



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

CFS OEWG-Nutrition/2019/03/08/01

MESSAGE FROM THE CHAIR OF THE CFS OEWG ON FOOD SYSTEMS AND NUTRITION

It is my pleasure to present the Preliminary Version of the Zero Draft of the Voluntary Guidelines on Food Systems and Nutrition. The document is the result of intense work carried out by the CFS Secretariat in collaboration with a Technical Task Team made up of representatives from FAO, WFP, IFAD, WHO, SCN, UNICEF, CGIAR, CSM and PSM.

The document is divided into four chapters. The introductory chapter provides the context in which the CFS policy process is implemented, the objectives and purpose of the Voluntary Guidelines and the nature of the instrument.

The second chapter deals with the key concepts concerning food systems and nutrition and guiding principles that were identified as critical to contribute to reshaping food systems.

The third one includes the proposed scope of the Voluntary Guidelines. In line with the decision taken at CFS 45, they will use the three constituent elements of food systems – food supply chains, food environments, and consumer behaviour – as policy entry points. As defined in the [Terms of Reference](#) that were endorsed at CFS 45 in October 2018, the structure and the content of this chapter are in line with the conceptual framework and the main findings of the [HLPE Report on Nutrition and Food Systems](#). The policy relevant areas will be further developed following the inputs provided by the CFS stakeholders in the different stages of the consultation.

The last chapter of the document is intended to include provisions regarding the implementation of the Voluntary Guidelines and the monitoring of their use and application within the framework of the CFS monitoring mechanism.

The purpose of the OEWG meeting on 8 March is to get specific feedback and suggestions on how to improve the document. Following the meeting, the opportunity to provide written comments will be given to CFS stakeholders. The inputs received will be considered in the preparation of the Zero Draft that is planned to be finalized by the end of April.

The Zero Draft will then be translated in the six UN official languages and presented and discussed during the following consultation process: an OEWG meeting on 30 May 2019¹, the five regional multistakeholder consultations planned between July and October, and the e-consultation taking place between June and August.

The outcomes of all these consultations will feed the preparation of the First Draft of the Voluntary Guidelines that is expected to be finalized by the end of 2019.

I would like to highlight once again the importance of an active participation of all interested stakeholders, especially at this initial stage in the process. This is a key factor for the implementation of an inclusive process and for an increased ownership and buy-in towards the development of the Zero Draft of the Voluntary Guidelines.

¹ Originally scheduled on 21 June 2019.

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It is very important that specific inputs are provided during the meeting and in written form after in order to ensure that the positions and views of all stakeholders are reflected in the Zero Draft.

I would also like to remind you that we are still at a consultation phase where we are not expected to find consensus between different views and positions. In order to facilitate the discussion on 8 March, I would kindly ask CFS stakeholders to focus their interventions on the four chapters of the Preliminary Version of the Zero Draft and to provide specific suggestions on how to improve its content.

Looking forward to your active participation and a fruitful discussion.

Dr Liliane Ortega
CFS Food Systems and Nutrition OEWG Chair

Preparation of the CFS Voluntary Guidelines on Food Systems and Nutrition–

Preliminary Version of the Zero Draft

[The different chapters of this document include suggested language for the Voluntary Guidelines, except for Chapter III which includes descriptive text that is intended to inform the preparation of the upcoming versions of the document]

Chapter I: INTRODUCTION

1. BACKGROUND AND RATIONALE
2. OBJECTIVES AND PURPOSE
3. NATURE OF THE VOLUNTARY GUIDELINES AND THEIR INTENDED USERS

Chapter II: KEY CONCEPTS AND GUIDING PRINCIPLES

1. KEY CONCEPTS CONCERNING FOOD SYSTEMS AND NUTRITION
2. GUIDING PRINCIPLES FOR ~~RESHAPING~~ **IMPROVING** FOOD

SYSTEMS Chapter III: THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS AND

NUTRITION Chapter IV: IMPLEMENTATION AND MONITORING

Commented [HK-F1]: Overall, the United States notes that this preliminary version of the zero draft is very wide-ranging and could have a major financial implications for Member States, nations, its citizens, local food producers, and the international food industry. This is highlighted in our suggested edits and comments in many of the “policy relevant areas” section descriptions throughout the document. In particular, the sections dealing with economic, social and environmental issues are of concern to the United States. Finally, the current draft document lacks any reference to Codex, which should be incorporated where relevant.

Commented [HK-F2]: Here and throughout the document, the United States suggests replacing the term “reshaping” with “improving”. Using the term “reshaping” implies that something is broken in the food system. For millennia, in agriculture, human intervention for the improvement of crops, trees, livestock and fish is continually occurring for the betterment of food systems.

I. INTRODUCTION

1. BACKGROUND AND RATIONALE

1. ~~Combating~~ malnutrition in all its forms – undernutrition, micronutrient deficiencies, overweight and obesity – is one of the greatest ~~global~~ challenges that countries ~~throughout the world~~ face today. Malnutrition ~~in at least one of its forms~~ affects every country in the world and most countries are affected by multiple forms. This represents a major impediment to achieving global food security and sustainable development. The impacts of malnutrition ~~and its various manifestations~~ have ~~potentially~~ profound consequences on people’s health and wellbeing, ~~lives and livelihoods~~ throughout their lifetime and, ~~in many cases~~, from generation to generation². Malnutrition ~~in all its forms can have~~ ~~negative~~ affects ~~anytime during the lifespan, but especially in childhood as it is an underlying cause for 45 percent of the~~ mortality of children under five ~~year of age~~. ~~In addition, malnutrition during childhood affects their~~ school performance, future productivity, ~~and~~ economic opportunities, ~~and~~ increasing their vulnerability to ~~chronic and non-communicable~~ diseases. Urgent action is needed to address ~~these challenges and the negative impacts of~~ malnutrition ~~and its impact, including elevated risk factors for disability and premature death~~.
2. ~~The~~ consumption of safe and ~~healthy~~ nutritious diets is crucial to ~~reversing~~ these negative trends as unhealthy diets are now one of the top risk factors globally for premature death and disability.

²Global Panel on Agriculture and Food Systems for Nutrition, 2016. Food systems and diets: Facing the challenges of the 21st century. London, UK

3. ~~While healthful diets are largely determined on an individual basis,~~ Promoting ~~public~~ policy changes, ~~improving the food supply and safety chain, engaging in community education, and making safe and healthy food available are all is~~ key to ~~fundamentally improving~~ ~~reshaping food systems that improve~~ nutrition, ~~and enabling~~ healthy diets, ~~while and~~ improving ~~their~~ economic, social and environmental sustainability as well.
4. ~~Policy and programs should~~ ~~The focus of policy guidance should be~~ on how ~~food systems can help~~ ~~deliver high quality diets that best~~ meet the ~~increasing and evolving~~ dietary needs of growing populations ~~facing the nutritional transition~~ while paying special attention to the poorest and most nutritionally vulnerable and addressing the barriers they face in accessing healthy diets, ~~through~~ ~~multisectoral action that includes government, civil society, and the private sector~~.
5. The Committee on World Food Security (CFS) is leading the policy ~~process that will result in~~ Voluntary Guidelines on Food Systems and Nutrition to be presented for endorsement ~~at the CFS Plenary Session in October 2020~~³.
6. The preparation of these Voluntary Guidelines is informed by the findings and scientific evidence provided in the High-Level Panel of Experts on Food Security and Nutrition’s⁴ (HLPE) Report on *Nutrition and Food Systems*⁵.
7. This policy process is taking place ~~at the same time as a variety of organization~~ ~~while a great number~~

Commented [HK-F3]: This paragraph does not acknowledge that the FAO has published in its SOFI reports for 2017 and 2018 that the decade-long decline in the prevalence of undernourishment in the world had reached an end, and was possibly in reverse. This was largely attributed to persistent instability in conflict ridden regions, adverse climate events that have hit many regions of the world and economic slowdowns that had affected more peaceful settings and worsened the food security situation. Here are the relevant links:
<http://www.fao.org/3/I9553EN/I9553en.pdf>
<http://www.fao.org/state-of-food-security/>

Commented [HK-F4]: The United States suggests deleting this text as it seems doubtful that there are any countries that are only affected by one form of malnutrition.

Commented [HK-F5]: It may be useful to include the reference for global food security:
Food security exists when all people, at all times, have physical, social and economic access to sufficient, safe and nutritious food that meets their dietary needs and

Commented [HK-F6]: This paragraph leaves out that global statistics show in some regions malnutrition is not a problem while in other regions, namely Africa and Asia, significant populations are affected. Africa and Asia bear the greatest share of all forms of malnutrition. See link here:

Commented [HK-F7]: Malnutrition affects mortality and productivity in older populations, too.

Commented [HK-F8]: The United States suggests deleting the text “in all its forms”. If that text is retained, then we believe that there may need to have some reframing for accuracy. For example, is there evidence that childhood overweight/obesity leads to under mortality? Or are the

Commented [HK-F9]: Global action has already been underway for a number of years, and the United States believes that the CFS is duplicating this work if it doesn’t take into account what is already happening within the UN System.

