

MINISTRY OF SOCIAL DEVELOPMENT AND FIGHT AGAINST HUNGER
NATIONAL SECRETARIAT FOR FOOD AND NUTRITIONAL SECURITY
EXECUTIVE SECRETARIAT OF THE INTERMINISTERIAL CHAMBER FOR FOOD AND NUTRITIONAL SECURITY
Esplanada dos Ministérios – Bloco A – Room 412 - CEP: 70.054-906 – Brasília, DF
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Position of the Brazilian Interministerial Chamber for Food and Nutritional Security (CAISAN) on the Draft Framework for Action to Implement the Rome Declaration, within the 2nd International Conference on Nutrition – Rome/2014

A. Context

1. In Brazil, the Interministerial Chamber for Food and Nutritional Security (CAISAN) is part of the National System on Food and Nutritional Security (SISAN). Created in 2007, CAISAN gathers 20 ministries and is responsible for the intersectoral coordination and monitoring of public policies related to Food and Nutritional Security (SAN), in order to guarantee the Human Right to Adequate Food (HRAF).
2. Since 2009, CAISAN created 11 intersectoral technical committees to discuss and elaborate proposals for the improvement of actions on Food and Nutritional Security, such as implementing and monitoring actions to prevent and control obesity, considering its multidimensionality.
3. This position was elaborated through the coordination of several Brazilian government sectors, motivated by the relevance of the Framework for Action to implement the Rome Declaration, regarding the Food and Nutritional Security agenda for the next 10 years (2015-2025).

B. Suggestions on the Draft Framework for Action

4. Overview: To consider the commitments presented in the Rome Declaration, describing objectively innovative actions and targets, to achieve these commitments. To present actions based on rights approach, mainly the Human Right to Adequate Food.
5. Item 1.2 Framework for Action: Differentiate the regional initiatives Scaling Up Nutrition movement (SUN) and the Global Nutrition for Growth Compact from actions agreed within the United Nations System; placing the information about these initiatives in the footer and removing them from the body text. This suggestion also applies to subsection 4.2 International Level item 4 accountability mechanisms.
6. Item 2.2 A better governance for nutrition: It is suggested the inclusion of a recommendation of mechanisms which ensure the effective participation of civil society in governance for nutrition at national and international level.
7. Item 3.1 Food Systems:
 - i. Inclusion of the word sustainable to the subtitle - Sustainable Food Systems;
 - ii. Enhancement of Modern Food Systems has been observed in order to increase productivity and production of nutritious food. It is suggested

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- the enhancement of sustainable and traditional food systems, rather than modern food systems, since those promote adequate and healthy supply of food, through diversification of production, rescue of socio-biodiversity and stimulus to culinary practices;
- iii. Address all stages of food systems (production, supply and consumption) and highlight the challenges of supply agenda, such as the retail industry and its relation to food prices. In the list of priority actions should be ranked the need for monitoring and managing high and volatile agricultural commodities prices;
 - iv. Address environmental, economic and social implications of the abuse of pesticides, fertilizers and genetically modified organisms;
 - v. Explain that there is no consensus among most countries about adopting strategies like bio-fortification; this the case of Brazil;
 - vi. It is suggested that recommendations for diets made by the World Health Organization deserve to be listed in a sub-item 3.1 Food Systems. It is also suggested that it should be moved to Item 3.1.2 Sustainable and Healthy Diets.
 - vii. Among the actions of “Promoting quality and dietary diversity” – Item 3.1 Food Systems – it is recommended the inclusion of the following action: implement economic and legislative measures to reduce the consumption associated with unhealthy products and unhealthy practices related to these products, including restrictions on advertising and other forms of marketing and taxing unhealthy products, and policies to reduce the price of healthy foods.
 - viii. It is suggested the displacement of item 3.3.4 Nutritional Education for behavior change to Item 3.1 Food Systems, preferably after item 3.1.1 Food Environments since the Food and Nutritional Education (EAN), once it has several practice fields, beyond the health and educational sector, such as the social assistance, agriculture and supply sector. In addition, the EAN is a strategy for ensuring the Human Right to Adequate Food, considering the multiplicity of feeding behavior, including environmental factors (availability of adequate and healthy food, advertisement), all stages of food system and the interactions and meanings that compose eating behavior. We also suggest the inclusion of the term Feed - Food and Nutritional Education - considering that actions should not be focused on nutrients, addressing only biological aspects of eating. In a school setting, community involvement (parents, teachers, principals, cooks), should be encouraged, as well as the participation of representatives of governmental and non-governmental organizations in food and nutritional education processes developed at school. Culinary practices can be developed with students, using local food production, which are part of the habits, culture and food traditions, contributing to

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conservation and / or redemption of traditional recipes, promoting production and the rescue of sociobiodiversity.

