

Inputs from FAO

To follow up on the OEWG on Nutrition meeting held on 8 March 2019, please find below the written statement made by Ms Lartey for FAO at the meeting:

“FAO commends CFS and the TTT, of which FAO is a member, for drafting the outline on the Food systems Framework. Indeed our food systems need to be transformed to deliver on healthy diets. This concern has been echoed in recent several publications. The immense role of small holder farmers in providing 50-80% of the world’s nutritious foods needs to be highlighted. The Guidelines should pay particular attention to special role of small scale farmers. Also, we would like the Guidelines to flag the excessive use of antibiotics in the food systems and its impact on food safety. The Voluntary Guidelines should also high light the special role of biodiversity in nutrition and how biodiversity can be integrated in food systems to deliver on healthy diets.

Furthermore, we would like to take this opportunity to provide you with additional comments for your further consideration, which could help strengthen the content of the relevant policy areas to be addressed in the Voluntary Guidelines:

1. Starting with the human rights-based approach to nutrition, food security and the realization of the right to adequate food as the ultimate goal to be achieved by these Guidelines, achieving sustainable food systems requires a comprehensive set of relevant policy areas, as argued during the OEWG. We are confident that the regional consultations will help further achieve this. FAO has been clearly entrusted with the capacity to provide substantial technical input to the Preliminary Zero Draft from a variety of policy stand-points. Some of these policy areas include: the right to food, food security, social protection, gender, decent work, and other socio-economic and cultural components which, by increasing access to, can greatly influence food systems and nutrition. These areas and how they can impact sustainability of FS and nutrition especially through increased access for the most vulnerable populations, should be highlighted.
2. Specific topics, such as food loss and waste, food fortification, food affordability and labelling have many different dimensions and implications, it would be important to address them from a socio-economic and cultural standpoint to increase sustainability. We have produced an exploratory study that for instance shows how food loss and waste can impact the realization of the right to adequate food.
3. We agree that it is important to facilitate and promote policy coherence, consequently we consider that future technical discussions and consultations should ensure that the Guidelines include clear linkages to the SDGs. In addition, we need to ascertain that changing one aspect of the food system does not result in unintended or unexpected consequences to other parts of the system.
4. From a CFS accountability perspective, the Voluntary Guidelines, are to be endorsed by CFS stakeholders. As per previous Guidelines (VGGTs, FFA and the RAI principles) they make explicit reference to the Right to Food Guidelines, which are the only Guidelines *adopted by consensus of the FAO Council*. Through a complementary relation, the Right to Food Guidelines have spearheaded the need to create further guidance on all these subsequent CFS products, which undoubtedly remain instruments of soft-law and are not legally binding. Having said that, while technical in nature, all these Guidelines include specific normative reference to international instruments recalling the importance of the responsibility of duty-bearers in fulfilling the right to

adequate food and other human rights through the implementation of a human rights-based approach (HRBA). The VG on FS&N should ensure doing the same.

5. Another element that reinforces accountability, is monitoring. The VG should include a section that similarly to the RTFG, FFA, VGGTs, elaborates on the provision of specific policy guidance to that end.
6. FAO has also been recalled by member countries as an instrumental agency to provide technical support to ensure that a HRBA, promoting the principles of participation, accountability, non-discrimination, transparency, human dignity, empowerment and equality and the rule of law, is applied and implemented. We stand ready to support this.
7. Food Systems and Nutrition must be mindful of urban and rural transformation (which is also addressed in the relevant HLPE report as a *driver of food system change*), migration, population growth and ageing, and related socio-economic and cultural dynamics and they must be addressed. Conflicts and humanitarian crises affect Food Systems and Nutrition, their particularities have to be addressed as well.
8. Policies have to deal with power imbalances and conflict of interests, both aspects should be part of the core elements of socio-economic and cultural analysis that guide members to more sustainable food systems and nutrition.
9. Climate change and its effects, again as drivers of FS and nutrition changes, have been pointed out and should have a specific section in the Guidelines. We agree with this.
10. No mention has been made to poverty reduction or alleviation even though these efforts go hand in hand with nutritional programmes and are relevant to the goals of Agenda 2030. The CESCR General Comment n.12, para 5 also addresses this. The text should address this.

For all these reasons above we would agree that the text should include a broader definition section, including obviously one on the right to food, but not only