

**Written Input from the United States regarding the Draft Terms of Reference for CFS Policy
Convergence Work on Nutrition**

Thank you for the opportunity to review these draft Terms of Reference. Specific comments from the United States on the proposed Terms of Reference follow in the text of the draft.

We agree with the initially proposed approach of using food environments as the focus of the voluntary guidelines. As recommended by the HLPE, this approach is most likely to yield a tangible, results-oriented tool.

We would appreciate seeing additional detail in the next draft regarding the proposed resource cost breakouts associated with this work as well.

Thank you for your consideration and inclusion.



1. Message from the Nutrition OEWG Chair

It is my pleasure to present the draft Terms of Reference (ToRs) for the CFS policy convergence work on nutrition. This document is the result of an inclusive process which saw five meetings of the Technical Task Team and numerous opportunities for its members to provide written comments. I take this opportunity to warmly thank the members of the TTT and their organizations (FAO, IFAD, UNICEF, UNSCN, WFP, WHO, CGIAR, CSM and PSM) for the support provided to the CFS Secretariat in the preparation of the draft TORs.

Three meetings of the Open-Ended Working Group are scheduled between 28 March and 15 June to finalize the Terms of Reference which are expected to be approved by the Bureau at its meeting on 23 July, and presented for endorsement by CFS plenary at its 45th Session next October.

Following on the recommendation made in the HLPE Report, and the indications from the majority of the TTT Members, the draft TORs suggest to **use food environments as the entry point for the purpose of these guidelines**. This approach does entail the exclusion of any dimension of food systems. In fact, food environments, as the interface between food supply and demand, represent lenses through which to look at the different elements of food systems and a crucial area of intervention in shaping food systems for healthy diets.

Comment [A1]: This document seems to vacillate between food systems and food environments, and this should be made far more clear in order for the ToR to result in tangible, useful guidelines. The United States supports the approach of looking at food environments as the primary focus.

It is important to emphasize that some Members of the TTT strongly proposed to expand the focus of the voluntary guidelines to a more comprehensive approach looking at food systems in their entirety. A long discussion was conducted between Members of the TTT, **but no agreement was reached in this regard**.

The proposed ToRs keep the focus on the main four dimensions of food environments (availability; affordability; ~~promotion~~ distribution; food safety and quality) and at the same time comprise some additional proposed thematic areas that in the HLPE report are included in the section concerning food supply chains and consumer behavior. This approach allows to look at the other elements of food systems through the lens of food environments.

Comment [A2]: We support focus on the four main themes identified first, with additional thematic areas only after guidelines can coalesce around clear, useful outputs on the four primary dimensions.

The ToRs also suggest that all CFS current and future areas of work should be considered as entry points to shape food systems for nutrition outcomes. CFS focus on nutrition is thus to continue beyond the development of the guidelines under this workstream by embedding nutrition in all CFS workstreams.

Comment [A3]: This may be out of sync with the opening sentence of this paragraph.

The meeting on 28 March is the first opportunity for the OEWG members to provide their feedback and inputs regarding the draft TORs. In particular, I would suggest the following guiding questions that may facilitate the discussion towards the most relevant issues at stake:

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



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

I would like to conclude by emphasizing that all Members of the TTT have strongly expressed their readiness to work on the guidance of the OEWG and adjust the ToRs, as deemed necessary, following a decision by the OEWG on the 28th of March.

I am looking forward for a constructive discussion.

Khaled El-Taweel
CFS Nutrition OEWG Chair

Comment [A4]: As stated in our intervention during the previous OEWG meeting, we believe that the focus should remain on food environments as recommended by the HLPE, to ensure that these guidelines are able to take shape into something both tangible and useful.

Comment [A5]: Expanding into a wide variety of policy directions will take this work far outside of both CFS's mandate and CFS's comparative advantage, possibly harming the utility of the final VGs.

Further, as in our comment above, the discussion related to the VGs is overly broad and diminishes their potential impact in specific areas.



