



Thank you for the European Food and Nutrition Action Plan 2015-2020. The European Nutrition for Health Alliance (ENHA) welcomes this document and the opportunities it provides for addressing undernutrition in Europe.

As I'm sure you are aware the European Nutrition for Health Alliance works with key stakeholders to improve nutritional care across Europe by actively promoting:

1. Implementation of nutrition risk screening across Europe
2. Public awareness
3. Appropriate reimbursement policies
4. Medical education

The ENHA strives to serve as a bridge across professional and sectoral divides and to unite and support a wide range of stakeholders in the fight against malnutrition.

The ENHA are very pleased that following our close collaboration with WHO EURO malnutrition and undernutrition are highlighted as key areas of action in the report, reflected in both the Vision and Introduction. However, whilst the report recognizes the importance of this issue for all European Citizens, we feel that the vision of tackling malnutrition in all its forms is not fully reflected in the action and implementation sections and there is further work to be done.

As such we would like to provide some points for review, which better reflect our original contribution to the document and strengthen the actions to be taken in tackling malnutrition and undernutrition.

1. The document must better reflect the Vienna Declaration of 2013 by European Ministers of Health, which explicitly stated the need for screening and monitoring of nutritional status. This intention is not mentioned in the plan and the two documents to be effective, must be fully aligned.
2. Screening and monitoring must be included as a part of managing the nutritional status of all citizens regardless of their type of malnutrition. Screening for obesity and for undernutrition are equally important and similar tools can be used to tackle issues at both ends of the spectrum. Paragraph 37, needs to mention screening and monitoring explicitly.
3. Non Communicable Disease prevention and management is a key part of the plan and its aims. In order to do this effectively nutrition counselling and support is key for those with conditions where their disease reflects on their nutritional status e.g. cancers. Patients will need support for the duration of their disease to ensure recovery where possible and effective treatment and management. This need must be outlined fully in the plan. It is mentioned, but briefly and without focus or implementation method.
4. Point 16 – Vision: the word 'undernutrition' should be added in the definition of malnutrition.

5. Point 40 – to establish screening, followed by nutritional assessment (as these clinically are two different things)

6. Rather than addressing ‘malnutrition’ or ‘undernutrition’, the action plan addresses nutrient deficiencies. Nutrient deficiencies are only one part of undernutrition. The action plan should cover the full spectrum of undernutrition.

7. Paragraph 63 ‘Specific priorities within this Action Plan may include a commitment to expand surveillance of nutritional status among older groups and to consider the food and nutritional needs of older populations living in institutions....’ This statement needs to emphasise the importance of screening and monitoring nutritional status and be more explicit in its execution.

The European Nutrition for Health Alliance recognise the challenges in creating such a wide ranging Action Plan and congratulate the WHO Euro on their document. However, we think undernutrition still needs to be addressed more specifically.

There are a number of specific issues that we would like to discuss with WHO EURO once the report is approved and prior to the implementation phase to further support the work you are undertaking.

To ensure lasting change in policy and practice, the FNAP 2015-2020 must explicitly emphasise the need for nutrition screening and monitoring and an ongoing commitment to tackling undernutrition among vulnerable groups including older people and those with Non Communicable Diseases. To do this the excellent Vision, Aims and Objectives must be conveyed throughout the action, implementation and evaluation of programmes.

Yours Sincerely

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On behalf of the European Nutrition for Health Alliance