

Permanent Representation of Italy
Ministry of Foreign Affairs
Rue du Marteau 5-11
1000 Brussels

Brussels, 13 October 2014

Object: Addressing recommendations regarding the Commission Staff Working Document: *Action Plan on Nutrition* ahead of the Foreign Affairs Council meeting

Dear Ms Daniela Tonon,
Ms Sara Monterisi,

The undersigned organisations, which are relentlessly fighting for maintaining maternal and child nutrition on the EU's agenda wish to welcome the Commission Staff Working Document and so-called *Action Plan on Nutrition* published on 3 July 2014. We welcome the commitments made to provide guidance to the EU Delegations, Member States and Governments of high-burden countries as to how to reduce the number of stunted children under the age of five by at least 7 million by the year 2025.

Ahead of the Foreign Affairs Council meeting that will take place in Brussels on 12-15 December, we would however like to raise a number of issues and recommendations that are in our view essential to be taken into consideration in order to strengthen the effectiveness of the Action Plan:

- While we appreciate the reference to some important human rights instruments, the Action Plan as a whole is not framed from a **rights-based perspective**, and in particular within the context of realising the right to adequate food and sustainable diets.
- While the initial goal of the Action Plan is setting how the European Commission will reduce the number of stunted children, it needs to **combine explicitly chronic and acute malnutrition reduction strategies** in order to maximise its global impact. The management of acute malnutrition needs to be integrated as a component under the nutrition preventive strategies implemented at country level. The strategic priority on knowledge for nutrition should put a specific emphasis on joint wasting and stunting framework knowledge and practices.
- While the Action Plan correctly acknowledges the importance of nutrition-sensitive interventions, we are concerned about the **balance between the proposed commitments for nutrition-specific and nutrition-sensitive interventions** (1:10 ratio). Reaching the impact targets requires adequate investments in nutrition-specific interventions.
- While the Action Plan rightfully recognises the role that EU Delegations play in strengthening nutrition governance, it does not mention the need for **focal points in all Delegations** of countries that have prioritised nutrition in their national indicative programmes.
- We welcome the support for “a sound and responsible involvement of civil society”, yet the **particular role that civil society has to play should be further recognised**, in particular that of groups most affected by undernutrition. Civil society organisations should be facilitated to participate in national planning, programming and monitoring processes. We encourage the EU to further integrate civil society and community-based organisations into the experience-sharing and decision-making processes, going beyond regional seminars carried out for EU Delegations.

- Furthermore, the Action Plan fails to provide details as to which **participatory mechanisms and exchanges of information** will put be in place, and lack of consideration is given to potential, real or perceived conflict of interest. Although a good starting point, the SUN multi-stakeholder platforms do not represent all the countries that have prioritised nutrition and therefore cannot stand as the only tool.
- While there is reference to the EU focusing its activities on the most affected populations, **support for community-level initiatives** will be imperative, particularly for bringing interventions to scale and ensuring impact of nutrition-sensitive approaches.
- Specific measures to maximise the **nutritional benefits of livestock** should be clearly outlined. Support for small scale livestock keeping and pastoralism, in particular in the arid and semi-arid regions is pivotal to increase its contribution to the four pillars of nutrition and food security. In pastoralist areas where little opportunities exist to produce a variety of food, milk production and consumption are particularly important, notably to reduce stunting among children.
- The emphasis on and commitment to accountability is welcome. This could be strengthened by outlining how the EU will practically **support national and local level accountability and transparency**, including through citizens' participation at every step of the accountability and decision-making process. Furthermore, it will be essential that the EU presents how the results of the monitoring will be aligned with those of other donors.
- Regarding the communication of results, we would welcome the European Commission **publicly and regularly releasing information on progress against the financial commitments made at the Nutrition for Growth summit**, i.e. on how the funds are being disbursed, the timeline, annual and public reporting on the impact of these investments and progress towards the EU's commitments.
- Finally, it is regrettable that the commitment to ensuring that nutrition is properly addressed in the post-2015 framework has been removed from the final text. As the Intergovernmental Process for developing the future development framework begins, the EU will have a much greater role and voice than hitherto. The EU must **take a bold position and push for a dedicated stand-alone food and nutrition security goal** with a suite of time-bound and measurable indicators that align with all six of the World Health Assembly targets and that are informed by the ambitious work of the Zero Hunger Challenge. We also call for the EU to use its influence by advocating for the incorporation of nutrition security indicators throughout other goals related to health, education, water, health and sanitation, social protection and gender.

We welcome the fact that the Italian Permanent Representation has placed a strong focus on food and nutrition security during its Presidency of the EU, and would encourage you to endorse strong Council Conclusions on the EU Action Plan on Nutrition in December 2014. We thank you for your support in ensuring that the above points are addressed and adequately reflected in the Foreign Affairs Council meeting and related Conclusions.

We thank you for your continuous support in keeping food and nutrition security high on the EU's agenda, and truly hope that we shall, together, maintain this momentum.

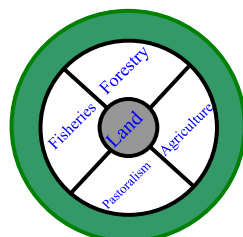
We wish you all the best along your EU Presidency's programme.

Yours sincerely,





**Micronutrient
Initiative**



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