

## Preliminary comments from Norway

1. and 2. Would you agree with the proposed approach which uses food environments as the entry point for policy intervention? 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?

- From the Norwegian point of view, a food systems approach is the preferred entry point for policy interventions. According to the HLPE report no 12, a food system is constituted by three elements: the food supply chains, the food environments and dietary behavior. The food system approach is thus more comprehensive and allows for policy interventions at many levels. This facilitates a flexible approach to improvements at each of these points, which is likely to be necessary considering the different challenges faced in different food systems.
- Considering the need for an inclusive process and consultation with different resource persons, the time schedule is very tight. More work is needed to sharpen the ToR, which would require more time for inputs from the OEWG members.

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

- The proposed areas are, as stated, non-exhaustive and should be expanded to cover a wider range of challenges and possible solutions.
- A central issue should be policy coherence for the transformation of food systems for better nutrition outcomes.
- We support that the VG will feed into CFS' current and future areas of work to shape food systems for nutrition outcomes. CFS needs to continue to emphasize nutrition beyond the development of the guidelines by embedding nutrition in all CFS workstreams.
- Norway's main input at this point relates to how the VGs can draw on the already developed human rights framework.
- The draft ToR states that "The Voluntary Guidelines on Nutrition and Food Systems are intended to provide guidance, as a reference document, to governments, their partners and other stakeholders on appropriate policies, investments and institutional arrangements needed to improve nutrition and healthy diets with a view to addressing the key causes of malnutrition in all its forms for the progressive realization of the right to adequate food in the context of national food security and the achievement of SDG2."
- Norway would like to see the voluntary guidelines more firmly and explicitly referring to human rights. Both the right to adequate food AND to health are highly relevant, since what people eat is a core link between food systems and their health and nutrition outcomes. In addition, explicitly stating that the VGs will promote the human rights principles of non-discrimination, equity, participation, inclusion, accountability and rule of law, is in line with

the CFS mandate and the SDGs. HLPE Report no. 12 states that “better results can be achieved if the determinants of the problems and the consequences of the decisions made are properly analyzed, and if the principles of human rights inform the decisions made.” (page 111). It also shows how legally based human rights can help bridge the link between food systems/food environments as analysed from a right to food perspective, and the conditions advancing the human right to health, including diet-related health.

- Other values added of using a human rights based approach include the explicit identification of the State as the main duty bearer for respecting, protecting and fulfilling peoples’ rights to adequate food, and diet-related health as well as the identification of the responsibilities of other stakeholders.
- The right to adequate nutrition has so far not been adequately interpreted but is embedded in the right to adequate food as well as in the right to health. Right to Health in Art 12 of the International Covenant on Economic, Social and Cultural Rights has been interpreted in General Comment 14, which states that it is “an inclusive right extending not only to timely and appropriate health care, but also to the underlying determinants of health, such as access to safe and potable water and adequate sanitation, **an adequate supply of safe food, nutrition** and housing, healthy occupational and environmental conditions, and access to health-related education and information, including on sexual and reproductive health.” Furthermore, the Convention on the Rights of the Child, states in Art. 24 the right of the child to the enjoyment of the highest attainable standard of health, which is further specified as i.a. in point (c) “To combat disease and **malnutrition**, including within the framework of primary health care, through, inter alia, the application of readily available technology and through the **provision of adequate nutritious foods and clean drinking-water**, taking into consideration the dangers and risks of environmental pollution.”
- The CFS is a point of convergence not only for the Rome based agencies, but for different UN specialized agencies and organizations and including the UN Special Rapporteur for the right to food. This should be reflected in the ToR of the Nutrition OEWG. The ToR should build on the best of human rights insights as developed in Rome for food security since the World Food Summit in 1996 and in Geneva for diet-related health as promoted by the WHO in particular.