

COMMENTS OF ARGENTINA TO THE “ZERO DRAFT DOCUMENT OF THE CFS VOLUNTARY GUIDELINES ON FOOD SYSTEMS AND NUTRITION”

PARAGRAPH 9

The Argentine Republic would like to draw the attention to the fact that consumer decisions are mentioned as a driver to improve the ability of food systems to generate healthy diets. In this regard, it is important to recall that it is State regulation on the protection of life and people’s health that holds a central role in promoting healthy diets, in accordance with the provisions of the Agreement on the Application of Sanitary and Phytosanitary Measures (SPS) of the World Trade Organization.

Furthermore, consumer decisions are motivated by the quest of standards which may not be directly related to health (such as quality issues, trends and prices) and, thus, may not necessarily define the characteristics of a “healthy” diet.

Therefore, the following changes are requested:

“Food systems and diets are major contributors to the nutritional status of populations. Food systems have an important impact on human and planetary health by shaping and enabling producers’ decision and consumers’ choices. At the same time, consumers’ decisions on what to consume can also have an impact on food systems ~~and improve their ability to deliver healthy diets~~. Relevant changes are needed within and across food systems, bearing in mind their economic, social and environmental impact and with the aim to generate positive outcomes along the three dimensions of sustainability.”

PARAGRAPHS 19 AND 20

It would be preferable to address policy fragmentation from a “coordination” approach rather than from a “coherence” approach, given that there is a variety of options and tools that can help face the challenges arising on the food, agriculture and health sectors, in consideration of the diverse economic, productive and socio-cultural aspects in which such policies are implemented.

Therefore, the following wording is suggested:

“The Voluntary Guidelines are expected to address the complexity of food systems with the intention to promote policy ~~coherence~~ coordination and foster and guide dialogue among different institutions and sectors.”

PARAGRAPH 21

The Argentine Republic would like to stress the importance of promoting sustainable food systems in accordance with intergovernmental regulations that apply to each of the parties.

To this extent, the following modifications are requested:

"Sustainable food systems that promote healthy diets are integrally connected with issues related to trade and investment, climate change, biodiversity and genetic resources, among others, which are all addressed in dedicated normative intergovernmental processes. Different actors dealing with these matters need to refer to, and build upon, ~~each other's resolutions and declarations~~ the international commitments which are applicable to each of them, promoting ~~coherence~~ coordination and addressing policy fragmentation, without duplicating efforts or moving beyond their mandates."

PARAGRAPH 24.c

The Argentine Republic requests replacing the term "food prices and volatility" with "extreme food price volatility", since price volatility is characteristic of commodity markets; therefore, only extreme volatility should be addressed. Furthermore, the suggested term is in line with target 2.C of the 2030 Agenda: "Adopt measures to ensure the proper functioning of food commodity markets and their derivatives and facilitate timely access to market information, including on food reserves, in order to help limit extreme food price volatility".

PARAGRAPH 36.c

The Argentine Republic highlights that the word "sustainable" encompasses the social, economic and environmental dimensions of sustainable development in a balanced way, without prioritizing one aspect over the other.

Therefore, the following wording is proposed:

*"c) **Healthy people, healthy planet.** Promote policies that are intended to enhance the livelihoods, health and well-being of the population and enhance ~~the sustainability of~~ sustainable food production and consumption as well as the protection of biodiversity and ecosystems."*

PARAGRAPH 36.f

The Argentine Republic suggests that the reference to "resilient" food systems be deleted, since the adjective describes food systems in a way that has not been agreed upon at a multilateral level. SDG 2.4 of the 2030 Agenda for Sustainable Development refers to "sustainable" food systems; a term that covers the social, economic and environmental dimensions of food systems in a balanced way. Furthermore, the term "resilient" is linked to climate change adaptation and mitigation and therefore calls to address food systems from the environmental approach only.

Therefore, the wording "sustainable food systems" is preferred.

PARAGRAPH 36.g

In line with comments under paragraph 36.c, the following wording is suggested:

“g) Capacity-building. Strengthen human and institutional capacities, particularly among nutrition and food systems actors, to address all forms of malnutrition and scale up the coverage, and impact ~~and sustainability~~ of sustainable nutrition programmes.”

