

Hungarian comments on the Preliminary Version of the Zero Draft of the Voluntary Guidelines on Food Systems and Nutrition

These comments confirm and complement the Hungarian statement made during the discussion at the OEWG meeting on Food Systems and Nutrition on Friday 8 March from 14.00 to 17.00.

General comments

1. We consider the preliminary version of the Zero Draft a good starting point for the discussions and appreciate all the efforts made by the Chair, the Task Team and the CFS Secretariat to prepare it. The presentation of the HLPE report by Ms Jessica Fanzo and the possibility of exchanging views with her has had a great value added.
2. The chapter on Definitions is essential for the clarity and coherence of the document, but some of the definitions would require further refining.
3. We fully support the principle that the Voluntary Guidelines should be elaborated on the basis of the HLPE report on Nutrition and Food Systems and build on all the previous related documents, such as ICN2's Rome Declaration on Nutrition and the adopted Framework for Action, in order to avoid any unnecessary overlaps.
4. We consider desirable that the Voluntary Guidelines will be applicable and usable in practice, providing real help to Member States in their efforts to improve the nutritional status of their population.
5. It is essential to further discuss, identify and agree on drivers of change (see paragraphs 13 and 31 in the document).
6. Among the drivers of change it would be appropriate to pay due attention to the positive and negative impacts (externalities) of the various-different food systems. In this regard, it would be advisable to consider the existing scientific evidence related to the true costs of food (for example FAO paper on true cost accounting: <http://www.fao.org/family-farming/detail/en/c/436356/>; TEEB Agrifood <http://teebweb.org/agrifood/measuring-what-matters-in-agriculture-and-food-systems/> and many others).
7. Sustainability is mentioned in the document but not sufficiently. We think it should be an overarching principle that prevails in every chapters. It would also be necessary to take all the 3 (economic, environmental and social) dimensions of sustainability in consideration and also the interlinkages and a desirable balance among them.
8. Similarly, it is important to help countries in their efforts to *“support the progressive realization of the right to adequate food in the context of national food security and the achievement of SDG2”* as mentioned in paragraph 8. At the same time, it should be made clear that these efforts (and the Voluntary Guidelines) are having significant impacts on the achievement of **many other SDGs**.
9. The issue of food losses and waste (FLW) is mentioned in the document in the chapter on Storage and distribution. However, we consider it important that the drivers of FLW are carefully identified in order to propose appropriate measures to tackle this serious economic and social problem.
10. Food fortification is also mentioned in the document and we agree that it could be essential in certain emergency situations. At the same time, we deem it important to make it clear that it should be considered only as a temporary solution in specific, fragile context and not as a final goal. The ultimate solution is the consumption of diverse, locally produced, nutritious food for a healthier diet, benefitting also the local communities who produce these food products. These products contain all nutrients,

minerals, vitamins for a healthy diet; therefore, on the longer run there is no need for fortification.

11. We are aware and agree that international trade rules and trade-related issues are not supposed to be covered and discussed by CFS and by FAO, these are the competences of appropriate international fora, including WTO. At the same time, there is a need for a dialogue on the *impacts of trade agreements on the food security situation* of certain countries or segments of populations. Therefore, we think that the related terminology could be modified accordingly.
12. Finally, we agree with the proposed process and timeline for the elaboration, discussion and approval of the Voluntary Guidelines.

