

Swiss Feedback on Zero Draft – Voluntary Guidelines on Food Systems and Nutrition

General comment

A) “Sustainable diets”

The Zero Draft is mainly focused on Nutrition and on fighting all forms of malnutrition but does not sufficiently consider the conditions under which the food was produced or how to make food systems more sustainable in order to ensure a healthy diet. Nutrition should not only be healthy for the individual, but also produced sustainably (in all three dimensions) and consumed sustainably, otherwise, we will ultimately fail on the health issue too. (→ indeed, the title relates to both terms FOOD SYSTEMS AND NUTRITION).

The definition of a healthy and/or sustainable diet is an ongoing discussion at the international level. Switzerland and others strongly supports the idea of linking a healthy diet with sustainable food production. To underline this indispensable linkage, we would champion the term “sustainable diet” which is defined – according to an international FAO-Symposium (2010) – as follows: “Sustainable Diets are those diets with low environmental impacts which contribute to food and nutrition security and to healthy life for present and future generations. Sustainable diets are protective and respectful of biodiversity and ecosystems, culturally acceptable, accessible, economically fair and affordable; nutritionally adequate, safe and healthy; while optimizing natural and human resources.”

- We therefore ask the secretariat to include «and sustainable diet» wherever the term «healthy diets» is used and not yet linked to the food systems perspective and sustainability in all its three dimensions.

B) Existing tools, initiatives and documents:

The Guidelines do not (yet) sufficiently refer to related processes and documents, particularly the AMR, Food Safety, Nutrition Literacy etc..

Systematic references to other processes and documents are important to assure the interlinkages as well as avoiding duplications etc. and increasing the acceptability.

C) Enabling Environment and Nutrition Literacy

The guidelines (and guiding principles) do not sufficiently reflect the vital role of an enabling environment to allow the individual to make healthy and sustainable choices. Currently, the focus is largely limited to the individual’s responsibility which is important, but has to be extended to how making the healthy and sustainable dietary choices can become the easy choice for the consumer. Attached to this is a proper discussion of accessibility, availability and affordability, which as others have pointed out, is hardly reflected in the document at all.

The importance of improved nutrition literacy among all stakeholders is not sufficiently reflected in the guidelines.

D) Policy relevant areas

In order for the VG to be a practical instrument for policy makers and other stakeholders, it is important that policy-relevant areas are outlined in such a way that it becomes evident which policy measures are favourable to (or otherwise hinder) good nutrition. The document becoming more specific regarding nutrition sensitive policies is desirable in order to facilitate action and impact of such measures.

Setting policy objectives and targets is another approach supporting the transformative actions which this Voluntary Guidelines need to undertake but has not yet been included

Specific comments on section I and II

- A) On strengthening the link between production and consumption, a holistic and systemic food system approach and the notion of «sustainable diets» needs to be further emphasised – see as proposed below

Paragraph 12: Environment sector is missing.

«New policies are required to address policy fragmentation and to design interventions that have to be coordinated across sectors such as health, agriculture and food systems, [environment], education, water and sanitation, gender, social protection, trade, employment, and income which all deal with the multiple causes of malnutrition.»

Paragraph 15) (Second sentence) add “Food Systems”

“This policy process is taking place at the same time as a variety of organizations from different sectors are addressing malnutrition. Nutrition and Food Systems has received increased attention in recent years from the global community, including the United Nations (UN) and its Member States, and is recognized as an essential component of efforts to achieve the goals of the 2030 Agenda for Sustainable Development. In 2014, at the Second International Conference on Nutrition (ICN2), the Members of the Food and Agriculture Organization (FAO) and the World Health Organization (WHO) committed to end hunger and malnutrition in all its forms⁴. In 2016, the General Assembly of the United Nations (UNGA) proclaimed the UN Decade of Action on Nutrition (2016-2025)⁵ and called upon FAO and WHO to lead its implementation, in collaboration with the World Food Programme (WFP), the International Fund for Agricultural Development (IFAD) and the United Nations Children’s Fund (UNICEF), using multistakeholder platforms such as CFS. Specific attention to Food Systems and nutrition was recently given by a number of UNGA Resolutions⁶, the UN Economic and Social Council (ECOSOC)⁷, the UN Environment Assembly⁸ as well as by the World Health Assembly (WHA)⁹.”

Reasoning: Compliance with the title of the Guidelines and a key objective of the entire work process. Accordingly, resolutions dealing with food systems should also be mentioned (+COAG 2018 recommendations). In addition, the resolutions now mentioned are not only about nutrition. The HLPF resolution (in footnote 7), for example, is not primarily about nutrition, but sustainable food systems (“We call upon all stakeholders to promote a sustainable food systems approach”).

