Zambia, CSO-SUN is strategically positioned to handle action Area 6- to ensure commitments for action towards nutrition related policies and dialogue. CSO-SUN spearheaded the formation of the All Party Parliamentary Caucus on Nutrition (APPCON) which members of parliament MPs including key nutrition champions are advocating nutrition legislation and enhancing political will and accountability to address the burden of malnutrition. CSO-SUN also works closely with the media

to keep nutrition relevant and has media trainings to increase accurate nutrition reporting thus creating space for dialogue.

4. How could this draft work programme be improved to promote collective action to achieve the transformational change called for by the 2030 Agenda for Sustainable Development and the ICN2 outcomes? What is missing? Issues on lack of financial resources may delay progress especially where relevant policies exist and implementation due to financial constraints is often the issue.

5. Do you have specific comments on the section on accountability and shared learning? It's imperative that the biennial reports that include government commitment should also reflect governments financial commitment as a criteria for commitment e.g. to nutrition related programs and national budget allocation towards nutrition.

32. Dosse Sossouga, Amis des Etrangers au Togo (ADET), Togo

2016-2025 is now. What FAO is waiting for? The SDGs was adopted since September 25, 2015. One year has passed and nothing. 2017 is passing.

33. Bruno Kistner, Asian Roundtable on Food Innovation for Improved Nutrition, Singapore

I would like to share another slide which demonstrates the importance of a balanced diet to prevent anemia, it is not done with an iron alone intervention - even if haemoglobin levels are increased it is not guaranteed that the person is healthier or less anemic....

Attachment:

<http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/Anemia.pdf>

34. Patrick Mink, Co-leadership of the 10YFP Sustainable Food Systems Programme, Switzerland

Dear facilitator and colleagues,

Thank you very much for this opportunity to provide feedback on the first draft work programme of the UN Decade of Action on Nutrition.

Please find below the joint feedback of the co-leadership team of the Sustainable Food Systems (SFS) Programme of the UN 10-Year Framework of Programmes on Sustainable Consumption and Production (10YFP).

Best regards,

Patrick Mink

1. Does the work programme present a compelling vision for enabling strategic interaction and mutual support across existing initiatives, platforms, forums and programmes, given the stipulation of Res 70/259 that the Decade should be organized with existing institutions and available resources?

Yes, in general the draft work programme does present a compelling vision for strategic interaction and mutual support. However, while there is much focus on the role that governments/countries can play, for example as Nutrition Decade champions and/or by establishing action networks, there seems to be less elaboration on the potential roles for other actors and bodies, such as multistakeholder partnerships, for example with regard to action networks.

2. What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition?

As the Co-Leads of the Sustainable Food Systems (SFS) Programme of the UN 10-Year Framework of Programmes on Sustainable Consumption and Production (10YFP), we would like to propose to strengthen the draft work programme by including also a reference to the SFS Programme in the context of multistakeholder platforms, i.e. in paras 54 and 69.

For the reasons outlined in response to question 3 below, the Co-Leads of the SFS Programme look forward to actively support this joint effort of making the UN Decade of Action on Nutrition a success.

3. Do you feel you can contribute to the success of the Nutrition Decade or align yourself with the proposed range of action areas?

We believe that the SFS Programme can make a meaningful contribution to the Nutrition Decade, in particular with regard to Action areas 1 “Sustainable, resilient food systems for healthy diets” and 6 “Review, strengthen and promote nutrition governance and accountability”, but potentially also others.

The 10YFP is a global framework of action to enhance international cooperation to accelerate the shift towards sustainable consumption and production (SCP) in both developed and developing countries. It reports to ECOSOC and the High Level Political Forum on Sustainable Development.

The SFS Programme of the 10YFP promotes sustainable food systems through activities at global, regional and national level. It contributes to the achievements of several Sustainable Development Goals (SDGs), in particular SDG 2 and SDG 12, as well as a series of issues covered by other SDGs including in the areas of health, biodiversity and ecosystems, partnerships, etc. The SFS Programme has five focus themes: sustainable diets; sustainability along all value chains; reduction of food losses and waste; multi-stakeholder platforms; and resilient, inclusive, diverse food production systems. The Programme promotes multistakeholder projects and initiatives along these focus themes, both at the policy level as well as through action on the ground - raising awareness, promoting enabling environments, and facilitating access to knowledge, information and tools.

The SFS Programme has four Co-Lead organizations (South Africa (Department for Trade and Industry), Switzerland (Federal Office for Agriculture), Hivos and WWF). They are supported by a 23 member Multistakeholder Advisory Committee (MAC), composed of organizations from the following five stakeholder clusters: government agencies; civil society organizations; scientific and technical organizations; UN agencies and other international organizations; and private sector. In addition, the Programme currently has more than 95 partners worldwide.

On February 13th, 2017, the SFS Programme MAC endorsed the Programme’s initial eight core initiatives. One of them – under the leadership of FAO and UN Environment, and in collaboration with UNSCN, CIHEAM, Hebrew University, ENEA, Organics International and WWF – aims to identify

indicators for sustainable diets and develop guidelines for assessing the sustainability of diets. This core initiative is in line with Action area 1 of the draft work programme. Another one of our core initiatives – under the leadership of Hivos, Biovision Foundation and UN Environment – aims to develop and support inclusive multi-stakeholder platforms at local and national level, in line with Action area 6. Furthermore, the SFS Programme has a core initiative that aims to strengthen methodologies and capacities on quantifying as well as reducing food losses and waste (FLW), and to establish a global community of practice on FLW. This core initiative is being lead by UN Environment and FAO, in collaboration with WWF, Nestlé, South Africa (dti), CIHEAM and WRAP, and it is in line with the potential action network “Reduction of food waste and losses” contained in table 1

The 1st Global Conference of the SFS Programme will take place on 21-23 June 2017 in Pretoria, South Africa. With an expected participation of 150 food system experts from all relevant stakeholder groups and around the globe, this conference could offer a good opportunity to raise awareness on the Nutrition Decade as well as for approaching potential partners.

In its resolution on Agriculture development, food security and nutrition of 2015 (A/RES/70/223), the United Nations General Assembly welcomed the launch of the SFS Programme. In October 2016, the FAO Committee on Agriculture requested FAO to strengthen its work on sustainable food systems in relation to the 10YFP. For more information on the SFS Programme, please refer to the programme brochure, and see: <http://www.scpclearinghouse.org/sustainable-food-system>

4. How could this draft work programme be improved to promote collective action to achieve the transformational change called for by the 2030 Agenda for Sustainable Development and the ICN2 outcomes? What is missing?

The achievement of the Sustainable Development Goals (SDGs) requires an inclusive and holistic approach, accounting for the interlinkages between the goals and targets of the 2030 Agenda, in order to avoid silo thinking. Therefore, we welcome very much the food systems approach that is promoted under Action area 1, which takes into account all stages of the food value chain and links the concepts of healthy diets and sustainable diets. However, in para 20, reference is made to guidelines on *healthy* diets only, which falls short of the multistakeholder food systems approach that is required to achieve the food and nutrition related SDGs of the 2030 Agenda. We therefore propose to refer to “[..] guidelines on *sustainable* and healthy diets“ in para 20.

In addition to the potential topics for action networks listed in table 1, there may be scope for further topics, such as sustainable diets; sustainability along all value chains; and resilient, inclusive and divers food production systems.

5. Do you have specific comments on the section on accountability and shared learning?

No.

35. Laura L. Dawson, Food Physics & Body Dynamics LLC, United States of America

February 18, 2017

It is my honor to be asked to comment on this important matter. Respectfully, after reading the First Draft the following are my comments. May you and yours...Be In Good Health.

RE: Dawson, Laura - Comments on: FIRST DRAFT, 27 JANUARY 2017 – Work Programme of the UN Decade of Action on Nutrition 2016-2025

1. Does the work programme present a compelling vision for enabling strategic interaction and mutual support across existing initiatives, platforms, forums and programmes, given the stipulation of Res 70/259 that the Decade should be organized with existing institutions and available resources?

a. Yes.

b. However, nowhere in this work programme did we see the mention of an essential element of nutrition for human sustenance; WATER, safe clean drinking water was declared a right by the United Nations several of years ago.

c. Here in the United States these regulations fall on urban leadership to keep the drinking water supply safe.

d. In rural areas, including farms there is no regulation to guard against water borne diseases, which can be insidious and tenacious as often these microbiologic pathogenic factors are not visible to the human eye.

e. We believe clean, safe, drinking water needs to be included in the Decade of Nutrition oversights to assure overall quality of life and health.

2. What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition?

a. Food in and of itself is or can be a social conversation with most people, however as a healthcare professional using food to heal or treat diseases, the master's thesis I developed is only as good and the *use* by a patient or consumer.

b. We would be wise to remind/encourage each individual of their own responsibility to know how their personal constitution assimilates and utilized food energy, and water needs, that are essential to Quality of Life.

c. In the traditional oriental medical model taught in most acupuncture colleges in the US, we may likely have been taught to discern or diagnose using the Eight Principles [Hot vs Cold, Internal vs External, Excess vs Deficiency and Yin vs Yang]. Also, many of the schools in the US teach the Five Element Theory, which is more subjective rather than the objective. Whereas the measurable comparisons of the Eight Element Model for Diagnosis, Treatment and Prognosis make it a more transferable and usable model of medical care. These Eight Principles are used when learning to apply foods based on color and flavor, as well as the amino acid, fat, enzymatic compositions that cool, warm, moisten, dry, stagnate or move, organ systems and functions with the human body.

d. I believe this makes the certified, 'Food Physics & Body Dynamics' transferable locally, nationally, and internationally.

e. Finally, there are no parts of this draft in which WATER is mentioned let alone prescribed as an essential fluid to be consumed, and expelled appropriately to sustain Quality of Life.

1. Somewhere, we will need to open the discussion on just what and how clean drinking water is accessed and consumed, and its role to sustain a healthy state of well-being, as a part of the whole nutrition aspect.

3. Do you feel you can contribute to the success of the Nutrition Decade or align yourself with the proposed range of action areas?
 - a. Yes, We have a nationally and internationally Certified Nutrition Education Protocol, which has been approved to teach licensed health care professionals to meet the requirement for Continuing Education in Nutrition as mandated in several states and countries.
 - b. I personally, have academics at a college and post-graduate level, have participated in policy making regarding access to healthy food and the Food and Drug Agency [FDA] in the capacity building of the newest Food Safety Modernization Act, instituted by President Obama in 2011-2012.
 - c. As a member of the public and a candidate to write the American Food Guidelines, it was my honor to be asked to contribute to the final published Food Guidelines in 2004, published in 2005.
 - d. As a stakeholder on several committees at the USDA Center for Nutrition Policy and Promotion, Food Safety and Inspection Services, and now on two Codex Alimentarius Committees, I have added expert comment and suggestions for more than a decade.
 - e. As a hosted participant, I contributed my expertise in Urgent Evoke, an event designed to address the world's biggest issues conducted by **International Bank for Reconstruction and Development** (The "World Bank"), and am a Founding Member effective 2010.
4. How could this draft work programme be improved to promote collective action to achieve the transformational change called for by the 2030 Agenda for Sustainable Development and the ICN2 outcomes? What is missing?
 - a. Recognizing that communication is the first and foremost matter we will need to resolve as to how and when we will address these important matters.
 - b. Nutrition Education models and certifications for those models will be helpful to encourage ongoing participation and maintain a high level of engagement by us as authors/creators of systems to achieve our desired outcomes and for the global community we are working to serve.
 - c. Clean water access as a necessary component of nutrition consumption, in addition to being necessary for clean and safer food use in the kitchen and at the table.
 - d. Ideas how to overcome language barriers during the work programs.
 1. A suggestion, in the recent past, SKYPE in the Classroom was formed and utilized by USDA to communicate to young students in schools for comparisons of foods being consumed.
 2. This source could be used in the meetings to accomplish our common goals, and/or
 3. Microsoft has a whole set of tools for Education and Communication here: <https://education.microsoft.com/microsoft-innovative-educator-programs/mie>
 5. Do you have specific comments on the section on accountability and shared learning?
 - a. While not certain how Member States will select their representatives, it is my desire to serve as a representative, or on one of the committees, or boards, as a United States health care professional who specializes in using foods to heal disease and citizen, if that may be feasible. If

you have recommendation or suggestions how to facilitate this role, please advise me via direct email using my FAO forum contact information.

b. I look forward to working on the UN Decade of Action on Nutrition 2015-2015 in collaboration with the UN FAO, and other stakeholders to set benchmarks for the development of commitments and the establishment of action networks to address the potential topics suggested in Table 1.

36. Melissa San Miguel, Grocery Manufacturers Association, United States of America

Dear Moderator,

I am writing on behalf of the Grocery Manufacturers Association, based in Washington, D.C., to submit the attached comments on the draft work program for the UN Decade of Action on Nutrition.

GMA appreciates the opportunity to submit comments and respectfully requests you take these comments into consideration.

Sincerely,

Melissa A. San Miguel

Attachment:

http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/20170217%20GMA%20Comments_UNSCN%20online%20consultation_Work%20Plan%20Decade%20of%20Action%20on%20Nutrition.pdf

37. Pontsho Sepoloane, WFP, Regional Bureau Johannesburg, South Africa

Dear FSN moderator

The work programme is clearly written, below receive a few comments send on behalf of WFP RBJ

1. Background: paragraph one:

I propose that we spell out undernutrition to also include acute and chronic malnutrition.

2. Page 5: action area 1: consider including this: erratic climatic conditions has resulted in severe conditions such as the El Niño leading to severe drought. These conditions poses risks to sustainable food systems. Additionally, sustainable and resilient food systems should also build on indigenous knowledge system by creating awareness and increasing demand and production of indigenous food crops.

3. Page 8: Action area 5: in this area, consider adding the following dimension: creation of supportive public food environment requires commitment and involvement of the food industry to ensure availability and affordability of healthy foods. Business should take the responsibility and held accountable through country legislative frameworks to ensure a safe and supportive food environment.

4. Page 12: Governance: on this section, expand on national government coordination in tackling commitments made. Lack of nationally led coordination and governance can play a role in non-attainment of nutrition actions by 2025.

5. The work programme is not mentioning monitoring instruments to measure progress made towards attainment of nutrition commitments in the next decade.

Regards

Pontsho Sepoloane

WFP, RBJ.

38. Florence Egal, Food Security and Nutrition expert, Italy

Thanks for sharing this first draft work programme and congratulations for the progress to date. Considering where nutrition was ten years ago, the change is most appreciated!

I would however like to make a few comments for your consideration.

- Given the mandate of both FAO and WHO, the focus on national policies is logical. But unless we include explicitly the sub-national level we will not be in a position to address sustainably all forms of malnutrition. *Promoting coherence of national, regional and international policies across multiple sectors* is clearly very important, but coherence is most needed and can best be achieved at local level. One of the priorities of the Decade should therefore be the alignment and joint planning of local strategies for nutrition. Agriculture and health should be supported to jointly take the lead in supporting local governments.
- While bringing together nutrition actors is definitely urgently needed, it is equally urgent that nutrition actors systematically engage in relevant (and/or high profile) development fora and initiatives (e.g. climate change, right to food, urban development/territorial planning ...) to add value to the debate and learn from other participants and mainstream nutrition. We need to get out from the ghetto we have contributed to build. Other actors need nutrition as a means to bring together a people-centred, integrated and pro-poor perspective but this awareness needs to be raised on both sides.
- There seems to be a confusion between food system and value chain - I quote *A food system approach – from production to processing, storage, transportation, marketing, retailing and consumption* –. Food systems should be analysed from the dietary entry point. The prevailing commodity-based approach cannot address complexity.
- Social protection is of course essential but needs to be seen in a broader perspective: why are people in need of social protection and what can be done about it? But also how can social protection measures seek win-win objectives and contribute to sustainable development? (Anecdotal evidence from the Andes mentions the erosion of local food and agriculture systems as beneficiaries switch to supermarket purchasing, while cash vouchers in NYC are linked to local farmers markets).
- Promoting healthy diets is good, but not sufficient. We need to ensure that they are the outcome of sustainable food systems which seek sustainable environmental management and social equity (implementing right to food. promoting youth employment and decent employment). We should therefore move beyond healthy dietary guidelines to sustainable dietary guidelines and from national to local (and when appropriate cross-border) education and communication strategies.
- While nobody can dispute the need for evidence-informed advocacy and communication, the focus on evidence-based nutrition interventions in the last decade has been on academic bio-

medical research which neither intended nor is able to address sustainability. It is urgent to identify and review promising practices at local level to inform consumers and nutrition actors.

- Specific attention should be given to the legal and regulatory context: the multiplication of often contradictory rules at local level eventually undermines diet quality, livelihoods, biodiversity and health. This needs to be better understood and rationalized.

39. Christopher Twiss, Save the Children, United Kingdom

Thank you for sharing the work programme. Please find below feedback from Save the Children.

Comments on the UN Decade of Action on Nutrition Work Plan

Feedback from: Save the Children

Question 1: Does the work programme present a compelling vision for enabling strategic interaction and mutual support across existing initiatives, platforms, forums and programmes, given the stipulation of Res 70/259 that the Decade should be organized with existing institutions and available resources?

There are some things to admire in the document. Amongst others, we particularly commend:

- The emphasis on addressing all forms and cases of malnutrition
- The emphasis of promoting coherence of national, regional and international policies
- The idea of bringing all nutrition efforts under one umbrella to ensure alignment and common advocacy
- The intention to develop a global accountability framework and mechanism, across sectors and constituencies

We do however hold concerns which we would like to see addressed; these are listed in some detail across the following questions.

Question 2: What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition?

- A) Resources:** We welcome the Decade of Action's efforts to provide clearly-defined time-bound operational frameworks to implement the commitments made at ICN 2 and the 2030 agenda.

We are concerned, however that there is not sufficient emphasis on need for increased resources for nutrition (especially DRM), nor the need to improve the use of existing resources via integrated multi-sectoral and multi-stakeholder working. Save the Children's research forecasts that even by 2030—the deadline world leaders have set themselves to end all forms of malnutrition—129 million children will still find their physical and mental development

stunted by malnutrition.¹ In fact, children living in 53 countries will continue to be malnourished way into the next century.²

Increased resources from all stakeholders (national governments, donors and the private sector) are urgently required to speed up progress. The World Bank estimates that reaching 4 of the 6 World Health Assembly nutrition targets by 2025 will require an additional average annual investment of \$7 billion over the next 10 years, of which donors should contribute an additional \$2.6 billion. The sooner that these resources are invested, the faster, better, and more sustained the economic and human gains.

Recommendation: *Increased emphasis on the need for increased resources for nutrition with a focus on domestic resource mobilisation supported by donors, businesses and others, e.g. strengthen language used for ‘mobilizing financial commitments to achieve rapidly increase resources’*

B) Plans: We are also concerned that the work programme is not yet ‘time bound’ and appears to be more a set of intentions than a work programme. This is most clearly demonstrated by the lack of concrete actions. E.g. desire to “address the increasing amount of emergencies”, but with no clear plan as to how. This is particularly worrying given that the assumption of the DoA is that the WHA indicators will need to be met by 2025; yet there is no explicit indication in the document on how the DoA intends to meet these objectives.

Further, the document mentions a broad range of issues, but it does not go into a prioritisation, nor does it give an idea of which issue to start with or how to start with it. This might not necessarily be a diktat, but rather advice on how to go about prioritising at the country level, with examples of how other countries have had successes or failures to reinforce that.

Recommendation: *Rapid development of clear, integrated, prioritised action plan, with timescales, to support activities outlined in the work programmes*

C) Country Specificity & Inclusion: The document does not mention any high-burden countries specifically, or reference how little commitment many of them have made to tackle malnutrition in their domestic spheres (which may threaten the DoA’s goal generally).

Perhaps even more importantly, the world is off-track against its goals because progress has not been inclusive enough. Millions of children miss out on adequate nutrition because of whom they are and where they live. These are the forgotten children who are discriminated against because of their gender, ethnicity, where they live, a disability, because they are forced from their home or on the move, or because of their family’s income. Inequalities in malnutrition are widening between different regions within countries, between the richest and the poorest, and

1 Stunting refers to a child who is too short for his or her age. Stunting is the failure to grow both physically and cognitively and is the result of chronic or recurrent malnutrition. The effects of stunting often last a lifetime.

2 Source: Save the Children and Göttingen University, based on Group and Inequalities Database and Joint Child Malnutrition Estimates.

between rural and urban areas. Discrimination and exclusion are helping to create and entrench these inequalities.

With this in mind, we applaud the aim and added value of this work programme to ‘leaving no one behind’, and the emphasis on reaching the most marginalised and most vulnerable in action areas including those on UHC and social protection. However, a cross cutting set of activities is required in order to reach the furthest behind first, in order to leave no one behind.

Recommendation: *Include an ‘action area’ to address inequalities, exclusion and discrimination to ensure no one is left behind. This should include recommendations for governments to:*

- Undertake a multi-sectoral contextual analysis to understand:
 - The national drivers of and trends in malnutrition
 - Which policies and practices will best address malnutrition
 - Which groups of people are most marginalised and vulnerable to malnutrition and the barriers they face to improving their situation
- Translate global goals into national targets, with adequate resources and plans that lay out how each country will reach its goals for all groups of society, based on the national context and trends
- Lay down appropriate policies and plans to reach those targets, for all groups of society
- Work with relevant sectors and stakeholders throughout
- Ensure appropriate finances are in place

D) Legal Frameworks: The right to food is a basic human right. Governments have an obligation to ensure all citizens have access to sufficient quantities of food, of sufficient quality and cultural acceptability to meet their needs. States also have a binding obligation, enshrined in international law, to respect, protect and realise children’s right to survival. The UN Convention on the Rights of the Child obliges states to do everything they can to prevent children from dying. To meet this commitment, states need to tackle malnutrition. Yet, many countries lack a legal framework that promotes child survival, and those that do often fail to implement it.

