

## **General**

- Welcoming the holistic approach, incl. entire food systems transformation and the orientation along the three constituent elements of food systems (food supply chain, food environment, consumer behavior) as policy entry points to promote a healthy diet and well-being.
- Welcoming that the ToRs now make reference to the fact the guidelines approach nutrition through a “sustainable diet lens”, which allows to establish the necessary link between nutrition and the way our food is produced (Paragraph 8 ...”to promote healthy and sustainable diets”, ...”ensuring the environmental sustainability of food production”)
- The ToR do not cover the humanitarian situation and specific challenges and we consider this appropriate since it would otherwise overstretch the scope of this work and risks to dilute the guidelines if they intend to cover too much.
- The level of detail in the description of the scope has changed significantly and lost a lot of value (see comment below).
- The description of food environments includes a logical mistake: “They consist.....; and the quality and safety of foods **through** branding and labelling”. Quality and safety is not assured through branding/labelling! Rather through the right processing and storing and the right formulations. So the text should be changed (e.g. “and the quality and safety **as well as** branding and labelling”)

### **a) Proposed Scope**

The structure of the proposed scope along the constituent elements of food systems is fine, but we miss the overarching aspects, such as listed in the HLPE report under “overarching recommendations”, like:

- i. Nutrition in national policies and programs
- ii. Promote the gains of a healthy diet throughout life, especially for the most vulnerable groups.
- iii. Reinforce health systems to promote healthy diets.
- iv. Global cooperation around nutrition
- v. Impact of trade and investment agreements on nutrition
- vi. Nutritional vulnerability of particular groups
- vii. Nutrition and women’s right and empowerment
- viii. Address conflicts of interest
- ix. Improve data collection/knowledge sharing
- x. Strengthen governance, alliances and networks to ensure a health-in-all-policies approach.

These should be considered in the drafting of the VG as titles or names of the articles. This goes in line with the observation that the policy relevant areas by topic are no longer listed. As we consider it was a strength of the previous ToR version, we encourage to take them in the drafting of the ToRs.

Even though the introduction of the new ToR version justifies that this level of detail was eliminated in order address them during the elaboration of the guidelines, we find it important that the ToR’s contain the list of policy relevant areas which the guidelines have to address. We suggest that these are kept in an annex to the ToRs or in an additional paper to be agreed within CFS participants in order to guide the drafting team. We fear that if the member states and other stakeholders cannot agree during the process of the establishment of the ToR’s on the topics to be addressed, there is a high risk that the guidelines will not touch them sufficiently either! Tackling the relevant and challenging aspects is key to elaborate guidelines with an additional value to what exists already.

In explicit terms, the following structure should be kept and the policy relevant areas listed (i, ii, iii, etc.), with a comment that they are not exhaustive:

- A) Food Supply chains
  - a. Production systems
    - i. Agricultural policies, incl. production subsidies
    - ii. Research policies
    - iii.
  - b. Storage and distribution
    - i.
  - c. Processing and packaging
    - i. Nutrition sensitive product formulations
    - ii. Regulation for packaging
  - d. Retail and markets
    - i. Product placing
  
- B) Food Environments (from the previous ToR version)
  - a. Availability and physical access:
    - i. Food deserts and food swamps
    - ii. Public procurement
    - iii. Market access for smallholders
    - iv. Landscape and dietary diversity
    - v. Postharvest losses and food losses
  - b. Economic access (affordability):
    - i. Nutrition sensitive trade policies
    - ii. Taxes and subsidies
    - iii. Social protection programs leading to improved nutritional outcomes
  - c. Promotion, advertising and information:
    - i. Regulation for advertising and marketing
    - ii. Transparency of information on labels
    - iii. National food based dietary guidelines
  - a. Food quality and safety:
    - iv. Food safety and traceability
    - v. Food quality improvements
  
- C) Consumer behavior and awareness about the gains of a healthy diet throughout life, including for the most vulnerable groups
  - a. Supporting a healthy start
  - b. Nutrition education/knowledge
    - i. School curricula
    - ii. Special capacity building of mothers
    - iii. Food and nutrition literacy, incl. labeling
    - iv. Food waste
  - c. Food acceptability
    - i.
  - d. Social norms, values and traditions
    - i. Women's right and empowerment
    - ii. Children's rights

With regard to the proposed structure and the listed policy relevant areas (see above), we recommend to link up the different dimensions of nutrition with the link in the value chain that is addressed. The results would be a systemic approach regarding nutrition and food systems with specific recommendations for each level of stakeholders in the food system.

### **CFS Intersessional events on Nutrition**

Thank you for the revised document.

We continue supporting the organization of an event on nutrition sensitive agriculture but not in connection with soils. Despite the soil issue is certainly relevant, the production of nutritious food is more negatively impacted by economic policies than by the poverty of the soils. An event about the development nutrition-sensitive agriculture in the context of economic development would allow to discuss the real possibilities government have to include nutrition related objectives in their agriculture policies.

An event for the presentation of the HLPE report would help socializing the conclusions of the report and several concepts.