We appreciate the new draft, which took into consideration many of the relevant comments made in the first meeting of the OEWG. We believe this text is more in line with the mandate given to this Working Group by the Plenary and we are happy to work on it as a basis for our discussions.

As we move forward into this process, considering the fundamental role nutrition plays in the concept of food security, we believe it is time that we not only recognize this role but also translate it into our language and documents. We propose, therefore, that we move forward by using the expression “Food and nutrition security”. This recognition would represent an important progress compared to the current use, “Food security and nutrition”. We understand this is agreed language, but this process is expected to represent an important contribution of CFS to this agenda and especially in the context of the UN Decade of Action on Nutrition. It is time we recognize the cruciality of the nutrition component in the Food Security concept. So we propose to use the expression “Food and Nutrition Security”.

Another comment that applies to the document as a whole is that it is very limiting to understand food systems only as providers of “nutrients”, as is implied in paragraphs 2, 7 and 18. We must address nutrition and diets in their multidimensionality and complexity, going beyond a purely biological perspective. This is the “adequate” part of the “right to adequate food”. The document should reflect the perspective that nutrition is not only about ensuring the right nutrients, but also about respecting each people’s habits and culture and how they relate to food, as well as moving towards environmentally sustainable production patterns.

Bearing that in mind, we also have more detailed comments:

- In paragraph 7, it is particularly important that we mention the cultural and traditional aspects related to nutrition. As already affirmed, we believe diets must be culturally appropriate;

- In paragraph 8, when we talk about “protection of biodiversity”, we suggest to address social diversity and traditional working methods related to nutrition and diets. Historically, some forms of extrativism and coexistence with the environment have been guaranteeing access to certain foods. These foods also ensure access to nutrients to a number of different communities and cultures;

- In paragraph 9, at the end of the second sentence, we should include the progressive realization of the right to adequate food in addition to “improving diets and nutrition outcomes”.

- In paragraph 11, in addition to “indigenous peoples”, we should also mention other traditional communities and peoples. In Brazil, this would mean encompassing the Quilombolas – which are traditional communities who descent from slaves;

- Paragraph 14 mentions only the negative aspects of malnutrition on human diets and health. We also need to mention the environmental consequences of the current production and consumption patterns;
• We are happy to see the “food supply chain” entry point in the document. It is crucial that we address food systems in their entirety. Effective actions and results in nutrition will only happen when we address the way we produce, process, storage, transport and consume food;

• As for paragraph 18, we understand this is more of a general sentence and that once we move into more detailed discussions on production, we will be able to address all kinds of production systems, also keeping in mind the importance of policies that protect and strengthen family farming;

• On food environments, we need to address regulatory measures such as prohibition of publicity for children, limits to procurement and availability of unhealthy foods such as ultraprocessed products, taxation on sugar drinks and so on. Personal preference is very much influenced by publicity, prices and availability of certain foods;

• On para 28, about Nutrition Education, we suggest to insert the concept of “Food and Nutrition Education”. People need to understand not only the consequences and determinants of their choices to their health, but also to the social, environmental and economic sustainability;

• Finally, we highly support a more positive language than the one used in para 31. Of course the guidelines are voluntary, but their authority will also rest on their consensual nature, credibility, collective ownership, and joint implementation. We need to show the commitment of all stakeholders to take measures so as to promote the use and implementation of these guidelines in order to achieve SDG 2 as well as the whole 2030 Agenda.

Thank you.