

Final

PSM Submission on the Zero Draft of the Nutrition Guidelines

June 28, 2019

On behalf of the PSM, we would like to thank the CFS Secretariat for its open-mindedness throughout this process and submit the following feedback on the Draft Guidelines for your review, as well as the 17 Policy Recommendations by the PSM. These Policy Recommendations were compiled with the aim of ensuring the Voluntary Guidelines on Food System and Nutrition are both implementable and transformative. We look forward to contributing positively throughout the entire consultation process.

1. PSM is pleased to see the strengthening of focus on capacity building in the current draft. Without well-trained nutrition stakeholders, policies and recommendations will not deliver the intended result.
2. The zero draft continues to be worryingly broad. There are currently 33 policy-relevant areas, with the scope to add more as we go through the consultation process. PSM would encourage CFS stakeholders to consider prioritizing key focus areas and/or introducing targets like the Global Nutrition Targets in chapter 1 to not only streamline the policy recommendations but to provide clear scope to the guidelines. Unless we do so, we run the risk of a long list of policy areas that may be too exhaustive for the finite resources provided to CFS to do justice to the policy convergence process.
3. Regarding the definition on Sustainable and Healthy Diets, we look forward to discussing the Revised Definition resulting out of the FAO/WHO technical consultation this July. Like others highlighted during the 30 May OEWG, we trust the scientific experts will base this definition on a sound and sufficient body of scientific evidence in order to facilitate consensus. We welcome a definition that will take into account all three dimensions of sustainability: economic, environmental, as well as social.

4. On para 36, the systemic and holistic and evidence-based approach should be updated to add science and evidence-based approach. There was a strong call during the two OEWG sessions for greater scientific and evidence basis for the guidelines.
5. On para 40, to avoid duplication, PSM recommends creating a list of international bodies whose work is relevant to the policy convergence process.
6. PSM would like to recommend including developing multi-stakeholder partnerships, in line with SDG 17, as one of the guiding principles should be followed to contribute to reshaping or promoting sustainable food systems, enabling healthy diets, improving nutrition and promoting sustainable development. While Section IV refers to knowledge sharing and exchange of experience, PSM encourages an exchange of best practices and successes, using case studies and concrete examples.
7. In reference to Chapters 3 and 4: please find the following suggestions:
 - a. Food Loss and Waste and food safety are cross-cutting across the entire food system. PSM encourages CFS stakeholders to either add these to each of the three policy entry points (food supply chain, food environment and consumer behaviour) as policy-relevant areas or create a special section called cross-cutting policy entry points. Please also see paragraphs 2 and 9 of the 17 PSM Policy Recommendations attached.
 - b. PSM recommends the addition of technology development and adoption as a key policy area. These guidelines should promote and foster the development of innovative technology to support food system transformation in technologies that support sustainable food production, improve food safety and infrastructure.
 - c. Issues of affordability are not addressed sufficiently in the current draft. We must consider: what is the magnitude and distribution of cost to consume a healthy diet? For example, a recent analysis conducted by GAIN of data from Bangladesh, Malawi, Brazil and Zimbabwe found that it would cost approximately 52% of per capita household income to purchase the recommended fruit and vegetable for all household members. Financial interest is, naturally, a fundamental shaper of the food system.
 - d. Para 52 on Food Quality describes the physical, chemical and sensorial attributes of food and refers, among other things, to the composition and may include aspects of the way food is

produced, stored and processed. The definition of Food Safety would benefit from previously accepted language on this, as well as references to Codex Alimentarius references. The inclusion of chemical additives also raises concern, since there are many that are safe and contribute to food safety and quality. Moreover, the use of certain “agriculture practices” is vague, and therefore, the PSM recommends deleting the text from the draft.

- e. Regarding the language in the section on Food Supply Chains, Processing and Packaging implies a reality for smallholder farmers – that enabling smallholders to process and package foods ensures both nutrition and income generation – that is often unattainable, as smallholders frequently aren’t able to compete with the high quality and low price of commercially processed and packaged foods. Instead, we suggest the Draft take the more nuanced view that, to help secure a nutritious food supply and in turn enhance nutrition, health and income generation, the capacity of smallholders and small entrepreneurs to reach consumers must be strengthened. This can in some cases mean improving their own capacity to process and package foods. However, in many cases the most efficient way is to link small producers to industrial scale food processors, where food products can be processed and packed to reach the highest possible standards of food quality and safety. Please also see paragraph 4 of the 17 PSM Policy Recommendations attached that highlighted the need to support value chain development and adoption of innovative practice to support the transition of all forms of agriculture systems.
- f. Under the section: Food Supply Chains, Retail and Markets, point a) Support to Smallholders, we suggest adding that “Linking smallholders to industrial value chains helps farmers reach market on a regular basis, and their produce can be processed and packed to reach the highest possible standards of food quality and safety.” This addition complements the existing solutions of information technology and capacity building, both of which PSM very actively supports as foundational strategies within the Guidelines. Please also see paragraph 4 of the 17 PSM Policy Recommendations attached.
- g. Under the Section Food Quality and Safety; namely, para 53 a) “Food Safety and Traceability” stands out namely because it only singles out food storage as a way to “increase the amount, safety and quality of the available food”. Here, reference to the whole value chain should be included, and we suggest the following text: “To increase the amount of available food and to maintain food safety and quality, the food must be handled, transported, stored, processed

and packed in an appropriate way.” The PSM welcomes the issue of Food Availability being highlighted more strongly, considering this issue was highlighted numerous times.

- h. PSM recommends strengthening the language on monitoring and gathering evidence on the effectiveness of the programs/policies put in place. This would ensure there is continuous learning and improvement in the effectiveness of the policy.