

**Zero draft version of the CFS voluntary guidelines on nutrition and food systems –
Comments by Italy**

We regret that many of our specific comments on the preliminary version of the zero draft were not taken on board. We thus wish to reiterate some of these comments and the rationale for the proposals, as well as making some new observations:

1. Paragraph 32 on the definition of healthy diets.

Although we appreciate the inclusion of definitions in the section on key concepts and guiding principles, we believe these definitions should be sufficiently generic and inclusive, as well as consensually agreed-upon, evidence-based and scientific. Unfortunately this is not the case for the definition of healthy diet in paragraph 32. In fact, the definition in this zero draft is even – and unjustifiably - more detailed than the one included in its preliminary version. We reiterate the comments already made on the lack of scientific consensus on the precise quantities and percentages of micronutrients and macronutrients that compose a healthy diet. This is a WHO working definition which has not been agreed upon at the international and intergovernmental levels. **We thus propose to keep the chapeau but eliminate all the text in sub-paras a to f.**

2. Paragraph 43 h.

We would like to reiterate the proposal we already made, which is that of **adding, to the list of nutrient-dense foods whose commercial development is to be promoted: legumes and animal-source protein** – as these are essential elements of a healthy diet. We also regret the inclusion of bio-fortified crops in this paragraph as we believe research should prioritise natural foods instead of these kind of crops. We suggest the **deletion of this reference.**

3. Paragraphs 45, 45b and 46.

References to the general objective of reducing the content of salt, sugar and trans fats or the marketing of products which are high in these substances.

We suggest to eliminate all these references. We are particularly surprised and worried about the inclusion, in paragraph 46b, to the need for policies to “consider ways to restrict the marketing of products high in fat, sugar and salt”. This notion has been newly inserted and was not present in previous versions of the text, neither has it been previously discussed by the Open-ended working group, as it should have been, given the wide-reaching implications of such a claim. **We strongly oppose the inclusion of this wording.**

As we know, scientific evidence, as well as intergovernmental consensus, from ICN2 to last year’s General Assembly resolution on “foreign policy and global health” and the Political Declaration of the Third Intergovernmental Meeting on Non-communicable Diseases in September 2018, is clear: **there are “healthy” or “unhealthy” diets, and not “healthy” or “unhealthy” foods.** What policies should aim at is promoting the attainment of an overall healthy balance between nutrients, and not targeting specific foods or products, which are

by themselves not necessarily unhealthy if incorporated in the correct quantities in a balanced diet. There is scientific consensus on this.

We are thus very surprised to read that policies should aim at “restricting the marketing of products high in fat, sugar and salt”: this kind of policies risks having close to no impact on the nutritional status of the population while at the same time targeting traditional products which have a place in the traditional, healthy diets of local populations. Our goal should be to defend, safeguard and enhance the livelihoods, habits and agricultural practices of local and indigenous populations, not singling out single foods or products as “harmful”, without appropriate scientific evidence to back this up. This is an important point for us.

Moreover, concerning para 45: the point on the “limit to the amount of specific ingredients (i.e. product reformulation)” is already made, although referring correctly to the notion of product reformulation, in para 45a; there is thus no need to mention the objective of reducing the content of salt, sugar and trans fats in the chapeau of para 45.

4. Paragraph 45 a

We reiterate our suggestion to **eliminate the reference to fortification in this context**. Fortification has a role to play in fragile contexts or in situations of humanitarian emergency. Policies and programmes should not generically promote fortification, as it risks diverting attentions and resources from long-term promotion of sustainable food systems. In fact, promoting fortification in contexts that are not conflicts or emergencies may undermine traditional healthy diets. Fortification should be considered only a temporary solution in specific, fragile contexts and not as a final goal of policy. The ultimate solution should contribute to benefiting local communities who produce food. These products contain all needed nutrients for a healthy diet; therefore, there is no need, in the longer run, for fortification.

5. Paragraph 50 b

Taxes and subsidies are particularly intrusive policy measures, to the contrary of consumer education and information, which should be the priority. Thus, any kind of intervention in this realm should be carefully and thoroughly weighed against scientific evidence, including analyses of results of previous or similar interventions. **We thus request to add the text, at the end of the second line, after “measure like taxes”, the text: “when supported by a strong evidence base”.**

6. Paragraph 51 b

We reiterate our request to **add the term “evidence-based” before referring to “nutrition labelling”** for the same reasons. We have a further proposal. As we know, the basis for nutritional labels is the nutrient declaration, which can be integrated but certainly not substituted by additional nutritional information, which, citing Codex rules, is “intended to increase the consumer’s understanding of the nutritional value of their food and assist in interpreting the nutrient declaration”. We thus cannot refer to “front-of-pack labelling” without referring also to the nutrient declaration. In light of this, **our proposal is to**

substitute the reference, in the brackets, to “front of pack” labelling, with the following text: “i.e. the nutrient declaration and in addition optional supplementary nutrition information on the front of pack”. We would also prefer to remain general and eliminate references to voluntary or mandatory approaches, simply mentioning that nutrition labelling on food packaging is one tool to inform consumers, shaping their preferences.

In addition, we would propose to **eliminate the reference to product reformulation in the second part of the same sentence**, as references to product reformulation are already present in three points in the draft, when discussing Processing and Packaging (para 45) and “Food Quality and Safety” (para 53). Product reformulation decisions are not conceptually linked to the transparency of information on labels, so it has no place here.

Incorporating these proposals, the new paragraph 51b would read:

Evidence-based nutrition labelling on food packaging (i.e. **nutrient declaration and in addition optional supplementary nutrition information on the** front of pack labelling) ~~through voluntary or mandatory approaches~~ is one tool to inform consumers, shaping their preferences ~~and encouraging product reformulations by manufacturers~~. The promotion of education and nutrition literacy campaigns are vital to help consumers understand labels which have to be accurate, transparent and easy-to-understand.

7. Para 53 b.

We reiterate our request to **add, at the very end of the paragraph, when referring to food fortification, the following text: “in fragile contexts or in situations of humanitarian emergency”**. With the same rationale as our previous proposal on food fortification, which is useful only in these contexts in our view.