Specific comments

1. At the end of paragraph 8 (or somewhere else in the document) we would propose an additional sentence. “In addition, the Voluntary Guidelines have essential role also in assisting countries to achieve a number of other Sustainable Development Goals directly (SDG 1, 3, 4, 5, 6, 8, 10, 12,) and all the others in an indirect way.
2. Under paragraph 13 five main categories of drivers are mentioned. We propose to complement the list of drivers and include the positive and negative environmental and social impacts (externalities) of the various-different food systems. These externalities should be given due consideration, based on already available, sufficient scientific evidence in assessing the true costs of food. (FAO paper on true cost accounting: <http://www.fao.org/family-farming/detail/en/c/436356/>; TEEB Agrifood <http://teebweb.org/agrifood/measuring-what-matters-in-agriculture-and-food-systems/> and many others).
3. Among the definitions in paragraph 22 mentions Healthy diets. We welcome and agree with a reference to the WHO indications regarding healthy diets but we think it would be perhaps desirable to make some specific, more practical recommendations. (For example, the suggested increase in the proportion of consuming pulses, legumes, whole grain, nuts, etc.).
4. At the end of the first sentence in paragraph 32. we propose to add: “... acceptability of nutritious food **for a healthy diet.**”
5. In paragraph 33. b) *Economic production incentives* we propose to replace *Agricultural subsidies* to *Agricultural policy incentives*, and reference could be made here as well to the true cost accounting (mentioned in point 2 above) and to the need for transforming our food systems to make them more sustainable, with due respect to the economic, social and environmental dimensions of sustainability.
6. In the same paragraph 33, in point g) *Climate smart and nutrition-sensitive approaches* we suggest to replace *Climate smart* and put *Sustainable* instead. Rationale: Climate-smart does not have a sufficiently wide and inclusive, internationally adopted definition, and the term “**sustainable**” does include the climate-smart concept, and goes well beyond that.
7. In paragraph 34 food losses and waste is included. As explained above, we consider it important that the drivers of FLW are carefully identified in order to propose adequate measures to address this issue. Therefore, it requires a more detailed elaboration here and its inclusion in the other chapters, as appropriate.
8. Fortification is mentioned in paragraph 35 b) and in 43 b) As explained in our general comment above, this requires some clarifications. One option could be to add * and provide appropriate rationale in a footnote, making clear that fortification should

considered only as a temporary solution in emergencies and in specific, fragile context and not as a final goal. The ultimate solution is the consumption of diverse, locally produced, nutritious food for a healthier diet, benefitting also the local communities who produce these food products.

9. Paragraph 36. mentions the role of retail and fast food chains in the context of offering food products at a lower price. This is not something we should consider as a positive development. On the contrary. This absolutely requires some additional information. First, in our current food systems lower prices regularly mean lower qualities. Lower quality food products (some of them belonging to the junk food category) frequently have undesired impacts on the nutrition and health status of those who regularly consume them. Here comes again the need for true cost accounting, the need for appropriate consideration to the public health impacts of various food products, of various food systems.
10. Paragraph 36. b) Local food procurement and supply of nutritious foods needs also some further explanation and addition. “*Encouraging retailers to buy from local smallholders at affordable prices*” can bring only modest results. Affordability of the prices is a complex matter; it again needs the true cost accounting. Furthermore, affordability is not only a cost issue; it depends on the distribution of incomes, the level of poverty and inequalities. In addition to encouraging retailers to buy more from local smallholders, we consider more important to enable smallholders to work together in storage, distribution and primary processing of their products. In this regard, incentives to establish local farmers’ markets, to strengthen the concept of short supply chain should be better highlighted.
11. Affordability is the topic of paragraph 39. In this regard, please see the explanations provided in the previous comment (point 10.). Prices, affordability, wages are interlinked, particularly in rural areas. Statistics show that great majority of the world’s poor and hungry people live in rural areas, their livelihood is based on agriculture. This is a paradox situation. Appropriate socio-economic analysis is essential to understand and adequately address this situation.
12. In paragraph 40 it is misleading, without further explanations, that more nutritious food is more expensive. It is the case, unfortunately, in our current distorted, broken food system, where indirect costs of food (for example the public health externalities) are not considered. True costs (based on scientific evidence) should be calculated to show that the “cheap” food in reality has a high “hidden” cost element. If these are incorporated in the cost structure of low quality (junk) food product it turns out that smallholders’ locally produced, diverse, nutritious food is competitive (in particular if sold at local markets at a decent price).
13. Paragraph 41. Promotion and Advertising contains a) and b). It would be appropriate to add a point c) about the responsibility of the retail chains (in particular their marketing and promotion policy) in encouraging consumers to buy “cheap” food (see our comments above...) and to buy quantities that in reality they do not need. The “cheap” and excessive quantities of food is having a direct consequence of wasting enormous quantities of food from the households. This driver, as proposed above, should be absolutely considered and adequately addressed.

