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Are the responses approved or endorsed by your organization?

Yes

## Comments on the "[Discussion paper](#)"

General comments : Please comment on the clarity and comprehensiveness of the approach

Sufficiently clear and comprehensive in summarizing the Background and General Principles but may benefit from having a section to bridge the discussion of the principles and the description of the tool itself.

Specific comments

The objective of Step 2 ("Have a clear understanding the risk's profile of the external actor and the engagement") needs to be reworded for clarity.

Appendix 1 Table is difficult to read and should be printed more clearly in the final version

## Comments on the "[Introductory paper](#)"

General comments : Please comment on the clarity and comprehensiveness of the introductory paper

The paper is sufficiently clear and comprehensive.

The principles are described with minimal technical or legal jargon.

Specific comments

We appreciate the example of the International Code of Marketing of Breastmilk Substitutes as one of the instruments that mutually reinforce children's right to health, but also recommend reference to the recommendations of WHA Resolution 69.9 on safeguarding against Col. These recommendations may not yet be implemented even in Member States with national legislation most consistent with the International

Code.

Examples such as those in Appendices 3 and 5 are better retained in the main body of text

NGOs who participated in the consultations should be listed

## Comments on the "[Tool](#)"

General comments : Please comment on the clarity and practical value of the tool

It is very text heavy and would benefit from a table of contents, and section outlines for each Step.

Its length may greatly limit its practical value.

Specific comments

The inclusion of Part 1 (Management of Conflicts of Interest for Public Officials) as a distinct section of the tool is not adequately described in the Discussion Paper (which immediately discusses the steps after the general principles) and may be mistaken for "Step 1".

The outline highlighting the tool's two components (managing COI for public officials, and for external institutions and individuals) needs to be better prefaced in the Discussion Paper and a brief section at the beginning of the tool.

Typographical error in Page 6, Step 2 (Profiling and Performing Due Diligence and Risk Assessment)

The sub-steps in Step 1 are called "Steps" while that for the others are "Tasks"

Table 2 for Step 3, Task 2 may benefit from column headings (e.g. "Definition" and "Ethical/Technical Impact")

A summary of Tasks at the start of each Step/Section will be helpful especially for the longer sections