

COMMENTS OF ARGENTINA TO THE DOCUMENT “PRELIMINARY VERSION OF THE ZERO
DRAFT OF THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS AND NUTRITION”

I. General comments

1. The document should be focused on promoting sustainable food systems (in its three dimensions: economic, social and environmental) for healthy diets. The current references to “reshaping food systems” give the idea that all food systems should be “reshape” and we do not agree with it.

2. The references to sustainability or sustainable development should always consider its three pillars (economic, social and environmental) in a balanced and integrated way. The current document is focused mainly in the environmental dimension. Therefore, the economic and social dimensions should be strengthen when referring to the sustainability of food systems.

3. Topics that are under negotiation in their respective competent fora should not be included in the document. This is the case with the mention to “economic production incentives” and agricultural subsidies mentioned in paragraph 33.

4. Concepts that are not agreed language should be avoided, for example the reference to “sustainable diets”. It is not clear the merit and value added of included this new concept in the document.

II. Specific comment

I. INTRODUCTION

- Para 3: we propose the following wording: “Fostering policy changes is key to promoting sustainable food systems that improve nutrition (...)”

- Para 4: the reference to “high quality diets” should be changed to “healthy diets” since the scope of the first concept is not clear.

- Para 10: as previously mentioned, the document should refer to “promote sustainable food systems” instead of “reshaping food system”.

- Para 12: we propose to change the word “diversity” by “different national realities, capacities and levels of development” and add the following language: “and will respect national policies and priorities”. This wording is agreed language from para 21 of the introduction of document “Transforming our world: the 2030 Agenda for Sustainable Development”.

- Para 13 c): the reference to “food prices and volatility” should be change by “extreme food prices volatility” given that volatility in food prices is an intrinsic characteristic of food commodities markets due to weather conditions and other factors. The real problem is its extreme volatility. This language is in line with target 2.c from Agenda 2030.

II. KEY CONCEPTS AND GUIDING PRINCIPLES

- Para 23: sustainable diets. This is not an agreed concept. It has not been used neither in the Agenda 2030 nor in the Second International Conference on Nutrition. It is not clear neither the merits nor value added of this concept. We ask for its deletion in the document. The reference to “sustainable food systems” and “healthy diets” covers well the elements needed for this exercise.

- Para 24: we propose the following wording to clearly mention the three dimensions of sustainable development: “Food systems serve and support multiple objectives within the three dimensions of sustainable development: the economic, social and environmental”.

III. THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS AND NUTRITION

- Para 33 b): we ask for the deletion of the reference to “Economic production incentives: agricultural subsidies could orient agricultural production systems toward diverse and nutritious food that enable healthy diets”.

In the framework of WTO, it was agreed, at its 10th Ministerial Conference, the elimination of agricultural export subsidies due to its distortive effect for production and trade.

Moreover, in target 2.b of 2030 Agenda it was agreed “Correct and prevent trade restrictions and distortions in world agricultural markets, including through the parallel elimination of all forms of agricultural export subsidies and all export measures with equivalent effect, in accordance with the mandate of the Doha Development Round”

Subsidies not only affect international agriculture markets and food security and nutrition of agriculture producers of those countries which do not subsidize, but they also represent an inefficient resources allocation. These resources could be assign to policies for poverty reduction or rural development, which could help to improve food security and nutrition.

- Para 33 g): the term “climate-smart approach” should be replaced by “sustainable approach”, which includes the three dimensions of sustainable development.

In the same para, we propose to replace “while minimizing the environmental effects of agriculture” for “while protecting/respecting the environment” because not all the production systems have an impact on the environment.

- Para 36: It should be avoided the promotion of “buy local” policies over imported products, which could affect the food security and nutrition of foreign producers of these goods. Moreover, these policies are against the principles of “national treatment” and “most favored nation”.

In addition, food produced locally is not necessarily more nutritious than food from other markets.

Therefore, we propose the following wording: “(...) Local and traditional markets represent one of the sources of nutritious foods”.

In the last sentence “(...) The impact of drivers of change, such as international trade and demographic trends, have to be considered and addressed”, we ask for the deletion of “and addressed” because it is not clear the meaning in this context. What we need to address are the restrictions and trade distortions, but not international trade in general.

- In Part 2 “Food environments”, item “1. Availability and physical access (proximity)”, we ask for the deletion of “proximity” because of the arguments presented for para 36.

- Para 38 b): instead of “quality food” in should refer to “healthy food”. Moreover, the reference to “local” should be deleted in order to include all sources of food, as appropriate.

- Para 40: we ask for the deletion of this paragraph because it incentives the use of subsidies. A process of reform of multilateral agriculture rules is under discussion, including the reduction of domestic support and the elimination of export subsidies – already agreed upon in the 10^o WTO Ministerial Conference -. Therefore, encouraging these subsidies could be contrary to the multilateral trading system where the aim is to reduce and eliminate them. This reduction and elimination of subsidies has been incorporated to target 2.b of the 2030 Agenda.

- Para 41 a): the reference to subsidies should be eliminated as previously explained.

- Para 41 b): labeling must be consistent with WTO rules. Therefore, it should be added at the end of this paragraph: “as long as they are consistent with WTO rules”.