Recommendation: *Strengthen the emphasis on the legal frameworks for child survival; possibility of using framework from Save’s “Unequal Portions” report (see p.25) http://www.savethechildren.org.uk/sites/default/files/images/Unequal_Portions.pdf*

E) Language: The definition of terms in the work plan could be improved. For example, the word “resilience” is included without an attempt to define what is meant by the term (for we know resilience is used widely across the sector in a multitude of different contexts).

F) Action Areas: The action areas are welcome in their ambition and structure, but we would propose some changes as per the below:

- Action area 1: food systems focus is important but it fails to address the income challenge for those working in agriculture and the fact that not everyone works in or profits from agriculture. It is quite production focused, but we know most people will still need to purchase most food. Explicit reference to the need for agriculture to increase incomes on the one hand and enable availability of affordable nutritious foods on the other is needed. Leading on from this, there is not enough attention given to market failure, and its impact



on private sector involvement in food systems. There is also little reference to livestock, the associated environmental challenges and the disease risk and its link to malnutrition

- Action area 2. This area would benefit from being more specific about what nutrition actions it refers to. There is no reference for example to the detection, referral and treatment of acute malnutrition – referring to the compendium of action on nutrition would be a good start here.
- Action area 3: There is minimal reference to evidence here. While we would be broadly supportive of what is proposed it could go further and reference the need for the size of transfers to enable households to afford nutritious foods and health and water services, the need to ensure households with children under 2 are covered. It could also go further to talk about the need for shock responsive social protection that can scale up and down in times of need to protect nutrition
- Action Area 4: Trade and investment are indeed important, but given the gridlock at the WTO, and the recent endangering of TTP, TTIP and NAFTA, should we be linking trade so explicitly to food policy? We do not see many successful examples of this occurring.
- Action area 5: Is there more that could be done to support exclusive breastfeeding in the informal sector? How about in the agricultural sector itself - contract farming for example? What should the private sector be accountable for/ what more could be done around maternity rights and support?
- Action Area 6: We would like to see this area strengthened. A reporting structure to involve civil society would be welcome as a start here – at present the accountability framework is unclear.

Question 3: How could this draft work programme be improved to promote collective action to achieve the transformational change called for by the 2030 Agenda for Sustainable Development and the ICN2 outcomes? What is missing?

- We welcome the guiding principle to provide an inclusive umbrella for all relevant stakeholders to consolidate, align and reinforce nutrition actions, but we feel more detail is needed on how the actors listed on page 3 (SUN, Zero Hunger etc) will be engaged in practice. For example, will joint activities be scoped? Will a joint work plan be developed, under the Decade of Action framework? How will the Decade of Action support the strides of these existing efforts?
- We also welcome the guiding principle to engage with a wide range of stakeholders, including civil society organisations. Again, we would like to understand better how this will be carried out in practice, including key actors like the CSM of the CFS, the SUN CSN and CIVICUS?
- We question the low level of ambition regarding member states to identify and commit to achieve ‘one of more’ nutrition targets... ‘one or more’ recommendation of the ICN2 framework, as this does not feel ambitious enough for SDG2 to be met (para 42).
- We welcome the development of a publically-accessible commitment repository and urge this to be made available as the soonest opportunity, as a vital mechanism for the DoA.
- We would encourage the DoA secretariat to report all commitments, including those that are voluntary, through the repository.



- We suggest more detail is added on the recruitment, remit and activities of nutrition champions, as vital actors in the DoA.
- We would like to know how will the 'smart commitments for action' be compiled and shared?
- We would like clarification regarding the suggested establishment of action networks, including logistical arrangements, and we urge confirmation that civil society will be included within them (para 49)? We strongly advise these are multi-sector action networks, that complement and engage existing mechanisms such as SUN movement.
- We welcome the emphasis on evidence informed advocacy and communication (para 61-66), but we strongly advise against the development of new networks of advocates. Many active networks exist, namely the SUN movement, Every Woman and Every Child, ... Resources should be invested in these existing structures to enable them to support the DoA advocacy approach, rather than developing duplicative structures or efforts.
- We recommend that the one shared visual identity developed uses SDG2 primary framing, whilst retaining linkages and accountability sharing with other related goals (SDGs 3,5,6 for example)
- We recommend that some mention at least is made of the various auxiliary issues that impact on nutrition, including climate change, water supplies, over population, urbanisation and food security

Question 4: Do you feel you can contribute to the success of the Nutrition Decade or align yourself with the proposed range of action areas?

We are looking forward to contributing to the DoA, but in order to identify concrete activities we need a clearer structure and timeline in order to constructively engage; there also needs to be a better governance system, including the involvement of civil society as reviewers of progress/accountability officers.

We will be happy to involve ourselves in the action areas, building upon our on-going work, particularly on social protection/nutrition education and the promotion of nutrition governance, and would see ourselves as active contributors to any additional action area that might be added on inclusion. We will also continue to be active in the advocacy networks, with efforts focused on:

- Sufficient, appropriate and best use of existing funding for nutrition
- Better coordination and understanding of policies to tackle malnutrition, with an inclusion lens
- Increased accountability for action on nutrition
- Improvements in new born and infant nutrition, including through the promotion of exclusive breast-feeding
- Disaggregation of data and the requirement for a participatory approach to continuous data collection

Question 5: Do you have specific comments on the section on accountability and shared learning?

We recommend one database is used to capture all commitments submitted in the DoA, not just those from Member States.

Inputs from Katherine Richards, Jo Grace, Natalie Roschnik, Christophe Belperron, Christopher Twiss, Hugh Bagnall-Oakeley, Claire Blanchard

40. Christine Campeau, facilitator of the discussion, UNSCN

Thank you to everyone who has contributed to the conversation. It has been another week of solid input that will no doubt help to shape the breadth and depth of the Decade's Work Programme.

Several themes are emerging strongly this week. One is the need for leadership, coordination and implementation, specifically at country level. Ending all forms of malnutrition requires bold, country-led leadership to shine a light on the pathways to coherent actions leading to results and impact. The coordination of these actions will help ensure that the final collective result is greater than the sum of the individual efforts. Through biannual reporting and course correction when necessary, the Work Programme's strongest added value will be in its clear focus on consolidation and implementation.

The sense of urgency to act to prevent increases in overweight and obesity due to low quality diets was emphasized. Priority also needs to be given to data collection for effective evidence-based policy making, which would help us understand what people are eating and why. Concrete measures to make our food systems and our direct food environment work better for nutrition are called for. Taxation was suggested as a means to ensure that healthy diets are available on the market, but this was questioned by others. This again highlights the critical importance of better understanding both consumer behavior and the effects of market regulation. Monitoring and evaluation of interventions to ensure that they are cost-effective, sustainable and are reaching their end target is essential.

The number of commitments being expressed through this consultation shows the universality of the problem and identifies solutions moving forward. The Co-leadership team of the *Sustainable Food Systems (SFS) Programme of the UN 10-Year Framework of Programmes on Sustainable Consumption and Production (10YFP)* gave concrete examples of the initiatives they are undertaking to enhance international cooperation across sectors to accelerate the shift towards sustainable consumption and production. It would be a missed opportunity if not all of the existing partnerships were encouraged to take part in the Decade because everyone has a role to play. The nutrition community also needs to systematically engage in all relevant fora to ensure that nutrition is mainstreamed.

Some participants asked for a calendar of events, and on that note, allow me to remind you of the upcoming ones specifically on the Decade's draft Work Programme. A briefing will be held on 27 February 2017 as an opportunity to informally brief the Permanent Representatives of FAO and WHO Members and seek their views on the main elements of the draft Work Programme. The FAO and WHO will then produce a revised Work Programme to discuss with their Member States during the World Health Assembly (May 2017) and the FAO Conference (June 2017). This Work Programme will remain a living document, building upon and connecting the independent initiatives of governments and their many partners and will be adapted according to needs and lessons learned.

We very much look forward to the next round of comments in the coming few days. By working together, we can make this Decade a decade of impact for nutrition.

Kind regards,

Christine Campeau

41. Laurence Rycken, International Dairy Federation, Belgium

The International Dairy Federation (IDF) is grateful for the opportunity to comment on the First Draft of the Work Programme of the UN Decade of Action on Nutrition, 2016-2025 (dated 27 January 2017). 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.

We congratulate the UN for drafting such an ambitious working program. As clearly addressed in the document, the solution to achieve this work program is by combined and coordinated efforts across all actors. International federations such as the IDF through the broad membership they represent can play an essential role in facilitating these partnerships. Industry can help through its expertise by knowledge sharing of social responsibility programmes, technical expertise for cost-effective product development, processing and distribution, as well as providing platforms for advocacy and education. We therefore strongly urge for that open and inclusive dialogue amongst all stakeholders.

We continue to advocate for a focus on foods and diets rather than single nutrients in any policy development and activities, other than where specific micronutrient deficiencies need to be addressed through targeted food fortification and/or supplements. Foods and diets are far more than the sum of their individual nutrients. Nutrients are not consumed in isolation and it is inaccurate to generalize about the effects of a single nutrient without considering the food matrix in which it is present. In some countries, dietary guidelines are shifting away from recommendations based on nutrients or foods in isolation and now focus primarily on healthy eating patterns. Overall, no single food or nutrient creates a healthy dietary pattern, but instead, it is the combination of nutrient-dense foods that is emphasized: “...dietary components of an eating pattern can have interactive, synergistic, and potentially cumulative relationships, such that the eating pattern may be more predictive of overall health status and disease risk than individual foods or nutrients^[i]”.

Nutrition science has moved on from just focusing on nutrients in isolation – it also considers foods and dietary patterns that are associated with good health. Nutrition policies need to take this into account^[ii].

We note that Point 21 suggests that a healthy diet is one that contains adequate macronutrients, fibre and essential micronutrients. This is too reductionist a view as food is much more than this.

- We suggest that the text is amended to reflect these points.

Table 1 suggests establishing an action network focused on food reformulation. The danger with this is that there is too much focus on single nutrients and too little on the overall impact of a food. Focusing on reformulation can lead to the use of oversimplified paradigms which in turn may undermine minimally processed, naturally nutritious foods. Nutrition policies that target the decrease or increase of the consumption of single nutrients will result in a modification of the

effects of the food and even the diet itself. Food reformulation can be complex, and simply taking out a nutrient is often not feasible. Typically, the nutrient that is removed provides properties that are important for food safety and/or acceptability of a product. In products where fat is removed to produce a low fat or fat free product, carbohydrates (mostly refined) are often added to maintain an acceptable flavour or texture profile [iii]. This could be counterproductive to reducing levels of obesity and risk of non-communicable disease. As addressed in the FAO/WHO report replacing SFA largely with refined carbohydrate has no benefit on CHD and may even increase the risk of CHD and favour the development of metabolic syndrome [iv] [v].

Reformulation is also a way for highly processed unhealthy foods to be positioned as being healthy.

- We suggest that all action networks should take a whole of food/dietary pattern approach rather than focusing on single nutrients in isolation.

It is essential that before implementing any new policies or activities there should be clear evidence for a positive impact and a risk based assessment should be considered to identify any potential negative consequences.

We also note that table 1 reference sustainable livestock production. While the concept of sustainable food systems is not new, much more research is needed to establish the scientific foundation on which informed recommendations for sustainable, healthy diets can be made.

A sustainable food system must meet the nutritional needs of the human population while not depleting or degrading the natural resources upon which life depends, as indicated in this definition by the United Nations Environmental Program:

“Sustainable food systems enable the production of sufficient, nutritious food, while conserving the resources that the food system depends on and lowering its environmental impacts. Such systems are based on the idea that all activities related to food (producing, processing, transporting, storing, marketing and consuming) are interconnected and interactive. [vi]”

The concept of sustainable diets contains additional aspects of sustainability related to the human population, as described in the Food and Agriculture Organization’s definition of sustainable diets:

“Sustainable diets are those diets with low environmental impacts which contribute to food and nutrition security and to healthy life for present and future generations. Sustainable diets are protective and respectful of biodiversity and ecosystems, culturally acceptable, accessible, economically fair and affordable, nutritionally adequate, safe and healthy; while optimizing natural and human resources. [vii]”

Whether framed as sustainable food systems, sustainable healthy diets, or nutrition security, the underlying systems - agricultural, environmental, social, and economic - are connected to one another in ways that are only recently being understood and appreciated by scientists and policymakers. A coordinated, interdisciplinary approach is needed to gain vital insights on interrelated dynamic and adaptive processes within and across these systems. Dietary guidance

based on an incomplete research base could lead to unintended consequences for both human health and the long-term sustainability of the food system.

Finally, we continue to support policy development that acknowledges the important and valuable role that dairy plays in balanced and varied diets. Dairy products are nutrient-dense foods that can help reduce malnutrition throughout the world, with increasing evidence that diets containing dairy help reduce the risk of obesity and NCDs.

[i] The Dietary Guidelines for Americans 2015-2020. 8th Edition
<https://health.gov/dietaryguidelines/2015/guidelines/>

[ii] Mozaffarian D (2017) Foods, nutrients, and health: when will our policies catch up with nutrition science? *The Lancet Diabetes & Endocrinology* 5, 85-8.

[iii] Sandrou DK, et al (2000). Low-fat/calorie foods: current state and perspectives. *Crit Rev Food Sci Nutr.* , 40(5):427-47.

[iv] Jakobsen MU, O. E. (2009). Major types of dietary fat and risk of coronary heart disease: a pooled analysis of 11 cohort studies. *Am J Clin Nutr.*, 89(5):1425-32.

[v] Fats and fatty acids in human nutrition. Proceedings of the Joint FAO/WHO Expert Consultation. November 10-14, 2008. Geneva, Switzerland. (2009). *Ann Nutr Metab.*, 55(1-3):5-300.

[vi] UNEP. Avoiding Future Famines: Strengthening the Ecological Foundation of Food Security through Sustainable Food Systems. United Nations Environment Programme (UNEP), Nairobi, Kenya 2012.

[vii] Burlingame B, Drnini, S. Sustainable diets and biodiversity: Directions and solutions for policy, research and action. Proceedings of the International Scientific Symposium, BIODIVERSITY AND SUSTAINABLE DIETS UNITED AGAINST HUNGER, 3 – 5 November 2010, FAO Headquarters, Rome 2012.

42. UN Network for SUN

UN Network/REACH Secretariat's inputs to the first draft work programme of the UN Decade of Action on Nutrition

- **Paragraph 4:** Paragraph 4 introduces the Nutrition Decade, however not clear what this is. An entity? A call for action? The UNGA proclaims the United Nations Decade of Action on Nutrition, within existing structures and available resources. So this appears to be more a call for action rather than an entity; a call for action whose implementation is to be led by FAO and WHO with support from WFP, IFAD and UNICEF. At times in the document, it appears that the Nutrition Decade sounds more like an entity doing something rather than a call for action that offers a forum embedded in existing structures that do the implementation. E.g. paragraph 55: the establishment of the Nutrition Decade. The Nutrition Decade is not established but it is proclaimed. Language may need to be adjusted.
- **Paragraph 9 (Aims and Added Value section):**

“Catalysing and facilitating alignment of on-going efforts of multiple actors from all sectors, including new and emerging actors, to foster a global movement to end all forms of malnutrition and leaving no one behind;”

- Is there scope to replace the text highlighted in yellow here with ‘the SUN Movement’ or to say “, leveraging the SUN Movement where it is in place’, understanding that the SUN is a global (and country level) movement that is seeking to end all forms of malnutrition. That would seem exemplify how the Nutrition Decade “works within existing structures”. The sentence makes reference to ICN2 commitments and the 2030 Agenda, but the SUN Movement contributes to those two.

“Establishing, under Member States’ oversight, a global accountability framework and mechanism across sectors and constituencies building upon existing mechanisms, processes and tools.”

- There seems to be a risk of duplication here. Again, it seems odd that the country-led SUN Movement is not mentioned here with its accountability framework since the MEAL framework would capture this, particularly when the sentence states ‘building upon existing mechanisms’.
- **Paragraph 11 (Aims and Added Value section):**
- There seems to be duplication with the SUN Movement here. For instance, considering the following sentence: “Provide an unprecedented opportunity to propagate society-wide movements for national policy change to end of all forms of malnutrition, in all countries”. The SUN Movement has also been providing this opportunity, among others to support scaling up nutrition in a rather revolutionary manner, with the UN Network/REACH providing close support to such SUN processes at the country level. It would be great to rework this section and perhaps articulate that the Nutrition Decade is aligned to SUN and will thus help catalyse those efforts. It would be important to acknowledge here that the Nutrition Decade involves all countries irrespective of income status.
- The paragraph says that it “establish a focused period to set, track and achieve an impact. This needs to acknowledge that it rather reiterates the emphasis of a period that has already been established by WHA (targets by 2025) and in SDG agenda 2030 that recognizes the WHA targets as a key transitory milestones to achieve the 2025. Instead of sounding new it should advocate for a milestones period (2025) already established by the member States.
- “Provide an unprecedented opportunity to propagate society-wide movements”. This needs to acknowledge the propagation already triggered by the SUN Movement, whose advocacy influence was praised in the ICE. It would be more accurate to say further expand the propagation of society-wide movements initiated by international initiatives such as the Zero hunger Challenge and Sun Movement.
- **Paragraph 12:** while it acknowledges that the Nutrition Decade builds on existing efforts, this does not come strongly enough in the rhetoric and planned means of implementation
- **Paragraphs 14 &15 (Guiding Principles section):**
- It is great to see explicit mention of the enabling environment here.
- **Paragraph 16.3 (Action Areas section):**
- It is important that the Action Areas are aligned to ICN2 Framework for Action recommendations/language and grouping
- It is noted that some of the recommendations included in the ICN2 Framework for Action (FFA) have not been included the work plan of the Decade of Action. For example no reference is made to the delivery of the direct nutrition interventions, wasting, stunting and so on. If the

work programme has to be based on the Rome Declaration and its FFA there should be consistency across the document and areas of interventions

- Is it really needed to create additional action areas? Can a reference be made directly to the FFA?
- Why is social protection grouped with nutrition education?
- **Paragraph 27 (Action Area 2 section):**
“including the WHO Global Strategy on Infant and Young Child Feeding,”
- We understand that this global strategy was jointly developed by WHO and UNICEF (see <http://www.who.int/nutrition/publications/infantfeeding/9241562218/en/>) although the copyright is WHO. It might be worth exploring whether UNICEF should be added here.
- **Paragraph 38 (Action Area 6 section):**
- Again, it seems odd that there is no mention of the SUN Movement here. Perhaps consideration can be made to note the importance of developing or updating on national multi-sectoral nutrition plans based on robust multi-sectoral nutrition analyses. Similarly, it may be good to mention the inclusion of nutrition in nutrition-related sector plans, including sub-national development plans.
- **Paragraph 39 (Action Area 6 section):**
- There are a number of targets and indicators that the countries are being asked to measure and track (e.g. SUN self-assessments are another exercise). Is it feasible to introduce another tracking exercise?
- **Paragraph 42 (Means of Implementation, Commitments for action section):**
- Member States have already committed to achieving all of the 6 WHA targets and seemingly to implementing the recommendations of the ICN2 FFA. Not clear why the paragraph presents the commitments as a future possibility for countries, also presenting the opportunity to pick and choose targets
- It could be great if the paragraph could be revisited. What are the nutrition targets States should commit to (e.g. ICN2/SDGs?). It could be good to specify it
- It could be good if the paragraph could rather focus on setting national SMART targets to achieve the global nutrition targets by 2025 and by 2030
- **Paragraph 43:** This sounds like a whole new planning process, called road map instead of plan. Not clear if this is a recommendation because it says “could raise... and develop”, but it does not acknowledge the fact that countries are/have been doing that already. Many countries have nutrition plans that include WHA and SDG targets. This should acknowledge that this process is/has happened in many countries.
- **Paragraph 46 (Means of Implementation, Commitments for action section):**
- This is the first mention of the Nutrition Decade Secretariat. Paragraph 68 mentions the Secretariat structure being a joint WHO/FAO Secretariat and supported by SCN Secretariat as well as WFP, IFAD, UNICEF and others. Language may need to be consistent across the document as sometimes the document refers to a Nutrition Decade Secretariat sometimes to a joint FAO/Who Secretariat
- If the idea is to build upon existing efforts and structures, is there really a need to establish a Nutrition Decade Secretariat? Where would it be based?

