



Submission by the Ecumenical Advocacy Alliance

17 August 2014

Based on our long experience working with food- and nutrition-insecure communities around the world, and with our governments at national and international levels, EAA welcome this opportunity to submit the following points for consideration to the Framework for Action (FFA) document.

1. Do you have any general comments on the draft Framework for Action?

Since the FFA is to be guided by the Rome Declaration on Nutrition, and to offer guidelines on how to implement the Rome Declaration on Nutrition, then it would be ideal if a final version of the declaration be made available in a timely manner.

Regarding the priority actions, while it is important that they are relatively imprecise to allow governments to tailor them to their specific context, they cannot be so vague that they fail to mention which actors should carry out the action and by when. Governments should be firmly in the driving seat of policy setting.

The FFA should also specify the role of civil society in the implementation of these actions.

For systematic reasons and to keep the text legible, goals should not be mentioned in the introduction. Instead they should appear in the respective chapters of the FFA, their source indicated in a footnote.

Specific text recommendations are attached as an Annex.

- Do you have any comments on chapter 1-2?

Section 1.1 can be significantly shortened or deleted as we would imagine that most of this material will be covered in the Rome Declaration on Nutrition and/or is repeated again later in the text.

Section 1.2: While it is useful to include, at the top of page 3, a brief summary of the commitments from the 65th World Health Assembly, as was done in the following paragraph dealing with the commitments from the 66th World Health Assembly, we suggest the following shortened formulation without bullet points. "This FFA aligns... by the year 2025, in particular to halt increase in childhood overweight and to increase exclusive breastfeeding rates in the first six months up to at least 50%."

Section 2.1 lacks substantial content.

Section 2.2: Please define the term 'nutrition justice' and eliminate redundancies.

The element 'Engage implementation partners' mentions the need for trust and mutual accountability but it is not clear about who needs to be accountable to whom. According to

some, mutual accountability is "to act so all stakeholders feel responsible for and are held collectively accountable to the joint commitments" but this is not feasible in multi-stakeholder processes when actors have diverse set of interests. Do not assign roles to governments that are not compatible with democratic processes.

The element "International support for national nutrition governance" should be merged with "Institutional arrangements that encourage multi-sector working" to avoid duplication.

EAA welcomes the emphasis on monitoring and evaluation but it would also be important to clearly state the need for greater availability of baseline information.

Section 2.3: This issue is about human development and health and not the economy. The paragraph "more money for nutrition" should explain in which ways signatories should mobilize more money for nutrition and not how to make money with nutrition.

"Priority actions for financing for improved nutrition outcomes" should be more concrete. For example, what kind of taxes could be suitable? Taxes on high processed food and other products that are inconsistent with a healthy diet? What innovative financing tools are being referred to? Access to credits (possibly microcredits), subsidies and other economic incentives for activities promoting nutrition should be mentioned. Subsidies that promote production of highly processed food with low nutritional value should be eliminated. The financial actions remain too vague. Existing systems of agricultural subsidies have to be reviewed in order to take.

- Do you have any comments on chapter 3 (3.1 Food systems, 3.2 Social Protection; 3.3 Health; 3.4 International trade and investment)?

The structure of the text is not systematic. Paragraph 3.1.2. should be merged with the first part of food systems (3.1), the paragraph food environment would be a separate paragraph (3.2), social protection (3.3).

While we agree that all these elements are important components to achieve nutrition security, we do not believe they all need to be listed in this section. For example, WHO dietary recommendations and the need to increase consumer awareness should not fall under the subtitle of Food Systems.

The paragraph "food systems" is too long and should not go into detail for consumption and diet recommendations.

The dimension of agricultural production is not sufficiently considered in the Priority Actions. The importance of reinvestment in agriculture and rural development, as well as progress towards sustainable modes of agricultural production for food security and nutrition, is neglected. Agroecological farming and the need of support for small-holder farmers (who are most affected by malnutrition by strengthening local and national markets and establishing cooperatives and other producer organizations) is not addressed.

3.1.1. Priority actions to improve the food environment - Standards in public institutions and the workplace: Standards are not the only way for public institutions to impact the food environment. Public institutions (schools, kindergartens, hospitals, administration etc.) have a significant market power that has to be used in order to improve nutrition. Canteens and cafeterias in public institutions should provide healthy and diverse food and quotas and better prices for high quality and locally produced food should be guaranteed.

3.1 Recommend to add "Integrate early warning, early actions to monitor vulnerability of people in order to anticipate food and malnutrition crisis and to put in place adequate resources such as social protection schemes."

3.1.2 Recommend to add "Integrate sustainability and climate change resilience into agricultural plans and strategies and encourage small holder farmers to practice agro-ecological farming approaches that reduce dependence of chemical inputs and increase biodiversity."

