

## 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.

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*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**

*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 multi-stakeholder 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](http://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?

- 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'?