- Shouldn't the focus be on tracking progress on the achievement of the nutrition targets rather than tracking commitments?
 - Consider avoiding the constitution of another Secretariat. Noting that there are already the following Secretariats: UNN/REACH Secretariat, UNSC Secretariat and SMS Secretariat
 - **Paragraph 47 (Means of Implementation, Nutrition champions section):**
 - Perhaps the important thing is to have nutrition champions (not Nutrition Decade champions, SUN champions, etc. *per se*). These nutrition champs could support and catalyse efforts through various nutrition movements, platforms, etc. (e.g. the Nutrition Decade, SUN, etc.).
 - **Paragraph 48 (Means of Implementation, Action networks section):**
 - Need to leverage existing platforms, where they are in place, instead of establishing Nutrition Decade Action Networks for avoiding duplication. It may also be helpful to qualify that the action networks may be created on thematic areas as indicated in paragraph 50 so as to discern them from other networks/groups (e.g. UN Network for SUN).
 - The Action Networks may cause confusion and could be duplicating what the SUN Movement, SUN countries and its Networks are doing. It could be good to build on existing structures rather than duplicating them where possible
 - **Paragraph 51 (Means of Implementation, Action networks section):**
 - It would be helpful if information about the Action Networks is shared as it becomes available with the UNN/REACH Secretariat to help foster UN coherence.
 - The paragraph mentions the joint FAO/WHO secretariat, is that different from the Nutrition Decade Secretariat mentioned in paragraph 46? It is confusing. Need to adjust language.
 - **Paragraph 58 (Means of Implementation, Technical support for implementation section):**
 - It would be good if this monitoring of quality and efficiency of policy and programme implementation leverages existing monitoring (e.g. SUN) efforts.
 - **Paragraph 60 (Means of Implementation, Technical support for implementation section):**
 - Perhaps there would be scope to add the word 'continue' in the first sentence, as shown below, since this is already happening.
- "All Nutrition Decade partners will continue to provide technical support to the implementation of policies and programmes by sharing good practices, knowledge and technologies, innovation and research outcomes"*
- **Paragraph 61 (Evidence-informed advocacy and communication section):**
 - It would be good if the Nutrition Decade launch events at regional and country levels can articulate how the Nutrition Decade relates to other existing platforms, movements, initiatives (e.g. SUN Movement, UN Network for SUN, etc.) so as avoid confusion.
 - **Paragraphs 62&63 (Evidence-informed advocacy and communication section):**
 - Perhaps, it could leverage the SUN CoP on communications and advocacy so as to minimize duplication.
 - **Paragraph 67 (Governance section):**
- "The Nutrition Decade will not seek to establish new structures but will facilitate broad consultation among stakeholders to seek alignment of priorities, policy instruments, and monitoring mechanisms."*
- This seems inconsistent with the information presented elsewhere in the work programme (e.g. establishment of Nutrition Decade Secretariat, Nutrition Decade action networks)

- **Paragraph 68 (Governance section):**
- It would seem good for the Nutrition Decade Secretariat, if it is finally established, to also periodically convene with the UNN/REACH Secretariat to help foster UN coherence on nutrition and minimize duplication of efforts.
- **Paragraph 70 (Accountability and Shared Learning section):**
- Suggest to include the UNN Country Dashboards (public versions), which highlight UNN contributions towards SUN progresses, in the Nutrition Decade biennial reports.
- **Paragraph 71**
- Shouldn't the focus be on tracking progress on the achievement of the nutrition targets rather than tracking commitments?
- **Paragraph 74:** Please consider mentioning the SUN Movement here
- **Table 2:** it could be good to reflect the technical support to the implementation under table 2
- It would be great if the document could articulate and detail the relationship with other existing nutrition initiatives/platforms (e.g. ZHC)

43. Ekaterina Sakhvaeva, Kyrgyzstan

Original contribution in Russian

Уважаемые Модераторы!

Изучив проект Программы работы (ПЕРВАЯ РЕДАКЦИЯ, 27 января 2017 года) в рамках Десятилетия действий ООН по проблемам питания, 2016–2025 год, хочу предложить следующее.

Пункт № 16 подпункт №3) предлагаю изложить в следующей редакции: «социальная защита и просвещение по вопросам питания, здорового образа жизни, необходимости физического воспитания детей, взрослых и пожилых людей». Поскольку здоровый образ жизни, физическая культура способствуют привитию рационального и качественного питания с детских лет до глубокой старости. Что в свою очередь способствует сохранению продовольственных ресурсов.

Также предлагаю обратить внимание на выращивание продовольственной продукции на основе органических приемов.

Кроме того, при выращивании продовольственной продукции и, особенно на орошаемых землях, происходит истощение земель, что ведет к обеднению минерального состава выращиваемой продукции, а, значит, к неполноценному питанию, бедности. Необходимо обратить внимание на вопрос обогащения орошаемых земель.

С уважением, Екатерина Сахваева, Кыргызстан

English translation

Dear Moderators,

Having examined the draft work programme (FIRST DRAFT, 27 January 2017) of the UN Decade of Action for Nutrition 2016-2025, I would like to propose the following:

Paragraph 16 (subparagraph 3) should be reworded as follows: “social protection and nutritional education and healthy lifestyles, the need for physical education of children, adults and older

persons". Because healthy lifestyles and physical education promote inculcation of a balanced diet and high-quality food since childhood to old age. This in turn helps to preserve food resources.

Also, I suggest to turn attention to organic cultivation of food products.

Besides, cultivation of food products, especially on irrigated lands, results in soil depletion, that leads to impoverishment of mineral composition of cultivated products, and thus to malnutrition and poverty.

Attention should be paid to the issue of enrichment of irrigated lands.

Best regards,

Ekaterina Sakhvaeva, Kyrgyzstan

44. Saydagzam Khabibullaev, "Land of Plenty Agro Distribution" LLC, "Real Estate Strong Partners" LLC, Uzbekistan

Original contribution in Russian

Доброго времени суток!

Благодарю за возможность быть причастным к столь важному делу. Потихоньку отвечу на все поставленные вопросы.

Касательно первого вопроса:

Думаю концепция жизнеспособна, но вот проведение процессов по реализации в рамках существующих структур и имеющихся ресурсов вызывает сомнения. Всегда на работающего человека возлагали самые большие надежды, но, в реальности функциональная деятельность этого же человека с возложением на него новых обязательств падает. Тут тоже самое - каждый должен заниматься своим делом, но никак не совмещать исполняемое функционированием.

По поводу второго вопроса:

Проблемы питания созрели не только из-за того, что надо питаться, но из-за того, что нет единого общепринятого подхода к самому понятию питание. По всему миру нельзя растить лишь сою или кукурузу, имеются огромное количество продукции как выращиваемой, так и перерабатываемой, которые в основном зависят от их мест выращивания. В связи с этим стоит вопрос унификации всего питания на планете, и делать упор на возможность упрощения экспорт-импортных дел в области обеспечения продуктами питания. Если не будут сделаны эти шаги, то выходит из ситуации лишь на собственных силах мест проживания того или другой страны - обречены на провал. К примеру на Атакаме не получится выращивать яблочные сады, а на территории Канады бананы. Так, что нужен универсальная классификация продуктов первой необходимости для поддержания сбалансированного состояния организма.

Что касается третьего вопроса:

Я не только чувствую, но и твёрдо намерен быть полезным в реализации Десятилетия действий, так, как именно от таких действий будет строиться платформа единого будущего человечества. Готов присоединиться к программе как лично, так и своими компаниями, которых я создавал для обеспечения здоровья нации.

Относительно четвертого вопроса:

Упущены ряд особенностей оценки самого факта недоедания и проявления НИЗ. Особенность оценки возникновения такой проблемы должно опираться на многих факторах. И необходимо через реализацию программ добиться того, что образ здоровья - это счастливый и сбалансированный во всех отношениях человек, а не образ врача и оздоровительных препаратов, а также никак не фармакологические средства. Образ счастливого человека должно выстраиваться от сытого и функционально способного на деятельность человека.

И по поводу пятого вопроса:

У меня замечаний нет. Но, всё будет зависит от изменений вносимых в области образования новой структуры или всё же деятельность будет возложена на существующую.

С уважением и пожеланиями благополучия СаидАъзам.

English translation

Good whatever time of day it is where you are,

Thank you for the provided opportunity to be involved in such an important work. I will comment on all questions.

In regard to the first question:

In my opinion, the concept is viable, but realization of implementation processes within the existing structures and resources is doubtful. A working man has always been put high hopes on, but in reality functional activity of such a person when he/she is entrusted with new responsibilities decreases. We have the same situation here - everyone should fulfill commitments according to his/her responsibilities.

In regard to the second question:

Nutrition became a topical issue not only because we need to eat, but because there is no consistent and universally accepted approach to the definition of nutrition. It's impossible to cultivate only soy and corn worldwide; there is a vast number of grown and processed products that mostly depend on their cultivation areas. Due to this fact, there is a question of unification of nutrition in the world, and we need to focus on the possibility to simplify export and import procedures in regard to the provision of food. Unless these steps are taken, all attempts to solve the situation using resources of places of living are doomed to failure. For example, it's impossible to grow apple orchards in the Atacama Desert or bananas in Canada. Therefore, there's a need for a universal classification of essential commodities to maintain a balanced overall health.

In regard to the third question:

Not only I feel, but I'm also determined to be useful for the implementation of the Decade of Actions, since the platform of one future of humanity will be built on such actions. I'm willing to join the programme both personally and with my companies that I established for the sake of nation's health.

In regard to the fourth question:

A number of peculiarities of malnutrition and NDCs assessment have been missed. Assessment of causes of such problem should be based on many factors. Through implementation of the

programme it is important to create an image of health which is associated with a happy and balanced in all respects human being, and not with doctors and medicines. The image of a happy person should be associated with a person, who has enough food and is capable to conduct activities.

And in regard to the fifth question:

I have no comments. But everything will depend on the changes in regard to the establishment of a new structure, or if the activities will be assigned to the existing one.

With best regards,

Saydagzam

45. Kuruppacharil V. Peter, World Noni Foundation, India

HORTICULTURE FOR NUTRITIONAL SECURITY is a recent compilation of essays authored by working scientists in the area of horticulture-fruits, vegetables, spices, tuber crops, plantation crops, mushrooms and edible bamboos. Professor M S Swaminathan Father of Green Revolution in India in his FORWARD to the book stated "There is a horticultural solution for every nutritional malady". A great Kashmiri saint stated "As long as forests exist, food will be available to humanity. The compilation is published by New India Publishing Agency New Delhi (www.nipabooks.com). Availability, access, absorption and sanitized habitat are a priori requirements of a healthy human nutrition. Nutrition garden/kitchen garden/ homestead garden/vertical garden/hydroponics/aeroponics etc are methods of farming for self sufficiency in horticultural crops requirement.

Attachment:

<http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/Chapter-1.pdf>

<http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/1876-Review%20Horticulture%20for%20Nutrition%20Security.pdf>

46. Rocco Renaldi, The International Food and Beverage Alliance (IFBA), Switzerland

The International Food & Beverage Alliance welcomes the opportunity to provide comments on the first draft (dated 27 January 2017) of the Work Programme of the UN Decade of Action on Nutrition, 2016-2025 (the "Nutrition Decade"). [1]

The Nutrition Decade calls for a global collective effort towards eradicating hunger and preventing all forms of malnutrition worldwide, to be implemented locally by Member States and their partners, working within existing structures and available resources. The Nutrition Decade will act as the umbrella for coordinating and aligning the nutrition actions of multiple actors across all sectors to achieve nutrition impact at scale and a healthier, more sustainable future.

In general, we agree with many of the key components of the draft Work Programme, particularly its aims, guiding principles, key action areas, and accountability framework.

We support the overall aim of the Work Programme to provide a clearly-defined, time-bound operational framework for governments to adopt and implement nutrition-related initiatives to create sustainable food systems and enabling environments that promote healthy dietary practices and support the fulfillment of the Second International Conference on Nutrition (ICN2)

commitments and achievement of the diet-related NCD targets by 2025 and the Sustainable Development Goals by 2030.

We support a Work Programme that is guided by the principles of inclusivity – maximizing the participation of a wide range of stakeholders and sectors, involving all countries and addressing the needs of all people everywhere. We are pleased that the Work Programme acknowledge the contribution the private sector can make to the Nutrition Decade.

We recognize the unique role the food and non-alcoholic beverage industry has to play in global nutrition and have committed to do our part to help consumers worldwide achieve healthy and sustainable diets. We also support the need for a transparent mechanism for tracking progress and ensuring mutual accountability for the commitments made.

As proposed, the Work Programme seeks to assume a coordinating role among all actors and across all sectors to consolidate, align and reinforce nutrition actions; build on existing efforts to improve nutrition worldwide; and accelerate actions and expand the geographic and sectoral scope of actions. We support this role.

The action areas outlined in the Work Programme are centered on six pillars, derived from the recommendations of the ICN2 Framework for Action and representing a broad range of policy actions for addressing all forms of malnutrition:

- Sustainable, resilient food systems for healthy diets;
- Aligned health systems providing universal coverage of essential nutrition actions;
- Social protection and nutrition education;
- Trade and investment for improved nutrition;
- Safe and supportive environments for nutrition at all ages; and
- Strengthened nutrition governance and accountability.

Many of the action areas reflect the strategies and initiatives IFBA members have been implementing for many years. We are formulating and innovating products that support the goal of improving diets – reducing key nutrients of public health concern, adding nutrients to reduce micronutrient deficiencies and promoting food components and food groups beneficial for good health, such as fibre, whole grains, fruits, vegetables and low-fat dairy. The provision of nutrition information to consumers forms the cornerstone of any policy framework to address poor dietary intakes and to promote healthier eating habits. We are providing nutrition information to consumers to help empower them to make informed dietary decisions tailored to their needs and lifestyles. We are restricting marketing to children; and promoting balanced diets and healthy lifestyles in our workplaces and in the communities we serve. We are raising awareness of the importance of good nutrition and promoting behavior change through our collaborations with governments and NGOs in public education campaigns and in schools and communities.

Improving food security worldwide requires the collective effort of all stakeholders. We support actions for sustainable food systems that promote healthy and safe diets and strategies that integrate nutrition and food safety objectives into food and agriculture policies and strengthen local food production and processing. As food and beverage companies that both depend on food production for its raw material and seek to deliver nutritious foods and beverages to consumers, IFBA members are committed to sustainable agriculture and the transition to a sustainable food

future – innovating more food choices by using fewer natural resources. We are also working with our suppliers and smallholder farmers to promote sustainable supply chains, helping to increase farmer knowledge and yields, improve their livelihoods and build thriving communities.

The Work Programme calls for the establishment of action networks - informal coalitions of countries aimed at advocating for the establishment of policies, sharing best practices and providing mutual support to accelerate implementation. Table 1 lists potential topics for the establishment of action networks. We would suggest, to ensure consistency, that on the basis the six action areas are derived from the recommendations of the ICN2 Framework for Action, so too should the Table 1 topics.

We are supportive of the establishment of these action networks and are committed to lend our support and technical expertise to these efforts. IFBA members are participating in successful multistakeholder coalitions, such as PAHO's SaltSmart Consortium and the Scaling Up Nutrition (SUN) Movement and believe an action network can be a successful vehicle for implementation of the commitments to action, provided there is a coherent and sustained alignment of efforts, "win-win" based terms of reference, an agreed set of actions, clear rules of engagement and defined roles and responsibilities for each stakeholder, transparency and accountability and measured progress towards stated objectives. Given the number of existing alliances and initiatives, we believe the Work Programme will benefit from clearly defined terms of engagement and an explanation as to how the Nutrition Decade will interact with existing alliances and initiatives to ensure increased focus and action.

We are encouraged to see that the Work Programme recognizes that actions taken by governments and other stakeholders must rely on the latest scientific evidence. We, too, believe that policy initiatives must be supported by strong scientific evidence – we need to understand what works and why. Given our significant research and development capacity, we believe there are real opportunities for collaborative research. We welcome the opportunity to share our technical expertise of nutrition science and consumer behavior with a view to finding new and relevant ways to leverage and collaborate on the science needed to improve food security and nutrition.

We support the establishment of repositories and knowledge-sharing mechanisms at national, regional and global levels and are willing to share our best practices on product reformulation, salt reduction strategies, nutrition labelling, responsible marketing practices and workplace wellness programmes.

We are committed to leading our industry in efforts to improve public health and look forward to working with all stakeholders to understand the most helpful role we can play toward realizing our shared goal of eradicating hunger and preventing all forms of malnutrition worldwide.

We are grateful for the opportunity to provide our comments and look forward to participating in further dialogues and consultations with the joint FAO/WHO Secretariat as work to develop the Work Programme continues.

[1] IFBA is an alliance of eleven multinational companies – The Coca-Cola Company, Ferrero, General Mills, Grupo Bimbo, Kellogg's, Mars, McDonald's, Mondelez International, Nestlé, PepsiCo and Unilever – who share a common goal of helping people around the world achieve balanced diets and healthy, active lifestyles.

47. George Kent, Department of Political Science, University of Hawai'i, United States of America

VERTICAL PARTNERSHIPS

I am concerned that the approach discussed here does not give sufficient attention to what people at the community level could do for themselves. More attention should be given to what higher level agencies could do to facilitate those local initiatives. As Florence Egal put it, "Given the mandate of both FAO and WHO, the focus on national policies is logical. But unless we include explicitly the sub-national level we will not be in a position to address sustainably all forms of malnutrition."

Top-down approaches tend to weaken and disempower those working at ground level. This is not a matter of simply favoring bottom-up approaches over top-down approaches. It is about figuring out how to work out an appropriate "division of labor" between agencies at different levels. Based on the principle of subsidiarity, higher level agencies should not do and decide things that ought to be done and decided at lower levels.

There is a need for discussion about how to work out the division of labor. Agencies at the higher levels should shift from designing interventions based solely on their understandings of both the problems and solutions, and move more toward facilitating analyses and action by those at lower levels. These should be partnership arrangements, with learning going on at all levels.

George Kent

48. Emerio Rubalcava, Universidad Autónoma del Estado de México, Mexico

Original contribution in Spanish

Estimada, FSS moderador,

Es importante la reestructuración de los ministerios o departamentos en los diferentes niveles de gobierno (nacional, regional, local) para que se alineen en las mismas políticas alimentarias y nutricionales, por que en ocasiones chocan o están ausentes.

Ejemplo en México la Subsecretaria de Alimentación está asignada a la Secretaria de Agricultura (SAGARPA) y su participación en la Estrategia antiobesidad, de manera oficial es casi nula.. La Estrategia Antiobesidad está dirigida por la Secretaria de Salud.

M.C. Emerio Rubalcava

Instituto de Ciencias Agropecuarias y Rurales
Universidad Autónoma del Estado de México (UAEMex)
Toluca, México

English translation

Dear FSN Forum moderator,

Restructuring the ministries or departments at the different government levels (national, regional, local) to align their food and nutrition policies is important, as they are occasionally conflicting or not in place.

For example, in Mexico, the Under-Secretariat of Food is allocated to the Secretary of Agriculture (known in Spanish as SAGARPA) and its formal participation in the Strategy Against Obesity (Estrategia antiobesidad) is almost non-existent. The Strategy Against Obesity is directed by the Secretary of Health.

M.C. Emerio Rubalcava

Institute of Agricultural and Rural Sciences
Autonomous University of the State of Mexico (UAEMex)
Toluca, Mexico

49. Diana Lee-Smith, Mazingira Institute, Kenya

Based on Christine's commentary so far, I want to emphasize something I touched on in my contribution earlier in the debate.

There are existing data linking lack of dietary diversity (over-consumption of starches and sugars) to low incomes in Southern Africa. See the work of AFSUN (African Food Security Urban Network) and the article I co-authored in the attached issue of Right to Food and Nutrition Watch Magazine last year (attached). I think it is also established through other evidence that lack of dietary diversity is linked to life-style diseases and to obesity. From this we can conclude that there is already some evidence that, in the urban transition, the malnutrition associated with obesity and life-style diseases is not associated with income increase and over-eating as is often asserted. Rather, it seems to be associated with urban poverty. The lack of affordable food for the urban poor is a major issue.

One of the ways this is being tackled in Africa is through encouraging urban agriculture. This enables poor urban residents to produce micro-nutrients for themselves, in the form of animal source foods such as milk and eggs as well as fresh fruit and vegetables. These may also increase available supplies in urban areas and help increase employment and incomes. I also attach the book Healthy City Harvests, published in 2008 which contains extensive research on urban agriculture, including establishing the link between urban agriculture and improved food and nutrition security.

Attachments:

http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/RtFNWatch_EN_web.pdf

<http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/Healthy%20City%20Harvests%20Nov08%20004361.pdf>

50. Marilyn Shapley, InterAction, United States of America

To whom it may concern:

We are sending in the attached comments on behalf of two InterAction members who also submitted separately. Apologies for missing the first deadline!

Please let us know if you have any questions.

Best,

Marilyn

Attachment:

[http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/InterAction%20 UN%20Decade%20of%20Nutrition%20Responses%202.23.2017.docx](http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/InterAction%20UN%20Decade%20of%20Nutrition%20Responses%202.23.2017.docx)

51. David Pelletier, Cornell University, United States of America

I am pleased to contribute to the draft work programme on the UN Decade of Action for Nutrition. I have three suggestions:

1. I suggest adding the bolded clause below.

48. Through the convening and catalytic roles of the Nutrition Decade, action networks will be established. These action networks are informal coalitions of countries aimed at advocating for the establishment of policies and legislation, allowing the exchange of practices, **promoting the conduct and capacity strengthening for implementation science**, highlighting successes and providing mutual support to accelerate implementation.

2. I suggest adding the bolded clause below:

58. The Nutrition Decade will seek to strengthen the quality and efficiency of policy and programme implementation and monitoring, **including the application of implementation science**. Technical assistance will need to be responsive and opportunistic in leveraging technological advances. An emphasis will be placed on amplifying country capacities and on ensuring that knowledge and experiences are shared and successes are scaled up where possible.