PARAGRAPH 43.k

In line with comments made under paragraph 24.c, the following change is requested:

“Efforts to adapt or increase the resilience of food supply chains to threats like conflicts, natural hazards, climate change, and global excessive food price volatilities, should include interventions aimed at strengthening access to finance, better forecasting data, and asset creation initiatives such as rehabilitating degraded land and infrastructure building. Similarly, disaster risk reduction and management interventions are key to building resilience and capacity, especially among particularly vulnerable communities.”

PARAGRAPH 46

The wording seems to promote “buy local” (instead of imported goods) policies, which would be detrimental to the food security and nutrition of foreign producers of those goods. It is important to stress that this type of policies are contrary to the “national treatment principle” and to the “most favoured nation clause”.

Moreover, foods produced in the local market are not necessarily more nutritious than those produced in distant markets.

Therefore, the following wording is proposed:

“36. (...) Local and traditional markets ~~are an important~~ represent one of the sources of nutritious foods...”

PARAGRAPH 46.b

The Argentine Republic would like to stress that the support granted for producers to reach safety and/or quality standards should be compatible with WTO rules, particularly Annex II of the Agreement on Agriculture.

On the other hand, it is relevant to consider that any policy that seeks to restrict trade of products must be established in accordance with the relevant multilateral regulations, such as the WTO Agreements on the Application of Sanitary and Phytosanitary Measures (SPS) and on Technical Barriers to Trade (TBT).

Thus, the following changes are requested:

“46. b) Supply of nutritious foods. New policies should be developed to encourage retailers to supply more nutritious food items at affordable prices, and to procure local products, particularly from smallholders at rewarding prices, bringing a positive impact in terms of dietary patterns and nutritional outcomes. At the same time, local farmers should be supported to meet safety and/or quality standards that could enable them to reach broader markets and higher profits for their products ~~and~~ ~~P~~policies ~~should~~ may also consider ways to restrict the marketing of products high in fat, sugar and salt, in accordance with multilaterally agreed rules.”

PAGE 14, SUBTITLE “1. AVAILABILITY AND PHISICAL ACCESS (PROXIMITY)”

In line with comments presented under Paragraph 46, the deletion of the word “proximity” is requested.

PARAGRAPH 48.b

Reference is made to the importance of ensuring the provision of “high quality” food options. However, the scope of this term is not precise and it has not been accepted or defined at the multilateral level. The term “healthy” is preferred instead.

Therefore, and also considering the comments exposed under Paragraph 46, the following modifications are requested:

“b) Public food procurement. Healthier diets can be enabled through incorporating nutrition standards into the procurement of food in public settings such as schools, hospitals, workplaces and government institutions. Food procurement policies should ensure the provision of ~~preferably local, high quality~~ healthy and safe food options. These policies should also influence nutritious food production by providing a reliable source of demand for ~~local~~ producers and businesses.”

PARAGRAPH 50.b

The wording of this paragraph could imply an endorsement of the application of differentiated border tariffs according to the emissions of greenhouse gases during the production process of a product. This would mean that higher border tariffs would apply to products with higher levels of emissions, in a context in which no methodology for quantifying greenhouse gas emissions in the production of goods and/or services has been agreed upon at a multilateral level. Therefore, this type of initiatives could lead to disguised trade restrictions and could entail the need to modify production patterns.

Therefore, the we request the deletion of paragraph 50.b.

PARAGRAPH 51.b

It is necessary that environmental mechanisms or measures, such as certification and labeling schemes, be consistent with WTO, so as not to constitute arbitrary or unjustifiable discrimination or disguised restrictions on international trade.

To this extent, the following change is requested:

“b) Transparency of information on labels. Nutrition labeling on food packaging (i.e. front of pack labeling), *as long as they are consistent with WTO rules*, through voluntary or mandatory codes is one tool to inform consumers, shaping their preferences and encouraging product reformulations by manufacturers...”

Under Part 3 –“Consumer behaviour”–, Item 1 –“Food and nutrition education and information”–, it would be relevant to make reference to the development of food composition databases as a key tool to inform the content of nutrients and other components of nutritional importance in food.