



Global Nutrition Report

February 14, 2023

By email to: contact@GlobalNutritionReport.org

Re: Open letter about observing the the “open” process for evaluating proposals to host the Global Nutrition Report

Dear Development Initiatives decision-makers,

My small NGO does not have the institutional capacity to host the *Global Nutrition Report* and did not apply to be considered to do so, but is interested in the success of the *Report* as a potential data user. I have been a public health lawyer focussed on food and nutrition issues in Canada and internationally since 1997 and in several Sub-Saharan African countries since 2018 for my small public interest CSO, the Centre for Health Science and Law (CHSL).¹

I recognize the *Global Nutrition Report's* considerable unrealized potential to generate and consolidate data that might inform food and nutrition law and policy reform in low- and middle-income countries, as well as high-income countries. However, I do not recall ever citing an annual *Global Nutrition Report* finding in the extensive international and national (in Canada and several Sub-Saharan African countries) public health nutrition law reform advocacy that I have done since the report began publishing in 2014. At another time, I am prepared to particularize my perspective about how its law and policy relevance could be enhanced.

For now, please consider the following perspectives on the host recruitment process.

1. Transparency of the process for reviewing a new host organization

I am encouraged, particularly, by the commitment in the “*Call for Expressions of Interest*” to:

“an open process” [and that the] “Responses will not be confidential except in cases where proprietary information is involved.” (at pages 6-7)

I would like to avail myself of the openness of your host recruitment process. The title of the report, *Global Nutrition Report*, suggests a public interest mission of the highest order, but a great deal of the operations and accountability (evidently, only to certain funders) remains below the line and leaves the impression that its global mission could be hindered by private or even trade ambitions of powerful companies headquartered in the donor government countries.

Lack of transparency can breed scepticism. A cynical interpretation of this confluence of interests is that there may be a low or attenuated desire by high-income country governments to support lower-income countries in tackling their severe nutrition challenges with nutrition-sensitive

agriculture and public water utilities and irrigation rather than importing processed food, vitamins and minerals for supplementation and fortification, infant formula, bottled water, soft drinks, etc.

2. Conflict of interest safeguards for vetting applications to host

The *Global Nutrition Report* currently appears to be heavily funded by an organization that holds nearly [US\\$344 million in shares in Coca-Cola among many other direct and indirect investments in food and pharmaceutical interests](#) that seem too closely linked, commercially, to the report's subject matter.

While Corys, author of the February 2022 *Global Nutrition Report Mid-Term Review*, underscored the need to strengthen conflict-of-interest safeguards and to address concerns expressed by several respondents that current conflicts-of-interest might tarnish the reputation of the *Report*, it also made 16 favourable mentions of the Scaling Up Nutrition (SUN) movement, which is widely seen by conflict-of-interest experts and public interest groups as a business-interest group with ineffectual conflict of interest safeguards.

For instance, concern about weak conflict-of-interest safeguards at SUN is described in the World Health Organization's report of an expert meeting entitled *Addressing and Managing Conflicts of Interest in the Planning and Delivery of Nutrition Programmes at Country Level*¹ as follows:

*Moreover, the SUN movement's recent project on conflicts of interest resulted in a redefinition of accepted conflicts of interest theory, thus justifying the multi-stakeholder model instead of questioning the role of industry on decision-making boards.*²

Likewise, a report published by public interest NGOs in 2020, [When SUN Casts a Long Shadow](#), concluded at page 61:

*In 2013/14 the Global Social Observatory (GSO), a Geneva-based organization, whose director also brokers business influence in public fora and works with corporate funding, received a grant of nearly one million US dollars from the [Bill and Melinda Gates Foundation] "to develop a transparent process to address perceived conflicts of interest and handle credible claims of conflict of interest within the Scaling Up Nutrition Movement" [and the SUN] "confuses COI – which should relate to a conflict within an individual or institution – with diverging opinions and interests among different actors"*³

The authors recommended human rights impact assessments of the role of SUN in countries where they operate.

Of the co-publishers of that report—FIAN International, Society for International Development, and International Baby Food Action Network—IBFAN is the leading global NGO champion of breastfeeding and co-publishes with UNICEF and WHO the biennial report on implementing the

¹ I was one of dozens of experts that participated in that meeting.

International Code of Marketing of Breastmilk Substitutes. IBFAN was founded approximately contemporaneously with the WHO Code. SID is one of 142 organizations worldwide with general consultative status with the United Nations Economic and Social Council which is a rarely designation accreditation accorded to only 2% of UN-affiliated organizations and one of only a handful focussing on food and nutrition issues worldwide. FIAN International is a global human rights organization that advocates for the right to adequate food and nutrition that was founded in 1986 and operates in 50 countries and in global policy settings.

I would caution the funders and supervisors of the *Global Nutrition Report* not to hand over the responsibility for hosting the report to any organization without performing due diligence on its human rights and, especially, child rights impact and conflict of interest safeguards. This is all to say that these are substantial public interest organizations with extensive experience and a wide reach that raise important concerns.

Also, the Scaling Up Nutrition Movement (SUN) supports the SUN Business Network which includes more than 400 corporate members that pledge to observe a code of conduct, but do not appear to be investigated, criticized, or disavowed for breaching the code.⁴

3. Funding situation of the Global Nutrition Report

The language in the “*Call for Expressions of Interest*” was unclear about whether the new hosts would be expected to steer a crew in a new direction with secure funding or float a sinking ship. However, it does appear from the *Call* that the prior year’s budget of 2 million Euros (1.8 million pounds sterling) is planned to decline by 8% to an average of 1.67 million pounds sterling for the next three years according to unpublished minutes referenced on page 17 of the *Mid-Term Review*.

