Dear Dr. Branca,

I thank you very much for taking such an active part in the UN Decade of Action on Nutrition and keeping us involved. We already discussed some key issues which should – in our view - be better reflected in the first draft during our telephone call on February 9th, 2017. To follow up on this call please find my comments in writing: We certainly welcome the new concept of “action areas” and “cross-cutting, integrative areas for impact” which will help to prevent silo thinking.

However, we think that more emphasis should be put on cross-sectional subjects. The action areas still seem a bit limited in their scope and do not clearly enough highlight the importance of cross-cutting approaches. For example nutrition education should not only be dealt with under action area 3, associated with social protection, but rather seen as a topic that affects people throughout their whole life. We think it crucial to increase public awareness for the importance of healthy diets and eating (and living) habits. This touches early nutrition education at home, in pre-schools and schools and the correspondent practical abilities as well as production and marketing of food, food choices in hospitals, canteens, care facilities, life styles, urbanisation and so on. If we want to achieve lasting improvements in dietary habits, it is not only important to offer a balanced diet from childhood and adolescent years on. But it is also necessary to convey nutritional knowledge and the corresponding practical competences.

Work Programme of the UN Decade of Action on Nutrition, 2016-2025

First draft, 17.01.2017
The scope and quality of the nutrition education that people receive in their life is of essential importance to their long-term eating and dietary habits.

With regard to the action networks we are thankful for the clarifications made in the first draft. We welcome the fact that the list of proposed priorities is not limited and open for new themes. However, we miss an indication to the role of civil society, academia, and the private sector in these networks. We would therefore appreciate to emphasize the active participation of civil society, academia, and, as appropriate, the private sector in the mentioned networks, as these are important players for more holistic approaches.

Food systems are changing very quickly, and information and communication technologies (ICT) are getting more and more important. Therefore, more attention should be paid on adaptation mechanisms to upcoming changes in our food systems through digitization. So far, this aspect is not addressed in the First Draft and we would welcome its implementation.

Women are mostly responsible for growing and preparing the food consumed in the home and raising small livestock. Women are also more likely to spend their incomes on food and children's needs. Research has shown that a child's chances of survival increase by 20% when the mother controls the household budget. Therefore, we are pleased that the draft now makes reference to the important role of women as key stakeholders for food security and nutrition. But we still consider it important that the decade on action on nutrition is also a decade to achieve a significant improvement of the realization of women's rights and therefore clearly points out the important role of women for food security, dietary diversity, and children's health.

We believe that the causes of overweight and diet-related diseases should not be attributed to individual foods or food components. This view does not do justice to the complexity of the development of these diseases. We are therefore critical of the fiscal tools such as taxation, subsidies for healthy foods (and removal of subsidies for unhealthy foods) as well as supply-side incentives mentioned in the Work Programme. In principle, we consider an approach focusing on the entire diet and not on individual nutrients or foods to be more useful for achieving healthy lifestyles. In this context, we would like to once again highlight the importance of nutrition education.

We also believe that when using the terms “healthy/unhealthy foods” the criteria according to which the foods are classified in one of these groups should be clarified.

We also propose strengthening further linkages to other policy fields, like the agricultural sector that have big influences on nutritional and health status. SDG 2 clearly links sustainable agriculture to the fight against hunger and malnutrition and the Decade should
follow this line. Sustainable agriculture is a key factor for sustainable development and sustainable food systems and therefore should find more attention in the draft.

We would like to recommend again to take a closer look at the living environments in which nutrition and food choices are taken. We made the experience that for sustainable success you need to look at all places where people regularly spend longer periods of time. Germany has launched a great number of initiatives since 2008 that are aimed at sustainably improving the dietary and exercise habits in Germany. They are targeted at all age groups in their direct living environments, e.g. in the family, in childcare facilities and schools, at work, in retirement homes or in the district/community. The goal is to create an environment in which a well-balanced diet and sufficient physical activity are firmly established. In our view it is important to strengthen people's skills in this regard and create conditions that make the healthier choice become the easier choice.

We look forward to hearing from you,

Best regards