Commented [HK-F10]: The United States believes that this paragraph is redundant to Para. 1 (above). We suggest to delete this paragraph. However, if that suggestion cannot be accommodated, we have provided some suggested edits and have a few comments.

Commented [HK-F11]: The United States questions why this is the only reference when there are other UN sources? <https://www.glopan.org/>
 The Bill & Melinda Gates Foundation, and the UK Department for International Development who together

Commented [HK-F12]: The United States believes that this text assumes - inappropriately - that the forthcoming negotiations of this document will reach consensus and Member States will endorse.

Commented [HK-F13]: The guidance should be drawn from a wider evidence base. The HLPE report, a flawed report from the United States perspective, contains too many instances of political views that many experts would not agree with.

~~of actors~~ from different sectors are ~~taking action actions to~~ addressing malnutrition. Nutrition has received increased attention in recent years from the global community including the United Nations and its Member States. ~~Nutrition and~~ is recognized ~~as an essential component of efforts to achieve the goals as a powerful driver towards the achievement~~ of the 2030 Agenda for Sustainable Development. In 2014, ~~at the Second International Conference on Nutrition (ICN2)~~, the Food and Agriculture Organization (FAO) and World Health Organization (WHO) Members committed to end hunger and malnutrition in all its forms ~~at the Second International Conference on Nutrition (ICN2)~~⁵. In 2016, the General Assembly of the United Nations proclaimed the UN Decade of Action on Nutrition (2016-2025)⁷ and called upon FAO and WHO to lead its implementation, in collaboration with the World Food Programme (WFP), the International Fund for Agricultural Development (IFAD) and the United Nations Children's Fund (UNICEF), using multistakeholder platforms such as CFS.

8. The Voluntary Guidelines are expected to contribute to and complement these international initiatives with a view to promoting sound policy coherence. They will provide evidence-based guidance to help countries operationalize ICN2's Framework for Action⁸ recommendations in support ~~of to the progressive realization of the right to adequate food, well-nourished populations and sustainable food systems 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".

Commented [HK-F14]: The CFS has no capacity for implementing the guidelines or responsible for any SDG goal. The WHO, FAO, and others in the UN system have recommendations already on the books. How will CFS take these into account?

Commented [HK-F15]: The United States suggests to delete the text "the right to adequate food" as it seems different than food systems and nutrition.

³ In 2018, the Committee has endorsed the Terms of Reference which provide the guiding elements for the preparation of the Voluntary Guidelines, including the main issues to be covered.

http://www.fao.org/fileadmin/user_upload/bodies/CFS_sessions/CFS_45/MX516_6/MX516_CFS_2018_45_6_en.pdf

⁴ The HLPE is the science-policy interface of CFS and provides structured evidence base to inform CFS policy discussions drawing on existing research and knowledge, and experiences and policies at different scales and in different contexts.

⁵ HLPE. 2017. Nutrition and Food Systems. A report by the High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security, Rome. <http://www.fao.org/3/a-i7846e.pdf/>

⁶ FAO/WHO. 2014. ICN2, Rome Declaration on Nutrition. <http://www.fao.org/3/a-m1542e.pdf>

⁷ General Assembly resolution 70/259 available at <http://undocs.org/A/RES/70/259> and the Work Programme of the UN Decade of Action on Nutrition, available at:

https://www.un.org/nutrition/sites/www.un.org.nutrition/files/general/pdf/mv131_rev1_undoa_wp_rev1_fr.pdf

⁸ FAO/WHO. 2014. ICN2, Framework for Action. <http://www.fao.org/3/a-mm215e.pdf>

2. OBJECTIVES AND PURPOSE

9. The Voluntary Guidelines are ~~non-legally binding and~~ intended to be a reference point that provides ~~evidence-based~~ guidance mainly to governments, as well as to their partners and other stakeholders, on effective policies, investments and institutional arrangements, that will address malnutrition in all its forms.

Commented [HK-F16]: The United States would like to emphasize the non-legally binding nature of the proposed Voluntary Guidelines.

10. The objective of the Voluntary Guidelines is to contribute to ~~policy dialogue on improving diets for all, reshaping-improving~~ food systems, in their different components, to make them ~~more~~ healthy and sustainable. This will ensure that the diets needed for optimal nutrition and health are available, affordable, ~~acceptable, safe and of adequate quantity and quality while conforming with~~ beliefs, cultures and traditions, ~~dietary habits and needs of individuals in accordance with national and international laws and obligations~~⁹.

Commented [HK-F17]: This text is not clear. Currently, it reads as healthy and sustainable food systems. But earlier in the document, the emphasis healthier diets. We note that the document does not define or describe what is meant by a healthy food system.

11. The Voluntary Guidelines will follow a comprehensive and systemic approach to bring coherence to the existing policy fragmentation ~~across countries~~, with ~~an special~~ emphasis on the food ~~and nutrition~~, agriculture and health sectors, while also addressing livelihood and sustainability challenges.

Commented [HK-F18]: Please delete the text. Beliefs can be false and even harmful, and should not be encouraged or catered to.

12. The Voluntary Guidelines are intended to be global in scope and to provide guidance to policy makers and relevant stakeholders while designing context-specific policies, strategies, plans and programmes. The ~~Voluntary Guidelines~~ will also help ~~them-users~~ analyze the food systems in which they operate. The Voluntary Guidelines will take into consideration country diversity, different ~~typologies-types~~ of food systems, as well as the many ~~endogenous and exogenous drivers impacting factors affecting~~ them.

Commented [HK-F19]: The statement lacks a clear focus and does not represent what was actually said in two places of the INC2 Declaration. This text cherry picks ICN2 and twists what the declaration actually states. <http://www.fao.org/3/a-m1542e.pdf> See Para. 3, Para. 10, OP 5(b), and OP 15(c).

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

Commented [HK-F20]: What are the different types of food systems? It seems like this should be discussed and, perhaps, with an example.

- a) ~~biophysical~~biophysical, biological, and environmental ~~factors~~ (e.g., natural resource and ecosystem services, climate ~~risk change~~);
- b) ~~i~~nnovation, technology and infrastructure;
- c) ~~p~~olitical and economic ~~factors~~ (leadership, globalization, foreign investment, trade, food policies, land tenure, food prices and volatility, conflicts and humanitarian crises);
- d) ~~s~~ocio-cultural (culture, religion, rituals, social traditions, gender inequalities and women's empowerment);
- e) ~~d~~emographic ~~drivers-factors~~ (population growth, changing age distribution, urbanization, migration and forced displacement).

Commented [HK-F21]: Regarding this ~~entire~~ paragraph, the United States believes that this discussion seems out of place. It is neither an objective nor is it a purpose of this draft Voluntary Guidelines.

If some or all of this paragraph is going to be retained, then please see our suggested edits within the text and please further discuss what is meant by 'categories'. Also, what isn't safety included as a driver? Finally, this discussion is missing the built environment. That is a huge gap in our urbanizing world. Especially considering urbanization is a key driver of the nutrition transition and changing food systems.

3. NATURE OF THE VOLUNTARY GUIDELINES AND THEIR INTENDED USERS

14. The Voluntary Guidelines will be non-binding and should be interpreted and applied consistently with existing obligations under national and international law, and with due regard to voluntary commitments under applicable regional and international instruments. CFS guidance should build on and integrate existing instruments adopted on these topics within the context of the UN system, including Member States endorsed guidance and recommendations¹⁰

⁹ FAO/WHO. 2014. ICN2, Rome Declaration on Nutrition. Paragraph 5.b. <http://www.fao.org/3/a-ml542e.pdf>

15. ~~The Voluntary Guidelines will can be a resource, as need, for speak to all stakeholders that are involved in addressing, or are affected by, malnutrition in all its forms, or who are affected by malnutrition.~~

16. ~~They Voluntary Guidelines are~~ primarily ~~are~~ targeted ~~towards at all levels of~~ governments to help ~~them~~ design public policies, but ~~they~~ can be used by ~~relevant~~ stakeholders in policy discussions and ~~policy~~ implementation processes. These stakeholders include, ~~among others~~:

- a) Governmental ~~actors~~, including relevant ministries and national, sub-national, ~~and~~ local institutions;
- b) Intergovernmental and regional organizations, including the specialized agencies of the UN;
- c) Civil society organizations;
- d) Private sector;
- e) Research organizations and universities;
- f) Development agencies, including international financial institutions;
- ~~g)~~ Philanthropic foundations.
- ~~g)h)~~ Vulnerable populations and communities.

Commented [HK-F22]: Consider moving this section (para 14-16) to:

“III. THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS AND NUTRITION”

Commented [HK-F23]: The United States notes that this draft implies that the Voluntary Guidelines are *mainly* intended for governments. The US recommends that paras. 15 and 16 be combined to ensure the readers understand that these Voluntary Guidelines can be utilized, as needed, by a wide variety of stakeholders.

