

World Health Organization (WHO)
comments on the Zero Draft of the CFS VG Food systems and Nutrition
28 June 2019

The World Health Organization would like to express its appreciation to the CFS Secretariat team for preparing this Zero Draft document, and to the Chair of the OEWG for guiding the process.

The CFS VG on food-systems and nutrition are of high importance for the UN Decade of Action on Nutrition, and for achieving food security, improved nutrition and other related SDG targets. The added value needs to be to go steps further with the operationalization of the agreed ICN2 Framework for Action. Moreover, these voluntary guidelines need to build on and integrate the guidance adopted by other member state bodies of the UN system. This includes also the integration of relevant World Health Assembly guidance into the broader multisectoral context for enabling sustainable food systems supporting healthy diets and improved nutrition and health for all.

Comments on Section 1 and 2

- 1. Call for an integrated approach from farm to fork** - In section 1, we would like to underline the importance of calling for an integrated approach to food systems from farm to fork. This is vital to avoid policy incoherence, and to ensure that policies included in the agricultural element are followed through in the different steps of the food supply chain, particularly around the elements of food distribution and retail and consumer policies. We observe misalignment of policies addressed at agricultural production (for example subsidies) with those addressed at consumers. We suggest the addition of a sentence under 'objectives and purpose' indicating that the Voluntary Guidelines should achieve policy coherence from farm to fork.
- 2. Establishing global policy goals** - We would like to suggest, in order to make that alignment, that the CFS might consider establishing specific goals for each of the recommended policy areas, such those policy areas would be conducive to address malnutrition in all its forms. In this way, the formulation of the policy would be more easily understood and implemented accordingly by countries. CFS might help the global community and countries in providing these key elements. Without such an analysis, the different sub-sections in Part 3 of the document, the way they are presented, could lead to further fragmentation and disconnect.
- 3. Healthy people and healthy planet as overall guiding principle** - We do welcome the inclusion of the 'healthy people – healthy planet' concept among the guiding principles. Indeed, health objectives could be an overarching factor and an aligning factor for food and nutrition policies. A key point is, that currently, food systems deliver in an inadequate way on their core-business which is to produce and provide the necessary food and nutrients for the population. Health of the population and health of the planet as key elements are more important than other aspects that drive the food system, e.g. considering the food system as a production system of commodities only.
We would suggest that this 'healthy people- healthy planet' element might be highlighted even more in the document as a key driver to avoid policy incoherence.
- 4. Unhealthy diet is the top risk factor for the global burden of disease** - The concept of healthy diet is central to these voluntary guidelines. In fact, the latest analysis that looked comprehensively at the outcomes in terms of disease, the Global Burden of Disease Study, indicates that unhealthy diet is now the top risk factor for the global burden of disease. It

accounts for 11 million death every year. This is a substantial element. The Global Burden of Disease Study is the most comprehensive worldwide observational epidemiological study to date, that assesses mortality and disability from major diseases, injuries, and risk factors to health.

We would like to underline the importance of this study result for these voluntary guidelines and suggest that it is reflected in the Introductory part 1 of the document. Furthermore, we would like to stress that it is very important that the Committee (CFS) looks at first and foremost at the concept of healthy diet as a guiding element for the discussion.

5. In Section 2, WHO welcomes the inclusion of the definition on 'Healthy diet', including the healthy diet of infants and young children (page 7). Regarding the reference to be used, it is correct to refer to the ICN2 information note as one reference and the WHO fact sheet for further details. However, in the footnote, we suggest deleting the first sentence that says 'there is no internationally agreed definition on healthy diets'.

The definition of Healthy Diet that is provided in the document is referring to the guidance developed by WHO as one of the UN specialized Agencies that is mandated by all Member States to specifically address healthy diet and provide Member States with an evidence-based definition. This definition is continuously updated, based on systematic reviews of the literature. Most of the guidelines have been updated in the last 3 years, done with a systematic approach and gone through the WHO Guideline Review Committee. This guidance is brought together to be translated into food based dietary guidelines (FBDG) for countries, considering the specific food cultures and production in countries. This definition of healthy diet is being used throughout many discussions among Member States at the WHA, the UNGA and the ICN2. We would like to stress, that since healthy diet is one of the top guiding concept and principle of these CFS VG, the evidence needs to be guiding the definition and related decisions. Political consensus, which is of course important, should be guided by this evidence and not contradict the evidence-based approach.

Moreover, we would like to inform the CFS Secretariat that WHO is also collaborating with FAO on this updating process. Jointly both agencies are organizing an expert consultation on the topic in the first week of July 2019. This consultation will look at diet from different entry points: including health, affordability and sustainability. Currently, five background papers are being developed and these will be valuable to inform the work of the CFS VG. We will update the CFS Secretariat team accordingly about the outcomes of this consultation, which will certainly be relevant for the CFS VG and should feed into the process.

Comments on Section 3 and 4

First, we would like to express our congratulations to the CFS Secretariat for having responded very well to the challenge of including so many policy areas in this chapter 3.

