

Comments on Zero Draft on The voluntary guidelines on food systems and nutrition.

The outline of the VG subject to consultation, provides already a very good framework and plan for the issues intended to be captured. Considering the objective of the VG to contribute to reshaping food systems, I think the content is comprehensive, very relevant and adds value as a voluntary guide to governments. The comments below are divided up as general comments on the draft as well as specific issues that could be further elaborated, clarified and explored in the next round of work.

General issues:

1. As the VG intends contribute to the reshaping of food systems, the paper could be clearer on the **desired change of direction** (still without being prescriptive), ie shift focus from global/transnational to regional/local (?) and from large-scale conventional farming to focus more on small-scale farming (?). As it stands now the reader senses this, but the draft does not address the levels or directions of change (perhaps deliberately so).
2. Poverty and lack of gender equality are the main reason why people suffer from all sorts of malnutrition, including hunger and famine, not primarily that the world at this moment in time does not produce enough for everyone. Yet, poverty (multi-dimensional) and lack of gender equality are not really addressed in the draft.
3. The universal right to adequate food for all human beings, needs to be a given point of departure to the VG zero draft, this is also the raison d'être for the FAO. A rights-based discussion with regard to land rights, local and available food and seeds, could purposefully be highlighted as this is a key concern for people in poverty and most in need of sustained food security. Links to resilience could be made here, as a fundamental aspect of degree of resilience, relate to readily available food in times of shock and crisis.
4. The language reads well, but there is a need for further clarification regarding some concepts related to farming practices, for instance the use of;
 - Sustainable diets [that are] protective and respectful of biodiversity and ecosystems ... (p. 7).
 - Enhance the sustainability of food production as well as the protection of biodiversity (p. 8).
 - More diverse and integrated production systems (p. 9).
 - Food production systems .. considered in relation to the three dimensions of sustainability: economic, social and environmental (p. 10).
 - Diversified agricultural systems (p.10).
 - Local agrobiodiversity (p.10).

5. Within food systems and food trade, major exchanges happen at the big global and national markets. Knowing this, speculation and corruption within agricultural and food trade need to be addressed, in order to reshape food systems.
6. Food systems are global as well as local, even a household can be described as food system unit. Large quantities of food and nutrition are produced, managed and consumed within the informal economy, where women play important roles and unpaid and unrecognized farmers and food providers. The zero draft needs to address this reality of the informal food system economy.

Specific issues:

7. **Education:** The need for education on food and nutrition in all societies, is addressed in the VG, but could be strengthened with a sharpened child perspective ie the need to include food and nutrition education/home economics in school curriculum (children are reliable change agents, they often educate their parents).
8. **Health:** Stunting and malnutrition give lifelong development problems, and ill health, repeated diarrheal diseases cause permanent damage to intestines, which impact on absorption of nutrients and retainment of food. Most of these serious problems are caused by lack of clean water and sanitation. Hence the VG zero draft needs to address *access to water and sanitation* (and the right to water), link to health in order to improve micronutrient deficiencies and undernutrition.¹ The discussion fits under (26. a) where safe drinking water and poor sanitation and hygiene is mentioned (p. 8).
9. **The decent work agenda** needs to be discussed in relation to food supply chains and production systems (pp. 9-11), as much of this is carried out in the information economy and under uncertain and/or exploitative conditions.
10. **Research and knowledge** are mentioned but could be further explored with regard to food items with high nutrient value, local food and alternative food (as part of climate change agenda); backing more research allocation into local agricultural knowledge and information, resilient crop diversification as well as integrated and organic farming practices (only 1% of global research funding goes to organic farming within agricultural research).

As expressed at the open meeting on March 8, Sweden welcomes the zero preliminary draft and considers it a useful basis to build on in this important process.

¹ This point would benefit from cross-referencing, since I am not a health expert.

Rather than engaging in text editing at this early stage, we opt for providing separate comments at a strategic level, in line with the preliminary comments delivered during the open meetings. We hope that this approach will facilitate your challenging task of integrating the various comments received.

On **Sustainability**: As noted, for CFS to add value in relation to other institutions working on food systems and nutrition, we consider it essential that the sustainability perspective, in its three dimensions, be strengthened and mainstreamed throughout the document.

As the Committee for food security and nutrition, the CFS has a responsibility to promote approaches where the strive for good global nutrition today will not compromise the food security of coming generations. This means that due consideration must be made to the sustainable management of natural resources and services throughout food systems. To reflect this standpoint we believe that references to climate change adaptation and mitigation (including efforts against food waste and loss, which is mentioned but should be further elaborated also in relation to sustainability), protection of biodiversity, and water management should be further elaborated and strengthened. Labeling indicating sustainable production and packaging could also be considered.

On **Partnerships**: The role of multistakeholder partnerships in building sustainable food systems that provide for good nutrition should be included and stressed. At present, partnerships are not mentioned in the draft. Being a multistakeholder body itself, the CFS should have a comparative advantage in providing lessons in this area. The HLPE report of last year should also provide helpful references. In particular, the private sector's leading role in food systems and potential to shift them in a more sustainable direction that also promotes better nutrition should be underlined.

This leads me to our third point on **Incentives and innovation**: actors in the food systems, including from the private sector, need incentives to shift towards more sustainable and nutrition friendly approaches. Incentives for innovation is an example, which could also promote the engagement of young people in our food systems. At present the draft includes references to taxes and subsidies, but mainly in relation to consumer choices.

Our final point at the open meeting was on efforts against **AMR**, including good animal husbandry, we would appreciate your consideration of this aspect and it's relevance to the guidelines.

In addition and building on the exchange at the open meeting, we would like to support the points raised by other delegations regarding the strengthening of references to **gender**

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equality and women's empowerment, including by ensuring equal access also to financial and information resources, as well as to the **rights based approach**.

These are our overarching comments at this point, yet we might come back with additional input for your consideration during the coming days from colleagues who requested some more time to consult the draft.

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