II. KEY CONCEPTS AND GUIDING PRINCIPLES

1. KEY CONCEPTS CONCERNING FOOD SYSTEMS AND NUTRITION

17. **Food systems** “gather all the elements (environment, people, inputs, processes, infrastructures, institutions, etc.) and activities that relate to the production, processing, distribution, preparation and consumption of food, and the output of these activities, including socio-economic and environmental outcomes”¹¹.

18. **Food supply chains** “consist of the activities and actors that take from production to consumption and to the disposal of its waste”, including production, storage, distribution, processing, packaging, retailing and marketing¹².

¹⁰ 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”.

¹¹ HLPE, 2014. Food Losses and Waste in the context of Sustainable Food Systems. A report by the High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security, Rome. <http://www.fao.org/3/a-i3901e.pdf>

¹² HLPE 2017b

19. **Food environments** “refer to the physical, economic, political and socio-cultural context in which consumer engage with the food system to make their decisions about acquiring, preparing and consuming food”¹³.

20. **Consumer behaviour** “reflects all the choices and decisions made by consumers on what food to acquire, store, prepare, cook and eat, and on the allocation of food within the household”¹⁴.

21. **The most vulnerable to malnutrition in all its forms** “typically include those with high nutrient requirements and those who have less control over their choice of diet. This implies particular attention to young and school-aged children, adolescent girls, pregnant and lactating women, the elderly, indigenous peoples and local communities and smallholders and rural and urban poor also in consideration of the different types of food systems they live in”¹⁵.

22. **Healthy diets**. “refer to a balanced, diverse and appropriate selection of foods eaten over a period of time. A healthy diet ensures that the needs for essential macronutrients (proteins, fats and carbohydrates including dietary fibres) and micronutrients (vitamins, minerals and trace elements) are met specific to the person’s gender, age, physical activity level and physiological state. WHO indicates that for diets to be healthy:

- a) daily needs of energy, vitamins and minerals should be met, but energy intake should not exceed needs;
- b) consumption of fruit and vegetables is over 400 g per day;

Commented [HK-F24]: The United States recommends that the “KEY CONCEPTS” from this section be deleted. Many of these concepts and terms are framed but not defined in several UN specialized agency fora and documents. See individual comment bubbles for Paras. 17–23. We see this has highly duplicative and inconsistent with work in other fora.

Commented [HK-F25]: The United States notes that the information contained in this section (Paras. 17–23) need to be compare with other internationally-agreed documents and policies. There can be many different definitions. From our review of this text, the draft does not rely on any internationally-agreed definitions. In particular, how does the FAO defines these terms/concepts? The United States questions the utility of this entire section (paras. 17–23) since there are no internationally-agreed definitions of any of

Commented [HK-F26]: The United States recommends that this paragraph be bracketed pending the determination of an internationally-accepted definition.

We note the following text from the FAO website: <http://www.fao.org/climate-smart-agriculture-sourcebook/production-resources/module-b10-value->

Commented [HK-F27]: Regarding a description for “food supply chains”, the United States would like to provide the following information for consideration:

1. FAO <http://www.fao.org/energy/agrifood-chains/en/>
Agrifood chains are the linked events in the agricultural production of food – the process being a chain of events

Commented [HK-F28]: From the US perspective, this definition is quite broad. Why include the word political? It has been stated many times stated by the international community not to make food a political weapon, meaning denial of food to populations.

See additional information here:

Commented [HK-F29]: Please see the following document for additional information:
USDA <https://www.ers.usda.gov/topics/food-choices-health/food-consumption-demand/>

Consumer demand for food is an important element in the formulation of various agricultural and food policies. Food

Commented [HK-F30]: The United States believes that this text goes too far from what the WHO defines as vulnerable. For example, the elderly, indigenous peoples and local communities and smallholders and rural and urban poor.
WHO <https://www.who.int/news-room/fact->

Commented [HK-F31]: As stated above, the United States recognizes that there is no internationally-accepted definition for healthy diets and recommends that this paragraph be deleted.

The United States recommends reframing the definition/description of ‘healthy diets’ to include promoti

- c) *intake of saturated fats is less than 10% of total energy intake;*
- d) *intake of trans fats is less than 1% of total energy intake;*
- e) *intake of free sugars is less than 10% of total energy intake or, preferably, less than 5%;*
- f) *intake of salt is less than 5 g per day*¹⁶.

23. **Sustainable diets** *"are those diets with low environmental impacts which contribute to food and nutrition security and to healthy life for present and future generations. Sustainable diets are protective and respectful of biodiversity and ecosystems, culturally acceptable, accessible, economically fair and affordable; nutritionally adequate, safe and healthy; while optimizing natural and human resources"*¹⁷.

¹³ *ibidem*

¹⁴ *ibidem*

¹⁵ CFS 46. Terms of Reference for the preparation of the CFS Voluntary Guidelines on Food Systems and Nutrition

¹⁶ Information Note on the Framework for Action. Joint FAO-WHO-ICN2 Secretariat. November 2014. http://www.fao.org/fileadmin/user_upload/faoweb/ICN2/documents/InfoNote_e.pdf – A healthy diet for infant and young children is similar to that for adults but other important elements need to be considered. WHO. Healthy Diet. Fact sheet No 394.

¹⁷ Definition agreed at the International Scientific Symposium on Biodiversity and Sustainable Diets, November 2010, FAO Headquarters. Report, p.7: <http://www.fao.org/docrep/016/i3004e/i3004e.pdf> – This definition is also used in the HLPE report on Nutrition and Food Systems (HLPE 2017b) and in the UNSCN discussion paper on Sustainable Diets for Healthy People and a Healthy Planet, 2017: https://www.unscn.org/uploads/web/news/document/Climate_Nutrition_Paper_Nov2017_EN_WEB.pdf

Commented [HK-F32]: The concept is **not** and internationally-agreed and there is no internationally-accepted definition or description. In particular, nothing was found in the ICN2 documents and we note that there was no participation by United States in the FAO symposium that is referenced in footnote #17. Therefore, the US does not believe this reference should be used and the footnote should be deleted.

The concept as written in the current draft links nutrition and sustainability too strongly, while leaving out economic sustainability for farmers. In the U.S., this was very controversial when the scientific panel for 2015 US Dietary Guidelines included language trying to link diets and sustainability without strong scientific evidence.

Here is some further information:

<https://www.usda.gov/media/blog/2015/10/06/2015-dietary-guidelines-giving-you-tools-you-need-make-healthy-choices>

In 2015, USDA and HHS in the 2015 Dietary Guidelines for Americans (DGAs), remained within the scope of their mandate in the 1990 National Nutrition Monitoring and Related Research Act (NNMRRRA), which is to provide "nutritional and dietary information and guidelines" ... "based on the preponderance of the scientific and medical knowledge." The final 2015 Guidelines are still being drafted, but because this is a matter of scope, the Departments said that the 2015 DGAs are the appropriate vehicle for this important policy conversation about sustainability. In October 2015, the U.S. Congress had hearings on the subject which led to legislative action out of concern about the integrity of the nation's nutrition advice and called for a comprehensive review of the way the influential Dietary Guidelines for Americans is compiled. In December 2015, legislation funded an effort by the National Academy of Medicine to conduct a study, which is underway.

2. GUIDING PRINCIPLES FOR ~~RESHAPING~~ IMPROVING FOOD SYSTEMS

24. Food systems serve and support multiple objectives ~~within economic, health, social, cultural and ecological~~ within all domains of sustainable development, ~~from economic to health, socio-cultural and ecological~~. While food systems might ~~be different in characteristics and articulation~~ differ greatly, they offer critical ~~entry points~~ opportunities for public policies and investments that aim to advance the ~~goals of the~~ 2030 Agenda for Sustainable Development across the SDGs.

25. The Voluntary Guidelines will include a number of guiding principles¹⁸ that ~~should may be followed to~~ contribute to ~~improving~~ ~~reshaping~~ food systems, ~~improving nutrition, enabling healthy diets and promoting~~ realigning them with sustainable development ~~while improving nutrition and enabling healthy diets~~.

26. These ~~guiding principles~~ ~~are~~ include the following suggestions:

- a) Promote a systemic and holistic approach that looks at the multidimensional causes of malnutrition in all its forms, including the lack of stable access to healthy, balanced, ~~diversified and safe diets and safe drinking water~~, inadequate infant and young child caring and feeding practices, poor sanitation and hygiene, insufficient access to education and health ~~careservices, and income~~ poverty ~~and low socio-economic status~~.
- b) Contribute to the implementation of cross-cutting and coherent policies through coordinated actions ~~among different actors and~~ across all relevant sectors at ~~international~~ community, ~~local~~, regional and national levels, ~~in keeping with national laws and priorities~~.
- c) ~~Promote~~ policies that are intended to enhance the livelihoods, health and well-being of the most vulnerable segments of the population, ~~improve nutrition~~, and enhance the sustainability of food production as well as ~~conservation the~~ protection ~~of biodiversity~~.
- d) ~~Promote~~ gender ~~equity~~ equality and women's and girls' empowerment respecting their rights and considering the importance of creating the conditions for women's strong engagement in shaping food systems that can ensure improved nutrition.
- e) Contribute to the ~~empowerment of people and the~~ creation of an enabling environment for ~~consumers~~ making ~~well-~~informed ~~positive~~ choices about food products for healthy dietary practices and appropriate infant and young child ~~caring and~~ feeding practices through improved health and nutrition information and education.