Subsequently, please add references such as

- COAG 2018 recommendations (Link: <http://www.fao.org/3/my349en/my349en.pdf>). In particular because these recommendations explicitly refer to cooperation with the CFS.

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¹ 1) The Committee welcomed FAO’s work on sustainable food systems. It acknowledged the need for a more integrated, multi-stakeholder approach to address the complex challenges of sustainable food systems development, taking into account the cultural dimension. 2) The Committee requested FAO to support governments, upon request, in adopting a sustainable food systems approach by strengthening capacities in the design and implementation of enabling policies, regulations and technological innovations. 3) The Committee requested FAO to continue its support in strengthening strategic partnerships and platforms, notably the 10 YFP Sustainable Food Systems Programme. 4) The Committee encouraged FAO to increase its collaboration with other United Nations (UN) agencies and the Committee on Food Security (CFS) in supporting sustainable food systems development. 5) The Committee requested FAO, subject to resource availability, to take the lead in collaboration with relevant actors to develop voluntary codes of conduct on food loss and food waste to be submitted to the next session of COAG (COAG 27).

- One Planet (10YFP) Sustainable Food Systems (SFS) Programme: A main objective of the SFS Programme is to promote policy coherence in the field of sustainable food systems and thus nutrition. This is exactly what is mentioned in paragraph 16 (first sentence).

Paragraph 16: add SDG-Indicator 2.4

The Voluntary Guidelines are expected to contribute to and complement these international initiatives with a view to promoting policy coherence. They will provide evidence-based guidance to help countries operationalize ICN2's Framework for Action10 recommendations in support of the progressive realization of the right to adequate food in the context of national food security and the achievement of Sustainable Development Goal (SDG) 2 "to end hunger, achieve food security and improved nutrition and promote sustainable agriculture" with particular attention to target 2.2 and 2.4 " by 2030, end all forms of malnutrition and by 2025 achieve the targets on wasting and stunting in children under 5 years of age".

Reasoning: Thus reflects the indispensable link between both aspects 2.2 (consumption) and 2.4 (production).

Paragraph 17: add food systems and thus the link between production and consumption

*The Voluntary Guidelines are intended to be a reference point that provides evidence-based guidance mainly to governments, specialized institutions and other stakeholders on effective policies, investments and institutional arrangements that will address malnutrition in all its forms.
, investments and institutional arrangements that will address malnutrition in all its forms from a food systems perspective.*

Reasoning: RE-establish the crucial link between Sustainability and Healthy Diets.

Paragraph 18: reference to sustainability and limited resources

The objective of the Voluntary Guidelines is to contribute to reshaping or promoting sustainable food systems to ensure that the food that contributes to healthy diets is available, affordable, acceptable, safe and of adequate quantity and quality while respecting planetary boundaries and conforming with beliefs, cultures and traditions, dietary habits and preferences of individuals [and in accordance with national and international laws and obligations.

Reasoning: Link between Sustainability and Healthy Diets.

Paragraph 20: The paragraph reflects the complexity inherent of Food Systems, which is an elementary building block to everything we are trying to achieve with this workstream. We therefore particularly welcome this paragraph. Nevertheless, this complexity is not reflected in any of the preceding paragraphs 1-19. This paragraph 20 illustrates why it is indispensable that food systems and their influence on healthy nutrition need to be more strongly reflected in the zero draft.

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

Paragraph 24: Revert to the wording of the preliminary version of the VG on Food Systems and Nutrition.

"The report identifies five main categories of drivers of food system changes that influence nutrition and diets that will be taken into account".

The "will be taken into account" has been deleted and should to be reinstated. The VG should be based on the HLPE (see paragraph 14).

In addition, the current wording does not correspond to the original wording in the HLPE report. The original formulation would be preferable due its clarity of concept:

"The report identifies five main categories of drivers of food system changes that influence nutrition and diets that will be taken into account".

The HLPE has identified five main categories and related drivers of food system changes that influence nutrition and diets. These categories are: a) biophysical and environmental (natural resource and ecosystem services, climate change);

b) innovation, technology and infrastructure;

c) political and economic (leadership, globalization, foreign investment, trade, food policies, land tenure, food prices and volatility, conflicts and humanitarian crises);

d) socio-cultural (culture, religion, rituals, social traditions, gender inequalities and women's empowerment);

e) demographic drivers (population

Paragraph 25 (last sentence): A framework is being launched in the One Planet (10YFP) Sustainable Food Systems (SFS) Programme (Link: <http://www.oneplanetnetwork.org/sustainable-food-system/collaborative-framework-food-systems-transformation>). We would like to invite the CFS-Secretariat to have a look at the framework as we believe it may be a relevant source for the VG.

