

## **NORWAY**

On a general bases we would like to point out that the text could have been more clearly linked to the different Sustainable Development Goals.

Further, the human rights focus could also be strengthened, e.g. linked to “leaving no one behind. Linking the text more to the SDGs would also show the global characteristics of the guidelines.

The Zero Draft is however a good starting point for work on the guidelines.

It is important that the guidelines build on the HLPE report and that all the areas of the report are discussed and taken into account. The suggested draft could have been clearer about both the environmental sustainability and the economic sustainability of the systems.

Economic sustainable food markets can secure stable supplies of healthy food at the markets and at the same time secure predictable incomes and development for the many millions smallholder food producers who are the core of food production in developing countries.

As urbanization develops, there is need to build longer value chains in order to get the healthy foods to the markets. This should be seen as an opportunity for business and job creation and will need policy support.

We support the suggested formulations of the objectives and purposes of the guidelines, which is to reshape food systems and make them more healthy and sustainable. We note, with satisfaction, that this includes both stable availability of sufficient healthy and acceptable food for the consumer and at the same time address livelihood and sustainability challenges of food production.

We also support the suggested formulations of the guiding principles. However, we want to emphasize the most vulnerable segments of the population mentioned in principle c) in many countries are the same smallholder farmers and fishermen who are the main producers and providers of the food we want to see in the markets. This means that supporting this part of the populations in their livelihood will serve multiple goals and should be a core effort in food systems support.

The voluntary guidelines suggested in chapter III of the document builds clearly on the HLPE report and the three parts foods supply chains, food environment and consumer behaviour. It is said that the guidelines will consider the different types of food systems defined by the HLPE. We cannot see that this is clear in the suggested guidelines and will suggest that the different contexts are paid more attention in further development.

We recognize and support the policy areas identified under food supply chains. However we will repeat that those who are the main food producers often are the poorest and most vulnerable and policies must take into account their situation and their challenges specifically. Moreover, the supply chains in many countries are made up of small enterprises and entrepreneurs who need to be politically supported. This should be reflected in the guidelines.

The suggested policy areas under food environments concentrate on the consumers. The connections to the first part about food supply chains is not very clear. One important policy-relevant area should be to promote the supply of locally (or at least nationally) produced food on the markets. This accounts for all

the three typologies of markets. Special attention should be paid to the growing modern markets in the cities where locally produced fresh food seem to loosen competition to the industrial processed less nutritious food.

We support the suggested policy relevant areas under consumer behaviour, and in particular the suggestion to develop national food-based dietary guidelines. We will emphasize that such guidelines should as far as possible, be based on national or locally produced food.

We will also emphasize that it should be made clearer that the production systems include both agriculture and fishing. In this regard, we would like to draw your attention to the input made earlier by the Norwegian Ministry of Trade, Industry and Fisheries. They point to the fact that in 2014 the CFS gave the advice to make fish a visible, integral element in food security and nutrition strategies, policies and programmes. In UN the word "agriculture" is defined to include crops, livestock, forestry, fisheries and aquaculture. Fisheries and aquaculture are included in the text, however hidden in the word agriculture.

We would advise to add a footnote were the term agriculture is used the first time, which states that in this document the term "agriculture" includes crops, livestock, forestry, fisheries and aquaculture. Another alternative is to change the wording "food and agriculture" to "food and food production".

With a reference to the above, we would like you to consider the footnote no 24 at page 11 which says: "While specific definitions are likely to vary from country to country, the food and agriculture sector typically comprises: i) entities that are engaged in growing crops, raising livestock and harvesting other animals as well as timber; ii) entities that transform agricultural products into food and beverage products for intermediate or final consumption (including packaging, etc.); iii) wholesalers and retailers (including transportation, etc.).

Proposed additions to the paragraphs 8, 13 and 14:

8. The Voluntary Guidelines are expected to contribute to and complement these international initiatives with a view to promoting policy coherence. They will provide guidance to help countries operationalize ICN2's Framework for Action<sup>[1]</sup> recommendations in support to the progressive realization of the right to adequate food in the context of national food security and the achievement of Sustainable Development Goal (SDG) 2 "to end hunger, achieve food security and improved nutrition and promote sustainable agriculture". *Since the ICN2 was held in 2014, also the interest in the progressive realization of the right to health<sup>[2]</sup> has grown as documented by reports from WHO<sup>[3],[4]</sup>. The right to health will equally support the achievement of SDG 3 "to ensure healthy lives and promote wellbeing of all at all ages", with nutrition as one of the underlying determinants<sup>[5]</sup>. Nutrition is thus both*

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<sup>[1]</sup> FAO/WHO. 2014. ICN2, Framework for Action. <http://www.fao.org/3/a-mm215e.pdf>

<sup>[2]</sup> International Covenant on Economic, Social and Cultural Rights (ICESCR, 1966); article 12: The right of everyone to the enjoyment of the highest attainable standard of physical and mental health.