¹⁸ These guiding principles make reference to already agreed international documents and tools, such as the Rome Declaration on Nutrition and the Framework for Action of ICN2.

Commented [HK-F33]: Using the term “domains” is a new concept with regards to sustainable development and the United States is not clear what the “domains” are: social? Ecological? Economic? political? cultural? Therefore, US cannot agree with this concept and suggests the document to focus on the 3 pillars of sustainable development from the Johannesburg Declaration on Sustainable Development -- There are three pillars internationally accepted—environment, social, and economic.
<http://www.un-documents.net/jburgdec.htm>

Commented [HK-F34]: Here and throughout the document, the text does not align with the recommendations in the ICN2 Framework for Action. In particular, we would like to point out the following:
- Recommendation 19: Implement nutrition education and information interventions based on national dietary guidelines and coherent policies related to food and diets, through improved school curricula, nutrition education in the health, agriculture and social protection services, community interventions and point-of-sale information, including labelling.

Commented [HK-F35]: From the US perspective, we believe that some of these paragraphs (guiding principles) are far outside of the mandate of the CFS – e.g., health and water. These guiding principles are not aligned with the WHO-FAO Work Program Decade for Nutrition
<https://www.who.int/nutrition/decade-of-action/workprogramme-doa2016to2025-en.pdf?ua=1>
See Paras. 23, 28, 34, 41, and 44.

Commented [HK-F36]: Safe food and safe water could be more adequately included here.

Commented [HK-F37]: Low socio-economic status is not necessarily associated with malnutrition.

Commented [HK-F38]: Policy implementation should not occur at an international level.

Commented [HK-F39]: This sub-paragraph lacks in focus and takes a “kitchen sink” approach. The inclusion of biodiversity at the end of the statement is duplicative of the concept of sustainability. Perhaps change the wording at the end to include conservation.

Commented [HK-F40]: The United States notes that this should be “equity” – and not equality. This is a distinction and it matters. Equality does not necessarily lead to equity. It can promote unfair practice, in fact.

III. THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS AND NUTRITION

Differently from the other sections of the Zero Draft, Part III – The Voluntary Guidelines on Food Systems and Nutrition- includes descriptive text that is intended to inform the preparation of the upcoming versions of the document. The language of this section does not represent suggested text for the Voluntary Guidelines but initial ideas regarding the issues and topics to be considered and discussed by CFS stakeholders.

27. This section includes the proposed scope of the Voluntary Guidelines. ~~In line with the conceptual framework introduced in the HLPE report,~~ The Voluntary Guidelines will ~~be partitioned by use the~~ three ~~constituent~~ elements of food systems as policy entry points for food system transformation towards improved nutrition. They are food supply chains, food environments, and consumer behaviours.

28. For each of these three elements the Voluntary Guidelines will consider the different ~~types~~ ~~typologies~~ of food systems, ~~with particular attention to those defined by the HLPE~~. Challenges and opportunities that specific food systems face along with the actors engaged, and the related power dynamics will be considered in order to assist policy makers in the design of policies, investments and interventions adapted to a given context.

29. The ~~policy fragmentation between the several sectors~~ that have an impact on food systems will be addressed in order to promote greater policy coherence between them.

30. The recommendations are expected to build upon and complement related guidance previously provided in other CFS policy guidelines and recommendations and ~~consider workstreams and outputs of relevant international bodies panels of experts convened by these bodies. These Voluntary Guidelines shall not duplicate~~ the work and mandate of other relevant international bodies.

31. Different drivers of change that impact and are impacted by the ~~ability of food systems to deliver healthy diets~~ are important as they contextualize the recommendations provided in the Voluntary Guidelines. ~~They Drivers of change~~ will be analyzed in the development of the policy guidance with regards to the different elements of food systems and their subcomponents.

Commented [HK-F41]: The text here is not aligned with the [HLPE Report on Nutrition and Food Systems](#). The text here appears to be based on Figure 15 – but the report describes this in a different way.
- Figure 14: Exit and entry points along the nutrition value chain (p. 93)
- Figure 15: Improved food systems for better diets and nutrition (p. 107)

Commented [HK-F42]: There are multi-sectoral linkages to food systems. Therefore, the United States would like to know what is the evidence for fragmentation? This needs clarity.
The paragraph could be reframed towards improving information systems.
Please see Rec. 5 from the ICN2 Framework for Action <http://www.fao.org/3/a-mm215e.pdf>
- Recommendation 5: Improve the availability, quality, quantity, coverage and management of multisectoral information systems related to food and nutrition

Commented [HK-F43]: From the US perspective, this represents duplication with work already underway by the WHO and the FAO. What is the value that CFS will be adding to this discussion that is not duplicative of the efforts in the other fora?

Commented [HK-F44]: Please provide clarity on the work and mandate of other relevant international bodies.

Commented [HK-F45]: Within this discussion, there needs to be text that stresses risk factors and behavioral drivers. Food system delivers **products**; however, it is the consumers that are making dietary **choices**. This document needs to be clear about this reality.

PART 1 – FOOD SUPPLY CHAINS

32. The decisions made by the actors at any stage or sector of the food supply chain have implications for the other stages and sectors. Interventions across food supply chains can affect food safety as well as the availability, affordability, and accessibility and acceptability of nutritious food. Activities along the food supply chains can both increase and decrease the nutritional value of food by changing affect the availability and access to foods containing diverse macronutrients and micronutrients, or the levels of substances associated with diet related non-communicable diseases.

1. PRODUCTION SYSTEMS

33. The different types and varieties of foods available can play a significant role in consumer's dietary choices shape diets. More diverse and integrated production systems at different scales tend to be more resilient to external shocks, which can and contribute to dietary quality and diversity of the food supply. Attention needs to be paid to the role of investments in food production systems and associated research and development. The impact of agriculture¹⁹ and food production systems on nutrition should be considered in relation to the three dimensions of sustainability sustainable development: economic, social and environmental.

Policy-relevant areas

- a) Diversity of agricultural systems Landscape and dietary diversity
Diversified agricultural systems can contribute to food security and nutrition through different pathways, for example as a direct source of food or income. Deliberate actions are needed to make sure corresponding barriers such as access to markets are accounted for.
- b) Economic production incentives
Agricultural subsidies could orient agricultural production systems towards diverse and nutritious foods that enable healthy diets.
- c) Protection of wild foods and local agrobiodiversity and genetic resources
There are a number of challenges to promoting the protection of wild foods and local agrobiodiversity and genetic resources. The diversity of genetic resources for food and agriculture plays a crucial role in meeting basic human food and nutritional needs. It is essential for maintaining and enhancing the efficiency and the resilience of production systems. These include overharvesting and land clearing for agriculture, difficulties in securing access to land and land tenure, perceptions about wild foods, loss of traditional knowledge, high workload to collect, process and prepare traditional foods, and weak integration in market economies.
- d) Farm-to-school programmes
Farm-to-school programmes can improve the supply of nutritious foods to schools. While, at the same time, these programs may create a guaranteed opportunity for stable markets for

Commented [HK-F46]: Within this section, the United States would like there to be a more comprehensive discussion of the importance of trade to increasing the availability of nutritious foods.

Commented [HK-F47]: There is no mention of the importance of safe/safety of the production system. Therefore, the United States suggests adding in some discussion (perhaps a policy relevant area) that incorporates food safety and preventive controls.

Commented [HK-F48]: Adding "or sector" here because in Para. #29 (above), it's emphasized that multiple sectors are involved.

Commented [HK-F49]: The US is unclear what this statement means. What is the evidence? For example, cooking vegetables and the loss in nutrients; the decline in freshness therefore lower in nutrients? What about fortification?

Commented [HK-F50]: The following text is deleted because it is the risk factors of the consumer's choices that determine their association between their diet and NCDs.

Commented [HK-F51]: More resilient than what? How is resilience being measured in this context? The United States understands that diversity can be closely correlated with stability over time; though, we are not sure the idea is well articulated here.

Commented [HK-F52]: Are the following eight (8) policy-relevant areas really the most important for production and supply chain in terms of feed the growing global population? From the US perspective, the evidence base supporting most of these policy-relevant areas is **extremely** lacking. Please provide the scientific evidence for each of these policy-relevant areas.

Commented [HK-F53]: Delete this paragraph. With regards to subparagraph b, agricultural subsidies **must** be done in accordance with each country/state's international obligations for agricultural domestic support under the WTO Agreement on Agriculture. Therefore, the US does not believe that this paragraph is appropriate as it does not comport with WTO agreements nor with what ...

