Response letter to: "Governmental institutionalization of corporate influence on national nutrition policy and health: a case study of Ecuador"

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Despite global efforts to improving global nutrition, most countries are far from meeting hunger and malnutrition targets by 2030. The private sector, particularly the food and beverage industry, has played a complex role to advance or undermine global nutrition goals. This journal published a recent health policy paper by Torres and colleagues,1 raising awareness about the undue influence of the corporate sector in Ecuador "to promote their brands, gain tax deductions, oversee public policy and set priorities, allocate resources, and decide on implementation of the country's child malnutrition strategy." Whilst we endorse the papers' alert to regulate and enact better transparency laws to curb the sectors' policy influence, we use this space to address several factual errors, important omissions, and gratuitous inferences made by the authors. Setting the record straight is critical to advancing a much-needed policy debate and preserving the integrity of the public health academic community and the work of Ecuador's Advisory Council for Reducing Chronic Undernutrition (CCDCI).

Firstly, there is a lack of conceptual precision that undermines the validity of the papers' recommendations. The paper alerts about the negative influence of the private food and beverage sector to undermine World Health Organization guidelines to address noncommunicable disease (NCD) risk factors. However, the paper uses this literature to criticize the country's national strategy Ecuador Grows Without Child Undernutrition which is devoted to fighting children's chronic undernutrition (stunting). If the authors review definitions carefully, they would note these are two different forms of malnutrition; the critical window to reduce stunting is during the first 1000 days of the child's life whereas NCDs tend to manifest at later stages in life. While some authors such as Koletzko and colleagues,² documented how early nutrition deficiencies affect longer term health, there is no discussion of the impact of NCDs on stunting. The policy paper misses an opportunity to discuss for example, how the corporate sector could undermine stunting reduction efforts by discouraging breastfeeding practices and promoting the distribution of powder milk instead, nor does it look at ongoing government or civil society efforts to promote breastfeeding or monitor and alert about negative private sector practices.

Secondly, the paper has not fully understood the role of the CCDCI. It identifies two roles assigned to the Advisory Council: "1) observing and advising the strategy and related instruments, and 2) guiding the implementation and assessment of the strategy, including through promoting participation and channeling civil society participation" (p. 3). But without citing other evidence or sources, the paper incorrectly reports that "the powers bestowed unto the Advisory Council are critical" (p. 3) including "(the) power to guide how the budget is spent" (p. 5). To clarify, the CCDCI is a civil society organization with a non-binding advisory role without any policymaking powers. The policy paper incorrectly claims that the corporate sector has a disproportionate influence within the Council to influence nutrition policy. Had the authors checked the actual composition of the CCDCI, they would see the food and beverage corporations, including the Child Nutrition Network (REDNI), have three of 19 members or 16% of the total CCDCI composition. Other members come from different sectors of Civil Society including children, women, indigenous groups (seven members), Academia (four members), United Nations and other International Organizations (three members) and Media (two members).

Thirdly, the policy paper does not elaborate causal arguments but infers strong conclusions from a superficial review of evidence. On (p. 3) there is a timeline of events that shows a sequence between the Executive creation of a Technical Secretariat to manage the strategy *Ecuador Grows Without Child Undernutrition* (*STECDSI*) and the convening of a CCDCI, and the





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adoption of executive decrees to offer fiscal exemptions and reduce sugar and tobacco taxes. The paper gratuitously infers that such initiatives were the result of private sector lobbying done through the CCDCI. The authors acknowledge collecting publicly available legal and policy documents and "google searches" to monitor government policies and activities of the corporate sector (p. 2), to conclude that "(...) private sector members of the Advisory Council are in a unique position to benefit from efforts pursued under the umbrella of a public national strategy." At no given point, the authors contacted any CCDCI member to request an interview or searched for primary information to corroborate their claims. Had they done so, and requested from the CCDCI a draft of the "Integral Development of Early Childhood" legislative bill, they would not find any text that advances private sector interests in the form of tax exceptions or deductions.

The policy paper raises necessary concerns about the negative and secretive influence of the corporate food and beverage sector on food and nutrition policy. But advancing concepts that are not well defined, creating general accusations from selective evidence and advancing assumptions without empirical testing, undermines the goal of fostering an informed policy debate with scientific validation. More rigorous research is needed to document the positive developments achieved in the effort to reduce stunting since 2020, including policy continuity across three administrations, the creation of a unique system of monitoring and rapid response, promoting intersectoral cooperation across different areas, and the active incorporation of academics and civil society into public health debates. More research is also needed to document the mechanisms and pathways through which corporate actors influence the food and nutrition landscape in a country that is struggling to fight its double burden of malnutrition. The new Lancet Regional series is well positioned to promote context specific debates to address public health challenges worldwide.

Contributors

The corresponding author (Mejia Acosta) is responsible for the conceptualization, research and analysis, and writing of the original draft. The coauthor (Garzon) is responsible for some conceptualization, and review and editing of the final manuscript.

Declaration of interests

Mejia Acosta, Andres. There are no conflictive relationships/activities/ interests related to the current manuscript. The author has been an academic member of the CCDCI since October 2022. This is unpaid work to serve as advisor in this civil society initiative.

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