**CIFF comments on the draft ICN2 framework for action**

Many thanks for the opportunity to comment on the draft ICN2 framework for action.

1. **Do you have any general comments on the draft Framework for Action?**
* We welcome the systems-focused approach of this draft; in particular the recognition of nutrition as a cross-sectoral issue, rather than simply a food systems one. However, we would like to see this balance reflected more in both the introduction and recommendations in the document: currently food systems have a much stronger footing, and the entire document is framed within a food systems context.
* It would be helpful if the document was clearer on how this FFA fits with existing frameworks (such as the Comprehensive Implementation Plan on Maternal, Infant and Young Child Nutrition, or post-MDGs). Does this plan aim to be *the* guidance, does this complement? Important that stakeholders at country and global audiences are not confused by another framework.
* The report contains a huge number of recommendations: it should also make clear that countries and organisations should prioritise recommendations based on data and evidence, and where possible prioritise recommendations within the FFA.
* The report recommends reviewing nutrition plans, and that WHO and FAO report on FFA actions: many countries have recently reviewed and revised their nutrition plans, so it is important to ensure that we do not replicate existing processes. Wherever possible FFA monitoring should be linked to existing processes, rather than creating new ones.

**Do you have any comments on chapters 1-2?**

Para 1.1:

* As well as underlining micronutrient deficiency and obesity levels, please also cite the statistic for stunting and wasting, which are important indicators of undernutrition.
* The introduction of the draft FFA places too much emphasis on food systems, given the emphasis the rest of the document places on other actors. We recommend amending the introduction to give the reader a sense of the cross-sectoral nature of the document to come. Paras 3 and 4 of 1.1. in particular should be more balanced.

Para 1.2:

* We welcome the reference in para 3 of 1.2 to previous frameworks and declarations, including the Nutrition for Growth Compact. We’d like to see the Global Nutrition Report referenced, to ensure that ongoing processes are not duplicated.
* On page 3 in 1.2, the document states that “this FFA provides the technical basis for adopting major policy guidelines and strategies and for developing and updating national plans of action and investments to improve nutrition.” This being the case, it is doubly important that the introduction and later recommendations focus less heavily on the food systems, and become more balanced. Again, it would be helpful to clarify how this fits with existing guidance and networks (such as SUN).
* Strongly welcome the inclusion of WHA 2025 targets in this section.

Para 2.1

* We welcome the emphasis on creating an enabling environment for nutrition. Once again, the focus here is on food systems primarily: this does not reflect the multi-sectoral nature of the document or - more importantly – nutrition as an issue. We’d also like to see domestic resources included in this: they are key to a national-level enabling environment.

Para 2.2:

* We applaud the emphasis on better governance for nutrition. Again, at the end of the first point – “Coherent government-endorsed policies with explicit targets and situation-specific strategies” – there is a strong emphasis on the need for strategies to address people’s dietary choices. As the rest of the document demonstrates, strategies need to do much more than this: for example health systems need to factor nutrition outcomes in to their delivery strategies. Suggest adjustment of this point to recognise the multi-sectoral nature of tackling nutrition challenges.
* The emphasis on accountability is welcome here, as is the emphasis on the engagement of all partners in the implementation of policies. However, under ‘priority actions’, please include the formulation and monitoring of accountability plans at national and global levels: this is critical to ensuring greater accountability. Please also include an emphasis on the need for high-level coordination within government to ensure better implementation of strategies and clearer accountability.

2.3:

- In ‘priority actions’, please include the measurement of nutrition spend at both national and international levels. At present, spend is measured patchily, if at all. We also recommend making a reference to the Global Nutrition Report here. Within this point, it will be important to also emphasise the quality pf spend, not just quantity: we need money better spent for better nutrition outcomes.

- We suggest including the economic case for investing in nutrition here, also – specifically linking to GDP costs.

**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)?**

Section 3 overall places too much emphasis on food systems; we recommend including greater balance both in the way nutrition is framed, and the quantity of text on each sector.

3.1:

- The section and recommendations are disproportionally long compared to other sections. Suggest addressing this imbalance.

- Para 2, page 7 emphasises that, “interventions that consider food systems as a whole are more likely to succeed.” This could also apply to health, education, agriculture: suggest this is removed, or amended to reflect the multi-sectoral nature of nutrition.

- Good to see the emphasis on nutritional quality of diets, also the emphasis on the role of gender in section 3.1.