Commented [HK-F54]: With regards to subparagraph c, the US stresses again that the evidence base is lacking and this paragraph does not explain WHY wild foods and local agrobiodiversity are important for nutrition. Is the ...

Commented [HK-F55]: The following text comes from the FAO.

Commented [HK-F56]: Deforestation is not within CFS's mandate and should not be in this Voluntary Guidelines. Further, this is no direct link to nutrition.

Commented [HK-F57]: CFS already has guidelines for these issues. Therefore, they should not be included in this Voluntary Guidelines.

Commented [HK-F58]: With regards to subparagraph d, the United States notes that there are international food assistance programs and we also have a domestic assistance program. However, there are many different food system ...

local farmers. These ~~programs~~ can positively ~~contribute to~~ school-aged children's nutrition knowledge and consumption behaviours.

e) Women producers' livelihoods

Women tend to be less involved in commercial agriculture and more involved in informal activities ~~which that~~ are often seen as an extension of their domestic responsibilities. Leadership in the community, women's time use, and access to and control of biophysical resources related to production are relevant areas for policy intervention to empower women.

f) Agricultural research and innovation and development for healthy diets

Investment in research and development ~~and innovation for commercial development of~~ for-nutrient-rich crops/foods, such as fruits ~~and~~ vegetables, cereals/grains, and animal products could lead ~~to an to improvements in productivity with better increased supply of access to a wider range of diverse foods~~ healthy diets and nutrition.

g) Climate smart and nutrition sensitive approaches

Climate smart ~~and nutrition sensitive~~ approaches are important to maintain necessary resilience in levels of nutritious food production while minimizing increasing the conservation of natural resources, the environmental effects of agriculture. These types of interventions may include integrating production systems, particularly in smallholder livestock-crop production systems, ensuring soil nutrient cycling is optimized increasing irrigation efficiency to help conserve ~~to provide more reliable~~ water for crops (recognizing that long-term irrigation with groundwater can have negative effects on soil quality),

¹⁹ In this document, the term agriculture includes crops, livestock, forestry, fisheries and aquaculture.

improving soil quality and health, improving fertilizer and pesticide uses to maximize farmers' production while minimizing farmers' input costs and environmental pollution, and increasing the diversity of tolerant crop varieties and livestock breeds to increase resilience to biological or environmental shocks ~~heat, drought, pests and diseases~~.

h) Resilient food supply chains

~~Efforts to adapt or rebuild food supply chains to threats like conflicts and climate change should consider investing in building or rehabilitating the physical capital by means of cash, vouchers or food-based transfer programmes. In particular, these should address their immediate food needs while at the same time boost their assets.~~

Commented [HK-F59]: With regards to subparagraph e, the forthcoming USDA National Agricultural Statistics Service (NASS) Census of Agriculture release is expected in April 2019. It is expected to include evidence of increasing numbers of women farmers in the US.

Commented [HK-F60]: With regards to subparagraph f, the United States has found that nutrient-dense food items may also be calorie-sparse which may be relevant to the undernutrition, a form of malnutrition as discussed in this document. Additionally, since the authors would like to address the three dimensions of sustainability, they may consider the synergies or trade-offs between health, economic, and environmental goals. Health goals (increased production of fruits and vegetables mentioned above) and environmental goals may be competing. In the work of the [USDA/ERS](#), they have found that healthier diets (with increased consumption of fruits and vegetables) may be more water intensive (Rehkamp & Canning, 2018), not considering the cost of diets may lead to increased energy use (Canning & Rehkamp, 2017), and that the environmental impact of healthy diets depends on the environmental impact factor (GHGE, water, land, etc.) that is considered (Canning et al., forthcoming from ERS).

In addition, this subparagraph should include research to improve the nutrient value of bio-fortified "staples" as well as animal sources. And the US thinks that the discussion here may need to take view towards agricultural innovation – perhaps with regards to the processing and transportation needs for ease of access.

Commented [HK-F61]: With regards to subparagraph g, although the US supports climate smart agriculture, by placing nutrition-sensitive here is opening for a broader definition than what FAO has already defined. It also may introduce an allegation that climate change may reduce nutritional value of food, which is not supported by evidence. It may be more appropriate for research in subparagraph f (directly above). More research is needed on nutrient content of food particularly when innovations are advancing to develop new varieties in plant with nutritional features. The ICN2 did not include this concept in the declaration – but the FAO promoted it in background documents. <http://www.fao.org/about/meetings/icn2/news-archive/news-detail/en/c/261494/>

Commented [HK-F62]: Regarding subparagraph h, this is not the United States' understanding of a resilient supply chain. A resilient supply chain should be able to withstand shocks and stressors – e.g., including access to finance, insurance, better forecasting data or risk management tools, or a diversified supply chain. This section is out of place here, emphasizing safety-net programming. Therefore, the US recommends to delete this paragraph. Perhaps the drafter want to consider adding a paragraph discussing risk management options for farmers or actors within the supply chain.

The United States thinks this topic should emphasize the importance of policies that promote international agricultural trade and farmers' access to markets. Trade

2. STORAGE AND DISTRIBUTION

34. Food storage and distribution have an impact on ~~diets~~ food safety and health. Lack of appropriate practices, facilities and technologies can contribute to food spoilage and contamination with potentially serious health consequences for consumers. Proper food handling, storage, and distribution are key to food moving through the supply chain contributes to the safety, quality, and making nutritious the nutrient value ~~food, with good quality attributes, available and accessible to a wide number of consumers~~. However, these facilities may not be available in all areas, especially in rural areas with poor infrastructure.

Policy relevant areas

a) Food losses and waste

Food losses and waste are a major challenge mainly caused by inadequate poor handling storage, transport conditions and lack of infrastructure. Strategies towards improving infrastructure and adopting efficient practices and technologies can have a positive impact on food systems by improving access to fresh and other perishable food, increasing shelf life and improving food safety.

b) Food safety

Food safety is a critical piece of the storage and distribution functions of food systems. This includes handling, preparation, storage, and distribution of food in ways that prevent food-borne illness (FBD), transmission or contamination of naturally occurring toxins (e.g., Mycotoxins), and the training and adoption of routine steps to manage food safety through scientific, risk-based practices to provide safe food and contributing to retention of nutritional value.

Commented [HK-F63]: Regarding storage and distribution, the [USDA's Rural Development \(RD\)](#) agency loans and grants for Community Facilities. USDA's [AMS](#) has Local Food Promotion Program grants to support supply chain capacity for local and regional food aggregation, storage, processing, and distribution.

Commented [HK-F64]: The US suggests the drafters consider adding research and development and food quality to this list of policy-relevant areas.

Regarding food quality grading and inspections, additional information be found here:

<https://www.ams.usda.gov/services/grading>

and

<http://www.oecd.org/agriculture/fruit-vegetables/>

Commented [HK-F65]: Regarding subparagraph a, this discussion should include more information that is consistent with the ICN2 Framework for Action <http://www.fao.org/3/a-mm215e.pdf>

Recommendation 11: Improve storage, preservation, transport and distribution technologies and infrastructure to reduce seasonal food insecurity, food and nutrient loss and waste.

3. PROCESSING AND PACKAGING

35. Appropriate food processing and packaging contributes to ~~preventing-reducing~~ food quantity and quality losses and waste and to extending shelf life. The extent to which food is processed may influence the degree to which its nutrient values and other substances/agents enter or exit the supply chain. ~~Interventions aiming Technologies and innovation also play an important role~~ to improve food processing and packaging ~~which could contribute to should look at~~ enhancing the nutrient content value of foods. ~~For example, vitamins and nutrients can be added during the processing stage and better packaging can preserve freshness and nutrient value. limiting the use of unhealthy ingredients. Technologies and innovation also play an important role.~~

Strengthening the capacity of smallholders and small entrepreneurs to process and package foods can help ~~secure-produce~~ a nutritious-safe food supply of food and in turn enhance nutrition, health, and income generation.

Policy-relevant areas

- a) ~~Practices and technologies to protect and add nutritional value, and maintain food safety along food chains~~
~~Government policies and initiatives Policies and programmes can be put in place programmes and approaches~~ to preserve or add micronutrients into foods ~~pre-harvest (i.e., biofortification) or during processing (i.e., drying, fermenting, fortification, pasteurization).~~ ~~These programs can also be combined with public-private partnerships. or to avoid or to remove less healthy ingredients (i.e. product reformulation).~~
- b) ~~Product Reformulation Food processing policies and regulations~~
~~Promoting product reformulation can contribute to reducing levels of saturated fats and trans fats, added sugars, and sodium in food.~~

~~Regulatory limits and mandatory labelling are among the approaches followed to reducing trans fat availability in the food supply leading to the reformulation of many products. Also recommended or mandatory targets or standards have been developed in different categories of foods to reduce salt and sugar intake.~~

Commented [HK-F66]: Following the flow of food from farm to fork, please move this section to before the "storage and distribution" section.