3. In Table 1 I suggest adding the following:

Implementation science: strengthen the capacity, funding and practice of implementation science at country and global levels.

52. Irene Zancanaro, FEDERALIMENTARE – The Italian Food and Drink Industry Federation, Italy

FEDERALIMENTARE, the Italian Food and Drink Industry Federation, would like to thank you the UNSCN for the opportunity to comment the first draft of the Decade of Action on Nutrition 2016-2025.

Please find enclosed our comments in the attached file.

Should you need any further information and/or clarifications, please do not hesitate to contact us.

Best regards,

FEDERALIMENTARE

Attachment:

http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/First%20draft_Decade%20of%20Action%20on%20Nutrition%202016-2025_Federalimentare%20comments%20Feb%202017.pdf

53. International Coalition on Advocacy for Nutrition

On behalf of the International Coalition on Advocacy for Nutrition (ICAN), please find below our joint submission on the UN Decade of Action work programme consultation. Thank you for the opportunity to comment on the draft, and we look forward to future collaboration.

Submission by the International Coalition on Advocacy for Nutrition (ICAN) to the UN Standing Committee on Nutrition's consultation on the Work Programme of the UN Decade of Action on Nutrition, 2016-2025

ICAN welcomes the opportunity to provide comments on the work programme of the UN Decade of Action on Nutrition (hereafter 'the Decade'). Our consolidated comments are below, which accompanies the individual submissions by ICAN members. The International Coalition on Advocacy for Nutrition is a civil society coalition of organisations worldwide, which jointly calls for greater investments in, and commitments to, end all forms of malnutrition. This submission was compiled by World Cancer Research Fund International, with input from the following ICAN members: 1,000 Days, WaterAid, RESULTS UK, ACTION, Save the Children UK, The ONE Campaign and Action Against Hunger.

Does the work programme present a compelling vision for enabling strategic interaction and mutual support across existing initiatives, platforms, forums and programmes, given the stipulation of Res 70/259 that the Decade should be organized with existing institutions and available resources?

- Overall, we welcome the emphasis on addressing all forms of malnutrition (stunting, wasting, micro-nutrient deficiencies and overweight & obesity), a focus on a food systems approach based on scientific evidence, the promotion of coherent national, regional and international initiatives and SMART policies, the effort to convene, coordinate and consolidate existing nutrition efforts across multiple sectors and actors, and the intention to develop improved accountability frameworks.
- The Decade has so far produced a compelling and clear identity/brand through its **communications materials**, which has been helpful in support of promoting and launching the Decade (para. 64-5).
- Unfortunately, we believe that the roles and responsibilities remain vague, accountability issues are not addressed in detail, and the 'how' remains to be detailed. In order to enable strategic interaction, there is a need to have more of a focus on resource mobilisation, more concrete outlines of specific actions, timelines/time commitments and next steps.
- A welcome addition would be more country-specificity outlining a focus on **high-burden countries** and awareness of differences between locations in terms of how to tackle malnutrition in all its forms.
- Clearer **links should be made to existing initiatives and platforms in other nutrition-related sectors**, such as the recently formed coordination between SUN, the Sanitation and Water for All partnership (SWA) and the Global Partnership for Education (GPE).
- Para. 3 – consider including **reference to SDG target 3.4**: By 2030, reduce by one third premature mortality from NCDs through prevention and treatment and promote mental health and well-being.

What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition?

Overall comments:

ICAN believes that the Decade should be further strengthened by:

- Having a clearer remit to **promote integrated action** between nutrition and other nutrition-related sectors such as WASH.
- Having a **stronger nutrition-sensitive focus**, in addition to the nutrition-specific one; there is a need to ensure ambitious funding for ‘nutrition-sensitive’, as well as ‘nutrition-specific’ actions are made explicit, as well as the Decade’s role in convening high-level stakeholders across nutrition-relevant sectors.
- Be strongly and explicitly anchored in a **rights-based framework** and the universal realisation of human rights, including the right to health, food, water, self-determination, education etc. Children’s, women’s, small-scale food producers and consumer rights must be protected and fulfilled by aligning macro-economic policies (e.g. fiscal and trade) with nutritional goals and human rights more broadly.
- Include references to the importance of **‘double-duty actions’** when developing and implementing national nutrition action plans, which has the potential to impact both undernutrition and prevent overweight & obesity at the same time.
- Include mention of the vital importance of **independent legal frameworks** to hold governments to account and promote implementation of action plans and policies.
- There is an urgent need to detail how the Decade propose to manage and prevent **conflicts of interest** in its engagement with the private sector and industry actors.
- Para. 9 ‘Aims and Added Value’ - The stated aims should be strengthened by a greater emphasis on not just “addressing” malnutrition (implying a focus on treatment) but **preventing it**. We propose an additional clear aim to “Supporting all countries’ efforts to prevent all forms of malnutrition through effective multi-sectoral action to address underlying determinants”.
- Para. 13 ‘Guiding Principles’ – on ‘facilitating action across rural and urban areas’ an explicit connection towards **integrating food supply systems** between urban and rural would be a welcome addition.

Comments specifically with regards to ‘Action areas’ (para. 16-39)

- Para. 18 - The reference to conducting “a full and thorough mapping” of existing initiatives and movements is welcome. We propose that this should explicitly include initiatives between nutrition-relevant sectors. For instance, SUN and the SWA have recently agreed a joint work plan for action on WASH-Nutrition integration, which may provide a useful model and example of cross-sectoral action at the global governance level.
- The role of the food environment and policies to create supportive food environments are not adequately captured within the action areas (only to a small degree in Action area 1 – para. 19 (p.5) and action area 5 – para. 36 (p.8)).
- **Action area 1 – “Sustainable, resilient food systems for healthy diets”:**
 - o The action area needs to address the income challenges for those working in agriculture, and there is little reference to livestock, environment or disease.

o Para. 19: on ‘improving food systems’ the link should be made explicit between improved food systems, agricultural production, trade and environmental policies.

o Para. 21: Water availability and water resource management are critical aspects of sustainable food systems (e.g. for adequate and consistent supplies to crops and livestock as well as people) and should be referenced.

o Para. 22 and 23: Improving access to WASH is fundamental to preventing Anti-Microbial Resistance (AMR).

• **Action area 2: “Aligned health systems providing universal coverage of essential nutrition actions”:**

o Para. 25: Ensuring adequate WASH in healthcare is critical to delivering quality health care, including the treatment of malnutrition. The Global Action Plan on WASH in Healthcare Facilities³, co-led by WHO and UNICEF is therefore a key initiative to highlight and coordinate with that will be fundamental to improving nutrition.

• **Action area 3: “Social protection and nutrition education”:**

o There is a need to employ more evidence in this area, include more detail of what transfers can achieve and who they should be targeted at.

o The benefits of knowledge and education should not be overstated in relation to changing behaviours and a focus on a comprehensive package of policies is necessary.

Action area 4: “Trade and investment for improved nutrition’:

o Para. 34: Consider including reference to the human right to health, alongside the right to adequate food.

• **Action area 5: “Safe and supportive environments for nutrition at all ages”:**

o Para. 37: We welcome the inclusion of an area on water, sanitation and hygiene. The paragraph would be strengthened by including a more thorough overview of the key links between WASH and nutrition.

o Consider adding the importance of marketing restrictions to children of food and drinks high in sugar, salt and fat, as part of creating a safe and supportive environment.

• **Action area 6: ‘Review, strengthen and promote nutrition governance and accountability’:**

o Para. 36: Member states should firstly establish national multi-sectoral coordination mechanisms in nutrition governance, then develop new plans or update previous ones. In countries which have signed up to the SUN movement, this mechanism should be aligned with SUN.

o Para. 38: How does the governance mechanism avoid conflicts of interest?

Comments specifically on ‘Means of implementation’ (para. 40-66)

• We support the proposal for “a publicly-accessible repository” of commitments made by Member States in support of the Nutrition Decade, which will help to drive transparency and accountability. This is particularly crucial for commitments to ‘nutrition sensitive’ action, which are often less easy

³ <https://www.washinhcf.org/home/>

to track and carry greater risk of 'double-counting' of existing commitments in other sectors without sufficient thought and effort to enhance nutrition-sensitivity.

- Ensure consistency throughout document, for example para. 45 speaks of a 'repository', while para. 72 refers to an 'open access database'. Clarity is needed whether this is the same thing?
- A database can be a great tool for monitoring, accountability and advocacy, provided it is kept up to date and with strong institutional support and separate earmarked funding. Specifics of where such earmarked funding would come from would be a welcome addition.
- Para. 44, 49 and 51: Is the 'resource guide' referenced here already available? If so, it should be clearly sign posted. Also, what 'operational tools' and 'tools' are specifically thought of?
- We question the level of ambition to member states only achieving 'one or more' of the nutrition targets, or 'one or more' of the ICN2 recommendations, as this will not hit the 2030 targets. Commitments should not be voluntary, as this is unambitious and not SMART enough - clear time-bound targets and commitments over the next two years are needed, with review and follow up hereafter.

Para. 47: Are 'Nutrition Champions' an official or unofficial title and what counts as an 'international initiative'? How will conflicts of interests be managed and prevented?

Comments specifically on 'Governance' (para.69)

- Country representatives should be from the office of Heads of State to ensure highest level of accountability.

Comments specifically on 'Action networks' (Table 1, page 14)

- There is a lack of clarity around how these particular topics were chosen, if any are priorities (if so, how and why), and whether there is a current level of activity in any of the networks outlined in the table?
- Para 49: Ensure that Action networks have the active participation of government representatives from across nutrition-relevant ministries to promote a health in all policies approach and policy coherence. Furthermore, ensure that CSOs are involved in all Action networks. and Action networks must engage with already existing groups (for example SUN).
- ICAN members believes that other particular topics could be suggested:
 - o Investment in research and evidence building on nutrition interactions with other sectors and the impact of such sectors on nutrition outcomes
 - o WASH-nutrition integration
 - o Exclusion, e.g. how to put the most vulnerable and marginalised first.
 - o Food safety, e.g. in terms of environmental pollutants and antimicrobial resistance
 - o Healthy retail environments

Do you feel you can contribute to the success of the Nutrition Decade or align yourself with the proposed range of action areas?

- ICAN welcomes the specific mention of our coalition in the work programme (para. 69), and the reference to ensuring coordination with the Nutrition for Growth moments (para. 45, 54, 69, 74).

As a coalition we stand willing to support the implementation of the Decade's work programme and is committed to coordinating with other civil society coalitions, such as the ICN2 CSO coalition in Rome. ICAN is already actively engaged with several of the foras of the proposed priority activities (Table 2).

How could this draft work programme be improved to promote collective action to achieve the transformational change called for by the 2030 Agenda for Sustainable Development and the ICN2 outcomes? What is missing?

- The general vision for the Decade is of a monitoring purpose, not an advocacy purpose. Advocacy is only mentioned passing (para. 61-6), and the implication of this is that it does not reflect the sense of urgency needed to invest in nutrition to achieve internationally agreed targets, as well as how a 'network of advocates' will be established (para. 62).
- ICAN believes that collective action could be improved by focusing on the resource tracking of ODA via the OECD DAC measurement.
- There is a missing element in how to ensure UN agencies include nutrition in their strategies and work programming, such as the need to implement nutrition (sensitive) indicators into related programming, as well as 'doubleduty actions'.
- Table 2 seems incomplete, without specific timelines and details of activities and responsibilities. There is also a lack of what the intended impact/outcome would be for the secretariat's activities (besides 'convening member states' etc.). We therefore urge the Secretariat to finalise Table 2 in conversation with member states and civil society actors to act as a work plan for the period April 2016-April 2018.

Do you have any specific comments on the section on accountability and shared learning?

- Para. 70: ICAN believes that the reporting to UN coordinating bodies, such as UNGA and WHA, should be done on an annual basis, not biannually, to have annual goals as benchmarks to monitor progress and success, create a sense of urgency and ensure achievements are made within the Decade's existence.
- Para. 71: Commitments by governments are only encouraged as voluntary and not required - and all reporting done through self-assessments - which will lead to issues of accountability. There is a clear need to outline whether and how this information will be verified.
- Para. 75: There is a need to outline how data collection and sharing of resources across the range of sectors and actors involved can be best utilised. Furthermore, how will the targeted programme and policy evaluations be 'facilitated by the UN system to identify good practices'?
- Further, explicit mention of DAC and SUN as additional networks of reporting mechanisms should be added.

54. Yemisi Jaiyeola, TOFTEH World, Nigeria (second contribution)

Dear Christine Campeau,

What we need presently now is action. There is need to start with immediate effect, if we are going to achieve all this beautiful plan. According to Christine Campeau, the sense of urgency to act is very essential.

We can always start with campaign, with good headlines, like " stop searching for luxury jobs, embrace farming ". Make 3million naira within three years, starting capital is two hundred and fifty thousand naira. .. Get loan now and payback latter. e.t.c. with captures that will get the attention of young graduates and the unemployed.

Let's get this started in the urban centres and we can camp these people and do it in form of training school, where by, examinations will be conducted and only the outstanding and ready-made candidates will proceed to the next stage.

They will be posted to departments based on their performance ranging from, crop....livestock. ...processing....preservations.

Let them know that the days of white collar jobs are over and high time to engage themselves in farming.

Different types of training in conjunction with the small and medium enterprises development agency (SMEDA) will be meaningful and produced a very good results, in fact nearly 90% successfully, if well implemented.

Since we all know that the days of Nigeria's dependence on crude oil are over. If we let the young people know that the days of oil boom and white collar jobs are over. That if we concentrate and put more effort on the agricultural sector, the lamentation about food scarcity and employment opportunities will be over. Much more than we realise on crude oil can be made also in agricultural sector.

This programme has to take off like an empowerment programme for young people and the unemployed to embrace it and run with it.

We must start now.

Yemisi Jaiyeola.

55. Louise Codling, World Cancer Research Fund International

World Cancer Research Fund International welcomes the opportunity to comment on the Decade of Action's draft work programme - please find our submission below.

Submission by World Cancer Research Fund International to the UN Standing Committee on Nutrition's consultation on the Work Programme of the UN Decade of Action on Nutrition, 2016-2025

World Cancer Research Fund (WCRF) International welcomes the opportunity to provide comments on the work programme of the UN Decade of Action on Nutrition (hereafter 'the Decade').

WCRF International is the world's leading authority on cancer prevention research related to diet, weight and physical activity. Our vision is to live in a world where no one develops a preventable cancer. Through our policy and public affairs work we advance the development and wider implementation of effective policies worldwide to help people reduce their risk of cancer and other non-communicable diseases. WCRF International is in Official Relations with the World Health Organization.

For further information contact policy@wcrf.org and www.wcrf.org.

Does the work programme present a compelling vision for enabling strategic interaction and mutual support across existing initiatives, platforms, forums and programmes, given the stipulation of Res 70/259 that the Decade should be organized with existing institutions and available resources?

- Overall, WCRF International welcome the emphasis on addressing all forms of malnutrition (stunting, wasting, micro-nutrient deficiencies and overweight & obesity), a focus on a food systems approach based on scientific evidence, the promotion of coherent national, regional and international initiatives and SMART policies, the effort to convene, coordinate and consolidate existing nutrition efforts across multiple sectors and actors, and the intention to develop improved accountability frameworks.
- Unfortunately, the roles and responsibilities remain vague, accountability issues are not addressed in detail, and the 'how' remains to be detailed - for example para. 13 does not outline how the Decade will 'engage and support all sectors of government' and help prioritise funding and action.
- In order to enable strategic interaction, there is a need to have more of a focus on mobilisation of financial and policy commitments, more concrete outlines of specific actions, timelines/time commitments and next steps.
- Para. 3: In addition to reference to SDG 2, we believe that the work programme should include a **reference to SDG target 3.4: By 2030, reduce by one third premature mortality from NCDs through prevention and treatment 2 and promote mental health and well-being.** In that way, the Decade promotes a coherent approach to tackling malnutrition in all its forms and the double burden of malnutrition by linking SDGs on health and nutrition.

What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition?

WCRF International believes that the work programme should be strengthened by:

- Including a specific emphasis on '**preventing**' malnutrition in all its forms, in conjunction with 'addressing' it – in its 'Aims and Added Value' section (para. 9) we propose an additional clear aim to "Supporting all countries' efforts to prevent all forms of malnutrition through effective multi-sectoral action to address underlying determinants".
- Including references to the importance of '**double-duty actions**' when developing and implementing national nutrition action plans, which has the potential to impact both undernutrition and prevent overweight & obesity at the same time.
- Including mention of the vital importance of **independent legal frameworks** to hold governments to account and promote implementation of action plans and policies.
- Be strongly and explicitly anchored in a **rights-based framework** and the universal realisation of human rights, including the right to health and food. Macro-economic policies (e.g. fiscal and trade) must be aligned with nutritional goals and human rights more broadly.
- Detailing how the Decade propose to manage and prevent **conflicts of interest** overall in its engagement with the private sector and industry actors, specifically with regards to the food and beverage industry and through multistakeholder mechanisms (para. 38 and 47 specifically).

Comments specifically with regards to 'Action areas' (para. 16-39)

- The role of the **food environment** and policies to create supportive food environments are not adequately captured within the action areas (only to a small degree in Action area 1 (para. 19) and Action area 5 (para. 36)).
- Para. 19: On ‘improving food systems’ the link should be made explicit between improved food systems, agricultural production, trade and environmental policies.
- Para. 28-32: The benefits of knowledge and education should not be overstated in relation to changing behaviours and a focus on a **comprehensive package of policies** is necessary.
- Para. 34: Consider including reference to the **human right to health**, alongside the right to adequate food.
- Para. 36-37: Consider adding the importance of **marketing restrictions** to children of food and drinks high in sugar, salt and fat, and the creation of healthy food retail environments, as part of creating a safe and supportive environment.

Comments specifically on ‘Means of implementation’ (para. 40-66)

- A database can be a valuable tool for monitoring, accountability and advocacy, and as such we welcome the initiative to develop a repository of commitments. However, a database is only useful provided it is kept up to date and with strong institutional support and separate **earmarked funding**. Specifics of where such earmarked funding would come from would be a welcome addition, as would more information about what type of information would be included.
- We **question the level of ambition** to member states only achieving ‘one or more’ of the nutrition targets, or ‘one or more’ of the ICN2 recommendations, as this will not hit the 2030 targets. Commitments should not be voluntary, as this is unambitious and not SMART enough - clear time-bound targets and commitments over the next two years are needed, with review and follow up hereafter.
- **Ensure consistency** throughout document, for example para. 45 speaks of a ‘repository’, while para. 72 refers to an ‘open access database’. Clarity is needed whether this is the same thing?
- Para. 42: What are these ‘intermediate outcomes’?
- Para. 44, 49 and 51: Is the ‘resource guide’ referenced here already available? If so, it should be clearly sign posted. Also, what ‘operational tools’ and ‘tools’ are specifically thought of?
- Para. 47: Are ‘Nutrition Champions’ an official or unofficial title and what counts as an ‘international initiative’? How will conflicts of interests be managed and prevented?
- Para. 57: How will the Decade ‘foster the exchange of experiences’? What is the role of the proposed repository in this? • Para. 58-60: How will this technical support be financed?

Comments specifically on ‘Action networks’ (Table 1, page 14)

- There is a **lack of clarity** around how these particular topics were chosen, if any are priorities (if so, how and why), and whether there is a current level of activity in any of the networks outlined in the table, and if so how do they operate?
- Para 49: Ensure that Action networks have the active participation of government representatives from across nutrition-relevant ministries to promote a health in all policies approach and policy coherence. Furthermore, ensure that CSOs are involved in all Action networks.

Do you feel you can contribute to the success of the Nutrition Decade or align yourself with the proposed range of action areas?

- WCRF International has already strongly supported the Decade's launch and promotion, through being the focal point within the International Coalition on Advocacy for Nutrition (ICAN) guiding the coalition's engagement with the Decade. WCRF International is also an active member of the ICN2 Civil Society Group in Rome and committed to ensure coordination between the two groups in its involvement with the Decade.

- Our **NOURISHING framework and policy database** highlights where governments need to take action to promote healthy diets and prevent overweight and obesity, and as such is a valuable tool for the success of the Decade. The framework brings together ten policy areas across three domains: food environment, food system, and behaviour change communication. The framework is accompanied by a regularly updated policy database, providing an extensive overview of implemented government policy actions from around the world. It is a tool for policymakers to assess whether an approach is sufficiently comprehensive, for researchers to decide where more research is needed, and for civil society organisations to hold governments to account. The database currently holds nearly 400 policy actions in over 120 countries, as well as 70 impact evaluations. www.wcrf.org/NOURISHING.

How could this draft work programme be improved to promote collective action to achieve the transformational change called for by the 2030 Agenda for Sustainable Development and the ICN2 outcomes? What is missing?

