WCRF International response to United Nations Non-Governmental Liaison Service consultation on the post-2015 development agenda planning process

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Contact:

Corinna Hawkes (Head of Policy and Public Affairs) c.hawkes@wcrf.org
Jo Jewell (Policy and Public Affairs Manager) j.jewell@wcrf.org

WCRF International, 22 Bedford Square, London, WC1B 3HH, UK

+44 (0) 20 7343 4200

Response to consultation on the report by the High-Level Panel of Eminent Persons on the post-2015 development agenda

What do you agree with about the narrative sections?

Identifying key principles

One of the most important contributions made by this report of the UN High-Level Panel to the emerging discussions on the post-2015 agenda is the establishment and clear articulation of a set of underlying principles. The vision is to be largely welcomed, with its reference to principles of equity, sustainability, solidarity, respect for humanity, and shared responsibility relative to respective capabilities. These principles will be instructive for, and central to, the further elaboration of the post-2015 sustainable development framework, which should aim to deliver sustainable prosperity and well-being for all. It is important that no principles lose out in the negotiating process.

Equality

In this context, the notable inclusion of a strong focus on equality is to be welcomed. The clear message to "leave no one behind" is ambitious but critical. One of the main shortcomings of the Millennium Development Goals (MDGs) was the failure to properly address inequality and the unequal distribution of progress in meeting goals, which resulted in widening gaps (IDS, 2010). Progress on achieving the health goals, for example, was measured with a focus on aggregate progress using national averages to assess countries' performance (IDS, 2010). Neglecting the inequality aspect may have severely undermined progress. The commitment to disaggregation of data (which links to monitoring and accountability, see below) will be particularly important in measuring progress.

Health for sustainable development

We appreciate the centrality of health, food security and good nutrition in the report, as these are essential foundations for sustainable development. Health remains a core obstacle to development in many low- and middle-income countries, and there has been unequal progress among countries and regions with many not having met the public health targets set out in the MDGS. The inclusion of non-communicable diseases in the report is to be welcomed as unequal progress on health-related MDGs appears to be significantly related to burdens of NCDs in a population, demonstrating the inter-relationship of different health challenges and development (Stuckler, 2010).

Ensuring structural change

We also value the focus on structural transformations as the primary enablers of progress in development. Tackling the barriers to development will require a major overhaul of the current policy and governance frameworks that define the status quo. In our field of expertise - food, nutrition, unhealthy diets and NCDs – much of the evidence points to structural (upstream) factors as the main influencers, with the nutrition transition being driven by food system transformation (FAO, 2013). It is these transformations that need to be addressed if real progress is to be made in the prevention of avoidable disease (Swinburn, 2011). Here government has the role and responsibility to create drivers and incentives for transformation through policy actions, including taxes, regulations and subsidies. Taking a strategic and coherent approach will be critical to achieving change (Hawkes, 2006). 'Behaviour change' - by governments, business, communities and individuals - can only be conducted within a supportive framework. As the report notes, regulatory standards are of great importance, including standards that ensure businesses conduct themselves appropriately.

Governance

The report also highlights the importance of improved governance in contributing to sustainable development. We welcome the emphasis on open and accountable public institutions. Resources will need to be allocated to support the development of good governance structures at the national level.

Another critical challenge for governance within the post-2015 agenda will be resource-raising and appropriate and fair distribution of funds. There is an element of risk involved in the identification and development of target areas for action as resources can gravitate to a select few areas. There is potential to distort action and encourage vertical approaches, rather than horizontal approaches in line with the spirit of the report, which then results in the neglect of work in other areas not covered by targets (as has been the case, for example, with NCDs under the current development framework) (Delamothe, 2009). Furthermore, action to meet agreed goals and targets should be guided by the best available evidence and not determined by the priorities of donors.

Monitoring and accountability

The profound emphasis placed on data for monitoring and evaluation is commendable. Such data and information is essential for monitoring progress against goals and targets, and will incentivise action. In addition, monitoring and evaluation of specific policy actions will help to identify what works. In the area of food and nutrition, there is great room for improvement, particularly in the

evaluation of the effectiveness of different policy options (Hawkes, 2012). The commitment to disaggregate data should also be welcomed, as it highlights the importance of progress across every group (according to age, gender, income etc.).

We also welcome the proposal for a set of goals and targets that are time bound and measurable, as these are powerful incentives for action by Member States. Experience from the MDGs has shown that they are a legitimate way to leverage increased attention and investment, and hold actors to account (Nayyar, 2012). They will all provide clarity for all stakeholders.