Commented [HK-F67]: Please incorporate food safety into this paragraph. Labeling is mentioned in this section – but there is no mention of the importance of food packaging/labeling to encourage healthy/nutritious consumer choice.

Commented [HK-F68]: [USDA/AMS](#) grant programs, including Farmers Market and Local Food Promotion Program (FMLFPP) Grants and Specialty Crop Block Grants would be relevant to this discussion. An evaluation of the 2014 FMLFPP grants (not yet published) found that nearly 70% of projects increase production or availability of value-added products, such as chopped/prepared vegetables, salsas, pickles, etc.

Commented [HK-F69]: The USDA/RD's Value Added Producer Grants.
Food Hub information:
AMS - <http://dx.doi.org/10.9752/MS046.04-2012>;
RD - <https://www.rd.usda.gov/files/sr73.pdf>, [Running a Food Hub: Lessons learned from the field - Vol. 1](#), [Running a Food Hub: A business operations guide - Vol. 2](#), [Running a Food Hub: Assessing financial viability - Vol. 3](#), [Running a Food Hub: Learning from food hub closures – Vol. 4](#)

Commented [HK-F70]: Regarding subparagraph b, the United States is concerned with the current draft for a number of reasons. First, this subparagraph seems more about packaging and labelling than processing. Second, it is a very poorly thought through section with a few generalities without considering the larger topic. In addition, this issue of trans fat is included with no context. Third, it seems as though the main point should be about improving consumers' useful information when making dietary choices. This idea seems to be mission and should be clarified. That is, labels have no impact on the nutritional quality of food, labels only report what the food is to consumers who, in turn, make decisions that directly impact their diet (as discussed below in Para. 36).
That said, the United States does not believe these Volun...

Commented [HK-F71]: The [USDA's Dietary Guidelines](#) and FNS school meal nutrition standards encourage reformulation by food companies.

Commented [HK-F72]: Labelling is already covered by the Codex Alimentarius and the WHO's mandates and workstreams. It is inappropriate for the CFS to be providing guidance or policies on this.

Commented [HK-F73]: Although the second statement may be true, it is written in a way that would imply it is being recommended as a part of the guidance. The US questions the scientific basis of this suggestion and requests that such recommendation, if they are to form part of the guidelines, be justified using evidence from credible assessments of th...

Commented [HK-F74]: The CFS should not be suggesting standards. The Codex Alimentarius is the recognized international standard setting body.

4. RETAIL AND MARKETS

36. Interactions between customers in retail and markets shape the food systems, and the food environment, where consumers make purchasing decisions, influencing consumer behaviours and food consumption patterns. When in season, locally-produced foods and traditional markets can be a represent an important source of nutritious food for consumers. However, the transformation occurring in agriculture and food systems, and in particular the rapid spread of supermarkets and fast food chains, means that in some places, consumers are offered a range of products at a lower-highly competitive prices, while in others, food choices are limited. This trend also brings challenges for smallholder farmers, in terms of requirements and standards, centralized procurement systems, power relationships and decision making. The impact of drivers of change, such as international trade and demographic trends, have to be considered and addressed.

Policy-relevant areas

a) Connecting smallholders to markets

Policies and investments need to address barriers preventing smallholders from accessing markets. Lack of adequate storage, including cold storage and chains, can lead smallholders to sell their products soon after harvest when prices are low. Lack of transportation and road infrastructure makes it difficult for smallholders to reach markets. Information technology can play a key role in increasing farmers' opportunities to deliver a diversity of fresh, safe and nutritious foods to market.

b) Local food procurement and food supply of nutritious foods

Policies and programmes should be developed to encourage retailers to supply more nutritious and safe food items at affordable prices, and to procure local products, particularly from smallholders, bringing a positive impact in terms of dietary patterns and nutritional outcomes. Consumers, in turn, should be educated about the benefits of high-quality local foods in order to create demand. Policies should also help local farmers meet safety and/or quality standards that could enable them to reach broader markets and higher profits for their products.

Commented [HK-F75]: The United States wants consumers to make their own choices.

Commented [HK-F76]: All markets (including international trade) are important sources. Seasonal production limits what is available locally. It is international trade that provides food when there is no local production.

Commented [HK-F77]: Supermarkets can have a positive impact by helping to diversify available foods and also possibly lower their costs to the local population.

Commented [HK-F78]: Lower prices make food more affordable and this is a good thing to highlight. Market competition is good for consumers. Smallholders will need to become more competitive and may require much higher levels of support which may be costly to governments and their budgets.

Commented [HK-F79]: The benefits of new market opportunities for smallholders should also be acknowledged.

Commented [HK-F80]: The [USDA/AMS](#) services to enhance market access – certification, inspection, grading, etc. This includes USDA Good Agricultural Practices certifications to demonstrate to buyers that a producer is meeting food safety standards. The AMS Farmers Market and Local Food Promotion Programs (FMLFPP) provide support for market access efforts through grants to a variety of entities working to facilitate market access in direct and intermediated local food markets. The evaluation of 2014 FMLFPP grants found that projects increased local food sales by more than \$30 million to more than 3 million consumers. (not yet published) USDA/AMS offers the Local Food Directories to support information dissemination and help buyers find farmers markets and other food outlets. AMS ...

Commented [HK-F81]: The United States believes it would be more appropriate to frame this as challenges. What is the evidence there are barriers preventing market ...

Commented [HK-F82]: The United States would like the discussion to have a higher focus on aggregation and infrastructure. Please see this [USDA/AMS report](#): ...

Commented [HK-F83]: CFS should consult with the World Food Program (WFP) to help formulate policy relevant area(s) regarding local food procurement.

Commented [HK-F84]: Regarding subparagraph b, the United States has several comments. First, the concept of local procurement should not prejudice international trade ...

Commented [HK-F85]: Please clarify what is meant by "more". Does this refer to a larger quantity?

Commented [HK-F86]: How?

Commented [HK-F87]: Using local products from smallholder farmers may be a competing objective with lowering food prices.

Commented [HK-F88]: As mentioned earlier, [USDA/AMS FMLFPP grants](#) support local food market development and consumer information regarding local and regional foods. ...

Commented [HK-F89]: This text conveys that local products are more nutritious. What is the evidence?

PART 2 – FOOD ENVIRONMENTS

37. Food environments consist of food entry points, namely the physical spaces where food is made available and accessible, and the infrastructure that allows access to these spaces; the affordability and price of foods; the advertising, marketing, and positioning of foods; and the quality and safety of foods as well as branding and labeling. Food environments are the interface between food supply and demand, a space of convergence where all actors involved in food systems can together bring transformative change leading to greater availability and affordability of nutritious food and ultimately healthier food consumption choices by consumers.

1. AVAILABILITY AND PHYSICAL ACCESS (PROXIMITY)

38. Unfavorable climatic and geographic conditions, low density of food entry points or limited access to nutritious foods, lack of appropriate infrastructure, lack of education, food losses and waste, all forms of conflict and humanitarian crises, migration and forced displacement, can have negative consequences on what can be purchased and consumed. The availability and physical access to diverse types of food influences what consumers can purchase and consume.

Policy-relevant areas

- a) Food deserts and food swamps
Policies and infrastructure are needed to encourage healthy outlets and address the spread of food deserts and swamps, particularly in mixed food systems, as countries urbanize.
- b) Public procurement
Healthier diets can be encouraged through the provision of local high quality food in schools, hospitals, workplaces and other government institutions and buildings. These policies would, also influence ing production, providing a reliable source of demand for local producers and businesses.
- c) Systemic food assistance
[Systemic food assistance, integrates emergency response with nutrition and longer term strategies towards sustainable development and resilient food systems. Combining humanitarian assistance with longer term development objectives can reduce the risks and impact of shocks, increase food productivity, and strengthen resilience to natural disasters and human made crises. Systemic food assistance, integrates emergency response with nutrition and longer term strategies towards sustainable development and resilient food systems. Utilizing humanitarian assistance to better highlight systemic gaps and improve targeting and prioritization of longer term development policy goals and objectives can help to reduce the risks and impact of shocks, increase food productivity, and strengthen resilience to natural disasters and human made crises.]

Commented [HK-F90]: These are determinants of markets, supply, and demand. The United States prefers that the CFS use of FAO's definition in this Voluntary Guidelines
FAO

<http://www.fao.org/3/a-i6484e.pdf>

Food environments may be thought of as all the foods which are available and accessible to people in the settings in which they go about their daily lives. That is, the range of foods in supermarkets, small retail outlets, wet markets, street food stalls, coffee shops, tea houses, school canteens, restaurants and all the other venues where people procure and eat food. Food environments differ enormously depending on context.

Commented [HK-F91]: The United States believed that affordability of food is integral to the discussion of availability and physical access. We suggest the drafters consider ways to merge and integrate the concepts in this section with the next section (i.e., economic access/affordability).

