

Zero Draft of the Guidelines on Food Systems and Nutrition – UK Comments

High level point:

- Given that we currently have several CFS guidance documents comprehensively covering food systems and nutrition (the Voluntary Guidelines on the Right to Adequate Food, the VGs on Land and the Principles for Responsible Investment in Agriculture and Food Systems) we have to make sure that the guidelines on food systems and nutrition bring additional value added.
There is a danger that more products in this area dilute the impact and authority of existing guidelines. The CFS should maintain and strengthen its focus on supporting successful implementation of existing products.

Comments on content:

- A few points that need to be brought out more strongly in the introduction:
 - To make a stronger link to the health agenda (paragraph 2): Maternal and child malnutrition is the single largest driver of ill health in low and lower-middle income countries, responsible for more than double the death and disability of HIV / AIDS, TB, and malaria put together.
 - Position nutrition as an essential driver of sustainable development – averting malnutrition in all its forms will help achieve at least 12 of the 17 SDGs – hence fundamental for creating a healthy, prosperous, and stable world in which no one is left behind.
 - Be realistic of the progress made to date (paragraph 8) – SDG 2 is currently off target. 1 in 3 of the world’s population suffers from one or more forms of malnutrition. Poor diet is now the leading cause of disease worldwide. Current dietary trends, combined with projected population growth to approx. 10m by 2050 will exacerbate risks to delivering the SDGs.
 - Make the connection to the prosperity / economic growth agenda (paragraph 9?) – food systems not only have an impact on human and planetary health but also the economic growth of a country. Healthy, well-educated and well-nourished people are much better placed to escape poverty, adapt to climate change and contribute to stable, growing economies as productive members of society. Malnutrition, for example, leads to an estimated 10% loss in lifetime earnings and losses of 10% of GDP per annum globally, 11% in Africa and Asia.
 - Make a stronger connection to climate– food systems are highly sensitive to climate, as they are both “victims” and instigators of the effects of climate variability and longer-term climate change. Food production constitutes the largest driver of environmental degradation; food systems contribute between 19-29% of global greenhouse gas emissions. Models estimate more than 500,000 additional deaths in 2050 due to climate-related changes in diets, including decreased food intake and decreased vegetable and fruit consumption between the years 2010 – 2050. Without a radical change in food systems we will fail to meet SDG2 on hunger and the Paris Agreement on climate change.
 - Make reference to the Nutrition for Growth Summit in Tokyo in 2020
- Mainstream the impacts of climate change in the ‘food supply chain’ section, e.g.:
 - Production systems – section h and I – biofortification and climate change – biofortified varieties released are “competitive” with existing high-yielding varieties.

- This includes resistance to diseases, pests, and the effects of climate change through heat and drought tolerance.
- Handling, storage and distribution – climate change will affect the ability to move food from production to markets, access to diverse, high-quality diets may become more limited.
 - Retail and markets – climate change and increased energy costs are expected to cause decreased food availability and increased food prices. Also in rural areas where retail infrastructure is basic and access to water or cold storage is limited – will create problems for food quality and safety.
- ‘Economic access’ – under fiscal and pricing policies – would be good to include subsidies here e.g. shifting away from subsidies that favour unhealthy foods.
 - Points on Biofortification – there tends to be confusion on concepts related to biofortification vs fortification, the below points on biofortification may help clarify why the UK thinks that biofortification needs to be included in the section about production systems:
 - Biofortification is the process of conventionally breeding food crops that are rich in micronutrients, such as vitamin A, zinc, and iron. Rather than over-medicalising food, biofortification is improving the quality of food at the source.
 - The evidence suggests that biofortification is an important long-term complement to other nutrition strategies. While fortification may cover a broader range of nutrients, for instance, it tends not to reach the same coverage of poor people in rural areas. Biofortification is also more effective at tackling certain deficiencies (in particular, zinc) than fortification.
 - In a recent review commissioned by BMGF from Abt associates, biofortification is more effective at reaching rural households that consume what they grow or who rely on local production and who are often not served by other micronutrient interventions.
 - As micronutrient deficiencies persist in most developing countries, it has an important role to play within and beyond fragile contexts.
 - Biofortification is not a temporary measure, but rather, part of a long-term solution to micronutrient deficiencies due to its cost effectiveness.
 - The 2008 Copenhagen Consensus, composed of the world’s leading economists, estimated the health benefit-to-cost ratio of biofortified nutritious crops as \$17 of benefits for every \$1 invested.
 - Once a micronutrient is bred into a crop line, that trait remains. This makes the process of biofortification, over time, sustainable and cost effective. These varieties don’t cost more or require more water or fertiliser. They are just as high-yielding as the regular varieties. They are just as resistant to diseases and pests; and they are designed to cope with the effects of climate change.
 - Finally, some language suggestions to strengthen the importance of Antimicrobial Resistance in the food systems and nutrition context.
 - In para 24:
 - 24. The HLPE has identified five main categories and related drivers which impact the functionality of food systems and their ability to deliver healthy diets. These categories are:
 - a) biophysical and environmental (natural resource and ecosystem services, [antimicrobial resistance](#), climate change);

- In para 43, please revise j) as follows:

- Antimicrobial resistance

The rise in antimicrobial resistance (AMR) on a global basis is a major threat to human and animal health. It endangers modern human and veterinary medicine, undermines the safety of food and water, impacts on the environment, and imperils food security, threatening a rise in malnutrition and susceptibility to infection. A collaborative approach involving multiple sectors is necessary to reduce AMR. The major policy areas of reducing AMR from the food system perspective include awareness raising on AMR and related threats, developing the capacity for monitoring AMR and antimicrobial use in agriculture and food production, strengthening governance and promoting good practices in agriculture and food systems, including phasing out the use of antimicrobials as growth promoters in the absence of risk assessment and introducing alternatives to antimicrobial drugs for infection prevention and control.

Comment [AR1]: This has been recommended by the IACG and by FAO guidance:
<http://www.fao.org/3/i1379e/i1379e.pdf>

- In para 51 b) on food labelling it would be great to add something also about preparation and storage advice.
- For para 53 we have the following language suggestions:

53. Insufficient efforts in adopting efficient practices and technologies or not promoting regulations and control for food quality and safety negatively influence consumption patterns and have negative consequences on the health and nutrition of consumers.

Policy-relevant areas

a) Food safety and traceability

The ability to trace and follow food through all stages of production, processing, storage and distribution helps monitor the food supply flow, better connecting producers to consumers and facilitating withdrawal and recalling of unsafe food. Improving food storage is another effective way to increase the amount, safety and quality of the available food. Strengthened institutions and policies are also key to improving cold chain, to allow adopting efficient practices and technologies and stabilization of the energy supply.