- The general vision for the Decade is of a monitoring purpose, not an advocacy purpose. Advocacy is only mentioned passing (para. 61-6) and does not reflect the sense of urgency needed to invest in nutrition to achieve internationally agreed targets.
- Para 62-3: It is unclear how a 'network of advocates' will be established and who this will consist of, as well as how capacities for evidence-informed advocacy be aligned and strengthened? 5
- Para. 70: WCRF international calls for annual reporting to UN coordinating bodies, such as UNGA and WHA, rather than biannually. This would help create annual goals as benchmarks to monitor progress and success, create a sense of urgency and ensure achievements are made within the Decade's existence.
- Para. 71: Tracking implementation of country-specific commitments will be based on country's self-assessments – how will this information be verified?
- Para. 75: There is a need to outline how data collection and sharing of resources across the range of sectors and actors involved can be best utilised. Furthermore, how will the targeted programme and policy evaluations be 'facilitated by the UN system to identify good practices'?

56. Davide Bradanini, Italian Permanent Representation to the UN Agencies in Rome, Italy

Please find below comments to the draft Work Programme of the UN Decade of Action on Nutrition.

General comments on the draft work programme of the UN Decade of Action

- It is an excellent draft which translates into action ICN2 and Agenda 2030 commitments on nutrition. In particular, Italy wishes to underline the added value of focusing on stimulating concrete

nationally-determined policies and programmes with the objective of creating sustainable food systems and enabling environments that promote healthy dietary practices. A localized approach is of utmost importance in order to ensure member state ownership of initiatives and policies in the context.

- What stands out in the draft is the operationalization of a “food system” approach, which is crucial in order to promote healthy, sustainable diets that improve nutrition. All actions and initiatives should thus be conceptualised not as isolated interventions but as placed in the context of a “food system”, thus taking into account political, environmental, cultural and socio-economic factors such as poverty, inequality and climate change. More reflection on the root causes on malnutrition in all its forms (poverty, unemployment) would be appreciated.
- Having this in mind, within the first action area on sustainable, resilient food systems for healthy diets, more detail would be appreciated on the issue of local diets, in particular on its outcomes in terms of mitigating the impact of climate change on health.
- Moreover, a reference to the issue of migration and migrant populations could be included in the document, as migration flows have had a significant effect on the nutritional conditions of populations. As an example, it would be important that countries develop “national epidemiological observatories on nutrition” in order to be able to exchange data and implement the adequate health policies for nutrition (such as correcting for any possible lack of micro or macro nutrients).
- Finally, we appreciate the establishment of Nutrition Decade champions and of action networks on specific topics of relevance for the Decade, as mechanisms for encouraging commitment.

57. Megan Pennell, Scaling Up Nutrition Civil Society Network, United Kingdom

On behalf of the Scaling Up Nutrition Civil Society Network, please find attached our response to the first draft work programme of the UN Decade of Action on Nutrition. We would like to thank you for the opportunity in input and look forward to working collaboratively together.

Attachment:

http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/DoA_Response_SUNC_SN.pdf

58. Glenys Jones, Association for Nutrition, United Kingdom

The Association for Nutrition welcomes this opportunity to comment on the first draft of the ‘WHO/FAO Work Programme of the UN Decade of Action on Nutrition, 2016-2025’.

Q1. Does the work programme present a compelling vision for enabling strategic interaction and mutual support across existing initiatives, platforms, forums and programmes, given the stipulation of Res 70/259 that the Decade should be organized with existing institutions and available resources?

The collective vision of ‘a world where all people at all times and at all stages of life have access to affordable, diversified, safe and healthy diets’ is compelling and fully supported by the Association for Nutrition. This draft work programme presents the rightly aspirational aim of the Nutrition Decade providing a clearly-defined time-bound operational framework that utilises and works with existing structures and available resources. We support the acknowledgement of the need for open,

inclusive, accountable and transparent activities; communication at all levels is essential for the successful implementation of actions to achieve the commitments made at ICN2, in the 2025 Global Nutrition and diet-related NCD targets and in the 2030 Agenda for Sustainable Development.

Q2. What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition?

We fully support the guiding principle that the Nutrition Decade will be fully inclusive, as malnutrition is a global issue with 45% of the cases of under-five mortality attributable to under-nutrition. The number of countries simultaneously experiencing the complex burden of different forms of malnutrition is an increasingly common issue and highlights the need for multifaceted action by professionals who are suitably trained in nutrition science.

The Global Nutrition Report 2014 included a conceptual framework highlighting the fundamental role enabling (an) environment for nutrition improvement has in obtaining the ultimate goal of achieving benefits from improved nutrition status. A key facet for achieving this is the provision of professionals with the knowledge and skills to support and address the nutrition issues in their locality. The World Food Programme has also noted >80% of the world's most food-insecure live in countries prone to natural disasters with high-levels of environmental degradation, and the need to build resilience of vulnerable people to disaster risk and climate change. These findings reiterate the fact nutrition professionals are vital in improving the knowledge, capacity and skill required for addressing complex situations and essential in empowering current and future generations to undertake practices that improve their nutritional status.

However scientific papers published by Association for Nutrition Registrants have demonstrated substantial gaps in knowledge and skill exists in countries of great need. In particular, registrants involved in the MDGs and SUN movement have highlighted the particular inadequacy in professional capacity in nutrition in Africa. For example, Ellahi et al (2015) found limited nutrition training was available in Africa compared to identified level of need. In this review of nutrition training provision, serious questions were raised in regards to programme structure, curricula content, standardisation, knowledge and practical/ interpersonal skills. These, combined with the fact that nutrition support in many countries is provided by health or support workers, rather than nutrition professionals, creates a potential bottleneck to ensuring evidence-based delivery of interventions and action.

Jackson and Ashworth³ (International Malnutrition Task Force) have also highlighted the need for capacity building and the emphasis required on the prerequisite of nutrition training and education and the potential establishment of Communities of Practice to address the, 'current piecemeal, scattered capabilities that are not fit for purpose'.

All six Action Areas are underpinned by the need for evidence based nutrition policy and practice, both at strategic and frontline levels. This can only be guaranteed if nation states have a qualified, trained and trusted workforce. Therefore we feel that this needs to be strengthened throughout the draft work programme.

Q3. Do you feel you can contribute to the success of the Nutrition Decade or align yourself with the proposed range of action areas?

The Association for Nutrition has longstanding experience in researching, developing and validating nutrition competency requirements not only for nutrition professionals but also for those working

or volunteering in health & social care, catering and fitness & leisure capacities, who alongside nutrition professionals carry a responsibility to use, translate or provide nutrition advice to the public. This work, undertaken with the support of UK's Department of Health & Public Health England, has extended our reach into the quality assurance of nutrition training provisions for these wider workforces.

The Association for Nutrition can contribute to the success of the Nutrition Decade through input and support relating to the development of international standards to enable nations to ensure action is supported by qualified, trained and trusted workforces. Our registrants also have the expertise to deliver training, support and research for the Nutrition Decade from a policy to frontline delivery, on both a national and international level.

Q4. How could this draft work programme be improved to promote collective action to achieve the transformational change called for by the 2030 Agenda for Sustainable Development and the ICN2 outcomes? What is missing?

The draft work programme would be strengthened by the provision for a set of standards by which all nation states can measure and ensure those delivering actions are suitably qualified and competent in nutrition to deliver evidenced-based support and activities, providing the ability to undertake comparisons of delivery across nation states. Setting and monitoring against these standards also has the potential to create education development and subsequent empowerment of individuals gaining skills and knowledge to support improved health as noted in Action 3 para 30.

Q5. Do you have specific comments on the section on accountability and shared learning?

The Association for Nutrition supports the transparent reporting of progress and the use of an open access database, which would enable nutrition researchers to explore this rich dataset for further research and investigations to further this area of knowledge.

Attachment:

<http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/AfN%20Reponse%20to%20the%20WHO%20FAO%20Nutrition%20Decade%20Work%20Programme%20Open%20Discussion.pdf>

59. Ekin Birol, HarvestPlus, United States of America

Dear Colleagues,

So many thanks for this opportunity to provide feedback on this very important document. Please find our comments below. We look forward to collaborating with you to end malnutrition, in all of its forms.

Sincerely yours,

Ekin Birol, HarvestPlus

Dear UN colleagues,

We appreciate and wholeheartedly support your leadership and global vision to combat malnutrition in all of its forms. We would like to congratulate you on a very well-written and -

thought out first draft of the work programme and thank you for the opportunity to provide feedback thereon.

Here are a few comments and suggestions for your consideration:

1. We really appreciate the thought you have put into the mechanisms for ensuring accountability for the commitments to be made. The “carrot” approach of nutrition champions is especially positive and encouraging. We suggest the selection of the champions to be as transparent as possible and to be based on the rate of progress a country makes towards reaching the targets to be set. Otherwise the selection of champions may be questioned. We were wondering, in addition to the “carrot” approach would you also consider a “stick” approach (e.g., the World Bank’s recent naming and shaming of the countries that fail to prevent stunting in children).
2. Related to the setting of the targets and measurement of the progress, we would recommend UNSCN to regularly validate the countries’ self-assessments (trust but verify) and we also recommend the methodology and the data behind the target setting, progress evaluation and validation checks to be vetted by international experts in nutrition and evaluation, and to be open to public discussion and access.
3. Despite the thought you have put into the mechanisms for ensuring accountability for the commitments to be made, the commitments are still voluntary and there are no visible sanctions. We recommend the UNSCN to consider Paris Agreement type global efforts to tackle global the global malnutrition problem and to set global and national/regional level targets and establish mechanisms and timelines for achieving these targets. UNSCN could perhaps consult with the UNFCC on their learnings from such efforts and the effectiveness of implementing mechanisms such as the sustainable development mechanisms. International financial institutions could also be persuaded to couple national grants and loans to the level/efficacy of activities/policies/programmes a country is implementing to reach nutrition targets.
4. Action areas identified are comprehensive and also caters for future changes (e.g., population growth, urbanization, climate change, changing food preferences). Acknowledgement of trade as an area of action is most welcome, given that several regions of the world (e.g., sub-Saharan Africa) will not be able to feed their populations – even if productivity gains are realized as a result of adoption new technologies – in the future.
5. Two important issues/topics that we think are missing from the action areas are: (a) both in situ and ex situ conservation of agricultural biodiversity – which is crucial for the development of productive and nutritious varieties/breeds of crops and livestock that are adapted to ever-changing and agroclimatic conditions, and (b) biofortification, i.e., development and delivery of micronutrient-enriched staple food crops, which has been proven to improve vitamin A and iron deficiency status. Both conservation of agricultural biodiversity and promotion of biofortified crops merit inclusion under action area 1 (sustainable, resilient food systems for healthy diets). UNSCN might consider consulting/collaborating with the Convention on Biological Diversity on (a), and with HarvestPlus on (b). Both of these topics should also be included among the potential topics for the development of commitments and the establishment of action networks, listed in table 1.

6. Table 2 (Page 15) lists the meetings/conferences where UN Decade of Action on Nutrition will be promoted in 2017 and 2018. You could also include in this list the third Global Conference on Biofortification, which will be held in India in Q2 of 2018.

Many thanks for your consideration. We would be happy to elaborate on/discuss any of the comments raised above.

Sincerely yours,

Ekin Birol

60. Emile Hougbo, National University of Agriculture, Porto-Novo (UNA), Benin

[English translation will be available soon]

Je note que le programme prend en compte des aspects importants en matière de sécurité alimentaire et nutritionnelle en Afrique, notamment, la gestion des fruits et légumes, la question des pertes et gaspillages. Toutefois, il y a besoin aussi d'insister sur les spéculations comme les racines et tubercules (manioc, igname, taro) qui donnent de hauts rendements en Afrique et qui peuvent être source de plusieurs appuis nutritionnels. Il en est de même de certaines spéculations à forte valeur ajoutée économique, sociale et nutritionnelle en Afrique de l'Ouest comme le riz et la banane plantain. Enfin, je souhaiterais qu'un accent particulier soit mis sur la protection sociale, notamment la question de lutte contre la pauvreté, vue sous son angle dynamique. Il s'agit de retenir quelques mesures appropriées et différenciées contre la pauvreté chronique et la pauvreté transitoire des exploitants agricoles. Au fait, la pauvreté chronique est un frein essentiel à la promotion de la nutrition et de la sécurité alimentaire en Afrique.

61. Tozie Zokufa, Pan African Animal Welfare Alliance, South Africa

Dear Ms. Campeau and the UN Team,

Thank you for the opportunity to give inputs/comments on this draft document.

We would like to highlights the points below:

- * Diversification and promotion of plant-based sources of foods, particularly fruits and vegetables.
- * Currently about 2 billion people suffer from incorrect nutrition or micronutrient deficiency, in order to address this scourge and achieve the SDGs an approach like One Health, in this case One Nutrition is needed, where different stakeholders with different skills are giving contributions, e.g. Agricultural Economists, Soil experts, etc.
- * Vertical integration of food production should be discouraged and small producers encouraged to diversify their production.
- * The link between nature, culture and diets needs to be further explored and harnessed.
- * Nutrition education and training (institutional capacity building) needs to focus on governments and policy makers

62. Stefan Pasti, The Community Peacebuilding and Cultural Sustainability (CPCS) Initiative, United States of America

Thank you for the opportunity to contribute comments.

While I am far from having a comprehensive understanding of what actions are already in place, or will be initiated, I understand that a comprehensive response like this is needed, and could make unprecedented progress, under any conditions and circumstances.

What I would offer, from my point of view, is that there doesn't seem to be anything upfront in this document accounting for the unprecedented cultural transformation (which will take decades) necessary to mitigate global warming/climate change. The following--"Address the increasing number of emergencies (including natural disasters, conflicts and chronic emergencies) affecting the nutritional status of vast populations" (top of p. 4)—is a "close relative" to what I'm suggesting, but... there still seems to be an assumption of some kind of "status quo". It seems to me that "in unprecedented flux" rather than "status quo" would better characterize the next three decades.

Also, we live in *very complex cultural landscapes*, and there are many different kinds of moral compasses attempting to navigate such landscapes. As a consequence, people who are not sufficiently informed about critical issues are everywhere, and they are *investing their time, energy, and money—voting—all the time*. *Even a most comprehensive approach like the one outlined in this draft will not help people who perceive that their rights and freedoms to act as they see fit—even if irresponsibly—are established and sovereign rights.*

Further, besides the unprecedented challenge of mitigating global warming/climate change, I believe that what we have now is a **convergence of critical challenges** (here is a [two page description of the ten most critical challenges identified by this writer](#)) [all documents referred to in this comment accessible on homepage of The Community Peacebuilding and Cultural Sustainability (CPCS) Initiative at www.cpcsi.org .]

I understand there may not be many who agree with my own personal assessment. Even so, a valid argument can still be made that a "Recalibrating Our Moral Compasses Survey"--

--a very careful and conscientious approach to identifying critical challenges and solution-oriented activity--*and to comparing that input with working definitions for "right livelihood" and "moral compasses" (to increase consensus on such definitions)--*

--*which sought responses from carefully selected people from around the world (possibly 300) who are who are well known in fields of activity associated with creating a peaceful and sustainable world--*

--could be a catalyst for collaborative problem solving at the local community level (such as Community Visioning Initiatives, Neighborhood Learning Centers, and Neighbor to Neighbor Community Education Projects in local newspaper)(and such a survey could be undertaken by a coalition of universities and colleges).

Summary Point: if more people discovered for themselves how unprecedented the challenges ahead are (from international "Recalibrating... Surveys", and subsequent local collaborative problem solving), and how much we need to be learning and working together to manage the profound cultural transformation needed to respond to such challenges, better decisions would be made locally, by many more people, and across a much wider spectrum of challenges and positive tipping points.

More in depth discussion along these lines can be found in:

1) "[Unprecedented Challenges Ahead--February 2017](#)" (2 pages; Feb. 2017)

2) “Convergence of Critical Challenges Alert to Peacebuilders, Chaplains--from cpcsi.org” (10 pages; Feb., 2017)(accessible on homepage of www.cpcsi.org)

63. Colin Bell, Global Obesity Centre, Deakin University, Australia

Thank you for the opportunity to provide comments on the first draft of the Work Programme of the UN Decade of Action on Nutrition, 2016-2015.

The Global Obesity Centre (GLOBE) is a research group based in the Centre for Population Health Research at Deakin University and a WHO Collaborating Centre. Our vision is to catalyse improvements in population health, with a focus on obesity, through innovative research that empowers people and enables healthier environments.

Comments are arranged according to the headings and numbered paragraphs of the draft Work Programme.

Background

The background should explicitly acknowledge the contribution of climate change to malnutrition. Also it should indicate that this workplan is building on the acknowledged double burden of under-nutrition and overnutrition such that synergistic programmes and policies are sought.

Paragraphs 3 and 4

- Including the global nutrition and diet-related NCD targets from ICN2 and the SDGs (currently in the footnote on page 2) would (1) focus the work programme and (2) better represent the full scope of malnutrition the programme seeks to address

Aims and added value

Paragraph 9

- There is an overemphasis on policy in the aims and consequent underemphasis on programmes and financial commitments. National and international policies are a critical part of the change that is required to combat malnutrition but will need to be implemented together with complementary financial commitment and innovative programmes.

Paragraph 11

- Advocacy, networks and accountability appear to be the main value adds of the work programme.
- In addition to “Put in place an accessible and transparent mechanism for tracking progress” we recommend a point on shared communication of successful initiatives in order to spread progress more rapidly.
- Significant value would be added by including support for sourcing finance.
- The Nutrition Decade could also add value by incentivizing creativity and calling for innovation.
- With global nutrition and diet-related NCD targets already in place, It will be important to prioritise tracking and achieving in addition to the already stated setting impact and outcomes.

Guiding principles

It was difficult to determine what the guiding principles are from paragraphs 12 to 15. To make the principles clearer we suggest

- Focusing paragraph 12 on taking **action** that builds on existing efforts
- Focusing paragraph 13 on equity (addressing malnutrition for all people everywhere)
- Adding a new paragraph on synergistic partnerships (participation with all actors who are committed to reducing all forms of malnutrition)
- Joining paragraphs 14 and 15 to form a principle of creating enabling environments (helping partners and people remove barriers to action)

Action Areas

Paragraph 17

- This paragraph could strengthen the localized approach mentioned in sentence two more by identifying ways of financing, evaluating and sharing such programs.

Paragraph 18

- Acknowledge rather than map existing nutrition-related initiatives and movements. Mapping would be a huge under-taking that will hinder action. Also, develop mechanisms to strategically build on successful existing initiatives.

Action area 1

Paragraph 19

- We endorse the food systems approach but note that work on marketing, retailing and consumption is under-emphasised in the work programme. Suggestions follow for strengthening these areas.

Paragraph 20

- It is hard to see the value of international guidelines and standards on healthy diets given those that WHO already have in place. These should be updated and promoted as a supportive piece of work but not an action area of the work programme

Paragraph 21

- Nuts and seeds have been left out of this and other paragraphs listing the food groups that the work programme will focus on. They should be included as important part of a healthy diet

Paragraph 22

- Some of the background information on Food safety could be included in the background section rather than here
- Join with paragraph 23

Make action area 2 action area 5

- While this is an important action area, most preventive action happens outside the health system. Also treatment represents a response so action areas 3-5 should be promoted in the list because they focus on prevention

Action area 3

- This action area is missing a paragraph on **reducing marketing**, particularly to children, which should be considered a social protection activity

- A greater emphasis needs to be placed on teaching children horticulture and food purchasing skills

Action Area 5

- Food retail environments need to be included here

Action Area 6

- The commercial determinants of malnutrition need to be recognised and actions are needed to help countries manage conflicts of interest and achieve transparency in policy-making, political donations, programme financing and related areas.

Means of implementation

Paragraph 42

- It is not clear why countries commit to (1) (2) **or** (3). Achieving in country nutrition targets implies mobilizing financial resources for domestic action. '**And**' requires a greater commitment and would achieve a greater collective impact.

Paragraph 46

- This is the first mention of the Nutrition Decade Secretariat. They should be introduced in the background.

Nutrition champions

Paragraph 47

- Governments may prefer to be invited rather than declared as Nutrition Decade champions

Funding modalities

What incentives can the Nutrition Decade provide to encourage funders to support innovative programmes to combat malnutrition?

Paragraph 56

- The World Bank estimates do not include costs of scaling up effective programmes for obesity prevention or reducing marketing. These should be estimated so countries can address malnutrition in all its forms.

Paragraphs 64-66

- We see the value of a visual identity for the Nutrition Decade but recommend this is kept low key. The specific and specialized campaigns mentioned in para 66 may be counter to not establishing new structures as mentioned in para 67

Accountability and Shared Learning

- Will there be a country to champion Nutrition Decade at the UN General assembly?
- What accountability will be in place for financial commitments?

Paragraph 75

- How will the UN system identify good practices to support evaluations?

Table 1

- Addressing the impact of climate change on fruit, vegetable and animal sources of foods should be a topic or more explicit in existing topics

Table 2

- A forum on financing is needed in the first biennium

64. Sumantra Ray, NNEdPro Global Centre for Nutrition and Health in Cambridge, United Kingdom

On behalf of the NNEdPro Global Centre for Nutrition and Health in Cambridge, we are delighted to submit our response to this cardinal and timely initiative. We particularly hold the fort in regard to Nutrition Education of healthcare and public health professionals as a self-sustaining strategy to promulgating adequate preventative as well as therapeutic aspects of Nutrition across at-risk populations, globally. We would be happy to have further dialogue and form partnerships with both the secretariat as well as other relevant stakeholders.

Professor S Ray, NNEdPro Chair and Executive Director & Dr G Jones, Head of Core Support for the NNEdPro Group

The Need for Nutrition Education/Innovation Programme (NNEdPro) and its Global Centre for Nutrition and Health in Cambridge, welcomes the opportunity to comment on the first draft of the 'FAO/WHO Work Programme of the UN Decade of Action on Nutrition, 2016-2025'.

