

**Written input following up today's CFS OEWG Nutrition meeting:**

**1. Would you agree with the proposed approach which uses food environments as the entry point for policy intervention?**

- Food environments are for GER an important entry point as the interface between food supply and demand. Therefore we support the proposed approach focusing on food environments, if it links food security measures with public health actions and nutrition education.
- GER proposes to look at the topic with an integrated approach on nutrition. It needs to be holistic and cross-sectoral (e.g. side effects on health, economy), taking into account all forms of malnutrition and its multidimensional causes. That means to link food security measures with public health actions and nutrition education for consumer behavior change.
- CFS work on nutrition has to have an added value CFS Mandate and Value added: the CFS is the best place to carry out the proposed activity, taking into consideration its mandate and added value).
- We particularly welcome the approach to continue CFS policy convergence work on nutrition beyond the development of these guidelines and to embed nutrition in all CFS workstreams.
- GER welcomes the link to ICN2, the UN Decade of Action on Nutrition and the Agenda 2030. With this in mind we emphasize that parallel processes have to be avoided.
- To improve the food environments, key areas are: healthy and sustainable diets, nutrition education, nutrition of infants and adolescents, particularly the improvement of nursery and school meals (see in detail under 3) as well as the nutrition of elderly people.
- The goal should be to create an environment in which a well-balanced diet and sufficient physical activity are firmly established in all places where people regularly spend longer periods of time starting from the first thousand days, and including childhood, the working environment and elderly people's lifestyles.
- GER emphasizes the need to share in a second step concrete policy examples of how the guidelines can be implemented according to national policies.

**2. If not, would you support expanding the focus of the ToRs looking at Food Systems in their entirety considering the time and cost implications among other factors?**

**Regarding time**

The proposed timeframe is in any case too tight. In other comparable processes (e.g. VGGT, RAI) there was a lot more time for regional consultation. In order to ensure a high quality of the product we strongly propose a more realistic tentative schedule:

- ToRs are endorsed at CFS 45 → October 2018
- OEWG meeting to discuss preliminary work on the Zero Draft and prepare a calendar of consultations → Early November 2018
- CFS Secretariat/TTT to prepare a Zero Draft of the product → Nov 2018 - Jan 2019
- Zero draft is discussed in OEWG and CFS Bureau → Feb 2019
- Regional multi-stakeholder consultations, e-consultation and consultations (if possible within existing regional meetings/fora) → Feb 2019 - Jan 2020
- CFS Secretariat/TTT to prepare Draft One → Feb 2020
- Draft One is discussed in OEWG and CFS Bureau → March 2020
- Global meeting to be held in Rome to negotiate Final Version → June/July 2020
- Product is submitted at CFS Plenary for endorsement → October 2020

**Regarding cost**

- An estimation for the costs should be included in the ToRs as also done in previous ToRs (e.g. for RAI):  
Estimated costs to implement the above would be \$ XXX and would cover the costs for human resources, organization of meetings and travel expenses for selected participants.

**3. Would you agree with proposed policy-relevant areas? Do you suggest any additions or amendments?**

**Formal points:**

- We agree with the type of instrument: A major policy product, e.g. guidelines:  
*The guidelines will be voluntary and non-binding and should be interpreted and applied consistent with existing obligations under national and international law, and with due regard to voluntary commitments under applicable regional and international instruments. These guidelines should be interpreted and applied in accordance with national legal systems and their institutions. They should be endorsed by the CFS.*
- We suggest to add to the intended users also the UN system, especially the RBAs
- We are missing a chapter on the proposed process for the consultations and propose an open and inclusive consultation process to ensure legitimacy and ownership of the product:
  1. The consultation process to develop the guidelines on nutrition should be open and include all stakeholders that are key to ensure ownership and legitimacy. Adequate participation of CSOs, the private sector (companies and investors of all sizes), of additional UN actors such as UNSCN, REACH, etc. initiatives, such as CAADP, SUN, etc. and of research organizations such as IFPRI, CGIAR, etc. should be ensured.

2. The process should take into account lessons learnt from other CFS led processes such as the RAI, the VGGT and the Global Strategic Framework (GSF).
3. The consultation and negotiation process should be properly planned, simple and efficient. Regional, national, thematic and/or stakeholder specific, electronic consultations, which enable multistakeholder dialogue should be considered. Where possible, appropriate existing forums/meetings should be used, and stakeholders should be periodically informed about the stage of development of the guidelines.
4. The consultation schedule and relevant documents such as the draft guidelines should be made available well in advance in all UN official languages in the interests of maximum participation by all stakeholders.
5. The CFS Secretariat will implement the consultation process under the oversight of the Bureau and in close collaboration with the OEWG Nutrition.
6. Adequate financial and human resources should be secured in advance to enable the consultations.

**Points as regards content (V.Proposed Scope):**

1. General comments

- Look at the topic with an integrated system approach on nutrition. It needs to be holistic and cross-sectoral (e.g. side effects on health, economy), taking into account all forms of malnutrition. That means to link food security measures with public health actions and nutrition education.
- Food-based dietary approach rather than a nutrient-based one.
- Considering not only healthy diets, but also sustainable diets according to FAO Definition (FAO 2010) <http://www.fao.org/docrep/016/i3004e/i3004e.pdf>
- Future issues like digitization and how this can be used to shape food environments for nutrition should be included.

2. Suggestions for inclusion in a)- d):

- Regarding chapter a) availability: To improve dietary diversity the aspect of improving databases about composition of available food should be included. (On an international level task of FAO; in GER Bundeslebensmittelschlüssel <https://www.blsdb.de/bls?background> )
- We welcome the inclusion of reduction of food waste and losses(p. 8) and propose to include also recommendations to the question: How can food environments be designed to improve the appreciation of foods?
- Under b) Economic access should be included as policy area the dialog with private sector (e.g. regarding diversification and innovated processing)→ Recommendations, how food environments can be designed to have better access and to improve consumer choice towards foods such as fruits and vegetables also in rural and remote areas.
- Beside access also consumer behavior should be looked at. There is no link to nutrition education as a policy-relevant area under c) Promotion , advertising, information.

- Moreover nutrition education and training should be combined with communal catering.
- Regarding d) linking food environments with food safety → Training on food safety issues and hygiene, technology transfer is missing.

3. Suggestions for amendments

- Include also in chapter V. that due to economic reasons the supply of unprocessed foods is limited. In our view there should be an emphasis on how improving access for these.
- Food fortification and reformulation can only be an additional element for specific contexts. As already stated there should be a clear emphasis on food-based recommendations. This corresponds with the recommendations of the HLPE.
- Market interventions, trade policy measures, taxing systems and subsidies as well as nutrition labelling beyond EU law are not helpful.
- “Food losses and waste are one important contributing factor of food insecurity and malnutrition” (p. 8). The original wording seems exaggerating the actual situation.
- “Actions should be undertaken to address the main factors impacting on food safety as food moves along the food supply chain: pesticide residues” (p. 10) Pesticide residues are not a main factor impacting on food safety, at least in the context of GER and the EU.