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2. Draft Terms of Reference for CFS Policy Convergence Work on Nutrition

I. CFS Vision on Nutrition

The Committee on World Food Security (CFS) adopted in 2016 a strategy concerning its engagement in advancing nutrition¹. CFS recognizes the need for a holistic, interdisciplinary and inclusive approach to nutrition that bridges all relevant sectors – in particular food/agriculture and health sectors – in the context of the progressive realization of the right to adequate food in the context of national food security. The vision for CFS work in advancing nutrition is *“a world free from malnutrition in all its forms, where all people at all stages of life and at all times have access to adequate food and enjoy diversified, balanced and healthy diets for an active and healthy life”*.

The focus of the agreed strategy is on malnutrition in all its forms, including undernutrition, micronutrient deficiencies and overweight and obesity as well as its multidimensional causes and consequences. Malnutrition in all its forms affects every country and requires integrated approaches that address a multiplicity of burdens and that ~~target~~ address their causes across the entirety of food systems.

The strategy indicates that CFS work is expected to identify policy changes needed for reshaping food systems to improve nutrition and enable healthy diets. The purpose is to address the key causes of vulnerability to all forms of malnutrition in different types of food systems in both rural and urban areas with special attention to the poorest and the most vulnerable.

The CFS Plenary at its 44th Session in October 2017 *“mandated the OEWG on Nutrition, in the context of the UN Decade of Action on Nutrition (2016-2025), to develop as per MYPoW 2018-19, using voluntary resources and re-prioritizing existing ones, terms of reference for the policy convergence process leading to voluntary guidelines for food systems and nutrition for submission to Plenary in CFS 45. These would be informed by the HLPE report and benefit from the outcomes of the CFS 2016-2017 intersessional activities and of nutrition-related discussions held at CFS 44”*².

CFS Plenary also *“recommended that subsequent policy convergence in CFS on nutrition is supported by the scientific evidence provided in the HLPE report”*³ and, in this regard, *“noted recommendation 9a of the report for CFS to consider elaborating voluntary guidelines on improved food environments for healthy diets”*⁴.

II. Objective

¹ CFS 2016/43/9 - <http://www.fao.org/3/a-mr186e.pdf>

² CFS 44 Final Report, paragraph 19.c - <http://www.fao.org/3/a-mv030e.pdf>

³ CFS 44 Final Report, paragraph 15.b - <http://www.fao.org/3/a-mv030e.pdf>



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⁴CFS 44 Final Report, paragraph 15.a.ii - <http://www.fao.org/3/a-mv030e.pdf>



The objective of the CFS policy convergence work on nutrition is to present a set of guidelines that contribute to address all forms of malnutrition by ensuring that via the diets needed for optimal nutrition are available, affordable, acceptable, safe and of adequate quantity and quality.

Comment [A6]: Too strong of language for voluntary guidelines.

Particular attention should be paid to the identification of policies and interventions that contribute to the achievement of the six Global Nutrition Targets (2025) endorsed by the World Health Assembly in 2012.

The CFS work will focus on the most vulnerable to malnutrition in all its forms that typically include those with increased nutrient requirements and those who have less control over their choice of diet. This implies particular attention to young and school aged children, adolescent girls, pregnant and lactating women, the elderly, indigenous peoples and rural and urban poor also in consideration of the different types of food systems they live in.

III. Purpose

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 that can 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.

Comment [A7]: We recommend naming the guidelines as suggested in 9a of the HLPE report: "voluntary guidelines on improved food environments for healthy diets". A name choice that mentions only food systems would be odd for a document intended to focus on food environments.

They are expected to provide guidance to help countries address the recommendations of the Second International Conference on Nutrition under the umbrella of the UN Decade of Action on Nutrition (2016-2025) and the 2030 Agenda for Sustainable Development.