Q1. Does the work programme present a compelling vision for enabling strategic interaction and mutual support across existing initiatives, platforms, forums and programmes, given the stipulation of Res 70/259 that the Decade should be organized with existing institutions and available resources?

As a global organisation concerned with malnutrition at all levels we fully support a collective vision that is inclusive of all, irrespective of life stage, geographic location or economic standing. The vision should underpin the work programme and its inclusion of activities addressing the complex and multi-factorial issues of over and under nutrition, food security, availability, sustainability, safety and access to knowledge and training.

The draft work programme identifies the use of existing institutions and resources but must also ensure that it is open to utilising the skills and assets of emerging stakeholders as well as institutions with established FAO/WHO relationships.

To achieve the commitments made at ICN2, in the 2025 Global Nutrition and diet-related NCD targets and in the 2030 Agenda for Sustainable Development it is essential activities are inclusive, accountable and transparent with data collection and evaluation undertaken in agreement with open data principles.

Q2. What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition?

The Nutrition Decade aim to 'be for all' is commendable, as malnutrition is a global issue impacting on health and the environment, as well as the economy at both national and global level. However research has shown there are currently significant gaps in the required nutrition knowledge and skills to deliver change, particularly in countries with the greatest need. This is an area that needs to be developed, as without a trained and competent workforce nutrition

interventions will be limited in their impact and effectiveness. Whilst it is the focus of Action Area 3, the need for nutrition education, knowledge and training actually underpins all the Action Areas. We believe that the work programme would be strengthened by providing further clarity that nutrition education, training and skill development is the foundation for all action, so as to underpin the importance to member states investing in this fundamental requirement. In addition we believe the draft work programme would be strengthened by the explicit mention of the role of implementation science. The funding, application and capacity for implementation science could, for example, be highlighted in Table 1. Furthermore, it is important for such Nutrition Education to be targeted towards a critical mass of healthcare and public health professionals and not just simply the population at large. The benefit of targeting such a group would be that statutory regulated professionals have a responsibility to consistently discharge safe, effective and evidence-informed advice, taking into account individualised requirements and circumstances. Internalising adequate Nutrition knowledge and skills within the healthcare and public health workforce is therefore a self-sustaining strategy.

Q3. Do you feel you can contribute to the success of the Nutrition Decade or align yourself with the proposed range of action areas?

NNEdPro is a global organisation with expertise in researching, developing and delivering nutrition education and skill development. Our multi-country network is ideally placed to support the Nutrition Decade in supporting the development of measurable markers for the nutrition knowledge and skill level of those delivering change and activities at a global, national and local level. Through our partnership with GODAN (Global Open Data for Agriculture and Nutrition) we can also support the implementation requirements for open data collection and reporting.

Q4. How could this draft work programme be improved to promote collective action to achieve the transformational change called for by the 2030 Agenda for Sustainable Development and the ICN2 outcomes? What is missing?

To promote collective action the draft work programme would be improved by the inclusion of more specificity in respect to timelines, activities, responsibilities and measurable outcomes. This could be achieved by providing more detail in Table 2 following dialogue with member states and stakeholders.

Clearer measures of capacity, activities and outcomes would be beneficial for transparently assessing impact and success. NNEdPro would request in particular the inclusion of measures for nutrition education provision (particularly to the healthcare and public health workforce) and for the measurement of the level of nutrition knowledge and skill of those delivering interventions and initiatives 'on the ground'. This would enable Member States to clearly determine and measure investment in this area and enable global comparisons and accountability.

Q5. Do you have specific comments on the section on accountability and shared learning?

NNEdPro supports transparent reporting and the principles of open data. The use of a publicly-accessible repository would enable nutrition researchers to explore this rich dataset for further research and investigations to further this area of knowledge. We would also seek to utilise our Annual International Summit in Medical Nutrition Education and Research for knowledge exchange from the UN Decade of Actions in Nutrition, with a dynamic international cross-section of healthcare professionals in particular.

65. Stefano Prato, Society for International Development, Kenya

The attached documents convey the collective comments of the platform of public interest civil society organizations and social movements that have actively engaged in the preparatory process for the Second International Conference on Nutrition (ICN2) and continue to advance its follow-up, including the Decade of Action on Nutrition, in the context of the civil society vision statement on nutrition. Besides the overarching and specific comments on the first draft programme (currently only in English), civil society's vision for the Decade is articulated in the Civil Society "Manifesto" on the Decade of Action on Nutrition (available in English and Spanish - French will soon follow). These documents are still at advanced but not yet final stage as consultations are still ongoing at various levels of the multiple constituencies of the group.

Attachments:

<http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/Civil%20Society%20Collective%20Comments%20-%20First%20DoA%20WP%20-%2026%20Feb%202017.pdf>

<http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/EN%20-%20Civil%20Society%20Manifesto%20on%20DoA%20on%20Nutrition%20-%20Advanced%20Draft.pdf>

<http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/ES%20-%20Civil%20Society%20Manifesto%20on%20DoA%20on%20Nutrition%20-%20Advanced%20Draft.pdf>

66. Samantha Chivers, 1000 Days, United States of America

Dear Christine,

Please see below the submission to the open discussion from 1,000 Days in Washington, D.C. Please feel free to contact me with any questions.

Best,

Sam

1. Does the work programme present a compelling vision for enabling strategic interaction and mutual support across existing initiatives, platforms, forums and programmes, given the stipulation of Res 70/259 that the Decade should be organized with existing institutions and available resources?

The work programme provides a basic framework for organising action across the UN agencies, as well as providing strategic opportunity for donor and high-burden countries to take action against malnutrition. However, without either a dedicated funding stream, institutional space and staff, or compulsory actions for members, the initiative does not provide a compelling vision for action.

As a coordinating mechanism, the Decade will not have a lot of power. Without dedicated funding, the vision presented here is primarily a monitoring one, not an active or advocacy one, so does not reflect the urgency in which the world must invest in nutrition to achieve the WHA targets.

Unfortunately, we believe that the roles and responsibilities remain vague, accountability issues are not addressed in detail, and the 'how' remains to be detailed. In order to enable strategic

interaction, there is a need to have more of a focus on resource mobilisation, more concrete outlines of specific actions, timelines/time commitments and next steps.

A welcome addition would be more country-specificity outlining a focus on high-burden countries and awareness of differences between locations in terms of how to tackle malnutrition in all its forms.

2. What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition?

3. How could this draft work programme be improved to promote collective action to achieve the transformational change called for by the 2030 Agenda for Sustainable Development and the ICN2 outcomes? What is missing?

To 1,000 Days, the goal is to integrate nutrition as a cross-cutting issue into the work of all UN agencies, but how to do that is not clearly enumerated in this workplan. One way to do that would be to require UN agencies to implement nutrition (-sensitive) indicators into related programming.

Related, this work plan sets out to accomplish a lot in the next 10 years, with very little guidance on how to stay on track. This is problematic to reaching the goals laid out, but also to suggesting any urgency of action. Having annual goals as benchmarks to periodically measure success against throughout the Decade would reflect its progress.

We also question the level of ambition to member states only achieving ‘one or more’ of the nutrition targets, or ‘one or more’ of the ICN2 recommendations, as this will not hit the 2030 targets. Commitments should not be voluntary, as this is unambitious and not SMART enough - clear time-bound targets and commitments over the next two years are needed, with review and follow up hereafter.

Reports to the UN coordinating bodies (WHA, UNGA) are biennial, not annual. That doesn’t provide many opportunities for information from a “decade” of action; in fact, perhaps only three or four reports will be provided by the end of the decade, after the platform is fully implemented. A lack of annual focus also does not provide a lot of impetus for countries to move quickly and thus, to achieve results. We understand that progress in changing malnutrition plans will take time, and there may not be too much progress to report each year, but small victories, including the development of costed plans and the uptake of policies in high-burden countries, is a victory and should be celebrated. Annual reports would provide a more compelling vision for all actors.

Having a clearer remit to promote integrated action between nutrition and other nutrition-related sectors such as WASH.

Table 2 seems incomplete, without specific timelines and details of activities and responsibilities. There is also a lack of what the intended impact/outcome would be for the secretariat’s activities (besides ‘convening member states’ etc.). We therefore urge the Secretariat to finalise Table 2 in conversation with member states and civil society actors to act as a work plan for the period April 2016-April 2018.

The range of action areas is broad but relevant to the issue.

The communications aspect seems well designed and ready to implement.

4. Do you feel you can contribute to the success of the Nutrition Decade or align yourself with the proposed range of action areas?

1,000 Days is the leading NGO that advocates for action and investment in child malnutrition. As such, our advocacy work aligns with several action areas of the UN Decade of Action. We are also the secretariat for the *International Coalition for Advocacy on Nutrition (ICAN)*. As such, we are managing ICAN's response to the Decade of Action, in both advocacy and communications. As both 1,000 Days and ICAN representatives, we are willing to share advocacy goals and targets, and use and support accountability mechanisms. We are also willing to review and participate in shared creative work as part of campaigns, and are very interested in working directly with UN leaders to co-develop campaigns as a CSO partner.

5. Do you have specific comments on the section on accountability and shared learning?

A database can be a great tool for monitoring, accountability and advocacy, provided it is kept up to date and with strong institutional support and separate earmarked funding. Specifics of where such earmarked funding would come from would be a welcome addition. ICAN believes that the reporting to UN coordinating bodies, such as UNGA and WHA, should be done on an annual basis, not biannually, to have annual goals as benchmarks to monitor progress and success, create a sense of urgency and ensure achievements are made within the Decade's existence. Commitments by governments are only encouraged as voluntary and not required - and all reporting done through self-assessments – which will lead to issues of accountability. There is a clear need to outline whether and how this information will be verified.

67. Wenche Barth Eide, Department of Nutrition, University of Oslo, Norway

1. Does the work programme present a compelling vision for enabling strategic interaction and mutual support across existing initiatives, platforms, forums and programmes, given the stipulation of Res 70/259 that the Decade should be organized with existing institutions and available resources?

That nutrition has been bestowed with a “UN Decade” assignment is a serious and honorable matter and should reflect the responsibility this entails of really drawing on the wider United Nations framework as informed by its Charter. While appreciating that this is to be an action programme, the nutrition community must recognise some of the fundamentals of the United Nations and build them into the frame for the Nutrition decade and fit the action areas accordingly.

2. What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition?

I miss an introduction or preamble which problematises in short and crisp language, some of the major causes of malnutrition at different levels, hereunder as related to skewed economic and other power relationships, and forms of exploitation that lead to poverty as the key underlying determinant of food insecurity, hunger and undernutrition and to a large extent also poverty-based obesity and related NCDs. The responsibilities of the corporate sector and other economic interests should already at the beginning be tabled as potentially conflicting with people's interests, also to make it more meaningful to establish an action network for managing conflict of interest.

The Decade coincides with signs that human rights as a basis for food security and nutrition programming, implementation and monitoring is again on the rise, informed particularly by the human right to adequate food and diet-related health but also other relevant human rights. While the ICN2 was weak on this, the Nutrition Decade is the occasion to bring human rights more systematically to the fore in fighting all forms of malnutrition. The draft programme has an explicit

opening for this in paragraph 14: “The Nutrition Decade will provide an enabling environment such that national, regional and international policies and programmes respect, protect and fulfil human rights obligations in accordance with the progressive realization of the right to adequate food and nutrition and other related human rights.”

However, this statement is meaningless unless further operationalised for what the human rights obligations listed (now reckoned as part of international human right law) would mean in practice at each stage in the “action”. It is fully possible to carry out that exercise and it should be done as part of the further development of the work programme. Inspirations can be found in the excellent work carried out by the FAO Right to Food Unit since 2005, and in more recent initiatives by several departments of WHO, including Nutrition for Health and Development Department.

3. Do you feel you can contribute to the success of the Nutrition Decade or align yourself with the proposed range of action areas?

4. How could this draft work programme be improved to promote collective action to achieve the transformational change called for by the 2030 Agenda for Sustainable Development and the ICN2 outcomes? What is missing?

Members of the Norwegian-based research and action network FoHRC – Food, Human Rights and Corporations, would in principle be ready to engage in discussions how elements of a rights based approach (as developed by the UNDG and specified further for the right to food by FAO); could bring new dimensions to the conduct of action on nutrition within the areas proposed. The relative length of the decade (9 years) offers the opportunity for testing human rights theory and values against practical realities, drawing on experiences from policy/programming and grassroots initiatives as would already be documented. Master students trained in both nutrition/PHN and human rights might be available for part of this work, also in their own interest.

And why not establish a separate Action network for operationalising a human rights based approach to action on nutrition? Or, combine this with the one proposed on Conflict of interest? One should also remember that one of the key values in human rights thinking and practice is the accountability of duty-bearers.

A special case of a human rights approach is the work of the UN regarding business and human rights (UN Guiding Principles on Business and Human Rights adopted by the UN Human Rights Council in 2011), emphasising Member states’ established obligation to protect their population from any harm done by a third party e.g. business, and at the same time the need for business to respect human rights in their operations and business relations.

FoHRC tries to operationalise these principles for the food-related business sector, which should be of interest to all concerned with the need for the food industry to end harmful practices (e.g. unethical marketing to children) and begin respect the human right to adequate food and diet-related health.

5. Do you have specific comments on the section on accountability and shared learning?

The Independent Accountability Panel seems to be the potentially most important mechanisms for accountability in the area of women and children’s (nutritional) health.

On shared learning, there will be a general need for sharing/learning new knowledge and experiences across sectors. In the case of human rights and nutrition, two very different sets of

knowledge (legal and biomedical) and practice must be shared and synthesised for mutual understanding of how to handle nutrition challenges through a rights-based approach. The work programme should take account of this.

68. Food Industry Asia (FIA) Secretariat, Singapore

To: FSN Moderator

Subject: FIA Responses to the Open discussion on the first draft work programme of the UN Decade of Action on Nutrition

Dear Sir/Madam,

Food Industry Asia (FIA) would like to thank you for the opportunity to participate in the consultation on the Open discussion on the first draft work programme of the UN Decade of Action on Nutrition.

Please find attached contribution from FIA.

Should you have any questions, please feel free to contact the Secretariat at fia@foodindustry.asia or Celia Zheng, Regional Policy Officer of the FIA Secretariat at celia.zheng@foodindustry.asia.

Best regards,

Food Industry Asia (FIA) Secretariat

1 Scotts Road, Shaw Centre #19-07/08, Singapore 228208

Attachment:

<http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/170224%20FINAL%20Draft%20FIA%20Response%20-%20Nutrition%20Decade%20Work%20Programme.pdf>

69. Judith Nihorimbere, The Micronutrient Initiative, Canada

Dear Christine,

I have followed discussions in this Forum and have enjoyed many shared contributions.

I would like to add the following:

Even though many talked about the need of strong coordination and Leadership, my big concern is how actors in diverse areas build synergies to ensure strong impact. In many times, complementarity is only on paper even when we hear one UN, we don't see much in concrete action. Often what we see is a kind of verticality in the way every organisation implements interventions and some times on less benefit for people served when they are the same. So I think the program should help countries create concrete ways to bring actors be complementary to reach better results.

Thank you and best Regards,

Judith

70. Mars, Incorporated Food Safety Team

Thank you for the opportunity to offer comments on the E-consultation. We are pleased to note the awareness placed on the role of food safety and quality. We have offered editorial comments with deletions shown in track changes and additions in red on Action Area 1.

Please find the comment attached.

Attachment:

http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/DOAN%20FINAL%2025.17%20%20Mars%20Comments_0.docx

71. Morgane Danielou, Private Sector Mechanism, France

UN Decade of Action on Nutrition

Draft Programme

Comments from the Private Sector Mechanism

The Private Sector Mechanism welcomes the opportunity to provide comments on the work programme of the UN Decade of Action on Nutrition. Several PSM members have already commented individually, this is a summary of our views.

1. Does the work programme present a compelling vision for enabling strategic interaction and mutual support across existing initiatives, platforms, forums and programmes, given the stipulation of Res 70/259 that the Decade should be organized with existing institutions and available resources?

The PSM supports the overall aim of the Work Programme to provide a clearly-defined, timebound operational framework for governments to adopt and implement nutrition-related initiatives to create sustainable food systems and enabling environments that promote healthy dietary practices and support the fulfillment of ICN2 commitments and achievement of the diet-related NCD targets by 2025 and the Sustainable Development Goals by 2030. PSM supports a Work Programme that is guided by the principles of inclusiveness and we are encouraged that the current draft work programme recognizes that addressing all forms of malnutrition and NCDs requires the commitment of all sectors and of a wide range of stakeholders, including the private sector.

2. What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition?

The PSM supports the selection of the 6 priority areas. On trade, we would like to point that trade policy frameworks that foster open, dynamic, and competitive economies increase food security and improve nutritional outcomes. Trade is an essential tool for ensuring commodities and food can be effectively and affordably distributed when and where they are needed and for promoting economic opportunities for producers⁴, in particular smallholder farmers and SMEs. Trade also creates opportunities beyond the farm because of the potential for value-added employment in

⁴ <https://www.oecd.org/agriculture/ministerial/statements/ag-ministerial-2016-summary.pdf>

food processing, marketing and distribution⁵. Trade policies also have a knock-on effect on farmers' and countries' decisions to invest in agriculture and to adopt new technologies. Open markets and private enterprise are critical for development and are an important part of achieving SDG 1 and 2. Trade liberalization protects national food markets against domestic shocks, and thus insulates vulnerable consumers from price volatility, by allowing more food to be imported in times of shortage and exported in periods of plenty. Standard setting is of key importance to trade. Global standards need to be science-based and developed through broad-based consultations. The Codex Alimentarius plays a critical role in food trade, as the most important international standard setting body in the areas of food safety, quality and fairness. It enables trade in agricultural products to benefit producers, importers and consumers.

3. Do you feel you can contribute to the success of the Nutrition Decade or align yourself with the proposed range of action areas?

In order to effectively achieve the Decade of Action's goals, we believe that the private sector should play a key role in helping people everywhere to achieve and maintain balanced diets and healthy lifestyles. Improving food security worldwide requires the collective effort of all stakeholders. We support actions for sustainable food systems that promote healthy and safe diets and strategies that integrate nutrition and food safety objectives into food and agriculture policies and strengthen local food production and processing. We believe that real progress can be made only through a constructive, transparent engagement between Governments, international organizations, the private sector and civil society. The Private Sector Mechanism is committed to working with all stakeholders to contribute to the success of the Decade.

4. How could this draft work programme be improved to promote collective action to achieve the transformational change called for by the 2030 Agenda for Sustainable Development and the ICN2 outcomes? What is missing?

The PSM continues to advocate for a focus on foods and diets rather than single nutrients in any policy development and activities, other than where specific micronutrient deficiencies need to be addressed through targeted food fortification and/or supplements. Foods and diets are far more than the sum of their individual nutrients. Nutrients are not consumed in isolation and it is inaccurate to generalize about the effects of a single nutrient without considering the food matrix in which it is present. In some countries, dietary guidelines are shifting away from recommendations based on nutrients or foods in isolation and now focus primarily on healthy eating patterns. In addition, we wish to underline the added value of focusing on stimulating concrete nationally determined policies and programmes with the objective of creating sustainable food systems and enabling environments that promote healthy dietary practices. A localized approach is of utmost importance in order to ensure member state ownership of initiatives and policies in the context.

We wish to support HarvestPlus comments when they note that "Two important issues/topics that we think are missing from the action areas are: (a) both in situ and ex situ conservation of agricultural biodiversity – which is crucial for the development of productive and nutritious varieties/breeds of crops and livestock that are adapted to ever-changing and agroclimatic

⁵ OECD 2016 agricultural ministerial summary <https://www.oecd.org/agriculture/ministerial/statements/ag-ministerial-2016-summary.pdf>

conditions, and (b) biofortification, i.e., development and delivery of micronutrient-enriched staple food crops, which has been proven to improve vitamin A and iron deficiency status. Both conservation of agricultural biodiversity and promotion of biofortified crops merit inclusion under action area 1 (sustainable, resilient food systems for healthy diets). UNSCN might consider consulting/collaborating with the Convention on Biological Diversity on (a), and with HarvestPlus on (b). Both of these topics should also be included among the potential topics for the development of commitments and the establishment of action networks, listed in table 1.”

Finally, we do not understand Table 1 in Annex: Potential topics for the development of commitments and the establishment of action networks. We are not sure what this is meant to be, how the list was compiled and how it is supposed to be used. The list of topics sounds eclectic and not based on any particular piece of research. We would recommend deleting it from the work programme at this stage, unless clarification is given into how it was developed, what the rationale and criteria were for selecting the topics and how they are meant to be used.

5. Do you have specific comments on the section on accountability and shared learning?

We are encouraged to see that the Work Programme recognizes that actions taken by governments and other stakeholders must rely on the latest scientific evidence. The PSM also strongly believes that policy initiatives must be supported by strong scientific evidence.

72. Susan Walker-Meere, Lakeland Community College, United States of America

I would like to add that a focus on ethno/anthro food knowledge be taught. Each culture has indigenous knowledge that should be preserved. This knowledge includes food preparations methods including fermentation that is now being found to be 'cutting edge' in the research areas of human health and the microbiome and interdependence of humans and the organisms that help keep us functioning to our peak capacity. Fermentation also acts to preserve foods (from spoilage and harmful organisms) and prolongs 'shelf-life' where re-refridgeration is limited.

