USAID Comments on WHO’s Draft (version 27 January 2017) Work Programme for the UN Decade of Action on Nutrition, 2016-2025

USAID congratulates WHO’s progress in moving forward its commitments on the 2030 Sustainable Development Agenda through the UN Decade of Action on Nutrition, 2016-2025. We are pleased to see that this is a living document, building and connecting with other nutrition initiatives of governments and their many partners and stakeholders.

Overarching Comments:
- The document rightly attempts to pull together many nutrition collaborators within the UN system to implement the work program, but it does not clearly describe relative roles and responsibilities in the action areas, which will be important in terms of responsibilities for monitoring, evaluating and reporting.
- The document mentions in the beginning that it “works within existing structures and available resources…” The document could better describe how it will build on, use/incorporate and engage with these existing structures and resources and not duplicate efforts that are on-going. Questions of how the Nutrition Decade Secretariat, the data on commitments repository, and the action networks are different from the SCN, N4G, and the SUN communities of practice respectively, and how they would be funded are not answered. Even though N4G and SUN represent subsets of UN member states, there would be little need to duplicate their efforts, especially for SUN where in-country multi-stakeholder platforms that are led by host governments are functioning well.

Aims and Added Value Comments:
- Para-9, bullet 5 – Suggest that this work program advocate for mobilizing policy and financial commitments.
- Para-9, bullet 6 – How will the global accountability framework and mechanism be managed and funded; how will it be different and more independent than the GNR?
- Para-11, bullet 5 – Rather than create a new mechanism apart from the GNR, it would be helpful to describe how UN agencies, especially WHO, UNICEF and FAO will contribute to improving the quality of data their systems produce which contribute to the GNR accountability mechanism. The value of an independent entity, such as the GNR, to produce an accountability report on all commitments cannot be underestimated.

Guiding Principles:
- Para-12, bullet 1 - Suggest that the Nutrition Decade will build on and act within existing efforts….
- Para-12, bullet 4 - Nutrition in emergencies and helping countries build resistance to nutrition and food security shocks is an important priority that could be elaborated upon in this document.
- Para-12, bullet 6 - It would be helpful to describe how all of these entities will be engaged – by which organizations and for what purposes. Will these
engagements be coordinated by the leads, WHO and FAO?

**Action Areas:**
- Para-18 – What organization will develop this map; how will it be financed; will it need to be continually updated; could SUN, which has already mapped progress in 58 countries help to complete this?
- Action Area 1 – Overall, this is described comprehensively and appropriately
- Action Area 2 – This area is described well in terms of UHC, but the focus on health systems lacks some of the specificity that health deserves in terms of critical topics in undernutrition such as severe acute malnutrition, early and exclusive breastfeeding, appropriate complementary feeding, adolescent nutrition for girls, nutrition for adolescent, pregnant and lactating women, nutrition and HIV, etc. It also neglects an important component of health service delivery, which is social and behavior change/demand creation, which is not adequately covered in the education Action Area 3. SBC is a unique discipline built on social science and distinct from, but contributes to social marketing and education that seeks to empower health services consumers to adopt healthy behaviors. Finally, as sustainability and country-led efforts are priority, pre- and post-service in clinical and public health nutrition will be essential for creating and sustaining local nutrition expertise.
- Action Area 3 – UNICEF and WFP are critical UN agencies engaged in social protection activities. Strengthening links between social protection activities to resilience and sustainable nutrition programs could be a key action area for the work program. Social protection goes beyond education, but the need for education is also critical through community outreach, social marketing (linked to SBC), and school-based programs.
- Action Area 4 – Para 34 – It’s important to stress not just adequate food, but also safe and nutritious food with appropriate labeling to inform consumer choices.
- Action Area 5 - Well described.
- Action Area 6 – This is an area in which SUN has made great progress along with the GNR. Much more needs to be done with this section to work with these existing entities to build on their successes.

**Means of Implementation – Commitments for Action**
- Para-45 – Rather than establish a separate, costly accountability mechanism, suggest using existing structures through the GNR, N4G and SUN.
- Para-46 – Please describe the roles and responsibilities of the proposed Nutrition Decade Secretariat, how different they will be from the SCN and how it would be funded.

**Action Networks**
- Para-48 – The topic areas described in Table 1 are pertinent and timely. Some of them duplicate communities of practice led by SUN or other entities. Please suggest how the proposed action networks will utilize existing platforms to avoid duplication of efforts and reduce costs.
Funding modalities
● Para-55 – It is important that the existing entities supporting the Decade for Action advocate support for new financing to countries for their multi-sectoral nutrition plans. It would be unlikely that new financing would be available for other endeavors or entities not at country level.
● Para 56 – Significant resources have been applied to support the costing of policies and programs in countries through SUN and through complementary exercises. Please continue to encourage and build upon the expertise gained through these on-going efforts.

Governance
● Para 67 – We applaud the statement that the “Nutrition Decade will not seek to establish new structures, but will facilitate broad consultation among stakeholders to seek alignment of priorities, policy instruments, and monitoring of mechanisms.”
● Para 68 – Please describe how the Joint FAO/WHO Secretariat does not establish a new structure and is cost-neutral.

Accountability and Shared Learning
● Please describe how the Decade for Action will incorporate existing, independent accountability mechanisms and not create a new mechanism that would duplicate what already exists.

Table 1- Topic and Action Networks
● Please show how many of these topics can already be accommodated through existing platforms so as not to duplicate efforts.