

**World Cancer Research Fund (WCRF) International and the NCD Alliance (NCDA) comments on the Second International Conference on Nutrition (ICN2) draft Framework for Action (Version dated 22 July 2014)**

**August 13 2014**

**General comments**

- We support the focus of the Framework for Action on “malnutrition in all its forms”. However, we would like to see this terminology used throughout the document for consistency and clarity, and for it to be clearly defined upfront.
- We support the preamble owing to its presentation of malnutrition in all its forms as a multi-dimensional issue, including a food systems issue, its reference to complementary documents and processes, its focus on meeting nutrition targets already set by WHO in the Comprehensive implementation plan on maternal, infant and young child nutrition, and the WHO Global Action Plan on the Prevention and Control of NCDs 2013-2020. It should, however, also signpost other key documents and agreements from which the priority actions are taken, and also make reference to the costs of inaction.
- Apart from the preamble, the document should be a relatively short and concise list of specific, time-bound priority actions. The priority actions should provide a roadmap for implementing the Outcomes Document of ICN2.
- The actions should be consistent with existing agreements. Following from the ICN2 Outcomes Document, it should include actions to address malnutrition in all its forms. It should seek to bring together priority actions to address the full range of determinants of malnutrition, and add value to existing frameworks and processes by including food systems solutions not typically found in existing political and technical documents.
- The actions should be clear and specific, but not so narrow that they remove flexibility in implementation for countries. Countries should be able to tailor the actions to their own national contexts.
- The FFA should be designed for the same time frame as the proposed “Decade for action on nutrition” i.e., 2015-2025.
- The FFA should be adopted at the ICN2 in November, along with the Outcomes Document in order that there are concrete priority actions agreed upon as a result of the meeting. If this is not possible due to the tight timeframe, the Outcomes Document should include a commitment to implement the Framework for Action, and set out a clear process for developing it.

## General recommendations:

- In the preamble, text in the first paragraph is changed from: *“Moreover, most countries are burdened by multiple types of malnutrition. Over two billion people suffer from one or more micronutrient deficiencies, while over half a billion are obese, with an increasing incidence of diet-related noncommunicable diseases (NCDs). The common denominator among all types of malnutrition is nutritionally inappropriate diets, but the nature and underlying causes of malnutrition are complex and multidimensional.”* TO *“Moreover, most countries are burdened by ~~multiple types of malnutrition~~ in a wide range of forms. Over two billion people suffer from one or more micronutrient deficiencies, while over half a billion are obese, with an increasing incidence of diet-related noncommunicable diseases (NCDs). The common denominator among ~~all types of malnutrition~~ in all its forms is nutritionally inappropriate diets, but the nature and underlying causes of malnutrition are complex and multidimensional”*.
- In the preamble, reference is made to a greater number of existing plans and monitoring frameworks on food security, nutrition, NCDs, sustainability etc issued by WHO, FAO, UNICEF, UNEP, World Bank, Scaling up Nutrition etc; regional plans (e.g. for African Union, Small Island Development States, WHO Regional Offices); and national action plans for nutrition.
- In the preamble, include text on the costs of inaction.
- Most of the technical text is removed from the FFA so that it is much clearer focused on priority actions. Actions should then be prioritized; replication should be removed, along with “*non-priority*” actions; and existing action plans and strategies should be signposted as much as possible in order to ensure that this document does not replicate, or de facto revise, existing nutrition agreements.
- Where relevant, actions should be reworded so that they become “actions” countries and international actors can take, rather than general statements about what is needed. For example by changing “*Institutional arrangements that encourage effective multi-sector working*” into “*Establish a cross-government, inter-sectoral governance mechanism.*”
- Most of the priority actions should focus on the national level, but there is also a section for international actions. Furthermore a section on actions by international partners (including civil society) should be included.
- It includes an accountability framework. This should be consistent with existing frameworks for nutrition and NCDs, but with a mechanism for reporting back specifically on the FFA. The current accountability framework requires a complete revision. We also question the need for an International Panel on Nutrition.
- The preamble should stay largely as it is, but with the additional reference to the existing plans etc on which the priority actions should be based.

## **Specific recommendations on priority actions**

We have reviewed the priority actions listed in the document and recommend that the following are included; many of the others can be deleted. Many of the actions we include here combine similar actions in the current draft to remove duplication. In other cases, existing agreements should be looked up to ensure consistency and to avoid replication.