73. Pat Mc Mahon, Nutrition for All, Ireland

Nutrition For All Analysis of work programme of the UN Decade of Action on Nutrition, 2016-2025.

We at 'Nutrition For All' would like to thank the UNSCN Secretariat for giving us the opportunity to contribute to this living document. The Work Program is a good step in showing the open transparent nature of what Nutrition Decade aspires to be. Given the excellent submissions on this forum, the Work Program will change rapidly. We at 'Nutrition For All' look forward to the work programme's evolution.

In particular, we would like to cite submissions from the Sun Movement, regarding the investment case for good nutrition and the double burden as well as country ownership, Raghavendra Guru Srinivasan, regarding the business case for good nutrition and national ownership on tax policy. We strongly agree with Sandy Thomas regarding the lack of reference to obesity and childhood obesity. Save The Children legally binding legislation and clearly reminding us of the metrics in terms of what funding is actually required. We strongly endorse the concept from Jane Sherman on a framework policy on nutrition interventions to act as a guide for Government and aid organizations under criteria such as cost effectiveness and impact. We would like to also to congratulate Jane on her outstanding submission on nutrition education. We pay special attention to Stefano Prato from the

Society for International Development Kenya for an excellent and systematic set of documents. Samantha Chivers from 1000 days United States for giving us a realistic overview of funding issues with Decade Nutrition itself.

We would like to contribute to Decade Nutrition's work program vision, elements and action areas with the following recommendations and rationales.

1. The Nutrition Landscape – Talking About All of The Problem – All of The Time:

The Nutrition landscape:

The nutrition landscape has changed so rapidly that we in the nutrition community do-not either have the words or mindset to deal with it. If we are to finally end global malnutrition it needs to be done using an inclusive and unified approach. We need to be talking about all of the problem all of the time.

Language:

We find that a barrier to a unified approach to ending malnutrition is our narrative around it. The recurring statements by the Nutrition Community which call obesity over-nutrition is confusing because we simply cannot be over nourished and malnourished at the same time. It suggests a lack of urgency and is factually incorrect.

Recommendations:

1.1 We propose two possible terms for malnutrition in its two manifestations that are both clear and accurate.

Underweight Malnutrition or Sub Asian Malnutrition and Overweight Malnutrition known as Obesity.

Rationale:

We believe that the words we use are important because it will, in particular, allow Western Nations to take ownership of the problem. It will also allow governments to present more accurately to its people, the scale and magnitude of the problem that we are all facing.

2. Looking at malnutrition in all its forms:

The Global Nutrition Report 2015 has stated that in order to achieve the second sustainable development goal "we need to pay as much attention to the obesity epidemic as we do to under nutrition". Given that the ultimate aim of Decade Nutrition is to support ICN2 and the SDGs and the adoption of the WHO's global noncommunicable disease (NCD) targets by 2025. It is surprising therefore that the draft Work Program is focused on underweight malnutrition with much less emphasis on overweight malnutrition. As was pointed out by Sandy Thomas from the Global panel on Agriculture and Food Systems for Nutrition. It is also surprising to us that the WHO European union and South East Asia action plan for ending obesity in children has not been mentioned given its relevance to global malnutrition.

The Nutrition Decade needs to be a time when we radically redefine our thinking around malnutrition and food production systems. We need to understand better how we present the scale of the problem to our citizens.

Recommendations:

2.1 That Nutrition Decade focuses equally on all aspects of malnutrition

2.2 In line with the Global Nutrition Report 2016 “All national governments should establish SMART national targets for stunting, wasting, exclusive breastfeeding, low birth weight, anemia, childhood overweight, adult obesity, diabetes, and salt reduction by the end of 2017. These targets should be ambitious but achievable and aligned”

2.3 It is imperative that we find ways to make nutrition newsworthy, interesting and personally relevant to everyone. We can do this by creating an inclusive approach that has at its center citizens right to informed choice.

We must directly tackle the impacts and perpetuating cycles of over consumption to health and wellbeing and consequential climate change. We would also suggest that Stainable Development Goal number 12 has a much higher relevance to nutrition than is being suggested. Both our personal consumption and production of food is affecting our lives so negatively. We must act now with the knowledge of what 2050 will be like if we do not succeed. History's pen is watching what we are now doing.

2.4 Establish a world nutrition summit template on the climate change talks in Paris. Please find attached document and brief overview further on in the document.

3. Investment Needed – We Know What To Do:

The painful truth that every organization and institution working in nutrition faces daily, is that we know exactly what to do but we simply do not have the financial resources or the political support to do it or political will

Not only is under investment in nutrition morally incomprehensible it does not make economic sense to not invest given the clearly documented returns. Malnutrition in all its forms is costing 2 trillion dollars per year. We know 6.5 million people, half of whom are children are dying annually because of its effects. According to the World Bank we need an annual investment of 7 billion dollars. Investment over the next 10 years which will give a return of 17 times that number. Tackling malnutrition is proven to be one of the most powerful policy options available to improve our overall health and long-term prosperity. So why is this investment not happening?

Recommendations:

3.1 As a matter of priority set up an advisory nutrition funding council that will reevaluate and reenergize all possible funding and financial streams such as:

The unrealized promise of development aid reaching 0.7% GDP

- Look again at where official development assistance (ODA) is being allocated and how new rules on how it is defined, is hindering on the ground impact.
- External Debt repayments of low-income countries. Following the example of Denmark on its stance on unethical lending to Mozambique. Given the high returns on investment on nutrition it makes financial sense to Reinvest the Debt straight into nutrition. This reinvestment could be one of the flagship calls for Decade Nutrition.
- Strengthen advocacy for Investment
- Consider a Reinvest the Debt campaign

- International Monetary fund
- World Bank
- Investment funds
- Stock market
- Reinvest unhealthy food tax back into nutrition initiatives

4 Country Commitments Accountability:

"More must be done to hold countries, donors, and agencies accountable for meeting their commitments to improve nutrition." Global Nutrition Report. (2014)

Recommendation:

4.1 Governments to set legally binding targets in order to meet commitments on ending malnutrition in all its forms by 2030. To the extent we know the scale of the problem, we can set targets to reduce it by percentage year on year from now till 2030. The voluntary route is unfortunately not yielding results. Millions of people are dying on our humanitarian watch. We are now at the scale of billions of people are not reaching their full potential because their basic rights to nutrition are not being met. The malnutrition crisis should be committed to, in the same legally binding way we are committing to change our behavior on Climate Action, including cost implications which are to be directed into investment in nutrition.

We believe that these need to be key questions of the Nutrition Decade.

5. SUN Movement Mechanisms – A Template for Change:

A stated aim of Nutrition Decade is to foster a global movement to end all forms of malnutrition within existing structures. We are fortunate to have such a structure in place already in the form of the SUN Movement, which is a framework for action that is working. Its vision is to have a world free from malnutrition in all its forms by 2030. It is impossible however for the movement to achieve its stated vision, as it is continuing to concentrate on underweight malnutrition.

However, the mechanism is in place for that to change 'SUN is open to all countries whose governments commit themselves to scaling up nutrition and to all stakeholders committed to providing support.' (SUN ICE ToR, 4) (Mokoro, 2015: 8)

A central question for the future of the movement needs to be whether the next developmental stage requires it to become a truly global movement.

Recommendation:

5.1 SUN's evolution needs to include a broader nutrition objective that would also specifically address over weight malnutrition and so embrace all forms of malnutrition on an equal footing. Tailoring SUN support to different country contexts and needs. The west can take a leadership role with swift multi sectorial actions spurred on by the active membership of the SUN Movement. Citizens know if they are overweight, they do not however know that they are malnourished. This might help to generate public debate.

Rationale:

Creating a truly global multi-sectorial will help all countries and its' citizens to face the problem ahead of us inclusively. This so far has not happened and in the view of Nutrition For All is unlikely to happen given current plans. Resources will need to be in place to facilitate such an expansion. We however feel strongly that such a move can and will be revenue positive.

6. Call to Action - Nutrition For All World Summit:

A proposal has been sent in late 2016 to a small group of people in the nutrition sector for a Nutrition For All World Summit. Inspired by the Paris climate change talks, the Nutrition for All Summit, where every country would recognize their problem in terms of malnutrition and make public commitments to its citizens. This is what Tom Arnold former SUN movement coordinator regarding the proposal for the Nutrition for All World Summit. (2016)

“There is a lot in the submission I agree with. I also admire the work you have been doing in India over many years and the credibility this brings to underpinning what you are advocating for.”

Find attached Nutrition For All world summit proposal.

Rationale:

Over-nutrition, obesity and their associated non-communicable diseases are now widespread and increasing so rapidly that the World Health Organization refers to this phenomenon as a new pandemic. Moreover, obesity is growing in all developing regions, even in countries beset by high levels of poverty where increasingly there is a double burden on the healthcare system from Under Weight Malnutrition-nutrition and Overweigh Malnutrition.

All international conferences on nutrition focus on underweight malnutrition. A unified global response is needed and has been shown to work as is evident in the Climate Change talks. A key to the summit will be to stimulate citizen involvement. Nutrition Decade can play a key role in this. Investment in solving underweight malnutrition and overweight malnutrition would be key elements of the proposed summit.

Data Collection:

“As the world embarks on an ambitious project to meet new Sustainable Development Goals (SDGs), there is a urgent need to mobilize the data revolution for all people and the whole planet in order to monitor progress, hold governments accountable and foster sustainable development” A World That Counts 2014

Nutrition For All have developed and completed the first year trialing of the 1000 day app. It is a real time data collection monitoring and evaluation tool that encourages stake holders to implement targeted nutrition programs around the first 1000 days of a child's life. It is bringing data monitoring into the 21st century with an intuitive, easy to use interface that is within the learning capabilities of all field workers. It relies on SMS to send and received data such as real time outcomes.

A short video outing the app is available to watch. The system cost E 120,000 to build and a lot of hard work. We are taking steps for this to become open source so that Governments can create there own versions of it and helping regain autonomy over their Nations nutrition status. We are seeking more stakeholders to conduct field trials of the 1000 day App.

How can we contribute to Decade Nutrition:

We at Nutrition For All believe that we can be a strong independent voice of advocacy with an inclusive approach. We will advocate for nutrition without prejudice and without preconceived ideas of what is not possible. We come with a decade and a half field experience in targeted Maternal nutrition programs. And Community Management of Severe Acute Malnutrition (CMAM)

We warmly welcome all contacts regarding this submissions.

nutritionforall.net@gmail.com

Pat J Mc Mahon

74. Department of Economic and Social Affairs of the United Nation

The programme provides concrete guidelines and steps forward in the Decade of Action on Nutrition. Yet, it may profit from a more proactive policy-oriented focus.

- The work programme is comprehensive and: a) provides a summary of the state of affairs on global malnutrition; b) distinguishes the various forms of malnutrition (undernutrition, vitamin & mineral deficiency, overweight/obesity, diet-related non-communicable diseases), c) identifies the international framework of agreements that prioritizes nutrition, d) identifies aims, added value, guidelines, actions areas, means of implementation and accountability elements.
- Actions areas and means of implementation constitute a sizable part of the substantive parts of the programme. It would be important to include or make reference to relevant experiences of nutrition programmes and actions, to set a more grounded context under which aims and action areas of the Nutrition Decade can occur.
- With regard to the background section, please note:
 - The CRPD requires State Parties to “prevent discriminatory denial of...food and fluids on the basis of disability” [CRPD 25(f)]
 - The CRPD requires State Parties to “take appropriate steps to safeguard and promote the realization of [...the right to adequate food...] without discrimination on the basis of disability” [CRPD 28]
 - The 2030 Agenda recognizes that 80% of persons with disabilities live in poverty (at para. 23)
 - Children with disabilities are at higher risk for malnutrition. A strong bilateral relationship exists between malnutrition and disability. The WHO report “Developmental Difficulties in Early Childhood” (2012) notes that Countries with high levels of malnutrition and nutrient deficiency often also report higher rates of disability and developmental delays. http://www.who.int/maternal_child_adolescent/documents/development_difficulties_early_childhood/en/
 - The UNICEF report: “Stronger Together Nutrition-Disability Links and Synergies Briefing Note” highlights that maternal and early childhood malnutrition lead to the development of disabling conditions and that the children with disabilities are at higher risk for experiencing malnutrition. https://www.unicef.org/disabilities/files/Stronger-Together_Nutrition_Disability_Groce_Challenger_Kerac.pdf

1.

- Action Area 3 (on social protection and nutrition education): Stigma surrounding disability may result in children with disabilities being given less nutritious or smaller quantities of food, or intentionally not fed at all, with families rationalising that limited resources should be devoted to children who have a greater chance of surviving and contributing to the household. In order to be fully effective nutrition education must include elements to combat disability stigma. (UNICEF report “Stronger Together Nutrition-Disability Links and Synergies Briefing Note” (2011) pg. 8)
- Action area 4 (on trade and investment) cites general yet relevant policy tools such as taxation, subsidies for health foods, removal of subsidies to unhealthy foods and supply-side incentives. It would be good that such rich identification be also complemented with analysis in this and other action areas.
- Action area 5 (Safe and support environments for nutrition at all ages):
 - The places where food and water are obtained must be accessible to all. Community based health and nutrition services must be provided in buildings that are accessible.
 - Child nutrition programmes should take into account that children with disabilities are less likely to attend school than children who do not have disabilities. Thus programmes designed to function only through school settings may not adequately reach children with disabilities. (UNICEF report “Stronger Together Nutrition-Disability Links and Synergies Briefing Note (2011) pg. 6)
- Action area 6 (Review, strengthen and promote nutrition governance and accountability): It would be useful to take into account the observations on institutions and linkages to SDG2, that was considered in session 3 of the expert group meeting held in Vienna in preparation for HLPF 2017 on readying institutions and policies for integrated approaches to implementation of the 2030 Agenda (with FAO, WHO and UNICEF in attendance, among others). (available at <http://workspace.unpan.org/sites/Internet/Documents/Report%20Vienna%20meeting%20FINAL.docx.pdf>)
- Table 1 is a great contribution to the identification of concrete areas of potential collaboration among governments and other relevant stakeholders in terms of means of implementation (p.14).
- It would also be important to allude to the linkages between agricultural sustainable policies and complementary policies in the industry and services sectors. For example, the provision of "incentives for local and small farmers and SMEs" (p.14) would be more effective if industrial and environmental policies were part of a national development strategy that prioritizes sustainable agriculture by strengthening capacities for a) seeds production, b) commercialization, c) transport infrastructure, and d) access to affordable food.
- A linkage between Action 2 (health systems) and Action 3 (social protection and nutrition education) may be needed: while Action 2 alludes to the provision of "universal health coverage UHC), Action 3 alludes to "basic or minimum social protection floors" (p.6). It would

be worth considering "health care floors" as complementary or part of "social protection floors" – as anchor for 'minimum and broader floors' in all countries.

- The programme is inclusive of all relevant stakeholders and aims at supporting "the establishment of action networks". Nonetheless, this would still be a top-down approach unless it includes and prioritizes a) the farming experiences at the local level, b) agriculture as an engine of growth and higher productivity, and c) agriculture, forestry, and fishing activities as cornerstones of sustainable processes of structural transformation.
- We note that there is only one reference to indigenous peoples. We believe that it will be important to include references to traditional knowledge systems and traditional livelihoods. These are referenced in the 2007 UN Declaration on the Rights of Indigenous Peoples and also in the outcome document of the 2014 World Conference on Indigenous Peoples (A/RES/69/2):
 - OP 22. We recognize that the traditional knowledge, innovations and practices of indigenous peoples and local communities make an important contribution to the conservation and sustainable use of biodiversity. We acknowledge the importance of the participation of indigenous peoples, wherever possible, in the benefits of their knowledge, innovations and practices.
 - OP 25. We commit ourselves to developing, in conjunction with the indigenous peoples concerned, and where appropriate, policies, programmes and resources to support indigenous peoples' occupations, traditional subsistence activities, economies, livelihoods, food security and nutrition.

75. Elizabeth Westaway, Independent Consultant, United Kingdom

Comments on how best to strengthen the Decade's first draft work programme:

- 1. Does the work programme present a compelling vision for enabling strategic interaction and mutual support across existing initiatives, platforms, forums and programmes, given the stipulation of Res 70/259 that the Decade should be organized with existing institutions and available resources?**

I have made comments throughout the document, but particularly feel that the role of grass roots organisations and alliances should be emphasised as an important element of the advocacy strategy to create a social movement for nutrition behaviour change on sustainable diets.

Also, it is important to ensure that the Agribusiness and Agrifood industries support diet-friendly policies and programmes incorporating agroecology, such as permaculture, throughout the sustainable food system.

All diet-friendly policies and programmes must ensure no/minimal negative impact on the environment.

- 2. What are your general comments to help strengthen the presented elements of the first draft work programme of the UN Decade of Action on Nutrition?**



I have made comments throughout the document, but particularly feel the role of agro-ecology, such as permaculture, can be emphasised throughout the sustainable food system to ensure consumption of affordable nutrient-dense, seasonal, local, high quality foods by populations.

The document applies to all countries -high, middle and low income – so high income countries need to be lobbied to come on board with different global initiatives that do not just apply to middle and low income countries, e.g. SUN Movement.

All forms of malnutrition are included, so governments, UN agencies, donors and NGOs need to focus on the double burden of malnutrition in order to combat a pandemic of NCDs.

3. Do you feel you can contribute to the success of the Nutrition Decade or align yourself with the proposed range of action areas?

Yes, I am working with the Permaculture Association on sustainable diets policy and advocacy.

4. How could this draft work programme be improved to promote collective action to achieve the transformational change called for by the 2030 Agenda for Sustainable Development and the ICN2 outcomes? What is missing?

I have made comments throughout the document, but particularly feel that grassroots organisations in high, middle and low income countries need strengthening on advocacy so that they can contribute to transformative social change on sustainable diets.

Monitoring, evaluation and impact assessment of policy, advocacy and programmes is essential for tracking change.

5. Do you have specific comments on the section on accountability and shared learning?

The advocacy strategy needs to have an M&E system.

Also, what will be done about countries that do not improve? How can they be pushed into action? E.g. name and shame them? Fine them? At what point in the Nutrition Decade will this take place?

The PDF contains a large number of comments, in comment boxes and on the text

<http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/Elizabeth%20Westaway%20comments%20First-draft-Work-programme-Nutrition-Decade.pdf>

UNITED NATIONS DECADE OF
ACTION ON NUTRITION



2016-2025



UNSCN

United Nations System Standing Committee on Nutrition

Comments from Members States of the World Health Organization

76. Kingdom of Bahrain

KINGDOM OF BAHRAIN
Ministry of Health
Minister's Office



مملكة البحرين
وزارة الصحة
مكتب الوزير

Regarding the work program of the UN Decade of Action, I would like to stress on the two following areas:

- The first action area is controlling micronutrient deficiencies which is a form of malnutrition by:
 - ✓ Addressing micronutrient deficiencies to prevent NCDs nutritional risk factors and Congenital Disorders and Micronutrient Deficiencies: iron, folate, iodine, zinc and vitamin A and D "
 - ✓ Improving Food-based approaches for reduction hidden hunger: food-based approaches promote interventions which encourage consumption of micronutrient-rich foods such as animal source foods, legumes, and some vegetables and fruits.
 - ✓ Improving micronutrients intake through consuming nutrient-dense foods, fortification and supplementation strategies, and promoting healthy and diversified diets.
 - ✓ Providing micronutrient supplementation to pregnant women as part of antenatal care.

- The second action area is over nutrition (obesity) prevention and intervention by:
 - ✓ Implementing government-led programs, to reduce sugar, total fat and energy levels in foods through cooperating with other Member States to adopt a regional approach for engaging with food producers to drive food reformulation to eliminate trans fats and reduce progressively total and saturated fat, salt, sugars, energy and portion size in a substantial proportion of processed foods
 - ✓ Physical activity interventions—Implement policies, legislation and interventions to promote and facilitate health-enhancing physical activity through mass media campaigns and develop a set of standards/guidelines promoting physical activity in the workplace, including facility/building design, availability of sport facilities and programs.
 - ✓ Food labelling—Implement or revise standards for nutrition labelling to include front-of-pack labelling for all pre-packaged foods, and enforce the labelling scheme and monitor its impact.

Ministry of Health
Kingdom of Bahrain

77. Switzerland

Dear Sir and Madame

We would like to thank you for your very comprehensive, balanced and well-structured Work Programme document for the UN Decade of Action on Nutrition, 2016-2025. It nicely reflects the needed action on malnutrition in all its forms.

We, therefore, have no specific comments on the overall content of the documents, nor on the modalities of implementation.

With regards to Table 1 we are happy to see that Health promotion for healthy eating and physical activity, urban sustainable food system, as well as regulative measures for unhealthy food and sugary drinks are at the focus for the development of commitments and the establishment of action networks. Under the category “research and evidence generation” we also see a need for further research on urban sustainable food systems as well as on global diet quality measures and information.

We would like to apologize for the late response and hope it can still be considered and adds to the discussion next week.

Please do not hesitate to contact us with any questions.

