

**PERMANENT DELEGATION OF BRAZIL
TO THE FOOD AND AGRICULTURE ORGANIZATION
OF THE UNITED NATIONS AND RELATED
INTERNATIONAL ORGANIZATIONS**

**COMMITTEE ON WORLD FOOD SECURITY (CFS)
CFS WORKSTREAM ON FOOD SYSTEMS AND NUTRITION**

Written inputs to the preliminary version of the Zero Draft of the
Voluntary Guidelines on Food Systems and Nutrition

Overall, the preliminary version of the zero draft is in line with the Brazilian policies and international documents agreed on the subject. In order to contribute to the construction of feasible voluntary guidelines that can be beneficial to all, in consultation with the technical areas in the Brazilian government, we consider opportune some detailed improvements to the text, as follows:

II. 1. 22. Healthy diets / Adequate and healthy food

Regarding the definition denominated “healthy diets”, Brazil supports – and adopts within its domestic regulation of the subject – a broader conceptual approach, “adequate and healthy food”, in order to incorporate perspectives other than biological (focusing on nutrients), bringing elements referring to the production of food, coherent socio-cultural aspects. In this sense, we propose the title “Adequate and healthy food” for the definition and the addition of the following concepts within item II.1.22:

"Adequate and healthy eating is understood as the dietary practice that is appropriate to the biological and sociocultural aspects of individuals as well as to a sustainable use of the environment. Thus, it must be in accordance with the needs of each phase of life and with special dietary needs; referenced by food culture and by gender, race and ethnicity; accessible from a physical and financial standpoint; harmonious in quantity and quality; based on adequate and sustainable production practices; with minimum quantities of physical, chemical and biological contaminants."

III. PART 1. 3. PROCESSING AND PACKAGING. 35. Policy-relevant areas

“a) Practices and technologies to protect and add nutritional value along food chains.

Policies and programmes can be put in place to preserve or add micronutrients into foods during processing (i.e. drying, fermenting, fortification) or to avoid or to remove less healthy ingredients (i.e. product reformulation)."

In the item mentioned above, it is considered more appropriate to specify that fortification practices and technologies should apply to fresh, minimally processed or at most processed foods. We believe that fortification of ultraprocessed foods, particularly those with high sodium, fats and/or sugars content is undesirable and contraindicated.

III. PART 1. 3. PROCESSING AND PACKAGING. 35. Policy-relevant areas

“b) Food processing policies and regulations

Regulatory limits and mandatory labelling are among the approaches followed to reducing trans fat availability in the food supply leading to the reformulation of many products. Also recommended or mandatory targets or standards have been developed in different categories of foods to reduce salt and sugar intake.”

It is suggested that in the trans fats approach, the term "reduce" should be replaced by the term "eliminate" (even if gradually) the use of industrial trans fats. In the case of salt and sugar reduction, it is suggested that emphasis be placed on the concern with the substitutes used, in view of the necessary avoidance of increased use of sweeteners and other additives, for example. Furthermore, although item b) deals with mandatory nutritional labelling, we believe that the approach to frontal nutrition labelling in this item is pertinent, considering that it is a regulatory issue as well.

SUBSIDIES TO AGRICULTURE AND OTHER TRADE-DISTORTIVE MEASURES PREJUDICIAL TO FOOD SYSTEMS AND NUTRITION

It is with some surprise and a great deal of concern that Brazil verifies the presence of references to subsidies and other trade-distortive measures in this document within the CFS. Brazil, along with other delegations, understands that the CFS is not the adequate or competent forum to deal with both subsidies and trade, which are a long-standing issue within the WTO.

Moreover, the application of subsidies are distorting measures to trade, notably agricultural trade, depreciating international food prices and harming poorer farmers, especially small-scales farmers in developing countries.

As putting an unfair competition to farmers all over the world, the application of subsidies, notably in the field of agriculture, and the use of other trade-distortive measures, in the end increase food insecurity, as they are not effective instruments to achieve better food systems and nutrition, on the contrary, world-scale harming and decreasing food security.

In this sense, references to subsidies and trade, such as the ones included in the following items:

- III. Part 1 – FOOD SUPPLIES CHAINS. 1. Productions systems. Policy-relevant areas. b) Economic production incentives (page 10)
- III. Part 2 – FOOD ENVIRONMENTS. 2. Economic access (affordability). Policy-relevant areas. a) Nutrition-sensitive trade policies (page 13)
- III. Part 2 – FOOD ENVIRONMENTS. 2. Economic access (affordability). Policy-relevant areas. a) Taxes and subsidies (page 13 and 14)
- III. Part 2 – FOOD ENVIRONMENTS. 3. Promotion and advertising. Policy-relevant areas. a) Regulations for advertising and marketing (page 14)

shall not be included in the draft, as they are not part of the mandate of the CFS neither of its scope.