Sir: The International Baby Food Action Network has prepared a discussion paper with the title: *The Scaling Up Nutrition (SUN) Initiative. IBFAN’s concern about the role of businesses.* IBFAN welcomes the call for greater ‘multisectoral’ action on nutrition during early childhood and pregnancy. However, we identify six fundamental problems in need of solution in SUN’s nature and policies. Until these are changed, we believe that the strategy could undermine breastfeeding, lead to low-income country dependence on inappropriate imported products and foreign technical expertise, and increase rather than reduce malnutrition. Our six concerns are as follows.

1. SUN promotes business partnerships.
2. The SUN strategy ignores non-communicable disease, and inadvertently assists the top strategic priority of the corporate sector, which is to displace traditional food patterns and cultures in low and middle-income countries.
There is a lack of clarity in SUN’s strategy as regards conflicts of interest and how violations of the International Code of Marketing of Breastmilk Substitutes and subsequent resolutions will be evaluated.

SUN accepts the Global Alliance for Improved Nutrition (GAIN), businesses and other organisations in which the corporate sector has a lead role, to be members of its lead group which sets the SUN strategy.

The new SUN strategy focuses on exclusive breastfeeding in the first 6 months. It does not mention continued breastfeeding alongside family foods.

SUN’s emphasis on micronutrient supplementation rather than on food causes a funding bias favouring product-based interventions.

Our discussion paper cites a report from the Special Rapporteur on the Right to Food, and also WHO World Health Assembly resolutions, which clearly back many of our concerns. We point out that ‘partnerships’ are, by definition, arrangements for ‘shared governance’ to achieve ‘shared goals’ and to reach ‘mutual accountability’. But what conflicted industry mostly gets out of these partnerships is ‘image transfer’. This has strong emotional and financial value especially for corporations whose past and current marketing practices damage health, the environment and human rights.

In IBFAN experience agreement cannot be reached with conflicted industry on effective policies such as the regulation of marketing. Only small incremental changes and voluntary initiatives, self-regulation and self-monitoring are acceptable to industries whose profits depend to differing extents on the mass sale of intrinsically unhealthy products. Not surprisingly what invariably emerges from Platforms and public-private partnerships are weak corporate ‘Codes of Conduct’ with no legal power that are promoted as adequate ‘governance’. ‘Lifestyle’ educational activities predominate, blurring the boundaries between marketing and education and providing ‘cover’ for ongoing irresponsible and ruthless advertising and marketing. So-called ‘public-private partnerships’ also threaten the independence and watchdog role of genuine civil society organisations working in the public interest.

In view of these concerns IBFAN and many of its allies cannot support the SUN initiative. However, we are open to discuss our recommendations with the SUN leadership, governments, public interest groups, and indeed World Public Health Nutrition Association representatives and your readers.

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