3.2 Priority actions on social protection: As the first 1000 days are key for the improvement of nutrition, recommendations of actions have to be more concrete and ambitious. How do signatories want to tackle this problem? What support can be given in terms of access and information/education? Examples for well-targeted interventions would be helpful. What role can hospitals and health care systems play to give advice and support? How can nutrition during early childhood be improved?

3.3 The importance of nutrition for recovery and the immune system has to be highlighted in the "Priority actions for health systems" and the procurement of nutritious food in hospitals, nursing homes and other health care institutions has to be addressed.

3.3.1. This is where the WHO goals and recommendations for stunting and wasting belongs.

Stunting, wasting and anemia should be briefly explained (especially difference between stunting and wasting) before introducing required actions.

Priority actions to address stunting: It has to be stated clearly that stunting is best prevented by breastfeeding and nutritious food and that food fortification can only serve to abate the symptoms. Prevention should be clearly prioritized.

Priority actions to address anemia in women of reproductive age: Actions should not only address the symptoms but also the causes of anemia in women. The prevention aspect (especially the implementation of women's rights, sexual and reproductive health as well as improvement of women's access to nutritious food) has to be addressed.

3.3.2. The sub-section entitled "Reproductive health and family planning"

While the title can be perceived as being related to nutrition, the formulation mixes health focus with ideological language, i.e. "reproductive rights" that is not directly related to the topic at hand and that never has been formally recognized by all Member States. Such language risks a diversion of attention and could threaten the process of consensus that is being sought by this International Conference and subsequent process. Suggest that the first paragraph in this subsection be re-written as follows: "Access to sexual and reproductive health care, including family planning, is important for the health and nutrition of mothers and their babies, and can play an important role in breaking the intergenerational cycle of malnutrition."

For the same reasons specified above, we suggest that the last sentence in the 2nd paragraph of this sub-section "A lack of access to sexual and reproductive rights ..." be deleted.

For similar reasons, we suggest that the first sentence of the 2nd recommendation in this sub-section be deleted. Specific reason: the first recommendation already calls for access to sexual and reproductive health care, which includes family planning.

3.3.3. Priority actions on breastfeeding: Should be more concrete, even referring to ILO-standards.

Consider including "Transpose and implement into domestic legislation the International Code of Marketing of Breast-milk Substitutes and the WHO recommendations on the marketing of breast-milk substitutes and of foods and non-alcoholic beverages to children."

3.3.4. Nutrition education for behavior change: The text is very comprehensive but does not contain any actions. Text should be summarized into a maximum of 2 paragraphs and actions extracted in bullet points.

EAA welcomes the emphasis on monitoring and evaluation.

3.3.5. Priority actions on water, sanitation and hygiene: Considering the importance of safe water, access to drinking water, adequate sanitation and hygiene to avoid infections, mal- and under-nutrition, this paragraph and the resulting actions are too general and don't live up to the challenges ahead.

3.3.6. Priority actions on antimicrobial resistance: Holistic view on food systems should be taken into account, especially the role of consumers. Consumer information and actions are key. Purely top-down approach to tackle the problem will not succeed. Labeling critical products is essential.

- Do you have any comments on chapter 4-5?

4.4 International trade and investment: Trade and investment should either be treated precisely with concrete and binding actions (which is not likely to be agreed upon) or not appear as a distinctive paragraph.

2. Does the Framework for Action adequately reflect the commitments of the Rome Declaration on Nutrition, and how could this be improved?

Not able to answer since the final version of the Rome Declaration is not yet available.

3. Does the Framework for Action provide sufficient guidance to realize the commitments made?

Not able to answer since the final version of the Rome Declaration is not yet available.

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Background and Introduction

Inspired by Christian ethics and human rights principles, members and partners of the Ecumenical Advocacy Alliance (EAA) advocate for justice and dignity for all, and especially for the poorest and most marginalized who are typically overlooked in policy-making and implementation. Our international alliance represents tens of millions of Christians around the world who support smallholder farmers, whose production capacity is the foundation of food security in much of the developing world, but whose interests are routinely ignored in relevant policy and practice.

EAA together with our members and partners have been involved in the food and nutrition security discussions for more than a decade and will continue to follow developments within this context with high interest to ensure that global food security and the protection of basic

human rights, including the right to food. We will strive to ensure that decisions taken during the ICN2 are consistent with what has been agreed within Committee on World Food Security.

*For more information on the Ecumenical Advocacy Alliance, see <http://www.e-alliance.ch>
To view our list of members, see <http://www.e-alliance.ch/en/s/about-us/members>*