Likewise, the “strong appetite” for the report to become self-funding seems like it might be an invitation to invite conflicts of interest. The “*Call for Expressions of Interest*” indicates that the current size of the team is 6-8 staff (at page 4), but the [LinkedIn posting for Global Nutrition Report](#) indicates the publishing entity has 51-200 employees, though perhaps this includes part-time consultants. Possibly, these fiscal restraints coupled with an expectation of significant course corrections signalled in the *Mid-Term Report* and demands for additional work products discouraged the former host from continuing.

Likewise, it appears from the *Mid-Term Review* that the *Report* has already had three host organizations since 2014 and changes in leadership in the research chair almost annually with short periods of continuity through the use of co-chairs. The *Mid-Term Review*, published in February 2022, indicated that the host contract with Developments Initiative was set to expire in 2025, but evidently was terminated nearly three years prematurely. It is not clear from the *Call for Expressions of Interest* what precipitated this parting of ways, but given the global importance of the purpose of the Report, it seems that an explanation is important for the public served as well as the successor organization. The lack of concordance with the global mission and the below-the-line financial accountability to a small group of public and private donors could be at the heart of the challenge of the declining relevance of the report and concerns about conflicts of interest. It does not appear that there is clear public financial accounting of the program. If there is

precarious or foreseeably declining access to funds, it could create a moral hazard analogous to capitulation-level wages.

4. Transparency of the operations of the host, past and future

Until I received the *Call for Expressions of Interest* by email in mid-December, I was unaware of the nature of the publishing corporations. Since then, I have learned only that “Development Initiative” is a trade name for a pair of for-profit numbered companies based in the city of Bristol in the United Kingdom and the state of Delaware in the United States, the latter jurisdiction of which is considered to be a [corporate tax haven](#).

Though no personal names or physical addresses are specified in the *Call for Expressions of Interest*, the named (research) Chair of the *Global Nutrition Report* is also the president of an organization—Canadian-based Nutrition International (formerly the Micronutrient Initiative)—whose nearly exclusive approach to global nutrition is shipping vitamins manufactured in high-income countries to low-income countries. This is categorically different from improving the production and distribution of locally grown foods or promoting nutrition-sensitive (and climate resilient) agriculture, especially considering that populations in low-income communities often produce much of the food they consume in their own backyard or community gardens. Supplementing sticky porridge with vitamins and minerals does not seem like a sustainable strategy for achieving domestic food security. Also, it seems important that the Chief Executive of the host organization for the five years from 2017 to 2022, had no formal training in nutrition, public health, or law reform.

In the spirit of transparency, I would like observe the process of review that considered “expressions of interest” and will consider full proposals by reviewing submissions, the criteria used to assess them, and the resulting decisions in both. I note that the *Call for Expressions of Interest* cautioned applicants that there are waiving the confidentiality, except for information designated as confidential business information.

Even better, instead, provide a publicly accessible database of applications, decisions, and reasons for declining or approving proposals to host the *Global Nutrition Report*.

Respectfully submitted,



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Endnotes

¹ The Centre for Health Science and Law is a founding member of the Geneva Global Health Hub (G2H2) and a member of the International Association of Consumer Food Organizations, and is accredited by the UN Economic

and Social Council (ECOSOC). CHSL’s executive director, Bill Jeffery, has been personally active in international standard-setting advocacy and expert deliberations at the Codex Alimentarius Commissions (since 1998), World Health Organization (since 2005), UN General Assembly (since 2011), several UN Human Rights Council committees (since 2018), and UNICEF regulatory reform in Sub-Saharan Africa (since 2018). He has advocated mandatory back-of-pack nutrition labelling at the Codex Committee on Food Labelling 1998-2012 and proposed front-of-pack nutrition labelling and advocated its adoption 2016-2021 and participated in the WHO’s first implementation consultation event on the Global Strategy on Diet Physical Activity and Health in 2005. In Canada, he has advocated nutrition labelling reforms, advertising restrictions, sodium reduction measures, a ban on trans fat, and a national, publicly funded school food program. CHSL is a member of the global School Meals Coalition and provided technical assistance to 10 national governments and intergovernmental organizations in Africa to implement the WHO *International Code on the Marketing of Breast-milk Substitutes* and other nutrition-related regulations 2018-2022. Bill served on the International Development Law Organization’s “Healthy Diets and Human Rights Research Initiative Advisory Board.”

² WHO. *Addressing And Managing Conflicts of Interest in the Planning and Delivery of Nutrition Programmes at Country Level*. Report of a technical consultation convened in Geneva, Switzerland, on 8–9 October 2015 at page 10. Available at: https://apps.who.int/iris/bitstream/handle/10665/206554/9789241510530_eng.pdf?sequence=1
See also: Richter J. Conflicts of interest and global health and nutrition governance – the illusion of robust principles. *BMJ* 2014;349:g5457. doi:<http://dx.doi.org/10.1136/bmj.g5457>

³ WHO. 2017. “Safeguarding against possible COI in nutrition programmes: Approach for the prevention and management of COI in the policy development and implementation of nutrition programmes at country level. Feedback on the WHO Consultation”. who.int

⁴ See: <https://sunbusinessnetwork.org/>