

SCALING UP NUTRITION (SUN) SECRETARIAT COMMENTS

Note on WHO Consultation on Conflict of Interest in Nutrition Programmes

Mandate and process:

- **2012:** The Comprehensive implementation plan on maternal, infant and young child nutrition, endorsed at the WHA 65 in 2012, recommends the **creation of “a supportive environment** for the implementation of comprehensive food and nutrition policies” and calls on Member States to “**establish a dialogue** with relevant national and international parties and form alliances and partnerships to expand nutrition actions with the establishment of adequate mechanisms to safeguard against potential conflicts of interest”
- Resolution WHA65.62 requested the Director-General to “develop risk assessment, disclosure and management tools to safeguard against possible conflicts of interest in policy development and implementation of nutrition programmes consistent with WHO’s overall policy and practice”.
- **October 2015:** Secretariat convened technical consultation on “Addressing and managing conflicts of interest in the planning and delivery of nutrition programmes at country level”.
- Following up on the outcomes of the technical consultation, the Secretariat developed a draft “Approach on the prevention and management of conflicts of interest in the policy development and implementation of nutrition programmes at country level”. The approach targets government’s officials involved in the development, design, and implementation of public health nutrition policies and programmes.
- **11 September 2017:** WHO released a discussion paper, together with an introductory paper and a tool, and invited Member States, UN organizations and non-State actors to provide feedback through an online consultation (11-29 Sept 2017) on the WHO discussion paper.
- After online consultation, **WHO Secretariat finalizing report, to be presented to WHO Executive Board in January 2018.** Secretariat also updating introductory paper and tool

Further details: <http://www.who.int/nutrition/consultation-doi/en/>

On the tool: it is a step-by-step decision-making tool that assists Member States in the process related to CoI on nutrition. The process consists of 6 steps, each followed by an assessment by the national authority of whether to continue the engagement or to stop.

Main comments on process and discussion paper:

- The proposed process and approach are not inclusive and participatory, but top-down
- Addressing the issue of 'Conflict of Interest' should initially start from a positive perspective, not from negative assumptions
- A strategy of collaboration should be envisaged bringing all stakeholders to the table
- Stakeholders should engage in dialogue to discuss and decide objectives and ways of collaboration, building trust while working together.
- Restricted engagement like proposed here, appears contradictory to the approach of the 2030 Agenda for Sustainable Development, in particular SDG 17
- Partnerships with civil society, business and other stakeholders are critical for achieving the Sustainable Development Goals
- Working through United Nations frameworks and decision-making tools to manage Conflicts of Interest should serve as the mechanism to enable, rather than prevent partnerships with non-state actors.
- Under the recommendations proposed in the WHO discussion paper, the Private Sector Mechanism to the UN Committee on World Food Security (CFS) in which WHO is involved– to give an example – could not continue to function
- Allow for more consultation time (online consultation was only open for 2 weeks)
- The proposal to follow a 6-step approach to Prioritize addressing Conflict of Interest, before engaging in a stake holder dialogue seems to be already a pre-decision in itself
- The proposed mechanism is complex and bureaucratic
- The 6-step approach should allow space for dialogue between stakeholders to build trust and address the critical issues
- There is a need for clarification: who is conducting the process (WHO Secretariat on its own?)

Few other questions and observations:

How does this process relate to the joint responsibility of WHO and FAO in the decade of action on nutrition?

WFP and UNICEF are leading in partnering with diverse stakeholders and they are doing well. They have an approach to create effective partnerships that support and contribute to their mandates and impact. What can WHO learn from these colleague UN Organizations?