Overall, WHO thinks that the right policy areas are highlighted. A missing element is that the document does not provide sufficient reflection on how those policy areas outlined in the document should be shaped. Certain policy areas could go into complete different directions from the intended targets, and therefore, more clarity should be included on each policy area.

Comment on an eventual reshuffling of section 3

Regarding a potential reshuffling of chapter 3, we would like to suggest that the policy areas could be organized around broad policy goals and the policy measures along the food supply chain.

For example, the existing challenges on enabling healthy diets could be taken as a starting point: Clearly one challenge is the availability and affordability of fruits and vegetables to the world population. Using an approach that addresses the question which different measures are required to address this challenge (which could be formulated as a global target), more clarity could be provided for the future user of the Voluntary Guidelines.

Another example could be the existing global problem over the supply of fats and oils for human consumption. The question to be addressed could be, what types of policies are required to increase the availability of healthier fats and oil and their production compared to the existing ones that currently are expanding; and to do this in line with the global target on the elimination of industrially produced trans fats or the target on the reduction of saturated fats in our food supply.

To address these and other challenges, which could be formulated in terms of global policy goals, clearly will require an alignment of consumer policies, industrial policies, food reformulation policies, research and agriculture policies.

We would like to suggest that the CFS Secretariat considers to be more explicit about what the VG are trying to achieve. In addition, regional specific goals and targets may be considered.

Comments on specific policy areas in section 3

On specific policy areas, we consider that the text is comprehensive. Our specific comments are the following:

1. In para 41, we would like to suggest including 'public food procurements' as a potential pathway for improving nutrition through food system action from farm to fork.
2. Regarding the **food environment**, we would like to provide some updates from the current work of WHO. At the moment, WHO is conducting systematic policy reviews on four areas. The outcomes of this work might support the provision of evidence-base for certain policies. The four areas are:
 - Marketing of food to children
 - Labelling policies
 - Procurement of food in public institutions
 - Fiscal policies.

Some of these policies might require some broadening with reference to the current wording in the document. E.g. on marketing: we strongly recommend that the whole of marketing policies is considered, and that the document stays broad as it is now and is not limited to one element like the marketing to children. Equally important are the marketing of breastmilk substitutes and the marketing of foods for young children as significant public health components.

3. On food quality and safety: we would recommend not having a specific item but rather have it as a cross cutting element that should be present in multiple policy areas. Moreover, we observe inconsistency in placing food safety in the document: food safety is mentioned in Farm-to-school Programmes but not elsewhere in Production Systems, is mentioned in Handling/ Storage/Distribution/ Processing/ Packaging but not in Retail/Markets,

and is totally absent in Consumers Behaviours section while the final preparation of food is particularly important for food safety including in informal sectors (street-vended foods). Food safety is an integral part of food security and nutrition, therefore its actions should take place along the entire food chain.

4. On the food environment, and particularly on the economic access component: - We would like to suggest more specificity around the **nutrition-sensitive trade policies**, and to mention the need to consider nutrition impacts of trade policies. We also would like to suggest the inclusion of **import policies as a measure to shape the food environment**.
5. Regarding the fiscal and pricing policies - When it comes to pricing policies, we would rather suggest to use the term '**economic measures**' and to not just consider taxation as the only measure. A broader concept would be more adequate that includes besides taxation also the management of subsidies, which is an important and critical element in the way food availability and the price of food are shaped.
6. **The informal food sector** - has a role to play in many parts in Asia and also in urban areas in Africa and elsewhere. In many low-income countries, the informal food sector is comprised of street and market food vending. Given its importance for a huge number of people in the world, we suggest including policies that address the nutritional value and safety of food produced in the informal sector, under the section on food environments – availability and physical access.

Comments on section 4

1. **Role of the multiple actors involved in food systems** - We would like to suggest to include the need for setting up rules of engagement in order to strengthen transparency and accountability. As addressed in the HLPE report on Multistakeholder Partnerships, this includes identifying and acknowledging possible tensions, power asymmetries and conflict of interest among partners; developing appropriate support tools to address these, and defining clear roles and responsibilities of the different partners. We consider it important to address the rules of engagement in chapter 4 of the document.
2. **The UN Decade of Action on Nutrition as an implementation mechanism for the VG** - The discussion of the VG might inform the workprogramme and the commitments for the second half of the Nutrition Decade. We would like to suggest that the Nutrition Decade is mentioned as a means to follow up and implement the VG.

FAO and WHO are preparing for the Mid-term Review of the Nutrition Decade to lead to an event in 2020. The main objective of the Mid-term Review will be to identify existing gaps and set priorities for the second half of the Nutrition Decade. The CFS VG play an important role in identifying these priorities with regard to food system action and guiding countries in further operationalising the relevant ICN2 Framework for Action recommendations. We see that also the Regional Consultations will produce rich inputs on countries and regional priorities which will help set the needed focus over the second half of the Nutrition Decade. More information on the Mid-term Review are available at this link https://www.un.org/nutrition/sites/www.un.org.nutrition/files/general/pdf/concept_note_for_nutrition_decade_mid-term_review_rev_130619.pdf

WHO looks forward to continuing working closely with the CFS Secretariat and all partners involved in this process.