

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

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Thank you for the opportunity to comment on this draft. We note the acknowledgment in the HLPE Report 12 'Nutrition and food systems' that fish and seafood are key components of diets. Specifically, that they are important sources of macronutrients including protein and omega-3 fatty acids as well as micronutrients. Given this acknowledgement, our comments below are aimed at helping to strengthen the inclusion of seafood in the Preliminary Version of the Zero Draft of the Voluntary Guidelines on Food Systems and Nutrition. The nutritional profile of seafood varies considerably and needs to be accounted for in policies addressing food systems and nutrition. Nutritional differences, and the means to optimise nutrition from seafood, are not directly acknowledged in the draft and we believe this is an important omission.

Increased fish availability through aquaculture has contributed to meeting growing fish demand (HLPE, 2014) and the majority of seafood produced in the foreseeable future will be farmed (FAO, 2018). However, the current focus of aquaculture on maximising productivity, with little consideration for nutritional quality of fish produced, has resulted in implications for diet quality (Bogard et al., 2017). Wild-capture fisheries focus on a number of highly targeted stocks, which may be higher value or more popular species, not necessarily the most nutritious. The range of seafood people eat is narrowing in many countries, while the demand for popular species is growing. Policies are needed to shift fishing effort and consumer preference towards a broader range of more nutritious species. Targeting underutilised species, many of which are micronutrient-rich, would help to increase overall fisheries production (Zhou et al., 2014) as well as introduce nutritious seafood into the food system. Consumer awareness around seafood nutrient profiles is lacking and preliminary research indicates that higher socio-demographic level is associated with the consumption of more nutritious species (Farmery et al., 2018).

We note and support the eight policy relevant areas for production systems highlighted on page 10 of Section III. We note that the term agriculture includes crops, livestock, forestry, fisheries and aquaculture (footnote 19, P10), however, there is no specific text relating to seafood or aquatic systems. We also note that this section does not currently contain draft text, instead highlighting initial ideas for issues and topics to be covered in the next iteration of the guidelines. For this reason, we do not make specific recommendations to alter the text, other than to ensure the language used is inclusive of aquatic systems. For example, securing access to land and sea (c) and Investment in research and development for nutrient-rich foods (f).

We wish to make specific recommendations about the issues to be considered under Section III, Part 1 – Food Supply Chains, 1. Production systems. The inherent nature of aquatic production systems, particularly capture fisheries, varies substantially from terrestrial agriculture. Therefore, we suggest that aquatic systems be given explicit consideration within the expanded text around each of the

policy relevant areas. For example, the types of interventions needed for climate smart fisheries and aquaculture differ largely from the terrestrial examples listed under (g) currently.

We look forward to providing specific comments to this text in the next iteration of the guidelines.

### **References**

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