

1) The Zero Draft can serve as a good starting point for further work on the preparation of Voluntary Guidelines aimed at improving food systems and food safety, and promoting approaches for healthy and balanced diets.

2) We support the inclusion in the document provisions on consumer behavior as well as those paragraphs dealing with education, food labeling, promotion and advertising.

3) At the same time, we have to mention that insufficient attention is paid to food safety issue in the document. In our opinion, it is necessary to add more provisions on this matter under sections «Food Quality and Safety» (page 14) and «Food Supply Chains» (pp. 9-12). We also propose to include the concept of “food quality and safety” in the Section II «Key Concepts and Guiding Principles».

4) We propose to remove the definition of “most vulnerable to malnutrition in all its forms” from Section II «Key Concepts and Guiding Principles», since it is not used later in the text. At the same time, we consider it would be possible to transfer this provision to the section III “Promotion and Advertising” and/or section III “Consumer behavior”.

5) Taking into account that the main objectives of the future Voluntary guidelines is about how to improve the level of health, increase the quality of life and reduce the risk of occurrence of foodborne diseases we suggest to slightly modify the Paragraph 24, as follows:

“Food systems serve and support multiple objectives within all domains of sustainable development, from **health and socio-cultural** to economic ~~to health, socio-cultural~~ and ecological”

6) In subparagraph c) of paragraph 26 (page 8), we propose the following amendments to the second part of the sentence: “...and enhance the sustainability of **safe and healthy** food production as well as the protection of biodiversity”.

7) We consider it necessary to expand Section III “Food Supply Chains” (page 9), reflecting also “food safety” among the issues of “... nutritional value of food by changing availability and access to macronutrients and micronutrients...”

8) We propose to add subparagraph b) to paragraph 34 (page 11, “Storage and distribution”), dedicated to measures, programmes and strategies aimed at improving and developing food storage and distribution systems in order to prevent contamination, spoilage, preserve freshness. It would be advisable to move the second sentence of subparagraph a) to this new subparagraph b), since it relates not only to preventing food loss and waste, but also to improving of the infrastructure for the storage of products as a whole.

9) In paragraph 35 (“Processing and Packaging”), we consider it important to amend the provision regarding “extending shelf life” of products. We suppose that it would be wise to mention in this paragraph that “extending shelf life” should not be done by reducing the level of food safety and through the use of inappropriate techniques and food additives that are hazardous to health.

10) In paragraph 36 (“Retail and markets”) we consider it advisable to reflect that the challenge of the rapid spread of fast food chains is more about balanced nutrition, safety and product quality rather than low production costs.

We also propose to transfer the sentence “Lack of adequate storage, including cold storage and chains, can lead smallholders to sell their products soon after harvest when prices are low” (para 36, a) to the Section III “Storage and Distribution”.

11) In paragraph 42 (“Food Quality and Safety”), we consider it important to include “various chemicals and unsafe food additives, veterinary drugs” may also be a factors for food contamination (not only pesticides, bacteria, viruses and parasites).

12) The Section “Food Quality and Safety”, in our view, should be also supplemented by the provisions on the formation and development of effective mechanisms for food safety surveillance systems.

13) We believe that Section IV “Implementation and Monitoring” needs substantial improvement, primarily regarding monitoring mechanisms.

Dear colleagues,

Once again I would like to draw your attention to the fact that the above-mentioned comments and suggestions are made only by some of the Russian ministries and agencies. We expect to get more ideas on how to improve and enrich the current text soon.

Please also be informed that the concept of «sustainable diets» (not agreed language in the UN system) is under consideration by the Russian side. We would like to reserve the opportunity to comment on this concept at a later stage.

Best Regards,  
Ilya Andreev