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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

We welcome the work carried that has clearly gone in developing a tool to address fundamental issues in the development and implementation of food and nutrition policies. This represents a major innovation and a key need in order to safeguard policy process from undue interference. However, it raises concerns about its applicability and accessibility at national level.

Therefore, we would like to suggest that a priority in further developing this guidance is to develop a process of testing the tool in various and diverse country contexts. The opportunity to contribute to this consultation is extremely valuable, however, the timing and nature of the consultation does not allow for testing of strategy and steps suggested. As this is an innovative, and very key instrument, it is particularly important to think through and test its applicability. This is an area with not many examples of best practices and we also have a limited base of effectiveness. However, we also understand that this is an urgent and very relevant issue to deal with current challenges faced by many countries attempting to implement nutrition policies. We do not want to delay the process of publicizing this important tool but it is equally important that it is an effective tool, therefore the importance of country testing.

There is a complexity involved in the proposal. The tool is extremely extensive and will require significant time and resources for ministries, health officials and other relevant civil servants to engage with it. So, we strongly suggest that the tool is prefaced with a simple and accessible (one page) list of guiding questions and/or key principles, that can be useful for officials who are seeking with conflict of interests for the first

time and to ensure that this is a key part of the policy process.

Specific comments

(i) We are concerned about the adequacy of the definitions of conflict of interest presented here. In particular, the framing of institutional conflict of interest makes an important assumption that may not be valid in many contexts. The assumption that “the government’s primary interest” is “to protect and promote public health” will not be universally shared across government ministries, and therefore gives little guidance to colleagues in seeking to explore conflict of interest in issues that relate to trade, taxation, agriculture and many other areas of economic and social policy. The guidance needs to better support efforts to promote policy coherence, as required by the SDGs.

(ii) Related to this, institutional conflicts of interest are often specified very narrowly with respect to the activities of a specific engagement or partnership, and can ignore wider tensions across other spheres of public health. An important example here is the partnership between the Global Fund and a leading brewer, justified with reference to very narrow interpretation of the goals of the Global Fund and ignoring clear conflicts with other health issues. Such problems will undoubtedly occur in nutrition policy, and it is important to develop a broader recognition of systemic or structural conflict of interest.

(iii) The first step of the decision tree starts with the mandate and purpose of a specific engagement or initiative and its relevance to health. This misses a crucial first step of first examining the actors involved in a proposed engagement. The logic of this tool is that the characteristics and objectives of specific non-state actors should shape the terms of any engagement, and would be better served by the first step being to consider the organisations involved. There is a risk that looking first at the proposed initiative, which might appear plausible and helpful in very narrow terms, can shift attention away from core conflicts of interest between public health and actors involved.

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

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

Specific comments

Comments on the "[Tool](#)"

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

The tool is extremely complex and therefore it raises concerns about its practicality. So we reinforce the suggestion above about testing its applicability

Specific comments

First step in decision tree starts with proposed engagement, rather than with actor with whom engagement would take place.

The scope, objectives and expected outcomes of the proposed engagement should be clearly defined before the first interaction with the non-State institution or individual. It is crucial that the engagement with an external actor is initiated only if it will help advance the nutrition or public health goal. (Tool pp4-5)