Food environments will serve as the policy entry point for the purposes of these guidelines. This does not entail the exclusion of any dimension of food systems that is deemed to be crucial and feasible for the guidelines to consider. Food environments represent lenses through which to look at food systems, a privileged viewpoint as the interface between food supply and demand and a crucial area of intervention in shaping food systems for healthy diets.

Comment [A8]: This wording is vague. Is this synonymous with "This will include all dimensions...?"

All of CFS current and future areas of work can be considered as entry points to shape food systems for nutrition outcomes. CFS focus on nutrition is thus to continue beyond the development of the guidelines in question by embedding nutrition in all CFS workstreams.

The Voluntary Guidelines should also present examples of how the guidelines can be implemented into concrete actions for impact, according to national policies.

IV. Background and Rationale



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~~Almost~~ **More than 800 million** people are still undernourished, 155 million children under five years of age remain stunted, and 52 million are wasted. In addition, overweight and obesity are rising quickly and affect all countries. Worldwide obesity has more than doubled since 1980. A staggering 1.9 billion adults were overweight, of which 600 million were obese. The latter represents a key risk factor related to the rise of diet-related non-communicable diseases. An estimated 41 million children under five were overweight, a quarter living in Africa and almost half in Asia. Approximately 2 billion has some type of micronutrient deficiency. Unhealthy diets are now the number one risk factor globally for death and disability⁵.

Comment [A9]: Latest FAO numbers have this above 800 million.

In order to address and revert this negative trend, it is key to adopt a holistic approach that looks at the multidimensional causes of malnutrition, including the lack of stable access to healthy, balanced and diversified diets and safe drinking water, inadequate infant and young child caring and feeding practices, poor sanitation and hygiene, insufficient access to education and health services, income poverty, inequalities in access to resources and limited economic opportunities.

The integrated nature of nutrition requires greater policy convergence across different sectors and the promotion of multisectoral and multistakeholder interventions, as a way to overcome policy fragmentation.

The challenge is to implement policies and actions that contribute to make food systems nutrition-sensitive and promote secure access to safe and high-quality diets for everyone. It is key to explore possible pathways and directions towards more sustainable food systems and identify possible areas where governments and other actors can intervene with a view to improving diets and nutrition outcomes.

Food systems gather all the elements (environment, people, inputs, processes, infrastructures, institutions, etc.) and activities that relate to the production, processing, distribution, preparation and consumption of food, and the output of these activities, including socio-economic and environmental outcomes” (HLPE, 2014a). In fact, they are shaped and moved by the people and institutions that initiate or inhibit changes in food systems. The HLPE identified three broad categories of food systems, namely traditional, mixed and modern food systems (HLPE, 2017b).

Food systems are shaped by culture and preferences, as demand affects supply. However, food choices are also shaped by food systems. This bidirectional relationship can be analyzed through the lens of food environments which are considered as the interface between food supply and food demand.

Food environments consist of the physical, economic and, policy and socio-cultural conditions that shape people’s dietary choices and nutritional status. It is in the food environments where consumers engage with the food system to make their decisions about acquiring, preparing and consuming food. They consist of: i) food entry points, namely the physical spaces where food is made available and accessible for purchase and consumption (supermarkets, small retail outlets, wet markets, street food

Comment [A10]: This is a strong definition choice to take on in the ToR – perhaps this discussion is better saved for the VGs themselves. This definition also does not align with what is outlined above in this document regarding the four dimensions.

⁵ FAO, IFAD, UNICEF, WFP and WHO. 2017. The State of Food Security and Nutrition in the World 2017. Building



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resilience for peace and food security. Rome, FAO.



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stalls, cafes, tea houses, school and work premises, and restaurant) and the infrastructures that allow access these spaces; ii) the affordability and price of foods; iii) the advertising, marketing, and positioning of foods; and iv) the quality and safety of foods through branding and labeling.

Comment [A11]: Branding is associated with marketing and advertising rather than safety and quality.

