**Comments provided by the Organisation for Economic Co-operation and Development (OECD) on the zero draft of the “Framework for Action” document for the November 2014 International Conference on Nutrition (ICN2)**

We are delighted to have been given an opportunity to comment on the zero draft of the “Framework for Action” document for ICN2. We generally support the wide ranging aspirations and ambitions expressed in the document, but there are a few areas that warrant clarification and/or development.

We hope the following comments are helpful as the document is further refined.

**General comments**

The declaration aims to be comprehensive, pertinent to the whole range of nutrition related issues across the globe, from starvation to obesity, from the poorest to the richest countries. This sometimes leads to statements that are very general, with wide scope for interpretation, as perhaps is the nature of this kind of initiative. Nevertheless, some kind of classification or typology of issues and problems would have helped in the formulation of recommendations better tailored to the different types of problems and situations.

The declaration seems to want to place the “food system” at the heart of the issue. As a result, the other drivers and determinants of nutrition related health problems are somewhat neglected. This leads to the impression that policy solutions lie mainly in improved “governance of the food system”, a concept that is otherwise not explained and which remains nebulous throughout the text. The food system is composed of myriad elements and agents, from “farm to fork”, and differs radically between countries at different levels of development. We would suggest sticking to specific recommendations and actions applicable to the different economic sectors involved in ensuring the supply and safety of food.

We would also encourage the Secretariat to cover “demand-side” policies more thoroughly, including, in particular, actions on some of the dimensions of the demand for foods and non-alcoholic beverages, such as information on food ingredients, nutritional value and calorie content; awareness and perception of health risks; and commitment to dietary change.

Throughout the text it is sometimes difficult to judge whether a statement of a proposed recommendation or action is appropriate because it is expressed in very general or vague terms. At the top of page 7 it is stated that “appropriate regulation and incentives can increase the compatibility between market signals and improved nutrition” but no examples are given.On page 10 (section 3.1.1) it is stated that to improve access to and consumption of healthy diets “this requires implementation of measures to modify food environments to improve the availability, acceptability and affordability of healthy diets” and again there is no hint of what the authors have in mind here. The recommendation on page 11 to “Increase incentives for production of nutrient rich foods and their movement into processing and retail through the value chain at all scales” is another example. Here again it is difficult to have a view in the absence of any information about what is intended by incentives in that context.

In several places it is stated or implied that “local” is better, in others there is reference to smallholders. Backyard/homestead farming is encouraged. It should be noted that these approaches are not unambiguously good in terms of nutrition outcomes, and indeed may have negative effects in some contexts, or may have disadvantages unrelated or less strongly related to nutrition, such as spread of disease from unregulated backyard animal production.

**Specific comments**

*Section 2.2.*

The concept of “multi-sector working” should be clarified, especially whether this relates only to government actions, and what the scope of multi-sector coordination should be. Partly in connection with this point, the first priority action listed under the heading of “nutrition governance” is very vague in its formulation, and may generate confusion.

Section 2.3.

A high burden of disease, *per se*, does not necessarily provide an economic case for action. An economic case rests on the availability of actions which are of proven effectiveness and represent an efficient use of scarce resources.

*Section 3.*

What is meant by “food system” and “food environment” is not entirely clear, and definitions should be provided.

At the end of the third paragraph of page 7, the text seems to hint at the positive correlation observed between national income and obesity at the country level. If this is the case, the correlation should be mentioned explicitly, along with the social patterns typically seen in the spread of obesity when national income grows.

The fourth paragraph of page 7 would benefit from some examples of relevant policies.

The third paragraph of page 8, addressing the implications for nutrition of the changing role of women in society, should not ignore the evidence that reductions in meal preparation time, partly associated with increasing female labour force participation, have been linked with increased food consumption outside the home, consumption of highly processed and micronutrient-poor foods (mentioned elsewhere in the text as a contributor to malnutrition) and obesity.

The two large sets of priority actions listed, respectively, on pages 9 and 10/11 contain several areas of overlap as well as gaps (e.g. regulation of nutrition claims in food environments, or policies addressing specific dimensions or components of food systems, such as food retail). The relevant sections could be revised providing a clearer focus in the respective areas and avoiding overlap and confusion between the two.

*Section 3.3.*

The role of primary health care could be brought up more explicitly in several sections addressing possible interventions within the health care sector, recognising differences in the roles primary care can play in countries at different levels of income and development, and in addressing different types of nutrition problems.

*Section 3.3.1.*

In the discussion on wasting and stunting, there is not enough attention paid to the emerging evidence that sanitation (sewage systems, toilets) plays a large role in determining outcomes in some countries..

*Section 3.3.4.*

No priority actions are listed.

*Section 3.3.6.*

The section on anti-microbial resistance is especially sensitive. No mention is made of the role of misuse of antibiotics in human health as a contributory factory to resistance. The link with nutrition and the relevance of the subject to this document is not so clear. Some countries may not sign up to a declaration that sounds like “an admission of guilt” in an area where there is still controversy and some uncertain science, and which contains such specific and technical commitments. (The recommendation on removing industrially produced trans-fats, while difficult to disagree with, may well run into the same type of opposition).

*Section 4.4.*

We also have some particular concerns with the short section 4.4 on International trade and investment. The text could be more balanced in recognising the potential benefits, and not just unspecified risks, for food security and nutrition associated with international trade and investment. When it is assumed that the latter may harm nutrition or undermine governments’ ability to implement effective nutrition strategies, the mechanism for such negative nutrition outcomes should be explained or established.

In this section, we have a call for “incentives to farmers to produce healthy foods to be sold at affordable prices” as well as the statement that “the availability of and access to unhealthy foods should be effectively regulated and discouraged”. And all this under the heading of trade and investment, as if the provenance of the unhealthy foods in question is always trade and as if a clear and unambiguous definition of what constitutes an unhealthy food could be established and enforced.