- ix. Item 3.1.1 Food Environments – to stress that structural/environmental actions that promote access to adequate and healthy food should focus on improving food production, through sustainable food systems that allow access to diverse food and sociobiodiversity and not only in improving the nutritional status of food, by reducing some nutrients such as sodium, sugar or fat.
- x. The terms 'nutritious food' or 'rich in nutrients' used in this (Item 3.1.1 Food Environments, Healthy Eating, priority actions) and other sections of the document generates misinterpretation and can encompass the encouragement to the production of food products that should not be reinforced, such as products rich in sugar, fat and calories. For this reason, the expression should be replaced by “to improve the intake of micronutrients through a diversified and healthy diet”. Furthermore, the wording of the first priority action listed under this item seems to suggest that the processing of some products rich in micronutrients such as fruit, vegetables and legumes, should be encouraged. The ultra-processing of these products should not be reinforced, and the products to have their production encouraged are the unprocessed or minimally processed ones, which are rich in nutrients.
- xi. In order to consider the regional peculiarities, we suggest to complete the writing of the priority action included in Item 3.1.1 (Food Environments, topic regulating the marketing, in the part priority actions, to implement the WHO’s Set of Recommendations on the Marketing of Food and Non-alcoholic Beverages to Children”), taking into account the suggestions of the regional representations of the WHO.
- xii. Item 3.1.2 Sustainable Healthy diets. In Brazil, the adoption of sustainable healthy diets is based on the coordination and implementation of programs and actions that aim at promoting sustainable food systems of organic production and agroecological basis, according to the National Policy of Agroecology and Organic Production (PNAPO). We suggest that this item should consider actions such as support the structures of supply that improve access to healthy and sustainable food, policies and programs of incentive to family farming through rural credit, promotion of the use of native seeds, purchase of goods from the family farming by public institutions, such as schools, hospitals, public companies, among others.
- xiii. Considering the data about the fast increase of overweight and obesity among children and adults in all regions, presented in the draft Rome Declaration on Nutrition (44 million children under five years-old were overweight or obese in 2012, and more 500 million adults were obese in 2010) Brazil is in favor of the adoption of a

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Framework Convention on Obesity, with targets agreed between the Member States, within the World Health Organization.

8. Item 3.2 Social Protection

- i. To make it clear that cash transfer programs by themselves are not the answer to all social determinants of health. In the case of the Bolsa Família Program (PBF), there is a linkage between cash transfers and the expansion of health and education public services. This intersectoral approach promotes a growing coverage and qualification of the public services on education, health and assistance, presenting, after 10 years of PBF, significant results on the reduction of malnutrition and diarrhea (RASELLA D. et al. 2013 – Lancet), and consequently reduction of under-five child mortality. According to the historical evaluation of children from 0 to 5 years old beneficiaries of the PBF (2008-2012), it was shown that a longer period under the PBF coverage - and therefore under monitoring of the basic health attention system - diminishes the risk of both malnutrition and overweight in children from 0 to 5.

9. Item 3.3 Health

- i. Reinforce the role of primary attention in the implementation of actions in the services of health.
- ii. Consider the issues of universality of rights and, at the same time, consider the issues of equity, in order to identify vulnerable populations and promote actions according to their peculiarities and needs.
- iii. Include prevention, control and treatment of other diseases and damages related to poor food and to food and nutrition insecurity, including the overweight, obesity and chronic diseases.
- iv. Promote the implementation and integration of rights-based policies, intersectoral programs and actions (education, sanitation, income, etc.) that work on the social determinants of health and nutrition to reduce acute and chronic child malnutrition.
- v. Expand strategies to prevent and control anemia to other populations, especially children, and incorporate strategies of prevention and control of other deficiencies of micronutrients, such as vitamin A, iodine, zinc and others, when necessary.
- vi. Improve the intake of micronutrients through diversified and healthy diet, and complementarily through strategies of supplementation and fortification.
- vii. Include in health services strategies to introduce complementary healthy food for children between 6 months and two years old.



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C. Final comments

10. This document presents issues and specific suggestions on the Draft Framework for Action to implement the Rome Declaration on Nutrition discussed in the Brazilian Interministerial Chamber for Food and Nutritional Security (CAISAN).

11. Finally, we suggest a reinforcement of the Framework for Action as a propositional document, focused on actions that prioritize the improvement of people's nutrition, based on the Human Right to Adequate Food and on Food and Nutritional Security.

Brasília, 28th August 2014.