<sup>[3]</sup> Advancing the right to health: the vital role of law. Geneva: World Health Organization; 2017 Licence: CC BY-NC-SA 3.0 IGO, <https://www.who.int/gender-equity-rights/knowledge/advancing-the-right-to-health/en/>

<sup>[4]</sup> Leading the realization of human rights to health and through health: report of the High-Level Working Group on the Health and Human Rights of Women, Children and Adolescents. Geneva: World Health Organization; 2017. Licence: CC BY-NC-SA 3.0 IGO, <https://www.who.int/reproductivehealth/news-events/launch-hhrwg-report/en/>

<sup>[5]</sup> General Comment No. 14 on the Right to the highest attainable standard of health (2000), Committee on Economic, Social and Cultural Rights, U.N. Doc. E/C.12/2000/4. <https://www.refworld.org/pdfid/4538838d0.pdf>

dependent on, and contributes to, the realization of these two established rights as bridged through a healthy diet; as such it has even been proposed to interpret adequate nutrition as a legal human right on its own derived from the right to food and the right to health<sup>[6]</sup>, similar to what has been done with the right to water<sup>[7]</sup>.

[1] FAO/WHO. 2014. ICN2, Framework for Action. <http://www.fao.org/3/a-mm215e.pdf>

[1] International Covenant on Economic, Social and Cultural Rights (ICESCR, 1966); article 12: The right of everyone to the enjoyment of the highest attainable standard of physical and mental health.

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[1] General Comment No. 14 on the Right to the highest attainable standard of health (2000), Committee on Economic, Social and Cultural Rights, U.N. Doc. E/C.12/2000/4. <https://www.refworld.org/pdfid/4538838d0.pdf>

[1] Fanzo, Jessica et al (2019) Tying the Knot: An Interdisciplinary Approach to Understanding the Human Right to Adequate Nutrition, *Columbia J. of Transnational Law* 57:62.

[1] General Comment No. 15 (2002) The right to water (arts. 11 and 12 of the International Covenant on Economic, Social and Cultural Rights), U.N.Doc. E/C.12/2002/11,

[https://www2.ohchr.org/english/issues/water/docs/CESCR\\_GC\\_15.pdf](https://www2.ohchr.org/english/issues/water/docs/CESCR_GC_15.pdf)

13. The five main categories and related drivers that were identified in the HLPE report will be taken into account. They are:

a) biophysical and environmental (natural resource and ecosystem services, climate change);

b) innovation, technology and infrastructure;

c) political and economic (leadership, globalization, foreign investment, trade, food policies, land tenure, food prices and volatility, conflicts and humanitarian crises);

d) socio-cultural (culture, religion, rituals, social traditions, gender inequalities and women's empowerment);

e) demographic drivers (population growth, changing age distribution, urbanization, migration and forced displacement).

While many of these drivers must be operationalized as such and analyzed for how they best can be addressed in the context of planetary boundaries, the Voluntary Guidelines will be alert to how they interact across thematic borders and often share underlying determinants. The Guidelines will, as appropriate, make use of new constructed concepts also from outside the direct UN arena, when they seem valid for underpinning such interaction. A case in point is The Lancet Commission and report in

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[6] Fanzo, Jessica et al (2019) Tying the Knot: An Interdisciplinary Approach to Understanding the Human Right to Adequate Nutrition, *Columbia J. of Transnational Law* 57:62.

[7] General Comment No. 15 (2002) The right to water (arts. 11 and 12 of the International Covenant on Economic, Social and Cultural Rights), U.N.Doc. E/C.12/2002/11, [https://www2.ohchr.org/english/issues/water/docs/CESCR\\_GC\\_15.pdf](https://www2.ohchr.org/english/issues/water/docs/CESCR_GC_15.pdf)

2019 on “The Global Syndemic of Obesity, Undernutrition and Climate Change”, with its first recommendation to “think in Global Syndemic terms” to create a focus on common systemic drivers for (here three) global pandemics that need common action; it follows that one must generally reject the silos of thinking and action and replace them with working collaboratively on common systemic drivers and “double-duty or triple-duty actions”<sup>[8]</sup>.

<sup>[1]</sup> <https://www.thelancet.com/commissions/global-syndemic>

14. The Voluntary Guidelines will be non-binding and should be interpreted and applied consistently with existing obligations under *relevant* national and international law, *including international human rights law*, and with due regard to voluntary commitments under applicable regional and international instruments<sup>[9]</sup>. CFS guidance should build on and integrate existing instruments *frameworks of action*, declarations and resolutions adopted on these topics *implied* within the context of the UN system, including Member States endorsed guidance and recommendations<sup>[10]</sup>.

<sup>[1]</sup> Among these, the *Voluntary Guidelines to support the progressive realization of the right to adequate food in the context of national food security*, adopted by the 127th Session of the FAO Council November 2004; the *Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security*, endorsed by the CFS at its Thirty-eighth (Special) Session on 11 May 2012; the *Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries in the Context of Food Security and Poverty Eradication*, endorsed by the CFS at its Thirty-eighth (Special) Session on 11 May 2012.

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<sup>[8]</sup> <https://www.thelancet.com/commissions/global-syndemic>

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<sup>[10]</sup> Among these, the Framework for Action and the Rome Declaration on Nutrition of ICN2, UNGA Resolution A/RES/72/306 “Implementation of United Nations Decade of Action on Nutrition (2016-2025)”, UNGA Resolution A/RES/72/2 “Political declaration of the third high-level meeting of the General Assembly on the prevention and control of non-communicable diseases”, UNGA Resolution A/RES/73/132 “Global health and foreign policy: a healthier world through better nutrition”, UNGA Resolution A/RES/73/253 “Agriculture development, food security and nutrition”.