Commented [HK-F92]: The United States recommends deleting the reference here to conflict, displacement, and humanitarian settings. This document is focused on stable country environments, and not the pockets or geographical areas of conflict. The OEWG and members need to discuss and agree on whether and how VG recommendations and language address humanitarian settings and situations of conflict, displacement.

Commented [HK-F93]: The United States would like these terms to be explained: food deserts and food swamps. The USDA/ERS has a lot to offer about food deserts. Please see here:

<https://www.ers.usda.gov/amber-waves/2010/march/access-to-affordable-nutritious-food-is-limited-in-food-deserts/>
<https://www.ers.usda.gov/data-products/food-access-research-atlas/documentation/>

Commented [HK-F94]: USDA's NIFA funds Community Food Projects and administers the FINI grant program.

USDA's FNS offers SNAP and WIC at Farmers Markets.

Commented [HK-F95]: The United States disagrees. In wealthy countries, old/established urban areas have food deserts, and rural areas also have food deserts.

Commented [HK-F96]: With regards to subparagraph b, this section could be expanded out based on USDA's experience in operating procurement programs. Please consult with the WFP. Also, school meals and humanitarian food assistance recognize the important linkages of local production capacity with provision of meals/food. However, there can be mismatches in scale of production and

Commented [HK-F97]: With regards to subparagraph c, we suggest both a re-write to the language and removal from this section. We recommend it be considered with any discussion regarding humanitarian and/or conflict-affected situation.

Further, the United States has several concerns. First, wha

2. ECONOMIC ACCESS (AFFORDABILITY)

39. For several segments of the population may have difficulty, affording a adequate diverse range of nutrient-rich foods. This represents a significant challenge and has an impact on consumption patterns. This challenge is even stronger when if prices increase were to increase to reflect the cost of production, including environmental costs, or if other costs that are not monetary are considered, such as the time and labour needed to buy, clean, prepare and cook.

40. The relative price of food is also a key issue as more nutritious and safe food is often relatively more expensive than processed food that is high in salt, fats, sugar and low in fibre. Actions should be taken to make nutritious and safe foods more affordable, for example by promoting free and open markets. Other options might include or to provide coupons to low-income groups and food transfers for women and children to safeguard maternal, infant and young child nutrition.

Policy-relevant areas

a) Nutrition-sensitive trade policies

Countries, in compliance with their international obligations, can consider promoting using trade policies to shift production patterns and lead to improvements in the way food is produced, traded and accessed.

b) Taxes and subsidies

Depending on the type of food system and the national and local context, and taking into consideration all possible effects including those on lower income groups, measures like taxes and subsidies can regulate pricing and may influence food choices and dietary intake.

c) Social protection programmes leading to improved nutritional outcomes

Policies are needed to promote the design and implementation of social protection interventions and programmes in a nutrition sensitive way to enable healthy diets and contribute to improved nutrition outcomes.

Commented [HK-F98]: There are myriad factors that could (and sometime do) drive up food prices.

Commented [HK-F99]: This statement is not only a sweeping generalization, but it is not true. What is the evidence for this claim? The US can and does provide safe, nutritious food at a low price. Please reformulate this text or delete it altogether.

USDA/ERS -- Geographic Differences in the Relative Price of Healthy Foods

Some healthy foods were more expensive than less healthy foods, but in other cases, healthier options were less expensive.

<https://www.ers.usda.gov/publications/pub-details/?pubid=44562>

IFPRI Study - Main findings:

- Food prices highly variable across regions and income levels
- Most foods relatively cheap in HICs, fruits & veg excepted

Commented [HK-F100]: Para. 35 already discusses the advantages of food processing for preventing food quantity and quality losses, enhancing nutrient content, etc. Therefore, the US suggests not indicating that processed food cannot be nutritious (it can depending on degree and

Commented [HK-F101]: With regards to subparagraph a, the CFS should not stray into the fiscal policy space. Nor should the CFS be advocating the use of subsidies to regulate prices, which is not consistent with WTO obligations or the views of developing countries in Geneva. From an econom

Commented [HK-F102]: From the US's perspective the words "in compliance with their international obligations" must remain part of this subparagraph, or subparagraph a must be removed altogether. Deletion of this text is a redline for the United States.

Commented [HK-F103]: It is unclear what this text means. This is a very new concept and it is not fleshed out enough to be part of a set of Voluntary Guidelines. The United States recommends removing this concept unless there is a better clarification of the intent and implications

Commented [HK-F104]: What types of improvements? Again, this text needs clarity.

Commented [HK-F105]: With regards to subparagraph b, the United States reiterates is recommendation that the CFS should not stray into fiscal policy space. Nor should it be advocating the use of subsidies to regulate prices, which is not consistent with WTO obligations or the views of

Commented [HK-F106]: Taxation continues to be a very controversial policy area and there is not enough evidence to conclude that these schemes produce the desired health impact. Rather than including this in the list of guidelines or recommendations, we strongly urge the CFS to investigate

Commented [HK-F107]: With regards to subparagraph c, if framed properly, then there could be support for expanding this out. It would be necessary to frame this discussion around USDA's and USAID's Food Assistance programs – e.g., SNAP.

3. PROMOTION AND ADVERTISING

41. Promotion and advertising have a direct influence on consumer preferences, purchasing behaviours, consumption patterns, and the nutrition knowledge of the population. Particular attention needs to be paid to children as they are particularly susceptible to the influence of food marketing and advertising. Regulatory measures and the provision of transparent information in commercial advertising represent relevant interventions to promote healthier diets.

Policy-relevant areas

a) Regulations for advertising and marketing

Children of all age groups require special protection and attention, e.g. through full implementation of the International Code of Marketing of Breast-milk Substitutes, ~~bans on less nutritious foods~~ and measures to ensure responsible food marketing, ~~promoting subsidizing~~ healthier alternatives and interventions in schools to promote ~~healthier positive~~ approaches to eating, as well as to encourage physical activity.

b) Transparency of information on labels

Nutrition labelling on food packaging (~~i.e. front of pack labelling~~) ~~through that is voluntary, fact-based and non-interpretive or mandatory codes~~ is one tool to inform consumers, ~~allowing them to decide shaping~~ their preferences ~~which will also inform and encouraging product reformulations by~~ manufacturers ~~of consumer preferences~~. ~~The promotion of eE~~ education campaigns are important to help consumers understand the labels, which ~~have to should be~~ ~~practical~~, accurate, transparent, and easy-to-understand ~~and use~~.

Commented [HK-F108]: In general, the United States questions the CFS providing Voluntary Guidelines and policy recommendations in this space. Perhaps reframe this section to be "Transparency of Information" and this section should be moved to the consumer education section in its entirety.

Commented [HK-F109]: Please clarify this statement. Is this referring to risk communication?

Commented [HK-F110]: Regarding the two policy-relevant areas in this section, the United States would like both to include references to consistency with international obligations.

Commented [HK-F111]: With regards to subparagraph a, this discussion needs more refinement. For example, language on 'bans on less nutritious foods' seems far-reaching.

Commented [HK-F112]: The CFS should not be in the business of promoting regulatory approaches on advertising and marketing. Consumer education is an area that would be more appropriate. The WHO's Code (see below) sufficiently covers the topic. The US does not believe the CFS should open up areas to duplicate or confuse with the WHO guidance involving age groups or USDA guidance.

In addition, there will be many complications in how to define children of all age groups. There are many dietary development stages from infants to young children with some key threshold ages when diets can be expanded. In the WHO, focus has been on young child feeding 36 months and younger.

WHO-- International Code of Marketing of Breast-milk Substitutes
The aim of this Code is to contribute to the provision of safe and adequate nutrition for infants
https://www.who.int/nutrition/publications/code_english.pdf
http://apps.who.int/gb/ebwha/pdf_files/WHA71/A71_R9-en.pdf?ua=1

Commented [HK-F113]: Nutrition labeling should not be taken up by CFS in these Voluntary Guidelines. The [Codex Alimentarius](#) is the place for setting standards for labeling.

Commented [HK-F114]: Mandatory front of pack labeling is very problematic and is a redline for the United States. The U.S. allows for voluntary front of pack labeling that is "non-interpretive" with the nutrition facts, but meaning no stop signs or other interpretation.

Commented [HK-F115]: Labeling discussion needs further refinement, and shouldn't focus on front of pack labeling to the detriment of other areas. The US, for example, now requires listing of added sugars on labels and introduced other nutritional label requirements to better inform consumers on nutrient content.

4. FOOD QUALITY AND SAFETY

42. Food quality describes the attributes of a food and refers, among other things, to the composition and may include aspects of the way food is produced, stored, and processed. Food safety refers to ~~those the use of risk-based, scientific regulations that produce safe food, consistent with international guidelines~~ hazards that may contaminate food, through pesticide residues and certain agricultural practices as well as bacteria, viruses and parasites.

43. Insufficient efforts ~~in promoting to promote~~ food quality and safety negatively influence consumption patterns and lack of food safety can have negative consequences on the health ~~and nutrition~~ of consumers.