A complex agenda

We recognise the need for a broad post-2015 agenda for sustainable development. This reflects the magnitude of the task at hand, its global applicability, and the inter-relatedness of the different challenges. We anticipate major progress (with co-benefits) will accrue by taking a horizontal and integrated approach. However, the complexity and overlap between different priority areas means that it will be absolutely critical to ensure policy coherence - not only within the post-2015 development framework, but also the integration of, and consistency with, existing political commitments (e.g. global action on NCDs). For example, in the area of food and nutrition, there is an important relationship between agriculture, diet and health. It is important to give greater consideration to the potential for agricultural actions to promote health, while recognising the role of the food supply chain in mediating this relationship (Hawkes, 2012)

Another important inclusion was explicit reference to the emerging diversity in low- and middle-income countries. There is now a range of development landscapes within and between countries, with significant sub-national and regional differences (between rural and urban areas or between different socio-economic groups, for example) that means the nature of the challenge - and thus priorities - may be quite different according to each situation and context. In the area of food and nutrition, for example, the double (or triple) burden of malnutrition is well established, with all forms of malnutrition co-existing within one setting (e.g. stunting, wasting, micronutrient deficiencies and obesity/overweight) (Haddad, 2001). Each represents a challenge to sustainable development and must be addressed appropriately.

What do you not agree with about the narrative sections?

There are major issues with the way in which the report describes the global NCD epidemic. These include significant inaccuracies when describing the impact on low- and middle-income countries, and an extremely poor articulation

of the global distribution of obesity and overweight as major risk factors. It is clear that NCDs affect every country in the world. No one country is immune and trends indicate that low- and middle-income countries will be the worst hit, experiencing the greatest impact moving beyond 2030 (WHO, 2010). The omission of NCDs was a major shortcoming of the MDGs, and their inclusion in a target here is a new milestone. However in the narrative we need to move away from describing NCDs, and, in particular, obesity as a risk factor, as issues exclusively experienced by high-income countries. Low- and middle-income countries are seeing a rapid upsurge in rates of obesity, where it co-exists with other forms of malnutrition (FAO, 2013). An estimated 1.4 billion people worldwide are overweight, of whom 500 million are obese; the sub-regions with highest prevalence of obesity have been found to be Central and South America, North Africa and the Middle East, Northern America and Southern Africa (FAO, 2013).

What do you agree with about the goals, targets and indicators?

We welcome the centrality of health as one of the goals and as a cross-cutting issue that will be impacted by action in many different areas. The MDGs were strong on health and it is important that this work continues as further progress is necessary. A stand-alone health goal is essential. Similarly, we welcome the inclusion of a goal on food security and good nutrition. We are particularly pleased to see nutrition and quality of diet given equal importance alongside hunger, as both are absolutely essential in addressing issues of malnutrition.

We are also pleased to note the inclusion of a target that makes specific reference to the need to address NCDs. This re-emphasises the need for global action and a commitment to addressing NCDs as a challenge to health and development. The inclusion of nutrition specific targets under the food security and good nutrition goal is welcome. Specifically we would like to highlight our support for the target on stunting, which has important implications for future risk of overweight and obesity. We are also confident that many of the targets in other areas are both health- and nutrition-sensitive, including on women and girls empowerment.

What do you not agree with about the goals, targets and indicators?

The absence of a target on obesity and overweight under the goal on food security and good nutrition is a major shortcoming. Obesity and diet-related risk factors for NCDs are the leading contributors to the burden of disease in every region outside of sub-Saharan Africa and South Asia (GBD, 2010); even in these regions rates of overweight and obesity are on the rise (WHO, 2013). It would be entirely possible to integrate targets on obesity and childhood obesity as contained in existing WHO documents such as the Global Action Plan on NCDs

(2013-2020) and the implementation plan for the Global Strategy on Maternal, Infant and Young Child Nutrition. The high-level consultation on food and nutrition security reached consensus on the need to address malnutrition is all its forms, including "imbalanced nutrition...due to excess energy consumption" (FAO, 2013b). This would ensure that the global response to malnutrition is coherent and systematic. As we strive to eradicate hunger and under-nutrition, it is important that the solutions are mindful of the need to prevent the health burden associated with unhealthy diets. We see the post-2015 framework as an opportunity to bring together those working on malnutrition in all its forms, not just hunger. This will improve the prospects for improve food and nutrition security in the long term.

The definition of NCDs currently proposed in the report is not consistent with the definition adopted and used by the World Health Organization. This should be amended to avoid further confusion.

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