

**Safeguarding against possible conflicts of interest in nutrition programmes:
Draft approach for the prevention and management of conflicts of interest in the policy
development and implementation of nutrition programmes at country level**

Canada's comments

Canada thanks the WHO Secretariat for the opportunity to participate in this consultation.

As noted in WHO's Framework of Engagement with Non-State Actors (FENSA), engagement with non-State actors (NSAs) benefits global public health. Canada agrees and further suggests that engaging stakeholders may provide valuable information to Member States on a variety of health issues, including nutrition. We therefore appreciate that the draft approach is designed to align with FENSA.

Canada encourages a risk-based approach to the management of conflicts of interest and notes that the draft guidance on this issue may serve as a tool for Member States. Canada recognizes that Member States may have already adopted domestic conflict of interest measures suited to their overall policy objectives in nutrition. In these cases, the WHO draft guidance might supplement, rather than replace, existing national resources.

Canada believes that the definition of "engagement" should be broadened to include informal engagement as well. FENSA governs five types of interactions between WHO and NSAs, including participation, resources, evidence, advocacy, and technical collaboration. A broader definition of engagement, in line with FENSA, could broaden the applicability of the draft guidance.

We are also of the view that all engagements, whether formal or informal, may benefit from a risk assessment. Adding a step, in the proposed guidance, to determine if a formal agreement and full assessment is required would be useful. In circumstances where a rapid decision is needed, a simplified version of the tool with points to consider could also be useful.