Policy-relevant areas

a) Food safety and traceability

~~The ability to trace and follow food through all stages of production and distribution. The development of national food safety systems that use risk-based, science and adhere to the guidelines of Codex Alimentarius helps producers provide safer foods for all consumers and better connect producers to consumers.~~ Improving food storage is another effective way to increase assure the amount, safety and quality of the available food, as is testing of food for microbial and other contamination. Strengthened institutions and policies are also key to stabilization of electricity supply thus improving cold chain transport ~~and stabilization of the energy supply.~~

b) Food quality improvements

Product reformulation and policy options for improving composition of food can improve ~~its~~ quality. Food fortification is also an effective public health intervention for preventing ~~nutritional-micronutrient~~ deficiencies while contributing to improving health outcomes.

Commented [HK-F116]: The issue of food quality and food safety is also discussed thoroughly earlier in this document – specifically, in storage and distribution section. We question the placement of this discussion within “food environment” – rather, it belong in the “production system” section.

Commented [HK-F117]: The description of this section should better reflect the range of food safety issues and specifically note their relevance across the food system (e.g., farm-to-fork). Currently, this section is too narrow by focusing on only traceability. Mandatory traceability is a redline for the United States. There are many policy areas to focus on preventive controls.

Commented [HK-F118]: As noted in the comment above, mandatory traceability is a major concern area for U.S. agriculture and food industry and is a redline for the United States. Traceability should not be included with food safety. In other words, the US does not support the requirement that traceability is necessary for food safety.

Commented [HK-F119]: What does this mean?

Commented [HK-F120]: The transport and energy sectors are outside of the scope for this CFS Voluntary Guidelines.

Commented [HK-F121]: Quality grades and standards are key. More information from the USDA/AMS at: <https://www.ams.usda.gov/grades-standards> Product formulation is best left to private sector to make in response to consumer demand and availability of ingredients.

PART 3 – CONSUMER BEHAVIOUR

44. Consumer behaviour is influenced by several factors including demographics, lifestyle, personal preferences, knowledge, attitudes, skills, values, social environment, traditions, culture and beliefs. Consumer behaviour is shaped by and has the potential to influence the existing food supply chains and food environments so that collective changes in consumer behaviour can open pathways to more sustainable food systems that enhance food security and nutrition and health.

Commented [HK-F122]: What about marketing?

Commented [HK-F123]: The United States would like this discussion expanded to include the following: The agriculture and food system take signals from consumer demand to make production and marketing decision.

Commented [HK-F124]: What does this mean?

1. FOOD AND NUTRITION EDUCATION AND INFORMATION

45. Food and nutrition education and information, including on the origin of food, what it is composed of, how it is processed and prepared, is intended to stimulate critical analysis, motivate actions and develop practical skills for food choices and related practices leading to healthy diets. Nutrition education and consumer messages play an important role in increasing the acceptability (and demand) of nutritious and safe foods for healthy diets.

Commented [HK-F125]: Remove this text. The US strongly discourages any inclusion of the term.

Policy-relevant areas

a) Social and behaviour change health communication

Social and behaviour change communication (SBCC) is the use of communication and other interventions to change behaviour by positively influencing knowledge, attitudes and social norms. SBCC coordinates messaging across a variety of communication channels to reach multiple levels of society to stimulate community engagement and buy-in, ultimately influencing behaviour, behavior, social norms, and demand.

Commented [HK-F126]: With regards to subparagraph a, this is a concept in health services and consumer choice. The USDA knows this subject as generic commodity advertising. More on food demand analysis, research and promotion could be included. See here:

ERS

<https://www.ers.usda.gov/topics/food-choices-health/food-consumption-demand/food-demand-analysis/>

<https://www.ers.usda.gov/topics/food-choices-health/food-consumption-demand/flexible-consumer-behavior-survey/>

AMS

<https://www.ams.usda.gov/rules-regulations/research-promotion>

ICN2 Framework for Action

<http://www.fao.org/3/a-mm215e.pdf>

- Recommendation 21: Conduct appropriate social marketing campaigns and lifestyle change communication programmes to promote physical activity, dietary diversification, consumption of micronutrient-rich foods such as fruits and vegetables, including traditional local foods and taking into consideration cultural aspects, better child and maternal nutrition, appropriate care practices and adequate breastfeeding and complementary feeding, targeted and adapted for different audiences and stakeholders in the food system.

b) Science and evidence-based National food-based dietary guidelines

National food-based dietary guidelines are another important source of information and guidance for consumers and producers. They provide recommendations based on the latest evidence of the composition of healthy diets adapted to national contexts. They are also a helpful source of information for policy makers for communication and in several sectors (i.e., to promote more investment towards in a healthier and a more diverse range of products).

Commented [HK-F127]: With regards to subparagraph b, more information should be included and the USDA is well-positioned regarding this topic. Many countries model the US Dietary Guidelines.

See also:

ICN2 Framework for Action

<http://www.fao.org/3/a-mm215e.pdf>

- Recommendation 19: Implement nutrition education and information interventions based on national dietary guidelines and coherent policies related to food and diets, through improved school curricula, nutrition education in the health, agriculture and social protection services, community interventions and point-of-sale information, including labelling.

- Recommendation 20: Build nutrition skills and capacity to undertake nutrition education activities, particularly for front line workers, social workers, agricultural extension personnel, teachers and health professionals.

2. SOCIAL NORMS, VALUES AND TRADITIONS

46. Food affordability, convenience and desirability are influenced by the quality of, and ~~the~~ marketing ~~around, of food, and but~~ also by ~~the~~ social norms and the cultural values associated with food.

Policy-relevant areas

a) Traditional food cultures

Protecting a diverse range of food cultures is a way to protect consumer preferences, including interest in traditional diets and knowledge originating from diverse production systems. It also helps preserving diversity and identity of several populations, stimulate local economy and local farming.

Commented [HK-F128]: The United States questions that the CFS should be delving into this area within the context of a Voluntary Guidelines for Nutrition and Food Systems. This section should be removed.

This has already been discussed in a CFR Voluntary Guideline. See Principle 7 and Para. 51 from: <http://www.fao.org/3/a-mm369e.pdf>
"Principle 7: Respect cultural heritage and traditional knowledge, and support diversity and innovation"
"Enterprises involved in the marketing of food products are encouraged to promote the consumption of food which is balanced, safe, nutritious, diverse and culturally acceptable, which in the context of this document is understood as food that corresponds to individual and collective consumer demand and preferences, in line with national and international law, as applicable."

Also see FAO's GIAHS: <http://www.fao.org/giahs/en/>
<http://www.fao.org/giahs/background/en/>
The concept of Globally Important Agricultural Heritage Systems (GIAHS) is distinct from, and more complex than, a conventional heritage site or protected area/landscape. A GIAHS is a living, evolving system of human communities in an intricate relationship with their territory, cultural or agricultural landscape or biophysical and wider social environment.

Commented [HK-F129]: With regards to subparagraph a, this could be part of consumer choice, but not a way to preclude other dietary options.

Commented [HK-F130]: The United States would like the word "protecting" to be clarified. The US recommends that the word "promoting" would be better word choice. Also, how is traditional defined? From the US perspective, it is better to take approach that allows cuisines to evolve continually, and for new cuisines to be created by innovation and cultural interaction.

Commented [HK-F131]: Often traditional food cultures, diets and knowledge lead to malnutrition. Many of the underlying causes of acute and chronic malnutrition are related to these issues. Many interventions deliberately strive to shift these traditions in order for healthy maternal, infant and young child feeding to be possible.

IV. IMPLEMENTATION AND MONITORING

47. All CFS stakeholders are encouraged to promote at all levels within their constituencies the dissemination, use and application of the Voluntary Guidelines to the extent that they support the development and implementation of national policies, programmes and investment plans across all sectors to address the multiple challenges of malnutrition in all its forms.

48. CFS should provide a forum where all relevant stakeholders can learn from the experiences of others in applying the Voluntary Guidelines and assess their continued relevance, effectiveness and impact on food security and nutrition. The intention is to support countries in making SMART commitments²⁰ and achieving nutrition objectives in the context of the UN Decade of Action on Nutrition 2016-2025 and the 2030 Agenda for Sustainable Development.

49. Efforts should be made to contribute to the achievement of the six Global Nutrition Targets (2025) endorsed by the World Health Assembly in 2012 and the diet related non-communicable disease targets, which are the aims of the Decade of Action on Nutrition and contribute to the realization of the SDGs by 2030.

Commented [HK-F132]: It would likely be very useful for these Voluntary Guidelines to actually include suggested indicators, which would go a long way to standardizing thinking of what this effort is trying to accomplish, and how these guidelines are connected to those targets.

²⁰ In the context of the UN Decade of Action on Nutrition and ICN2 follow-up process, the next step is to translate the recommended policy options and strategies into country-specific commitments-plans for action. These commitments should be specific, measurable, achievable, relevant and time-bound. https://www.who.int/nutrition/decade-of-action/smart_commitments/en/