With best regards,
Marlene Heeb and Karin Gross

Karin Gross
Health Policy Advisor
Global Programme Health

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78. USAID

USAID Comments on WHO’s Draft (version 27 January 2017) Work Programme for the UN Decade of Action on Nutrition, 2016-2025

USAID congratulates WHO’s progress in moving forward its commitments on the 2030 Sustainable Development Agenda through the UN Decade of Action on Nutrition, 2016-2025. We are pleased to see that this is a living document, building and connecting with other nutrition initiatives of governments and their many partners and stakeholders.

Overarching Comments:

- The document rightly attempts to pull together many nutrition collaborators within the UN system to implement the work program, but it does not clearly describe relative roles and responsibilities in the action areas, which will be



important in terms of responsibilities for monitoring, evaluating and reporting.

- The document mentions in the beginning that it “works within existing structures and available resources...” The document could better describe how it will build on, use/incorporate and engage with these existing structures and resources and not duplicate efforts that are on-going. Questions of how the Nutrition Decade Secretariat, the data on commitments repository, and the action networks are different from the SCN, N4G, and the SUN communities of practice respectively, and how they would be funded are not answered. Even though N4G and SUN represent subsets of UN member states, there would be little need to duplicate their efforts, especially for SUN where in-country multi-stakeholder platforms that are led by host governments are functioning well.

Aims and Added Value Comments:

- Para-9, bullet 5 – Suggest that this work program advocate for mobilizing policy and financial commitments.
- Para-9, bullet 6 – How will the global accountability framework and mechanism be managed and funded; how will it be different and more independent than the GNR?
- Para-11, bullet 5 – Rather than create a new mechanism apart from the GNR, it would be helpful to describe how UN agencies, especially WHO, UNICEF and FAO will contribute to improving the quality of data their systems produce which contribute to the GNR accountability mechanism. The value of an independent entity, such as the GNR, to produce an accountability report on all commitments cannot be underestimated.

Guiding Principles:

- Para-12, bullet 1 - Suggest that the Nutrition Decade will build on **and act within** existing efforts....
- Para-12, bullet 4 - Nutrition in emergencies and helping countries build resistance to nutrition and food security shocks is an important priority that could be elaborated upon in this document.
- Para-12, bullet 6 - It would be helpful to describe how all of these entities will be engaged – by which organizations and for what purposes. Will these

engagements be coordinated by the leads, WHO and FAO? Action

Areas:

- Para-18 – What organization will develop this map; how will it be financed; will it need to be continually updated; could SUN, which has already mapped progress in 58 countries help to complete this?
- Action Area 1 – Overall, this is described comprehensively and appropriately
- Action Area 2 – This area is described well in terms of UHC, but the focus on health systems lacks some of the specificity that health deserves in terms of critical topics in undernutrition such as severe acute malnutrition, early and exclusive breastfeeding, appropriate complementary feeding, adolescent nutrition for girls, nutrition for adolescent, pregnant and lactating women, nutrition and HIV, etc. It also neglects an important component of health service delivery, which is social and behavior change/demand creation, which is not adequately covered in the education Action Area 3. SBC is a unique discipline built on social science and distinct from, but contributes to social marketing and education that seeks to empower health services consumers to adopt healthy behaviors. Finally, as sustainability and country-led efforts are priority, pre- and post-service in clinical and public health nutrition will be essential for creating and sustaining local nutrition expertise.
- Action Area 3 – UNICEF and WFP are critical UN agencies engaged in social protection activities. Strengthening links between social protection activities to resilience and sustainable nutrition programs could be a key action area for the work program. Social protection goes beyond education, but the need for education is also critical through community outreach, social marketing (linked to SBC), and school-based programs.
- Action Area 4 – Para 34 – It's important to stress not just adequate food, but also safe and nutritious food with appropriate labeling to inform consumer choices.
- Action Area 5 - Well described.
- Action Area 6 – This is an area in which SUN has made great progress along with the GNR. Much more needs to be done with this section to work with these existing entities to build on their successes.

Means of Implementation – Commitments for Action

- Para-45 – Rather than establish a separate, costly accountability mechanism, suggest using existing structures through the GNR, N4G and SUN.
- Para-46 – Please describe the roles and responsibilities of the proposed Nutrition Decade Secretariat, how different they will be from the SCN and how it would be funded.

Action Networks

- Para-48 – The topic areas described in Table 1 are pertinent and timely. Some of them duplicate communities of practice led by SUN or other entities. Please suggest how the proposed action networks will utilize existing platforms to avoid duplication of efforts and reduce costs.

Funding modalities

- Para-55 – It is important that the existing entities supporting the Decade for Action advocate support for new financing to countries for their multi-sectoral nutrition plans. It would be unlikely that new financing would be available for other endeavors or entities not at country level.
-

- Para 56 – Significant resources have been applied to support the costing of policies and programs in countries through SUN and through complementary exercises. Please continue to encourage and build upon the expertise gained through these on-going efforts.

Governance

- Para 67 – We applaud the statement that the “Nutrition Decade will not seek to establish new structures, but will facilitate broad consultation among stakeholders to seek alignment of priorities, policy instruments, and monitoring of mechanisms.”
- Para 68 – Please describe how the Joint FAO/WHO Secretariat does not establish a new structure and is cost-neutral.

Accountability and Shared Learning

- Please describe how the Decade for Action will incorporate existing, independent accountability mechanisms and not create a new mechanism that would duplicate what already exists.

Table 1- Topic and Action Networks

- Please show how many of these topics can already be accommodated through existing platforms so as not to duplicate efforts.

79. Ecuador



Misión Permanente del Ecuador
ante la ONU y otros Organismos Internacionales
Ginebra - Suiza

Nota No. 4-7- 46 /2017

La Misión Permanente del Ecuador ante las Naciones Unidas y otros Organismos Internacionales con sede en Ginebra, saluda atentamente a la Secretaría de la Organización Mundial de la Salud (OMS), y en relación a la Consulta Informal para tratar el primer borrador del Programa de Trabajo del Decenio de Acción sobre Nutrición 2016-2025, celebrada el 27 de febrero de 2017, tiene a honra puntualizar que la convocatoria fue recibida el día jueves 23 de febrero de 2017, fuera del horario de oficina, sin que previamente se haya circulado la propuesta del borrador del Programa de Trabajo, por lo que apreciará recibir respuesta a las siguientes preocupaciones:

1. ¿Cuáles son los mecanismos, procesos e instrumentos actuales que se encargarán, bajo la supervisión de los Estados, del seguimiento, rendición de cuentas y presentación de informes del Decenio sobre Nutrición?
2. En la página 4 de la propuesta de Programa, se dice que el Decenio sobre la Nutrición proporcionará un marco inclusivo y se mencionan varias iniciativas, no todas de carácter intergubernamental. ¿Cómo se piensa conciliar los diversos tipos de gobernanza y toma de decisiones e intereses de múltiples partes interesadas?
3. ¿Cuál es el mandato de la Secretaría de la OMS para colaborar con el Foro de Nutrición para el Crecimiento, que se llevará a cabo en octubre de 2017?
4. ¿Cuál es el mandato de la Secretaría de la OMS para colaborar en la Guía de recursos para la elaboración de compromisos en la Reunión Mundial del Movimiento SUN, en noviembre de 2017?
5. ¿Cuáles son los recursos que destinará la Secretaría de la OMS para apoyar a actores multipartes distintos a los Gobiernos?

Por otra parte, la Misión Permanente del Ecuador apreciará recibir oportuna información sobre el contenido y del informe que deberá ser presentado para consideración de la 70ª. Asamblea Mundial de la Salud, así como el cronograma de consultas adicionales.

La Misión Permanente del Ecuador ante las Naciones Unidas y otros Organismos Internacionales con sede en Ginebra hace propicia la ocasión para reiterar a la Secretaría de la Organización Mundial de la Salud, las seguridades de su más alta y distinguida consideración.

Ginebra, 1 de febrero de 2017.

A la
Secretaría de la Organización Mundial de la Salud,
Oficina del Director General Adjunto de Enfermedades No Transmisibles y Salud Mental de la OMS.
Ginebra.

80. Japan

Japan comments

Japan agrees especially with the points that we should address all people everywhere, including women and youth and that we should facilitate action across rural and urban areas. These points are also discussed in G7 Ise-Shima Summit last year.

Japan also agrees with the importance of private investments but we feel it is better to mention the importance of food manufacturing sector, not only trading sector, as they are and will be a significant collaborator for global nutritional improvement.

Japan would like to highlight the value of water. This document does refer to water and sanitation but we hope water and sanitation is mentioned more as it has a significant role in addressing malnutrition.

Japan appreciates the inclusion of multi-stakeholder approach in this document as we repeatedly stress the importance of stakeholder diversity to improve nutritional status in the world. In this context, we propose to add “dietitians” and “nutritionists” as one of the stakeholders to engage with in paragraph 13 (item6);

“Engage with a wide range of stakeholders including governments, inter-governmental institutions, development banks, parliamentarians, cities, civil society organizations, academia, dietitians, nutritionists, media, philanthropic foundations and the business sector...”

We believe that the contribution of dietitians/nutritionists who are working in their countries or at international organizations is large.

Kenichi SANNABE (Mr.) First Secretary

Permanent Mission of Japan to the UN Tel: 1-212-521-0658(direct)

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81. United Kingdom

From: Shipton, Nicky [mailto:nicky.shipton@dh.gsi.gov.uk]

Sent: 20 March 2017 15:01

To: nutrition

Subject: FW: Informal consultation of Member States to seek inputs to develop the joint FAO/WHO draft Work Programme for the UN Decade of Action on Nutrition 2016-2025 - FOLLOW UP...

Importance: High

Dear WHO Nutrition,

We have one point that we would wish to make on behalf of the UK.

The UK would like to recommend that you consider removing ‘in developing countries’ at the end of point 5 in table 1: “Food reformulation: provide reference ranges for reformulation of products (removal of trans fatty acids, reduction of sodium, sugar and saturated fat and portion size) , reformulation technologies, establish country and regional platforms, product monitoring mechanisms; benchmarks/standards for complementary food; fortification ; support for food processing SMEs in developing countries”

This is because we consider that the support for SMEs is needed in every country that is concerned about poor diet and obesity or maybe running a reformulation programme.

Thank you in advance for your understanding

Nicky

Nicky Shipton-Yates

WHO Policy Manager

EU & Multilateral Team, International Branch

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Follow us on Twitter @DHgovuk

82. France

DGM/DDD/HUMA

13.03.17

Consultation on the work programme of the UN Decade of Action for Nutrition, FAO/WHO

The work programme is very broad; it would be interesting to develop more some of the positions and objectives. There is a risk in the current shape of the programme that it would add more complexity to an already crowded nutrition landscape. We would highlight three areas where the Nutrition Decade could adequately complement existing initiatives:

- To serve as the framework of reference for monitoring progress against global nutrition targets (last bullet points in para 9, p.2). This should start, as stated, by “a full and thorough mapping [...] to identify and chart all existing nutrition-related initiatives and movements, financing mechanisms and policy actions”. It is not clear which entity will carry out this important piece of work, which will be necessary to encourage the emergence of a clear action line for the Nutrition Decade. The CFS could be a good candidate because of its experience in terms of progress tracking and its inclusiveness
- To push member states to engage and commit funding for nutrition, and to translate existing commitments taken at the global level into their national policies. The document should be careful not to provide a window for reducing the scale of existing engagements (cf para 42 “achieve one or more” aiming at achieving one target is not enough).
- To provide a leverage to advocate for nutrition at the highest levels and a very visible scene for reporting progress and promoting accountability of states.

The work programme should provide a clearer vision on some of the action areas presented, on what are their objectives and strategic orientations:

- The role and added value of the “action networks” (para 48) need more argumentation.

Particularly, it is quite unclear how the list of potential topics (p.14) has been developed. The proposed topics form quite a heterogeneous list.

- The section on “technical support for implementation” remains quite vague. Which type of support are we discussing? What would be the role of the Nutrition Decade in implementing technical support?
- Since advocacy will be one the focus of the Nutrition Decade, it would be helpful to detail how WHO and FAO envision advocacy efforts and modalities.
- The focus on food systems approaches is welcome, but not sufficiently developed.

Particularly, the economic barrier in accessing a healthy diet is sometimes overlooked (affordability). The impact of climate change on food systems should also be a point of specific interest.

83. The Philippines

MISYON NG PILIPINAS SA MGA
NAGKAKAISANG BANSÀ



PHILIPPINE MISSION TO THE
UNITED NATIONS

556 FIFTH AVENUE
NEW YORK, N.Y. 10036
TEL. NO. (212) 764-1300

No. 000338 - 2017

The Permanent Mission of the Republic of the Philippines to the United Nations presents its compliments to the Food and Agriculture Organization of the United Nations (FAO) and the World Health Organization (WHO), and with reference to its Note 000173-2017 dated 04 April 2017 has the honor to inform WHO and FAO of the Philippines' willingness to share and make public its inputs and comments on the Draft Work Programme for the United Nations Decade of Action on Nutrition 2016-2025.

The Permanent Mission of the Republic of the Philippines to the United Nations avails itself of this opportunity to renew to the Food and Agriculture Organization of the United Nations (FAO) and the World Health Organization (WHO) the assurances of its highest consideration.

New York City, 24 May 2017

A handwritten signature in blue ink, appearing to be "Garcia", written over a light blue horizontal line.

The Director
Nutrition and Food Systems Division
Food and Agriculture Organization (FAO)
Email: ESN-Director@fao.org, lon-registry@un.org

The Director
World Health Organization
Email: nutrition@who.int

84. United States of America

U.S. Comments on the draft Work Programme of the UN Decade of Action on Nutrition 2016-2025

The United States welcomes the opportunity to review the first draft work programme of the UN Decade of Action on Nutrition, 2016-2025, and to share general reflections on the document. We find the draft programme to be helpful and comprehensive. However, we note the need to allow flexibility in implementation with voluntary Member state commitments and accountability mechanisms and to focus on

national level policies given the different contexts among Member States' respective nutrition policies and programs. Also, while we agree that the Decade of Action should focus on fostering international dialogue on the menu of actions, policies and resources that can contribute to improved nutrition globally, we caution against the inclusion of prescriptive policy statements in this work programme. The document should therefore avoid any language that could be interpreted as legally binding, such as "shall," "agreed," and "will," and substituted for alternative verbs ("seek," "aim to," etc), and it should be clarified that any "commitments" arising from implementation or accountability mechanisms will be voluntary in nature.

In addition, the human rights language in the document needs to conform to the language of relevant human rights treaties, and the text should accommodate the fact that not all WHO member states are necessarily party to each of those instruments. We are concerned that the document implies obligations upon States through instruments that not all States are party to. For example, we would request that references to "the right to (adequate) food" be replaced with "more effectively promote the progressive realization of the right to an adequate standard of living, including adequate food." Likewise the reference to "adequate sanitation as a human right" should be reframed as sanitation and safe drinking water being essential to the right to an adequate standard of living and to the enjoyment of the highest attainable standard of health (we would be happy to furnish some proposed alternatives that would address these topics in ways that more are consistent with legal instruments that are agreed).

With respect to the Action Areas proposed in the document, the United States would like to offer the following comments:

- 1) Antimicrobial Resistance (paragraph 23 and Table 1): We agree with prioritization of antimicrobial resistance (AMR) on the global stage, however, we do not believe that it is desirable or necessary for AMR's inclusion in this particular work stream as there is a multitude of very focused work on the AMR occurring in other forums.
- 2) Codex (paragraph 34): We do not agree that the role of Codex is to ensure that international trade respects and promotes health and nutrition; its official mandate is to protect the health of consumers and assure fair practices in food trade.
- 3) Action Area 4: Trade and investment: We believe that the document should focus on the high-level point that coherence between trade and nutrition policy is important, and that governments and relevant organizations should continue to identify opportunities to achieve nutrition targets and pursue nutrition policies while also promoting trade and investment and respecting international trade obligations. We do not support statements in the work programme as to how trade policy or trade organizations should contribute to achieving these objectives, or references to specific trade agreements, such as the WTO Agreement on Trade- Related Aspects of Intellectual Property Rights (TRIPS).
- 4) Taxation (paragraphs 35 and 57 and Table 1): Robust evidence is needed to support any taxation or pricing policy recommendations that might result from the Work Programme. We recommend that further study of the taxation/pricing of particular foods and beverages include a thorough examination of all relevant scientific studies, and that additional studies are necessary in this area before drawing conclusions as to the efficacy of these types of policies.
- 5) Animal Source Foods (Table 1): We are concerned about the call to move away from intensive farming systems, which may not be appropriate in certain circumstances, and would prefer instead simply noting the value in supporting small farms.
- 6) Table 1: We would recommend the inclusion of a recommendation for countries to consider establishing public private partnerships to develop and implement nutrition policies and programs to support national nutrition objectives.

We also have the following questions:

With regard to global food and nutrition targets in paragraph 35, are these referring to the UN Sustainable Development Goals, if not, then please clarify.

Paragraph 45 states “Commitments from Member States and regional political and economic communities will be formalized through a communication between the Head of State or Minister and the Director-Generals of either FAO or WHO, or both.”

- Does this mean that FAO and WHO will be securing extra-budgetary commitments at a Ministerial meeting or reaching out to leaders directly rather than securing commitments through permanent representatives and country representatives?
- Given that there is no funding to support coordination activity, how will the International Organization partners be soliciting commitments?
- How will FAO’s budget reduction in “de-emphasizing” the work in nutrition education, Food composition and Minimum Dietary Diversity affect this implementation plan?

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Work Programme of the UN Decade of Action on Nutrition, 2016-2025

First draft, 17.01.2017

Dear Dr. Branca,

I thank you very much for taking such an active part in the UN Decade of Action on Nutrition and keeping us involved. We already discussed some key issues which should – in our view - be better reflected in the first draft during our telephone call on February 9th, 2017. To follow up on this call please find my comments in writing: We certainly welcome the new concept of “action areas” and “cross-cutting, integrative areas for impact” which will help to prevent silo thinking.

However, we think that more emphasis should be put on cross-sectional subjects. The action areas still seem a bit limited in their scope and do not clearly enough highlight the importance of cross-cutting approaches. For example nutrition education should not only be dealt with under action area 3, associated with social protection, but rather seen as a topic that affects people throughout their whole life. We think it crucial to increase public awareness for the importance of healthy diets and eating (and living) habits. This touches early nutrition education at home, in pre-schools and schools and the correspondent practical abilities as well as production and marketing of food, food choices in hospitals, canteens, care facilities, life styles, urbanisation and so on. If we want to achieve lasting improvements in dietary habits, it is not only important to offer a balanced diet from childhood and adolescent years on. But it is also necessary to convey nutritional knowledge and the corresponding practical competences.

The scope and quality of the nutrition education that people receive in their life is of essential importance to their life-long eating and dietary habits.

With regard to the action networks we are thankful for the clarifications made in the first draft. We welcome the fact that the list of proposed priorities is not limited and open for new themes. However we miss an indication to the role of civil society, academia and the private sector in these networks. We would therefore appreciate to emphasize the active participation of civil society, academia and, as appropriate, the private sector in the mentioned networks, as these are important players for more holistic approaches.

Food systems are changing very quickly and information and communication technologies (ICT) are getting more and more important. Therefore, more attention should be paid on adaption mechanisms to coming changes in our food system through digitization. So far, this aspect is not addressed in the First Draft and we would welcome its implementation.

Women are mostly responsible for growing and preparing the food consumed in the home and raising small livestock. Women are also more likely to spend their incomes on food and children's needs. Research has shown that a child's chances of survival increase by 20% when the mother controls the household budget. Therefore, we are pleased that the draft now makes reference to the important role of women as key stakeholders for food security and nutrition. But we still consider it important that the decade on action on nutrition is also a decade to achieve a significant improvement of the realization of women's rights and

therefore clearly points out the important role of women for food security, dietary diversity and children's health.

We believe that the causes of overweight and diet-related diseases should not be attributed to individual foods or food components. This view does not do justice to the complexity of the development of these diseases. We are therefore critical of the fiscal tools such as taxation, subsidies for healthy foods (and removal of subsidies for unhealthy foods) as well as supply- side incentives mentioned in the Work Programme. In principle we consider an approach focussing on the entire diet and not on individual nutrients or foods to be more useful for achieving healthy lifestyles. In this context, we would like to once again highlight the importance of nutrition education.

We also believe that when using the terms “healthy/unhealthy foods” the criteria according to which the foods are classified in one of these groups should be clarified.

We also propose strengthening further linkages to other policy fields, like the agricultural sector that have big influences on nutritional and health status. SDG 2 clearly links sustainable agriculture to the fight against hunger and malnutrition and the Decade should follow this line. Sustainable agriculture is a key factor for sustainable development and sustainable food systems and therefore should find more attention in the draft.

We would like to recommend again to take a closer look at the living environments in which nutrition and food choices are taken. We made the experience that for sustainable success you need to look at all places where people regularly spend longer periods of time. Germany has launched a great number of initiatives since 2008 that are aimed at sustainably improving the dietary and exercise habits in Germany. They are targeted at all age groups in their direct living environments, e.g. in the family, in childcare facilities and schools, at work, in retirement homes or in the district/community. The goal is to create an environment in which a well-balanced diet and sufficient physical activity are firmly established. In our view it is important to strengthen people's skills in this regard and create conditions that make the healthier choice become the easier choice.

We look forward to hearing from you,

Best regards

A handwritten signature in blue ink, appearing to read 'K. Heide', is located at the bottom of the page.