### **NATIONAL ACTIONS**

We recommend that priority actions are listed for the national level in three main areas: governance and financing; policies on food systems and food environments; and nutrition and health interventions.

#### **Recommended priority actions for governance and financing**

- Establish a cross-government, inter-sectoral governance mechanism including the engagement of local and intermediate level governments, with the mandate of providing leadership in nutrition and the identification of implementation of nationally appropriate actions.
- Establish multi-stakeholder platforms, including engagement with local communities, with adequate mechanisms to safeguard against potential conflicts of interest.
- We strongly support the inclusion of actions on financing. We would recommend adding an action on financing, taken from existing frameworks/agreements. We also support the proposal to a proposal to cost national plans and assess the gaps.
- We would also recommend including an action about supporting research to find the most effective solutions and evaluate effects of actions.

#### **Recommended priority actions for policies on food systems and food environments**

- Review existing national policies and programmes across sectors which influence food and nutrition and identify and address areas of incoherence with nutrition objectives. Review public investments in agriculture and food systems for coherence with nutrition objectives. Based on the findings, take actions to integrate nutrition objectives with agriculture and food systems policies and programmes to ensure they are not detrimental to nutrition objectives and utilise opportunities to improve nutrition.
- **Take actions to remove barriers to the access of sufficient, safe and nutritious foods and diverse diets**, such as by strengthening the infrastructure, facilities and training, for production, post-harvest storage processing, distribution, procurement logistics and retailing of safe and nutritious foods, creating incentives for their production, distribution and sale, leveraging local food systems and engaging local populations, establishing markets for smallholder and family farmers, supporting women engaged in local and smallholder food production systems, leveraging

traditional/indigenous crops and developing urban food systems to meet the needs of the local population.

- Implement population-wide nutrition policies outlined in the WHO Comprehensive Implementation Plan on Maternal, Infant and Young Child Nutrition and the WHO Global Action Plan for the Prevention and Control of NCDs 2013-2020, including the implementation of the WHO Set of Recommendations on the Marketing of Food and Non-Alcoholic Beverages to Children.
- Implement a plan to improve the healthiness of the food supply, including policy measures to promote the provision and availability of safe and nutritious food, increase the provision of clean water, such as in public institutions, replace trans-fatty acids with unsaturated fats, reduce the level of salt in the food supply, and reduce the level of sugar and caloric sweeteners.
- We also recommend an action is included here on nutrition education.

### **Nutrition and health interventions**

We recommend priority actions are included in the following areas. These actions should be consistent with existing agreements on priority actions in these areas:

- Social protection
- Integration of nutrition into health systems
- Wasting, stunting, anemia
- Infections
- Breastfeeding
- Water and sanitation
- Food safety, including anti-microbial resistance

### **INTERNATIONAL ACTIONS**

A range of priority actions are needed for international agencies. These should include:

- Define sustainable diets and develop and disseminate a clear and robust set of guidelines for sustainable food production practices applicable to the setting.
- Create and improve systems and tools for gathering better and more frequent data, particularly on undernutrition rates, micronutrients, diet quality (including metrics relevant to obesity and non-communicable diseases) and local availability and affordability of diverse nutritious foods. This data is essential to monitor the problem of malnutrition in all its forms, as the basis for solutions, and to monitor and evaluate impact.

## ACCOUNTABILITY FRAMEWORK

- We support the inclusion of an accountability framework but in a much revised form. The current version includes many specific actions which would be more appropriate if placed in the priority actions, or are not necessary and can be deleted.
- The accountability framework should start with reference to the “Decade of Action for Nutrition”, and explain what this would consist of i.e, what the “actions” would be during the decade.
- It should call for the development of a monitoring and evaluation framework, which is made up of existing frameworks complemented with additional needs created by the ICN2 Outcomes Document Framework for Action.
- It should include reporting mechanisms, and suggested timelines for reporting.
- It should include actions designed to promote accountability among international agencies, as well as action taken by them to promote national accountability.
- The objective of an International Panel on Nutrition should be better defined in order to enable a fuller discussion on what it could achieve and whether it is needed. Discussion of new governance structures should follow from the needs created by the Outcomes Document, the Framework for Action and the Decade for Nutrition, rather than precede them.
- While we recognise that more resources are needed for nutrition, the notion of a Global Trust Fund should be considered in the context of existing funding allocated to malnutrition in all its forms. Again, we believe new governance structures should be considered after an assessment of the needs created by Outcomes Document, the Framework for Action and the Decade for Nutrition.