Food environments are a space of convergence where all actors involved in food systems can bring together transformative changes towards greater availability and affordability of nutritious food and ultimately healthier food consumption for improved diets and nutrition. As the interface between food supply and food demand of consumers, food environments can be considered as the policy entry point to influence the impact of food supply chains and their functions (production, storage and distribution, processing and packaging, and retail and markets) on the choice and quality of diets of the individual through a variety of factors. They determine what food can be accessed at a given time, at what price and with what degree of convenience and desirability, thus influencing dietary intake through a variety of factors, such as physical and economic access to food (proximity and affordability), food promotion, advertising and information, and food quality and safety.

All global citizens interface with some type of food environment be it, their own homestead food production, an informal wet market, kiosks and corner stores, a refugee camp food distribution center, or super and supermarkets. The food environment is the place where citizens make a decision about what to harvest, buy or order. Some have less foods to choose from, some more. Some have largely unprocessed foods in the environments in which they engage, some have more processed, packaged foods or ready-to-go cooked meals to choose from. Subsistence farmers are net buyers of food and interact with local food environments. This is to say, unhealthy food environments are an issue for all populations including those communities struggling with undernutrition, with micronutrient deficiencies, with overweight and obesity, or the multiple burden of these. The diversity of food environments within diverse food systems around the world are vast, complex, and in need of close examination for positive transformation.

Today food systems need to better support the development of food environments that adequately promote good nutrition and health through high quality diets. For many consumers, dietary patterns comprising minimally-processed food are no longer the norm. Fruits, vegetables and pulses are facing obstacles to both production and distribution, with negative consequences in term of availability.

Comment [A12]: This statement implies that fruits, vegetables, and pulses – more than other foods – are facing obstacles to production and distribution. Can this be verified through a source?

In consideration also of the many different food systems and food environments, changes in global, regional and national policies, investment patterns technologies and infrastructure are needed to ensure support food environments around the world are transformed in ways that better promote greater diversity, availability, affordability and safety of healthy nutritious food.

Comment [A13]: These are voluntary guidelines.

Transforming food systems for better nutrition outcomes may well require more than one entry point. While food environments will serve as the entry point for the purposes of these guidelines, the work on nutrition will continue beyond their production through the integration of nutrition in all CFS workstreams and all of its policy convergence work.

IV. Proposed Scope

The following section includes a proposed non-exhaustive scope of areas to be addressed in the voluntary guidelines on nutrition and food systems. Each of them includes a description of the problem statement and indications concerning related policy areas. The proposed approach is to look at these thematic areas, within the wider food systems, through the lens of food environments to capitalize on the interface between food supply and food demand, as a key policy entry point to promote good nutrition and health through quality diets.

Comment [A14]: As above, this is repeated as the name choice, but that does not align with the food environments focus proposed by the HLPE.

Different drivers of change will be considered to contextualize the recommendations provided in the guidelines. Climate change and variability, for example, with more frequent natural disasters, impact health, productivity and resilience of ecosystems, communities and households, particularly of the most vulnerable. Food systems' resilience could be increased through policies that link emergency relief and preparedness interventions with longer term strategies for sustainable development.

Comment [A15]: Throughout this draft, the work areas proposed do not seem to align with the problem statements, within the sections or the overall document. It's not clear why many of these topics are being discussed.

a) Availability and physical access (proximity)

Problem statement

Unfavorable geographic conditions, lack of appropriate infrastructure, all forms of conflicts and humanitarian crises, migration and forced displacement can limit access to and distribution of diversified food, especially fresh and other perishable foods, with negative consequences on what can be purchased and consumed.

Among the factors influencing access to food that need to be addressed, those play a critical role: distance to food entry points and limited means of transportation; ~~poor health conditions; limited purchasing power;~~ and lack of knowledge and skills; systems that are put under stress by humanitarian crises and conflicts.

Comment [A16]: It is unclear how this plays a role in access to food.

Comment [A17]: The meaning of this language is unclear in this context.