3.2:

* We welcome the focus on the first 1000 days here, but suggest that this is referenced much sooner in the document – perhaps in the introduction. The critical 1000 day window is relevant across all sectors, not just social protection. Please also underline the importance of pre-pregnancy interventions to improve nutrition, as these are important in ensuring better nutrition outcomes in mother and baby.

3.3:

* This section sees disproportionately short, given the important role that health systems have to play in delivering better nutrition outcomes. Suggest much greater emphasis on ante-natal care and 1000 days, and on the vital role that health systems play in those first 1000 days.

3.3.1:

* Strongly support the reference to the economic impacts of stunting on page 16, and suggest that this is strengthened.
* The terminology on wasting is out of date. It is more usual to refer to Severe Acute Malnutrition.
* The section is entitled “*delivery* of effective nutrition interventions”, yet the recommendations on wasting are mostly about improved understanding and refining of models rather than overcoming actual delivery bottlenecks (they read like a research agenda more than an action agenda). There should be concrete and actionable recommendations on:
	+ In high-prevalence areas, implement service points for the treatment of severe acute malnutrition within easy reach of every household;
	+ Track and eliminate stock-outs of specialised products for the treatment of SAM;
	+ Monitor cure rates in SAM treatment programs and deploy quality improvement methods to bring them to SPHERE standards if inadequate;
	+ Institute routine longer-term follow-up of children treated for SAM to prevent relapse or death.
* On stunting, we suggest adding the following practical recommendations:
	+ Screen and treat pregnant women for diseases such as malaria, urinary tract infections and/or pre-eclampsia, all of which predispose to low birth weight
	+ Protect young infants from infectious diseases such as malaria, and measles (at the moment the comments are based exclusively on diarrhoeal disease, but all disease in this age group is going to tip the child towards or into stunting)
	+ Through social protection measures or direct provision of appropriate foods, ensure that the most food insecure households have access to appropriate foods for feeding of the young infant (6-24 months) throughout the year
	+ The promotion of appropriate complementary foods should include a specific citation of animal-source protein.
* We question the inclusion of a linear growth assessment. As far as we know, there are no interventions which would be provided conditional on the finding from a linear growth assessment, so this would add programme complexity with limited advantages.
* In the priority actions to address stunting, should nutrition-sensitive agricultural interventions be referenced here?

3.3.2:

- We suggest adding in PMTCT, measles immunisation, antibiotics for women with bacteria in their urine.

3.3.4:

* It would be helpful to see the link between adolescent girls’ education (secondary) and its link to reduced stunting levels referenced here.
* It would be helpful to add some priority actions for BCC.

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

* The emphasis on a trust fund risks taking the focus away from the need for domestic resources to be mobilised in developing countries. We strongly recommend putting greater emphasis on national resource mobilisation in this section in recognition of the fact that only domestic resource allocation will be sustainable.
* It’s not clear how a trust fund would overlap with other mechanisms – it would be helpful to clarify this further.
* 4.4.1 – it would be good to a reference to the importance of programmes being managed in a cross-sectoral way.
* Overall chapters 4 and 5 need to reference WHA targets and the Global Nutrition Report, and explain how this framework will fit in with existing initiatives such as SUN and the GNR.
* Under recommendation 5(b), please emphasise the measure progress on allocating adequate resources for nutrition, and the impact of doing so.
* Many countries have recently reviewed their nutrition plans: important that this document and process draws on existing processes, rather than repeating them.
* How will FAO and WHO involve other agencies on the monitoring of the FFA? Given the multisectoral nature of the FFA, this is key. Similarly, greater clarity on linkages to SUN would be helpful.
1. **Does the Framework for Action adequately reflect the commitments of the Rome Declaration on Nutrition, and how could this be improved?**

The framework needs to have a more balanced focus on all sectors: it is still introduced through a food security lens and this should be adjusted.

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

As mentioned above, the framework should place more emphasis on measuring progress on both the allocation of resources (inn particular domestic resources) and their impact.

1. **Are there any issues which are missing in the draft Framework for Action to ensure the effective implementation of the commitments and action to achieve the objectives of the ICN2 and its Declaration?**

As referenced above, it’s not clear how this FFA will draw on and fit with existing processes and avoid duplication. Current references to existing processes are vague. More clarity on this will avoid future duplication and confusion, for example with SUN or the Global Nutrition Report.