

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”:**
 - The action area needs to address the income challenges for those working in agriculture, and there is little reference to livestock, environment or disease.
 - Para. 19: on ‘improving food systems’ the link should be made explicit between improved food systems, agricultural production, trade and environmental policies.
 - 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. 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”:**
 - 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 Facilities¹, 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”:**
 - 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.
 - 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.

¹ <https://www.washinhcf.org/home/>

- **Action area 4: “Trade and investment for improved nutrition”:**
 - 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”:**
 - 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.
 - 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’:**
 - 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.
 - 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 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:
 - Investment in research and evidence building on nutrition interactions with other sectors and the impact of such sectors on nutrition outcomes
 - WASH-nutrition integration
 - Exclusion, e.g. how to put the most vulnerable and marginalised first.
 - Food safety, e.g. in terms of environmental pollutants and anti-microbial resistance
 - 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 able 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 'double-duty 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.