Policy-relevant areas

- Food deserts and food swamps
Policies are needed to encourage healthy outlets and address the spread of food deserts and swamps, especially in LMICs, particularly in mixed food systems, as these countries urbanize.
- Public procurement
Healthier diets can be encouraged through the provision of quality food in schools, hospitals, workplaces and other government institutions and buildings, also influencing production, providing a reliable source of demand for local producers and business. For example, farm-to-school programmes have the potential to positively affect school-aged children's nutrition knowledge and healthy consumption behavior.
- Connectivity of smallholders to markets

Comment [A18]: These policy areas do not align with the problem statement.

Taking into account the recommendations endorsed by CFS in 2016, policies and investments need to address a wide range of barriers preventing smallholders from accessing markets. Lack of storage, including cold storage, lead often smallholders to sell their products soon after harvest when prices are low. Lack of transportation and road infrastructure make it difficult for smallholders to reach markets contributing to disconnect rural smallholders from urban markets. Information technology can play a key role in increasing farmers' opportunities to cater nutritious foods to markets.

Landscape and dietary diversity

Small-scale farming can contribute to food and nutrition security through different pathways by acting for example as a direct source of food and income.

- Food losses and waste

Food The reduction of food losses and waste are among the main contributing factors to a major challenge for food insecurity and malnutrition. Up to one third of all food is spoiled or wasted before it is consumed by people, due to inadequate/inefficient harvesting, storage, packing, transport, infrastructure or market mechanisms, as well as institutional and legal frameworks. In this context, taking into account the recommendations on this matter adopted by CFS in 2014, policies can contribute to create a positive and enabling environment for improved storage and distribution methodology and technology.

b) Economic access (affordability)

Problem statement

For the most vulnerable segments of the population, affording nutrient-rich foods such as animal source foods (ASF), fruits and vegetables represents a significant challenge. Both High food price levels and volatility negatively affect household purchasing power, welfare and food security and nutrition. Higher prices reduce consumer welfare, while lower prices and price volatility will impact producers. Moreover, food price volatility creates uncertainties in the whole food system, discouraging investments and negatively impacting food security and nutrition in the long term.

Policy-relevant areas

- Nutrition-sensitive trade policies

Countries, in compliance with their international obligations, can consider to use trade policies to shift production patterns and lead to improvements in the way food is produced, traded and accessed

- Taxes and subsidies

Depending on the type of food system and the national and local context and taking into consideration all possible effects, including those on lower income groups, the cost of healthy food options is often at high prices and unaffordable. Measures like taxes and subsidies can

Comment [A19]: Again, the problems laid out and the proposed solutions do not seem to be linked, and the evidence basis is unclear here.

Comment [A20]: It is unclear what this claim means, where it comes from, or what it has to do with landscape and dietary diversity. Small-scale farming isn't inherently predisposed to dietary diversity, and market access can be a strong contributor to promoting dietary diversity.

Comment [A21]: This paper suggests less knowledge exists on this topic than currently does. It may be beneficial to explore linkages better with other work that has been previously done, like through GLOPAN's food environments work.

Comment [A22]: This unsourced claim is a step too far in directly tying FLW to food insecurity and malnutrition. We suggest revising the TOR language to the language from the HLPE report #12 (see below).

From the HLPE Report #12 (p. 88),
"With almost one-third of food produced for human consumption – approximately 1.3 billion tonnes per year – either lost or wasted globally, the reduction of food losses and waste (FLW) is a major challenge for FSN (HLPE, 2014a)."

And from the HLPE Report #8 on FLW, (p. 35)
"1.3 FLW and food security. Food lost or wasted while people go hungry is first of all a sign of a global food system that does not fulfil adequately its function – whatever the reason. FLW are often taken as a symbol of both inefficiency and inequity of current food systems. However, real causes of hunger and malnutrition are very complex and cannot be reduced to the existence of FLW, nor to food availability concerns. Therefore one should be careful in being too simplistic in associating global FLW to global food insecurity. Any reduction of FLW in food-secure or exporting countries will not necessarily translate into increased availability and supply in food-insecure countries."

