

General comments

- France welcomes this new draft of the ToRs and thanks the Chair, the CFS Secretariat and the Technical Task Team for the numerous improvements. We also would like to recommend further enhancements to the content of the ToRs along the following lines:
- The question of the role of the various stakeholders in the food system should not be neglected. That means identifying the stakeholders with their constraints and their room to maneuver, questioning the practices and strategies of supply players that have led to the construction of food environments which are more or less favorable to nutrition as well as tackling the issue of the balance of power between the actors. The power asymmetries, within value chains (between farmers and processors or distributors) and at each stage of these chains (between small and large companies) should also be taken into account. In addition, as new kinds of multi-stakeholder governance are emerging (Milan Urban Food Policy Pact ...), the questions of governance of the food systems should be mentioned.

The conceptual framework proposed in the HLPE report is indeed a functional framework, which neglects the fact that actors at every stage also have strategies. In order to define policies, this functional conceptual framework must be coupled with a mapping of actors that accounts for their weight, their power, their evolution.

- The elaboration process should be preceded by an inventory and analysis of already existing international and even regional guidelines on nutrition and food systems, principles and standards so as not to duplicate the work and take into account of these documents as appropriate. In that sense, the Annex I to be developed should be a real analysis, able to show the real added-value of the CFS, and not only a compilation of the existing guidelines on nutrition and food systems.

Additional/other elements that need to be included in Section IV on the Proposed Scope of the Voluntary Guidelines

- This section IV does not give any element towards more sustainability of food systems (and consequently of food diets) although paragraphs 8 and 9 clearly express the importance of sustainability. Thus we propose to include a reference to the sustainability of food systems in parts a) and c) related to food supply chains and consumer behaviour.
- **Paragraph 25:** this paragraph is a little bit confusing and we propose to move the packaging aspects in paragraph 27. The sentence ‘the extent to which food is processed’ is not really clear.

Some suggestions directly in the text of the ToRs below:

- **Paragraph 27:** we propose to include packaging as well 27. **Packaging**, promotion, advertising and information have a direct influence on consumer preferences, purchasing behaviors, consumption patterns, nutrition knowledge of the population.
- **Paragraph 28:** Lack of food quality and safety negatively influence consumption patterns and consumer health through changes either in consumer preferences or in food affordability. **In order to address the issue of food safety, Member States should encourage the set-up of**

appropriate risk assessment systems based on science and independent expertise, and the capacity to elaborate an efficient framework for risk management.

Suggestions concerning the other sections of the document

Some suggestions directly in the text of the ToRs below:

Paragraph 8:

8. The Voluntary Guidelines will focus on food systems and nutrition following a comprehensive and systemic approach with a view to countering the existing policy fragmentation between the food and health sectors, while also addressing livelihood and sustainability challenges. Policies that are intended to promote healthy and sustainable diets should also aim at enhancing the livelihood of the most vulnerable segments of the population and ensuring the environmental sustainability of food production **including through agroecological approaches** as well as the protection of biodiversity.

Paragraph 15: 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, diversified and safe diets and safe drinking water, inadequate infant and young child caring and feeding practices **including insufficiency of breastfeeding**, poor sanitation and hygiene, insufficient access to education and health services, income poverty, inequalities in access to resources and limited economic opportunities.

Paragraph 21: Different drivers of change that impact the functionality of food systems and their ability to deliver healthy and sustainable diets are important elements to contextualize the recommendations provided in the guidelines. They could also be considered as additional entry points for policy coherence. The five main categories and related drivers that were identified in the HLPE report will be taken into account, namely: biophysical and environmental (natural resource and ecosystem services, and climate change); innovation, technology and infrastructure; political and economic (leadership, globalization, foreign investment and trade, food policies, land tenure, food prices and volatility, conflicts and humanitarian crises, **private sector's engagement in social and environmental protection**); socio-cultural (culture, religion, rituals, social traditions and women's empowerment); and demographic drivers (population growth, changing age distribution, urbanization, migration and forced displacement). The impact of these drivers depends on the type of food systems, of actors involved, and of policies and interventions that are designed.

Paragraph 32: The Voluntary Guidelines are complementary to and support national, regional and international initiatives which aim at addressing all forms of malnutrition by ensuring that the diets needed for optimal nutrition are available, affordable, acceptable, safe and of adequate quantity and quality, based on sustainable and diverse production, **fair and remunerative for smallholder and family farmers**. In particular, CFS guidance should build on and integrate existing instruments adopted on these topics within the context of the UN system.