Paragraph 33: Include Definition of «Sustainable diet» as per the preliminary version of the VG on Food Systems and Nutrition.

Reasoning:

- Healthy diets do not have an internationally agreed definition either (see footnote 17), yet are still, rightly, an important part of current discussions within the VG work stream. As fundamentally important and complementary to this debate on healthy diets, sustainable diets is a concept that is fundamentally important.
- Moreover, the guidelines on sustainable diets are based on the HLPE report, which in turn acknowledges the concept of "sustainable diet".
- With the FAO definition (2010) we in fact already have a scientific basis and an excellent working definition. The HLPE report uses the FAO definition.

Paragraph 35: add food systems and thus the link between production and consumption

The Voluntary Guidelines will include a number of guiding principles that should be followed to contribute to reshaping or [promoting sustainable food systems enabling healthy diets, improving nutrition and promoting sustainable development.

- B) On strengthening the notion of enabling environments and nutrition literacy regarding education

Paragraph 36:

e) Nutrition knowledge and awareness

g) Capacity-building

Strengthening nutrition literacy is important to enabling consumers to make informed choices. The educational content must however go beyond just nutrition and also encompass the sustainability dimensions of food – i.e. their impact on the environment and how the consumer can influence and shape them.

Additionally, it is vital that the guiding principles makes clear that the responsibility of healthy and sustainable food choices is not entirely that of the consumer! The choice an individual can make (or not make) is to a large degree influenced and defined by the environment of the individual (food accessibility, affordability, availability etc.). Therefore, the enabling

environment in which he or she exists. Therefore, the dimension of the enabling environment has to be part of nutrition knowledge and awareness.

The same is true for the guiding principle “capacity-building”: It is not only about scaling up coverage, impact and sustainability of nutrition programmes, but equally important is to broaden enabling environments, which facilitate a healthy and sustainable diet! Increasing nutrition literacy among all the stakeholder is a key aspect of “capacity building” and needs to be better reflected in the guiding principle as well as in the VG as such, resp. the policy relevant areas.

Specific Comments on Section III

Paragraph 43 a) und h) Link between "Healthy diets" and "Sustainable Food Systems" must be established.

Paragraph 43 d): We propose using the term “natural resources” instead of listing them (and risking to omit even crucial ones, like in the current text – e.g. soil is not mentioned).

Paragraph 44 b)

Reference to existing definitions of Food Safety is missing. Particularly the perspective of Hygiene still needs to be consequently included as also microbiological hazards.

Food Safety must be included in all parts of the value chain (not only by “handling, storage and distribution” – either by mentioning it explicitly in each paragraph or referring consequently to it in the overarching paragraph (as currently proposed in chapter 4. Food Quality and Safety).

Paragraph 53

References to Food Safety definitions are to be included as well as a link to Codex Alimentarius.

The Hygiene dimension of food safety is missing.

The whole preventive approach is still not sufficiently incorporated. It remains a crucial aspect of the food safety and quality which simply cannot be ignored – e.g. prevention of toxic residues through reduced pesticide application; reduce antibiotic resistance through better regulated and limited use of antibiotics etc. See also the following references:

^[1] <https://www.who.int/news-room/fact-sheets/detail/pesticide-residues-in-food>

² Draft Recommendations of the Ad Hoc Interagency Coordination Group on Antimicrobial Resistance. January 2019. Recommendation A3.

Paragraph 55 b) A link between «Healthy diets» und «Sustainable Food Systems» must be established.

Specific comment on section IV

Paragraph 61 (second sentence).

Multistakeholder platforms, partnerships and frameworks and local, national and regional levels and across multiple sectors have to be established or strengthened as a key element contributing to reshaping and promoting sustainable food systems. Particular attention has to be paid to those partnerships and platforms that are already promoting multistakeholder efforts for improved nutrition and sustainable food systems at country level, such as the Scaling Up Nutrition (SUN) Movement, the One Planet (10YFP) Sustainable Food Systems (SFS) Programme and others. Actions should be taken to improve partners' capacity to design, manage and participate in these partnerships, to ensure transparency and accountability and promote good governance as a way to ensure effective results.

Reasoning: Currently the paragraph speaks only of Nutrition and not of Food Systems. There are many multi-stakeholder platforms that are more broadly based (= food systems).