Comment [A23]: FAO data shows us in a period of low volatility. It appears from context that the main concern here is high prices, as addressed earlier in the sentence – volatility is not the issue.

Comment [A24]: International trade policies are not within the scope or mandate of CFS and it is inappropriate for this entity to call on countries to use trade rules to enforce nutrition policy. We believe that these recommendations should reflect the fact that all foods, including beverages, can be part of an overall diversified, balanced, and healthful diet. Further, we expect that countries' implementation of any of the recommendations will be consistent with their international trade obligations.

~~regulate pricing and when applied appropriately~~ may influence food choices and dietary intake (i.e. ~~reduction-reduced consumption~~ of taxed sugar- sweetened beverages and increase consumption of subsidized fruits and vegetables)

- Social protection programmes leading to improved nutritional outcomes

Social protection programmes, such as cash transfers and school feeding programmes can play a key role in addressing immediate, underlying and basic causes of malnutrition. In line with the CFS recommendations endorsed in 2012, policies are needed to ~~ensure-encourage that~~ social protection interventions and programmes are designed and implemented in a nutrition-sensitive way to contribute to improved nutrition outcomes.

Comment [A25]: Proposals that promote specific fiscal policy (e.g. subsidies, taxation) fall outside the scope and mandate of CFS. These taxes often disproportionately target imported products but may not similarly affect domestic products. Again, the U.S. views that all foods, including beverages, can be part of an overall diversified, balanced, and healthful diet. And again we emphasize that countries' implementation of any of the recommendations should be consistent with their international trade obligations.

Comment [A26]: These are voluntary guidelines.

Comment [A27]: There is a lot of ongoing research into these topics that does not seem to be referenced here.

c) Promotion, advertising and information

Problem statement

In order to positively impact consumer preferences, purchasing behaviors, consumption patterns, nutrition knowledge of the population, it is key to promote nutrition education and to put in place public policies and interventions that promote nutrition-sensitive strategies addressing promotion, advertising/labelling and information of food products.

Policy-relevant areas

- Regulations for advertising and marketing

Healthier food options can be promoted through different approaches. Children at all age groups require special protection and attention e.g. through ~~education campaigns and restrictions on advertising-marketing bans~~ to children and education campaigns, subsidizing healthier alternatives and ~~restricting certain ingredients and~~ interventions in schools to promote healthier approaches to eating and physical activity.

Comment [A28]: Unrelated to advertising/marketing.

Comment [A29]: Nutrition labeling should be accurate, truthful, and not misleading so any claims need to be defined and based on science.

Comment [A30]: The placement of this bullet almost seems like an afterthought. Perhaps this is the intention, as the focus of the guidance really seems to be on other topics. Not sure if that is the intent, but at least the U.S. Dietary Guidelines for Americans (DGA) are a source of information and guidance important to many others, not just consumers and producers.

The DGA also provide more than recommendations on latest evidence of food and nutrient composition of healthy diets... Could expand on this topic by including the reach of the audience, what they are, and how they are used.

- Transparency of information on labels

Nutrition labelling of foods on food packaging (i.e. front of the pack labelling) through voluntary or mandatory codes is a tool to inform consumers, shaping their preferences and influencing industry behavior by encouraging product reformulations. ~~The promotion of e~~Education campaigns are important to help consumers understand the labels which ~~have to~~ should be accurate, transparent and easy-to-understand.

Comment [A31]: Food safety related matters fall within the purview of other international organizations (OIE, IPPC, Codex), and this committee has no mandate or scope to call for actions on food safety issues. While we support calls for improvement in cold chains, storage, and transport, it is inappropriate for this committee to speculate on what does and does not constitute a problem in food safety systems.

- National food-based dietary guidelines

National ~~food-based~~ dietary guidelines are another important source of information and guidance for consumers and producers. They provide recommendations on latest evidence of food and nutrient composition of healthy diets adapted to national contexts.

Comment [A32]: Food transformation: framing involving the private sector would make sense – how can they be involved in the discussion to help shape a healthy food system? How do we define healthy processed food? How do we ensure micronutrients are kept during processing and storage?

d) Food quality, safety and transformation

Problem statement

Insufficient efforts in promoting food quality and safety negatively influence consumption patterns through changes either in consumer preferences or in food affordability.

Comment [A33]: This sentence is unclear.

Actions should be undertaken to address the main factors impacting on food safety as food moves along the food supply chain: pesticide residues exceeding maximum residue levels, certain agricultural practices, lack of cold chain storage and transport, overuse/misuse of antibiotics in livestock sector.

Comment [A34]: Not sure which food safety concerns this is meant to refer to – please clarify.

Investments should be encouraged in order to develop new technologies and biotechnologies ~~and~~, to make existing ones more affordable, and to implement training and education programmes. Actions should be undertaken to improve food quality such as through improved product composition.

Comment [A35]: Bringing up pesticides and antibiotic use in livestock specifically with no context implies only negative connotations and labeling them as "the main factors in food safety" is inappropriate and incorrect. Regulated use of these and other technologies - as specified by other international organizations - in fact increase agricultural productivity and safety of food.

Policy-relevant areas

- Food safety and traceability

The ability to trace and follow food through all stages of production and distribution helps provide safer foods and better connect producers to consumers. Strengthened institutions and policies are also key vehicles to improve cold chain transport and stabilization of the energy supply. Improving food storage is another effective way to increase the amount, safety and quality of the available food.

Comment [A36]: This paragraph seem to selectively focus only on certain aspects of food safety and ignore others that are very important, like mycotoxins, bacterial contamination and foodborne illnesses, etc. In particular, there is a concerning focus on modern, commercial farming, which ultimately is necessary to ensure food and nutrition security.

- Food quality improvements

Product reformulation and policy options for improving composition of food can improve its quality. Food fortification is also an effective public health intervention for preventing nutritional deficiencies while contributing to improving health outcomes.

V.V. Type of Instrument

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 CFS.

V.VI. Intended Users of the Guidelines

The voluntary guidelines speak to all stakeholders that are involved in addressing, or are affected by, malnutrition in all its forms. The primary aim of this tool is to provide concrete instruments to build policy coherence between and across public policies at national level as well as between international and national public policies. They should therefore primarily address governments at all levels to help design public policies, although they will be used by all relevant actors in policy discussions and policy implementation processes. These stakeholders are:

Comment [A37]: Which international public policies? Ensure that CFS stays within its mandate and respects the mandates of other international organizations and agreements.

- Governmental actors, including relevant ministries and national, sub-national, local institutions;
- Intergovernmental and regional organizations;

- c) Civil society organizations;
- d) Private sector;
- e) Research organizations and universities;
- f) Donors;
- g) Foundations.

VIII-VII. Timeframe

The CFS Secretariat will implement the consultation process under the guidance of the OEWG on Nutrition and with the assistance of the TTT on Nutrition.

Adequate financial and human resources should be secured in advance to enable the policy convergence process.

The following tentative schedule is proposed:

Task	Timeframe
TORs are endorsed at CFS 45	October 2018
OEWG meeting to discuss preliminary work on the Zero Draft	November 2018
OEWG meeting to discuss Zero Draft	January 2019
Regional multistakeholder consultations and e-consultations on Zero Draft	January-February 2019
OEWG meeting to discuss the Draft One	April 2019
Negotiation of final version of the voluntary guidelines	June/July 2019
Guidelines are submitted at CFS Plenary for endorsement	October 2019

Comment [A38]: We would appreciate seeing a detailed budget breakdown with costs for the individual meetings and staff resources.

Comment [A39]: Will the timeline be revised to reflect the conversation from the March OEWG meetings?